

**FINAL**

**The Meadows at Bailey Canyon Specific Plan  
Environmental Impact Report**

*Prepared for:*

**City of Sierra Madre**

232 W Sierra Madre Boulevard  
Sierra Madre, California 91024

*Prepared by:*

**DUDEK**

2280 Historic Decatur Road, Suite 200  
San Diego, California 92109

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# Acronyms and Abbreviations

Acronym/Abbreviation	Definition
AB	Assembly Bill
ACM	asbestos-containing materials
ACWM	asbestos-containing waste materials
AF	acre feet
AFY	acre-feet per year
AIA	Airport Influence Area
ALUC	Airport Land Use Commission
ALUCP	Airport Land Use Compatibility Plan
AMSL	above mean sea level
AQMP	Air Quality Management Plan
AST	aboveground storage tank
BACT	Best Achievable Control Technology
BMP	best management practice
BTEX	toluene, ethylbenzene, and xylenes
CAAQS	California Ambient Air Quality Standards
CAFE	Corporate Average Fuel Economy
CalEPA	California Environmental Protection Agency
Cal-OSHA	California Occupational Safety and Health Administration
CARB	California Air Resources Board
CAT	Climate Action Team
CBC	California Building Code
CCR	California Code of Regulations
CDF	controlled density fill
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CESA	California Endangered Species Act
CFC	California Fire Code
CFR	Code of Federal Regulations
CGS	California Geological Survey
CH <sub>4</sub>	methane
CHRIS	California Historical Resources Information System
CNEL	noise equivalent level
CNRA	California Natural Resources Agency
CO	carbon monoxide
CO <sub>2</sub>	carbon dioxide
COS	Constructed Open Space
CPUC	California Public Utilities Commission
CRHR	California Register of Historical Resources
CUP	Conditional Use Permit
CWA	Clean Water Act
DOC	Department of Conservation
DPM	diesel particulate matter
DPW	Department of Public Works

Acronym/Abbreviation	Definition
DTSC	Department of Toxic Substances Control
DWR	Department of Water Resources
EDR	Energy Design Rating
EIA	Energy Information Administration
EIR	Environmental Impact Report
EO	Executive Order
EPA	Environmental Protection Agency
ERB	East Raymond Basin
ESA	Environmental Site Assessment
FAA	Federal Aviation Administration
FEMA	Federal Emergency Management Agency
FESA	Federal Endangered Species Act
FHSZ	Fire Hazard Severity Zone
FICON	Federal Interagency Committee on Noise
FMA	Fuel Modification Area
FMMP	Farmland Mapping and Monitoring Program
FMZ	fuel modification zone
FPP	Fire Protection Plan
FTA	Federal Transit Administration
GHG	greenhouse gas
GWP	global warming potential
HAP	hazardous air pollutant
HERO	Human and Ecological Risk Office
HFCs	hydrofluorocarbons
HMS	Hazardous Materials System
HQTC	high-quality transit corridor
HRA	Health Risk Assessment
HVAC	heating, ventilation, and air conditioning
HWTS	Hazardous Waste Tracking System
I	Interstate
IBC	International Building Code
IPCC	Intergovernmental Panel on Climate Change
ITIP	Interregional Transportation Improvement Program
LACDPW	Los Angeles County Department of Public Works
LACFCD	Los Angeles County Flood Control District
LACM	Museum of Los Angeles County
LACSD	Los Angeles County Sanitation District
LCFS	Low Carbon Fuel Standard
LHMP	Local Hazard Mitigation Plan
LID	low-impact development
LOS	level of service
LRA	Local Responsibility Area
LST	localized significance threshold
MAF	million acre-feet
MBTA	Migratory Bird Treaty Act
MDO	Medium Density Overlay
MGD	gallons per day

Acronym/Abbreviation	Definition
MM	Mitigation Measure
MPO	Metropolitan Planning Organization
MRZ	Mineral Resources Zone
MS4	municipal separate storm sewer system
MT	metric ton
MTA	Metropolitan Transportation Authority
MWD	Metropolitan Water District of Southern California
N <sup>2</sup> O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NETR	Nationwide Environmental Title Research
NF <sub>3</sub>	nitrogen trifluoride
NHTSA	National Highway Traffic Safety Administration
NO <sub>2</sub>	nitrogen dioxide
NOAA	National Oceanic and Atmospheric Administration
NOP	Notice of Preparation
NOS	Natural Open Space
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
O <sub>3</sub>	ozone
OPR	Office of Planning and Research
OSHA	Occupational Safety and Health Administration
PDF	project design feature
PFCs	perfluorocarbons
PM <sub>10</sub>	particulate matter 10 microns in diameter
PM <sub>2.5</sub>	particulate matter 2.5 microns in diameter
PPV	peak particle velocity
PRC	Public Resources Code
PRIMP	Paleontological Resources Impact Mitigation Program
PUSD	Pasadena Unified School District
RBJ	Raymond Basin Judgment
RBMB	Raymond Basin Management Board
RCNM	Roadway Construction Noise Model
RCP	reinforced concrete pipe
REC	recognized environmental condition
RGB	Raymond Groundwater Basin
RHNA	Regional Housing Needs Assessment
RPS	Renewable Portfolio Standard
RSL	Regional Screening Level
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
SAFE	Safer Affordable Fuel-Efficient
SB	State Bill
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coastal Information Center

Acronym/Abbreviation	Definition
SCE	Southern California Edison
SCS	Sustainable Communities Strategy
SF <sub>6</sub>	sulfur hexafluoride
SGMA	Sustainable Groundwater Management Act
SGVMWD	San Gabriel Valley Municipal Water District
SJCWRP	San Jose Creek Water Reclamation Plant
SLCP	short-lived climate pollutant
SLF	Sacred Lands Files
SMFD	Sierra Madre Fire Department
SMMC	Sierra Madre Municipal Code
SMPD	Sierra Madre Police Department
SMWD	Sierra Madre Water Department
SO <sub>2</sub>	sulfur dioxide
SP	Specific Plan
SR	State Route
SRA	Source-Receptor Area
SSC	Species of Special Concern
SSMP	Sewer System Management Plan
SSO	sanitary sewer overflow
ST	short-term
STIP	Statewide Transportation Improvement Program
SVP	Society of Vertebrate Paleontology
SWP	State Water Project
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminant
TBA	tert-butyl alcohol
TCR	tribal cultural resource
TMDL	total maximum daily load
TPA	transit-priority area
TPH	total petroleum hydrocarbons
UL	Underwriters Laboratory
USACE	U.S. Army Corps of Engineers
USC	United States Code
USDA	U.S. Department of Agriculture
USFWS	U.S. Fish and Wildlife Service
UST	underground storage tank
UWMP	Urban Water Management Plan
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	vehicle miles travelled
VOC	volatile organic compound
WDR	waste discharge requirement
WMP	Waste Management Plan
WNWRP	Whittier Narrows Water Reclamation Plant
WUI	wildland/urban interface
ZEV	zero-emissions vehicle
ZNE	zero net energy



# Preface

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The City of Sierra Madre (City), as the lead agency under the California Environmental Quality Act (CEQA), has prepared this Final Environmental Impact Report (Final EIR) for the proposed The Meadows at Bailey Canyon Specific Plan Project (project or proposed project) located within the northwestern portion of the City. As described in Sections 15089 and 15132 of the CEQA Guidelines, the lead agency must prepare a Final EIR before approving a project. Pursuant to CEQA Guidelines Section 15132, a Final EIR shall consist of:

- The 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 points raised in the review and consultation process; and
- Any other information added by the lead agency.

Pursuant to these guidelines, this Final EIR (State Clearinghouse No. 2020060534) includes, in the following order: a list of persons, organizations, and agencies that provided comments on the Draft EIR; responses to comments received on the Draft EIR; and revisions to the Draft EIR (see Section 1.1, Format of the Final EIR, below).

## 1 Format of the Final EIR

This Final EIR consists of the following four chapters:

**Preface.** This chapter summarizes CEQA requirements and the contents of this Final EIR.

**Response to Comments.** During the public review period for the Draft EIR, several comment letters were received. This chapter contains these comment letters and the City’s responses to the comments.

**Final EIR.** Several of the comments that are addressed in the Response to Comments resulted in minor revisions to the information contained in the July 2021 Draft EIR. Deletions to the text are shown in ~~strikeout~~ and additions to the text are shown in double underline text all chapters of the Draft EIR. In the Draft EIR sections in which changes occurred as part of the Final EIR, the footer dates have been revised to January 2022. Additionally, through the certification of this Final EIR, where the term “Draft EIR” is used in the text, this is now deemed to be “Final EIR.”

**Mitigation Monitoring and Reporting Program.** This section of the Final EIR provides the mitigation monitoring and reporting program (MMRP) for the proposed project. The MMRP is presented in table format and identifies mitigation measures for the proposed project, the implementation period for each measure, and the party responsible for implementation and monitoring. The MMRP also provides a section for recordation of the date of completion for mitigation reporting.

## 2 Revisions to the Draft EIR

CEQA Guidelines Section 15088.5 sets forth requirements for why a lead agency must recirculate an EIR. A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the Draft EIR but before certification of the Final EIR. Information includes changes

in the project or environmental setting as well as additional data or other information. New information added to an EIR is not considered 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. As defined in CEQA Guidelines Section 15088.5(a), significant new information requiring recirculation includes the following:

1. A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
2. A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
3. A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.
4. The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

The minor clarifications, modifications, and editorial corrections that were made to the Draft EIR are shown in this Final EIR. None of the revisions that have been made to the EIR resulted in new significant impacts; none of the revisions resulted in a substantial increase in the severity of an environmental impact identified in the Draft EIR; and, none of the revisions brought forth a feasible project alternative or mitigation measure that is considerably different from those set forth in the Draft EIR. Furthermore, the revisions do not cause the Draft EIR to be so fundamentally flawed that it precludes meaningful public review. As none of the CEQA criteria for recirculation have been met, recirculation of the EIR is not warranted. As stated in CEQA Guidelines Section 15088.5(b), "recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR."

# Responses to Comment Letters Received on the Draft EIR

The Draft EIR was circulated for public review from August 2, 2021, through October 4, 2021, in accordance with Section 15105(a) of the California Environmental Quality Act (CEQA) Guidelines. A total of 116 written comment letters were received on the Draft EIR from agencies, organizations, and individuals as shown in Table 0.3-1. Each of the written comment letters have been assigned an alphanumeric label, and the individual comments within each written comment letter are bracketed and numbered. For example, Comment Letter A1 contains one comment that is numbered A1-1.

The responses to each comment on the Draft EIR represent a good-faith, reasoned effort to address the environmental issues identified by the comments. Pursuant to Section 15088(a) of the CEQA Guidelines, the City of Sierra Madre (City), as lead agency, is not required to respond to all comments on the Draft EIR, but only those comments that raise environmental issues. In accordance with CEQA Guidelines Sections 15088 and 15204, the City has independently evaluated the comments and prepared the attached written responses to any significant environmental issues raised.

**Table 1. Comment letters and Commenters**

Comment Letter	Commenter	Date Received
<b>Agency</b>		
A1	California Department of Fish and Wildlife	October 1, 2021
<b>Tribal Government</b>		
T1	Gabrieleño Band of Mission Indians- Kizh Nation	September 22, 2021
<b>Individuals</b>		
I1	Alice Whichello	August 5, 2021
I2	Barbara Vellturo	August 5, 2021
I3	Andrea Van Wickle	August 3, 2021
I4	Nancy Beckham	August 11, 2021
I5	Vickie Shackett	August 16, 2021
I6	Greg and Denise Nelson	August 11, 2021
I7	Kathy and Eoin Harty	August 23, 2021
I8	Allen Ma, P.E.	August 2, 2021
I9	Jody Gunn	September 2, 2021
I10	Daniel and Arline Golden, PhD	September 2, 2021
I11	Ron Martinelth	September 7, 2021
I12	Ellen Carroll	July 7, 2021
I13	Peter Smock	September 9, 2021
I14	Gary Bosso	September 14, 2021
I15	Nancy Lingeman	September 15, 2021
I16	Deirdre Murphy	September 16, 2021
I17	Daniel and Arline Golden, PhD	September 16, 2021
I18	Anke and Jean Bardenheier	September 16, 2021
I19	Frances Qiu	September 27, 2021

Table 0.3-1. Comment letters and Commenters

Comment Letter	Commenter	Date Received
I20	Chris Leclerc	September 27, 2021
I21	Christie M. Dimon	September 27, 2021
I22	Sherry Wheelock	September 27, 2021
I23	Stanton Hunter	September 27, 2021
I24	Tom Halpenny	September 26, 2021
I25	Katrelya Angus	September 27, 2021
I26	Henry Leung	September 27, 2021
I27	Valerie G. Salembier	September 27, 2021
I28	Clyde F. Stauff	September 27, 2021
I29	Nancy Lingeman	September 28, 2021
I30	Randall Family	September 28, 2021
I31	John and Mary Hopkins	September 28, 2021
I32	Nancy Beckham	September 28, 2021
I33	Barbara Vellturo	September 28, 2021
I34	Nancy Beckham	September 28, 2021
I35	Darlene Papa	September 29, 2021
I36	Barbara McCallon	September 29, 2021
I37	Daniel Golden	September 28, 2021
I38	Daniel Golden	September 28, 2021
I39	Michael Charters	September 29, 2021
I40	Gracie Charters	September 30, 2021
I41	Ashley Wilson	September 29, 2021
I42	Caroline Brown	September 29, 2021
I43	Katrelya Angus	September 30, 2021
I44	Anke and Jean Bardenheier	September 30, 2021
I45	Alice Whichello	September 30, 2021
I46	Nancy Beckham	October 4, 2021
I47	Nancy Beckham	September 30, 2021
I48	Evan Steinberg	September 30, 2021
I49	Deirdre Murphy	October 3, 2021
I50	Judy Webb	October 3, 2021
I51	Mary Steinberg	September 30, 2021
I52	Marcielle Brandler	October 3, 2021
I53	Barbara Ontiveros	October 3, 2021
I54	Deb Sheridan	September 30, 2021
I55	Stephanie Allison	October 1, 2021
I56	Sarkis Baltayian	October 3, 2021
I57	Miriam Trogdon	October 3, 2021
I58	Lauren Yee	October 3, 2021
I59	Rosalie Curry	October 3, 2021
I60	Brian Bielanski	October 2, 2021
I61	Claire McLean	October 2, 2021
I62	Linda Hernandez	October 1, 2021
I63	Randy Boyd	October 3, 2021
I64	Caroline Brown	September 30, 2021

Table 0.3-1. Comment letters and Commenters

Comment Letter	Commenter	Date Received
I65	Susan Neuhausen	October 3, 2021
I66	Lorna Brosio	October 4, 2021
I67	Teri Vessella	October 4,2021
I68	Nancy Beckham	October 4,2021
I69	Nancy Beckham	October 4,2021
I70	Nancy Beckham	October 4,2021
I71	Nancy Beckham	October 4,2021
I72	Barbara Vellturo	October 4,2021
I73	Barbara Vellturo	October 4,2021
I74	Barbara Vellturo	October 4,2021
I75	Barbara Vellturo	October 4, 2021
I76	Barbara Vellturo	October 4, 2021
I77	Arlene Arrieta	October 4, 2021
I78	David Hughes	October 4, 2021
I79	Bertha D. Patsavas	October 4, 2021
I80	Shelby Moser	October 4, 2021
I81	Maria Karafilis	October 4, 2021
I82	Vicki Jennelle	October 4, 2021
I83	Bruce H. Jones	October 4, 2021
I84	John Wiedeman	October 4, 2021
I85	Tricia Searcy	October 4, 2021
I86	Wendy Thermos	October 4, 2021
I87	Laura Kalayjian	October 4, 2021
I88	Colleen Allen	October 4, 2021
I89	Alexander Arrieta	October 4, 2021
I90	John Clarke	October 4, 2021
I91	Pat Alcorn	October 4, 2021
I92	Christopher Spensley	October 4, 2021
I93	Scott Hood	October 4, 2021
I94	Carol Parker	October 4, 2021
I95	Glenn Hickman	October 4, 2021
I96	Lynne Collmann	October 4, 2021
I97	MaryAnn MacGillivray	October 4, 2021
I98	Connor Murphy- Boyd	October 4, 2021
I99	Ally Arrieta	October 4, 2021
I100	Susan Neuhausen	October 4, 2021
I101	Ellen Munoz	October 3, 2021
I102	Deb Sheridan	October 4, 2021
I103	Phillip, Alicia, Daniel, and Marites Yoa	October 4, 2021
I104	Karen Rowinsky	October 4, 2021
I105	Karin Delman	October 4, 2021
I106	Helena Karafilis- Spensley	October 4, 2021
I107	Matthew Bryant	October 4, 2021
I108	Heather Allen	October 4, 2021
I109	Brian Stieler	October 4, 2021

Table 0.3-1. Comment letters and Commenters

Comment Letter	Commenter	Date Received
I110	Teng Hik & Kiok Gwat	October 4, 2021
I111	Robert Gjerde	October 5, 2021
I112	Beth Kerns	October 5, 2021

## Global Responses

**GR-1** Net-Zero Water Impact. Several comments received expressed concerns regarding water supply and the project's net-zero water use.

The amount of anticipated water demand associated with the new homes and residents resulting from the proposed project was calculated in Draft EIR Section 4.19, Utilities and Service Systems. However, a few clarifying revisions made in the Final EIR Section 4.19. As discussed in this section, the proposed project would result in an increased water demand of approximately 26.30 acre feet per year (AFY) (8.26 AFY associated with indoor water use and 18.04 AFY associated with outdoor water use). The estimated water consumption of the proposed project would result in approximately 1.14% of Sierra Madre Waster District's (SMWD) projected water demand for Years 2025, 2030; 1.13% for Years 2035 and 2040; and 1.12% for Year 2045, during a fifth year of a multiple dry year. The City's 2021 UWMP accounts for projected population in the City's service area based on growth rate projections obtained from SCAG's 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which accounts for an increase of 300 residents in the City between 2016 and 2045. The proposed project would result in an increase of 134 residents. Therefore, SMWD would have sufficient available supply to meet the water demand associated with the proposed project and impacts would be less than significant. In addition, the City has indicated that the project was included as a contemplated project in the City's 2021-2029 Housing Element and has been included in order to provide a complete picture of potential housing growth in the community during the eight-year planning period.<sup>1</sup> Therefore, the growth associated with the proposed project has been accounted in City planning documents.

Despite this less than significant impact, the project would also offset all of its (less than significant) water demand. As discussed in Final EIR Section 3.3.7, Proposed Utilities , to achieve a net-zero impact on existing local water supplies, the project Applicant would contribute to one of three programs: (1) increase the City's water supply through the purchase of additional supplemental water from the San Gabriel Valley Municipal Water District (SGVMWD); (2) the creation of a lawn retrofit program, which would provide homeowners with a grant provided to replace their lawn with turf; and (3) funding of improvements to existing water infrastructure, such as pipe leakage fixes (see project design feature [PDF]-UTL-1 under Final EIR Section 3.3.13, Project Design Features). If the City opts for purchase of supplemental water the amount of supplemental water purchased would be equal to all anticipated indoor and outdoor water demands for the proposed residential units over a 50-year period. This purchase of additional supplemental water would offset any additional demand placed on existing City supplies by this project, and would be in addition to the City's existing agreement with SGVMWD, which currently allows the City to purchase up to 2,500 acre-feet of supplemental water annually. The additional supplemental water procured by the City as a result of the project would be stored in the Main San Gabriel Groundwater Basin and would be available to serve the public. .

Various comments also expressed concern regarding whether or not enough water supplies would be available 50 years from now for purchase of additional water supplies given inflation and drought. Although accounting for inflation and changes of cost related to water are not an environmental issue. As discussed above and in Final EIR Section 4.19, without the purchase of additional supplies, SMWD

<sup>1</sup> City of Sierra Madre. 2021. 2021-2029 Housing Element. Adopted November 2021. Accessed January 4, 2021. <https://www.cityofsierramadre.com/common/pages/DisplayFile.aspx?itemId=18148538>

would have sufficient available supply to meet the water demand of the proposed project and would have sufficient supplies to accommodate the purchase of supplemental water to be provided to the City during a normal year. However, for a single dry year, and multiple dry years, supplemental water may not be available. In this case, the applicant would provide funds to the City to support the creation of a lawn retrofit program or improvements to existing water infrastructure, which would achieve a commensurate level of water reduction. Therefore, implementation of PDF-UTL-1 is not speculative, would offset the already less-than-significant demand placed on existing supplies, and would be done in addition to the City's existing allocation from the SGVMWD.



**GR-2** Tree Removal. Several comments received expressed concerns regarding tree removal on the project site, including impacts related to loss of trees, loss of mature trees, tree replacement viability, tree relocation, and consistency with the City's existing ordinances and plans related to tree protection.

The proposed project would require the removal of 105 mature trees, 14 of which are protected under the City's Tree Preservation and Protection Ordinance. This would include 11 coast live oak trees (10 of which are protected under the Tree Preservation and Protection Ordinance). Aside from the City's Tree Preservation and Protection Ordinance, coast live oaks are not considered a special status species pursuant to CEQA, and there are currently no State or federal regulations in place specific to the protection of coast live oaks.

As discussed in Draft EIR Section 4.4.5, Impacts Analysis, in Section 4.4, Biological Resources, it is possible that some trees would be preserved at the project site. It should be noted that revisions have been made in the Final EIR (see Section 4.4, Biological Resources) and Appendix C2, Arborist Report, as a result of the proposed off-site widening of Carter Avenue. As explained in both Final EIR Appendix C2 and Final EIR Section 4.4, Biological Resources, these revisions and proposed off-site improvements do not raise new or additional environmental issues concerning the adequacy of the Draft EIR. As discussed in Final EIR Section 4.4.5, to provide a conservative analysis, it has been assumed that 105 trees, including the 14 trees meeting the definition of a protected tree under the City Tree Preservation and Protection Ordinance, would be removed as part of the project. Construction of the proposed project would require the removal of 14 protected trees, thus requiring a permit. According to the City's Tree Preservation and Protection Ordinance, any protected tree located on the project site that requires removal must be replaced on a one-to-one basis with a like species. The City's Tree Preservation and Protection Ordinance identifies tree replacement requirements for tree removal associated with a development project, such as the proposed project. In addition, 10 trees located within the off-site improvement area would have direct impacts as construction is anticipated within the tree protection zone. Due to removal of 14 protected trees on-site and direct impacts to 10 additional trees, the project would result in potentially significant impacts (Impact BIO-3). According to the City's Tree Preservation and Protection Ordinance, any protected tree located on the project site that requires removal must be replaced on a one-to-one basis with a like species. MM-BIO-3, Protected Tree Replacement, which requires the 1:1 replacement of protected trees impacted by development and a 5-year monitoring program to ensure their continued viability, would be implemented to reduce the impacts to the City's protected trees to less than significant. In addition, because trees would be directly impacted during the road widening, an arborist will be required to be present on-site during the proposed widening of Carter Avenue, per the City's Tree Preservation and Protection Ordinance and MM-BIO-3 (see Final EIR Section 4.5.6, Mitigation Measures, in Section 4.4, Biological Resources). With implementation of MM-BIO-3, Protected Tree Replacement, impacts to existing protected trees would be less than significant.

The City Tree Preservation and Protection Ordinance does not require tree relocation. In addition, there is no guarantee that relocated trees will remain in good health and be viable plant material to be planted back into the landscape after transplanting. All of the potentially disturbed trees were evaluated for their potential for preservation in place or relocation. Trees identified as candidates for preservation in place and relocation typically exhibit good health (new growth and vigor) and structure (trunk/branching); have no uncorrectable, outwardly detectable defects; and show no signs or symptoms of serious pest infestation or species-specific pathogens. Based on the on-site trees' health, structure, observable defects, and tree location, only six trees (including three protected trees) could be considered potential candidates for relocation.

A consistency analysis was performed to analyze the project's consistency with local plans and policies in Draft EIR Section 4.11, Land Use and Planning. It should be noted that a few revisions have been made in Final EIR Section 4.11, as a result of the proposed off-site widening of Carter Avenue. These revisions and proposed off-site improvements do not raise new or additional environmental issues concerning the adequacy of the Draft EIR. As concluded in Final EIR Section 4.11, the project's consistency with the Tree Preservation Element of the General Plan was determined to be generally consistent with these policies except for Goal 1, which identifies preservation and protection of existing trees as a goal in the General Plan. The project was determined to be consistent with the City's Forest Management Plan with the adherence to MM-BIO-3 and with implementation of the project's landscape plan. Although additional non-protected trees would be removed from the project site, new trees would be planted throughout the site, within the proposed public park, along proposed streets, and within the open space located in the northern portion of the project as part of the proposed landscape plan, which can be found in Draft EIR Figure 3-5, Conceptual Landscape Plan, in Chapter 3. The proposed landscape plan would incorporate more trees on-site compared to existing conditions. In addition, the proposed project would implement MM-BIO-1, Nesting Bird Avoidance, which would reduce impacts related to nesting birds during vegetation clearing, such as tree removal. Therefore, although the project would require the removal of 105 trees, through compliance with the City's Tree Preservation and Protection Ordinance and implementation of the proposed landscape plan, that would provide for the replacement of the removed trees such that the overall number of trees would exceed existing conditions, the project's impact is considered less than significant.

**GR-3**

Very High Fire Hazard Severity Zone. Several comments received expressed concerns relating to

the project's location in a Very High Fire Hazard Severity Zone (VHFHSZ). Relatedly, several comments expressed concern regarding consistency with objectives of the Hazard Prevention Element of the City's General Plan, which was adopted in November 2021, after release of the Draft EIR.

As stated in Draft EIR Section 4.20, Wildfire, the VHFHSZ designation does not indicate that development cannot occur safely but does indicate that a higher level of ignition resistant construction must be implemented. As stated in the project's Fire Protection Plan (FPP) (see Appendix F2 of this Final EIR), once the project is built, the fire potential of the site will be much lower than current conditions, given that the project will convert potential wildland fuels to managed landscaped areas and structures consistent with the latest ignition and ember resistant fire codes. Through compliance with existing regulations and implementation of the project design features identified in the FPP, per PDF-WF-1, the proposed project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. Impacts would be less than significant. Additionally, as concluded in Draft EIR Section 4.15, Public Services, existing fire protection services would adequately serve the site.

Additionally, some comments expressed concern about consistency of this project with objectives from the Draft EIR for the Draft Safety Element Update (now the adopted Hazard Prevention Element) of the General Plan. Therefore, this response addresses consistency with Objective Hz7 and Policy Hz3.2, which were added to the Hazard Prevention Element through the November 2021 update to the General Plan. (The comments reference Policies R3.2 and R3.3, but there are no policies with this numbering in the newly-adopted Hazard Prevention Element and so it is assumed that the reference is the Hz3.2.) Objective Hz7 calls for providing adequate response in case of flooding emergency. The proposed project's impacts to public services were analyzed in Draft EIR Section 4.15 and determined

to be less than significant. The proposed project would be required to comply with existing notification requirements in case of a disaster such as a flooding event. Thus, the project is consistent with the newly-adopted objective. As noted above, it is assumed that Policy R3.2, mentioned by commenters, refers to Policy Hz3.2. It is unclear what Policy R3.3 is referring to as no policy numbered 3.3 exists in the Hazard Prevention Element Update. Policy Hz3.2 directs the City to “Work with Public Works staff of adjacent jurisdictions to ensure that roadways are adequate for fire equipment.” Per Final EIR Section 4.20, with incorporation of measures from the FPP (Appendix F2), the project would provide adequate roadway capacity for fire equipment and would not result in impacts related to wildfire (see Global Response GR-4). No issues relating to fire equipment accessibility have been identified by adjacent jurisdictions. Thus, the project is consistent with this newly-adopted policy.

**GR- 4** Emergency Evacuation. Several comments received expressed concerns about emergency evacuations in and around the project site, including impacts from additional traffic, the adequacy of the project’s proposed ingress/egress via Carter Avenue, and the availability of staging areas for emergency vehicles.

Emergency access to the proposed project site was analyzed in Draft EIR Section 4.17.5, Impact Analysis, in Section 4.17, Transportation. It should be noted that a few revisions have been made in Final EIR Section 4.17, as a result of the proposed off-site widening of Carter Avenue. These revisions and proposed off-site improvements do not raise new or additional environmental issues concerning the adequacy of the Draft EIR. During construction, the project may result in a temporary increase in traffic on surrounding roadways due to increased truck loads or the transport of construction equipment to and from the project site. However, all construction activities, including staging, would occur in accordance with City requirements, including the Sierra Madre Municipal Code (SMMC) Chapter 17.30, which requires that streets be maintained free and clear during construction. This would ensure that adequate emergency access to the project site in the event of an emergency or evacuation order would be provided during construction of the project.

Project design feature PDF-WF-1 requires the project to comply with the recommendations outlined in the FPP (Appendix F2 of the Draft EIR) during construction and operations. The City does not have an adopted evacuation plan; however, as discussed in Draft EIR Section 4.9, Hazards and Hazardous Materials, the City has prepared a Local Hazard Mitigation Plan (LHMP), which aims to reduce long-term risks to people and property from natural disasters. Implementation of the FPP would not impair implementation of LHMP. With implementation of the recommendations outlined in the FPP, the proposed project’s impact to existing evacuation plans would be less than significant.

The proposed project would have two points of ingress and egress options, one via Carter Avenue, and the other via North Sunnyside Avenue. Compliance with the FPP and local regulations governing emergency response would ensure impacts such as the project’s potential to substantially impair an adopted emergency response plan or emergency evacuation plan would be less than significant. Further, loss of the site as a fire response landing area would not result in a significant impact with implementation of PDF-WF-1 and FPP measures. Per the FPP, new project site access points will be consistent with the City’s roadway standards and the 2019 California Fire Code (CFC) Section 503 for road widths and connectivity. Specific requirements for provision of fire apparatus access roads are also provided in the FPP. All roadways within the project site, including Carter Avenue, are designed to meet all fire department access requirements. The existing West Carter Avenue access point, outside of the project boundary, does not currently comply with fire apparatus access road requirements.

Therefore, a stop sign would be provided at the southern portion of the project site along Carter Avenue for safety of vehicle and pedestrians. In addition, in order to address commenters' concerns related to safety issues along Carter Avenue and outside of the boundaries of the proposed project site, the project applicant is proposing off-site improvements to Carter Avenue (see Global Response GR-5 for details). In addition, as discussed in Final EIR Section 4.20.5, the proposed driveways and the proposed roadways serving the project site would comply with the City's roadway standards and the 2019 CFC Section 503. All access roads within the project site would meet SMMC standards, requiring roadways to have a minimum 20-foot unobstructed width (30- and 36-foot-wide roadway surfaces are proposed) and a minimum 26-foot width within 25 feet of hydrants.

As analyzed in Draft EIR Section 4.20, implementation of the proposed project would not require additional fire protection services, and with compliance with applicable codes and fire safety standards, the project would have a less than significant impact on fire protection services. The project specific FPP, which has been reviewed and approved by the City Fire Marshal, includes provisions for pre-planning for emergencies, including wildfire emergencies. The pre-planning focuses on being prepared, having a well-defined plan, minimizing potential for errors, maintaining the site's fire protection systems, and implementing a conservative approach to evacuation (evacuate as early as possible) and site uses during periods of fire weather extremes. Implementation of these evacuation requirements would ensure that residents located in the project area, including the Mater Dolorosa Retreat Center and nearby residential uses, would be able to properly evacuate in the event of wildfire or similar emergency event. During wildfire evacuations, law enforcement and fire agencies would manage the evacuation event and provide downstream intersection control, as needed, to move persons within higher threat areas to lower threat areas. The proposed project would be adequately served by emergency response services and provide emergency access throughout the project site, as described in Draft EIR Section 4.15.

**GR-5** Carter Avenue. Several comments received expressed concern about the capacity of Carter Avenue. Commenters brought up concerns regarding the road width and proposed street improvements, geometric design issues related to the narrowing of Carter Avenue just outside of the proposed project site; confusion regarding secondary ingress/egress points; capacity as ingress/egress during emergencies and non-emergencies; and pedestrian safety concerns associated with the Carter Avenue road width.

Carter Avenue will perform as a two-way access for the project site and will experience additional traffic generated by the proposed project. Under the proposed project, Carter Avenue would serve as one of two locations for access (Sunnyside Avenue being the other). Therefore, drivers will have a choice of streets and will not be limited in traveling to and from Carter Avenue. Appendix K, Traffic Conditions with the Proposed Sierra Madre Residential Project, has been added to the Final EIR for informational purpose in response to public comments and details the expected changes in traffic conditions – i.e., trips and traffic volume, with the proposed project. As discussed in Appendix K, which has now been provided as part of the Final EIR for informational purpose in response to public comments, the project will generate approximately 436 daily trips on weekdays and 491 daily trips on weekend days, and approximately 16% of these trips would use Carter Avenue. Please refer to Table 4-1 and 4-2 of Appendix K for the Project trip generation estimates. The ancillary activities associated with the Mater Dolorosa Retreat Center are reflected in the existing roadway volume counts.

As discussed in Draft EIR Section 3.3.6, Access and Circulation Network, Carter Avenue would be improved to provide secondary egress and ingress access to the site, as well as internal circulation throughout the project site. More specifically, Carter Avenue would transition from its existing 25-foot right-of-way to a varying 44.5- to 46-foot right-of-way within the project site and would have curbs, gutters, and planting areas on both sides; parking on the west side of the street; and a sidewalk on the west side of the street. The project would implement street sections that slow traffic and create a safe and pleasant small neighborhood environment. In addition, in order to address commenters' concerns related to safety issues along Carter Avenue and outside of the boundaries of the proposed project site, the project applicant is proposing off-site improvements to Carter Avenue, between the southeastern portion of the project site boundary and Lima Street (See Figure 3-11, Proposed Off-Site Improvements and Figure 3-12, Carter Avenue Offsite Improvement Plan, which have been added to the Final EIR). The applicant would acquire approximately 9 feet of public right-of-way in order to widen Carter Avenue to a total of 24 feet (10 feet for each travel lane plus one 4-foot curb along the southern boundary of Carter Avenue) and a 6-foot sidewalk on the north side of Carter Avenue. The total off-site improvement area would be approximately 4,560 square feet (0.10 acres). These additional details have been added in Final EIR Section 3.3, Project Description. The proposed improvements would occur within an already existing roadway. However, various trees are located within the existing right-of-way, within the northern portion of the proposed improvement area. A tree inventory of these trees has been prepared and included in Appendix C2, Arborist Report, and Final EIR Section 4.4, along with potential impacts to these existing trees. As discussed in both Final EIR Appendix C2 and Final EIR Section 4.4, Biological Resources, these revisions and proposed off-site improvements do not raise new or additional environmental issues concerning the adequacy of the Draft EIR. Please also refer to GR-2, above. Although both access points provided would be similar in nature, Carter Avenue would likely provide secondary access due to the existing networks of roadways surrounding the project site.

Draft EIR Section 4.17.5, Impacts Analysis, analyzed the project's potential to substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections), including Carter Avenue and determined impacts from the project would be less than significant. Final EIR Section 4.17.5 also includes a discussion of the proposed off-site widening of Carter Avenue, which would further reduce any potential hazards. As discussed in Final EIR Section 4.17.5, the project does not include any project elements that could potentially create a traffic hazard for motor vehicles, bicycles, or pedestrians due to a proposed, non-standard design feature. The proposed project's circulation system is designed to interconnect with the existing adjacent public street system and discourage cut-through automobile traffic. In addition, as discussed above, North Sunnyside Avenue would provide motorists an additional choice of streets and will limit travel to and from Carter Avenue. Additionally, three additional streets (Streets A, B, and C) that run east to west would be provided within the project site and would further improve circulation within the project site and nearby roadways. A few comments expressed concern about the 12% slope on Carter Avenue in the project site causing a hazard as cars exit the project site. A stop sign, which would require cars to come to a stop as they approach the egress point of the site, would be provided at the southern portion of the project site along Carter Avenue for safety of vehicles and pedestrians. Motorists traveling along Carter Avenue would also be required to comply with the speed limit of Carter Avenue. Therefore, access points would not create a hazard for vehicles or people entering or exiting the site.

Several comments state that the portion of Carter Avenue just outside the project site is not wide enough to accommodate the project and does not currently meet current City requirements for road width. The public right-of-way for West Carter Avenue terminates at the southern boundary of the project site, where the Mater Dolorosa Retreat Center gate is located. This segment of West Carter Avenue just before the entrance to the project site currently has a 25-foot right-of-way and was designed to meet fire code at the time it was constructed. As discussed above, in order to address commenters' concerns related to safety issues along Carter Avenue and outside of the boundaries of the proposed project site, the project applicant is proposing off-site widening to Carter Avenue, between the southeastern portion of the project site boundary and Lima Street, which would ensure that Carter Avenue would comply with existing code within and outside of the project site. All roadways within the project site, including Carter Avenue, are designed to meet all fire department access requirements as well as SMMC standards and would be improved to meet fire apparatus access road requirements. More specifically, as discussed in Draft EIR Section 4.20.5, the proposed driveways and roadways providing access to the project site would comply with the City's roadway standards and the 2019 CFC Section 503. In addition, as discussed above, a stop sign would be provided at the southern portion of the project site along Carter Avenue for safety of vehicle and pedestrians.

Additionally, comments express concern about the width of West Carter Avenue that terminates at the project site and pedestrian safety from cars parked alongside the narrow road. It should be noted that there are no sidewalks located along Carter Avenue, under existing conditions. However, as discussed in Final EIR Section 3.3.12, the proposed project would result in 6-foot development of a sidewalk on the north side of Carter Avenue, between the southeastern portion of the project site boundary and Lima Street. Currently "No Parking" Signs are located along West Carter Avenue. Any illegal parking that would occur on this segment of West Carter Avenue, impairing the circulation to and from the project site, and any illegal pedestrian activity along Carter Avenue is not within the scope of the required environmental analysis under CEQA. In addition, as discussed in Final EIR Section 4.17.5, the proposed project would not result in conflict with a program, plan, ordinance, or policy addressing the pedestrian facilities. Additionally, a pedestrian path extending from the east side of Carter Avenue and the proposed sidewalk along Carter Avenue would provide enhanced connectivity to Bailey Canyon Wilderness Park. In addition, a stop sign would be provided at the southern portion of the project site along Carter Avenue to improve pedestrian access in the area. Please refer to Global Response GR-4, above, regarding emergency access along Carter Avenue.

**GR-6** Traffic. Several comments were received regarding the project's potential to increase traffic levels in the surrounding community.

Pursuant to Senate Bill 743 (detailed in Draft EIR Section 4.17.2, Relevant Plans, Policies, and Ordinances), auto delay, level of service (LOS), and similar measures of vehicular roadway capacity and traffic congestion can no longer be used as the basis for determining whether a project results in potential significant impacts to traffic and transportation under CEQA. In place of traffic congestion measurements, SB 743 directs public agencies to consider a project's impact on vehicle miles traveled (VMT). Thus, under SB 743, comments addressing concerns about increased traffic do not raise issues relating to the Draft EIR's transportation impacts analysis as LOS or other measures of vehicular roadway capacity and traffic congestion cannot be used to evaluate the adequacy of the EIR or the project's impact on traffic and circulation under CEQA.

Regardless, for informational purposes only, the project's potential to increase traffic in the vicinity was described in Draft EIR Section 4.17, which determined the proposed project of 42 single-family detached homes would be expected to generate 9.44 vehicular trips per dwelling unit per day. Trip rates are calculated using the Institute of Transportation Engineers Trip Generation 10<sup>th</sup> edition manual. This per dwelling unit daily rate would result in a total of 396 daily trips. This represents a conservative estimate of vehicular trips and accounts for visitors, deliveries, and employees, as the residents alone are not expected to make an average of 9.44 trips per unit per day. The project's anticipated 396 daily trips, includes 31 AM peak-hour trips and 42 PM peak-hour trips. As discussed in Draft EIR Section 4.17.5, although daily car trips would increase, the proposed project would be located in a low VMT generating area which is the basis for determining traffic and transportation impacts under SB 743. As concluded in EIR Section 4.17, the project would not result in potentially significant VMT impacts. Impacts would be less than significant.

Although not required as part of the Draft EIR's transportation analysis which CEQA limits to vehicle miles traveled (VMT), Appendix K, Traffic Conditions with the Proposed Sierra Madre Residential Project (traffic conditions analysis), has been added as part of the Final EIR for informational purposes in response to public comments and details the expected changes in traffic conditions (i.e., trips and traffic volume) with the proposed project. The report includes details on data collection (i.e., traffic counts), which were conducted at four intersections and six roadway segments in October 2020. The report noted travel activity and traffic volumes were potentially atypical, thus, the methodology included review of multiple data sources to represent 2020 in a non-COVID environment. The report also included traffic volume calculations of the Mater Dolorosa Retreat Center to estimate the average weekday and weekend trips associated with the center. Page 6 of Appendix K presents the trip distribution analysis for the project, and Table 7 indicates that congestion levels will not be impacted by the project. While not previously included in the Draft EIR, Appendix K provides additional analysis related to traffic impacts that was provided for informational purposes and is not required under CEQA, per SB 743; therefore, this information does not constitute new information or change or modify the findings presented in the Draft EIR.

**GR-7** General Plan Consistency. Several comments were received concerned with the project's consistency with the goals, policies, and objectives of the General Plan, as well as the implementation of the Specific Plan and how it relates to the current General Plan.

As discussed in Draft EIR Chapter 3, Project Description, implementation of the proposed project would require amendments to both the City's General Plan and the Zoning Code. Draft EIR Section 4.11 states the adoption of the Specific Plan would establish the zoning and development standards to guide future development on site. When a specific plan is adopted in accordance with the SMMC, the specific plan may effectively supersede portions or all of the current zoning regulations for specified parcels or plan area and becomes an independent set of zoning regulations that provide specific direction to the type and intensity of uses permitted, and may define other types of design and permitting criteria. Upon project approval, the proposed Specific Plan would be adopted by ordinance and serve as the primary zoning document for the project site.

Draft EIR Section 4.11 includes a consistency analysis with the City's applicable goals, policies, and objectives. It should be noted that a few revisions have been made in Final EIR Section 4.11, as a result of the proposed off-site widening of Carter Avenue. These revisions and proposed off-site improvements do not raise new or additional environmental issues concerning the adequacy of the Draft EIR. Per Final

EIR Table 4.11-1, Project's Consistency with the City of Sierra Madre's General Plan Goal and Policies, the project was found to be consistent with all applicable goals, policies, and objectives aside from Goal 1, Goal 4, Policy L51.8, and Policy L52.8 of the General Plan. However, the project would be required to implement MM-BIO-3, which would replace protected tree species removed from the site in order to address inconsistency with Goal 1, Continued preservation and protection of existing trees. Regarding inconsistency with Goal 4, use of local sources groundwater rather than imported water, the project would not result in a significant environmental impact on water supplies (see Global Response GR-1). Therefore, this inconsistency would not result in a significant environmental impact. Policy L51.8 prioritizes alternative forms of transportation to eliminate need for expansion of roadways, the project would not impact existing bicycle facilities, but would ultimately expand roadways and not provide bicycle facilities. Not constructing bicycle facilities, as required to be consistent with Policy L52.8, would not result in significant environmental impacts. Explanations as to why the project is consistent or inconsistent with certain polies can be found in Final EIR Table 4.11-1. As discussed in this section, none of these inconsistencies would result in an environmental impact.



Comment Letter A1

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

GAVIN NEWSOM, Governor  
CHARLTON H. BONHAM, Director



October 1, 2021

Vincent Gonzalez  
Director of Planning and Community Preservation Department  
City of Sierra Madre  
232 West Sierra Madre Boulevard  
Sierra Madre, CA 91024  
[VGonzalez@cityofsierramadre.com](mailto:VGonzalez@cityofsierramadre.com)

**Subject: Comments on the Draft Environmental Impact Report for The Meadows at Bailey Canyon Specific Plan, SCH #2020060534, Los Angeles County**

Dear Mr. Gonzalez:

The California Department of Fish and Wildlife (CDFW) has reviewed the Draft Environmental Impact Report (DEIR) for The Meadows at Bailey Canyon Specific Plan (Project) from the City of Sierra Madre (City; Lead Agency). Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

A1-1

**CDFW's Role**

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State [Fish & G. Code, §§ 711.7, subdivision (a) & 1802; Pub. Resources Code, § 21070; California Environmental Quality Act (CEQA) Guidelines, § 15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect state fish and wildlife resources.

A1-2

CDFW is also submitting comments as a Responsible Agency under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 *et seq.*). Likewise, to the extent implementation of the Project as proposed may result in "take", as defined by State law, of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 *et seq.*), or CESA-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish & G. Code, §1900 *et seq.*), CDFW recommends the Project proponent obtain appropriate authorization under the Fish and Game Code.

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**Project Description and Summary**

**Objective:** The proposed Project would establish zoning and development standards to guide future development of single-family residential uses on approximately 9.19 acres of the 17.30-acre Project site. The Project also includes 3.39 acres of open space (including a 3.04-acre neighborhood public park). A 1.04-acre grading and landscape buffer would be located within the northern portion of the Project site. In addition, the proposed Project includes dedication to the City of a 35-acre open space area. This open space area is located on the hillside to the north of the Project and the existing Mater Dolorosa Retreat Center.

The Project also includes a proposed General Plan amendment to change the land use designation and zoning for the Project site from Institutional to Specific Plan.

**Location:** The Project site is located at 700 N. Sunnyside Avenue, Sierra Madre, CA 91024. The site is along the northern urban fringe of the City of Sierra Madre. It is surrounded to the west, south, and southeast by residential development. Immediately east is the Bailey Canyon Wilderness Park. To the north is located the Mater Dolorosa Community.

A1-3

**Comments and Recommendations**

CDFW offers the comments and recommendations below to assist the City in adequately identifying, avoiding, and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions are also included to improve the environmental document. CDFW recommends the measures or revisions below be included in a science-based monitoring program that contains adaptive management strategies as part of the Project's CEQA mitigation, monitoring and reporting program (Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15097).

A1-4

**Specific Comments**

**Comment #1: Impacts from New Path Installation**

**Issue:** The Project proposes to create a public park along the southern boundary of the site that also includes a pedestrian path in the southeast corner. This path is expected to improve pedestrian access to the Bailey Canyon Wilderness Park and trail located just east of the Project site.

**Specific Impacts:** Project activities, such as park and path installation are likely to accommodate (and subsequently lead to) increased recreational frequency and duration in the Bailey Canyon Wilderness Park. Elevated pedestrian usage is likely to create direct and indirect impacts to local wildlife species through the loss of potential habitat.

A1-5

**Why impacts would occur:** The area of influence that the trail has upon the surrounding habitat is being increased. An increase in the number of hikers has potential to impact sensitive wildlife species and their habitat through a variety of ways:

- increased numbers of people and dogs using the trail system
- loss of habitat due to erosion from footpaths
- increased noise levels

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- increased trash or pet waste
- introduction of unnatural food sources via trash and trash receptacles
- introduction of invasive species from other sites

**Evidence impacts would be significant:** Outdoor recreation has the potential to disturb wildlife, resulting in energetic costs, impacts to animals' behavior and fitness, and avoidance of otherwise suitable habitat. Studies have shown that outdoor recreation is the second leading cause of the decline of federally threatened and endangered species on public lands (Losos et al. 1995) and fourth leading cause on all lands (Czech et al. 2000). As a result, natural resource managers are becoming increasingly concerned about impacts of recreation on wildlife (Knight and Gutzwiller 1995).

Recreational trails can fragment the habitat that they pass through. These negative impacts generally result from the expansion of the area of influence that a trail has on its surrounding open space. Trails can create artificial boundaries or areas of avoidance for wildlife as they bring outsiders into areas that would otherwise be unvisited. Along with these perceived outsiders, in this case hikers, comes a new set of perceived threats to local wildlife in the form of visual, auditory, and olfactory cues that remain along the trail well after recreational usage.

If habitat is available, wildlife may move to areas farther from trails, beyond the areas of influence, to avoid recreation-related disturbance (Reed et al. 2019). However, the greater the proportion of a protected area occupied by trails, the fewer options there are for wildlife to move outside of those areas of influence. There are simply fewer opportunities for wildlife to retreat from nearby recreational users in an already shrinking habitat.

The higher the level of recreation in protected areas, the greater the potential there is for the effects of trails and their use to extend beyond habitat loss and individual-level effects (behavioral and physiological) on wildlife. This may transition into population- and community-level effects, including depletion of floral and faunal populations, alteration of the trophic community structures, and reduction of biodiversity (CDFW 2015).

With increased recreational usage of trails through open spaces, comes increased exposure of wildlife to humans. Habituated urban wildlife is less likely to avoid contact with humans, which may increase the probability of human-wildlife conflicts and of attraction to anthropogenic food sources; both are considered problematic in many urban areas (Whittaker and Knight 1998; George and Crooks 2006). Wildlife habituation to humans may also increase wildlife aggression toward humans, or render wildlife more vulnerable to predators, poaching, or roadkill (Whittaker and Knight 1998; George and Crooks 2006; Marzano and Dandy 2012). Furthermore, habituation of wildlife may impact their reproductive success. Habituation of adult individuals may also be associated with negative consequences for their offspring as habituation of adults does not necessarily lead to immediate habituation of juveniles (Reilly et al. 2017).

**Recommended Potentially Feasible Mitigation Measure(s):**

**Mitigation Measure #1:** Educational materials and signage should be made available to trail users to keep aware of the impacts that human disturbance brings to open spaces. Hikers should be made aware of the impacts that they have on surrounding habitat (such as noise or smells), particularly during breeding seasons.

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People are often not aware of how their activities affect wildlife, even if they see animals respond to their actions (Stalmaster and Kaiser 1998). By emphasizing how human activities affect wildlife, people can associate their actions with either benefitting or harming animal populations and begin to develop a conservation ethic (Miller et al. 2001). With improved educational materials and outreach efforts, recreational users are more likely to support restrictions if they understand how wildlife will benefit.

**Mitigation Measure #2:** CDFW recommends the City install appropriate public information signage at trailheads to: 1) educate and inform the public about wildlife present in the area; 2) advise on proper avoidance measures to reduce human-wildlife conflicts; 3) advise on proper use of open space trails in a manner respectful to wildlife; and 4) provide local contact information to report injured or dead wildlife. Signage should be written in the language(s) understandable to all those likely to recreate and use the trails. Signage should not be made of materials harmful to wildlife such as spikes or glass. The City should provide a long-term maintenance plan to repair and replace the signs.

**Mitigation Measure #3:** Restrictions on types of activities allowed in some areas, such as prohibiting dogs or restricting use to trails near active breeding habitat, will aid in minimizing disturbance. Pets should be kept on leash and on trails at all times. Hikers should be encouraged to clean up after their dogs and discourage animal waste as it tends to lead to wildlife avoidance.

**Mitigation Measure #4:** Trash receptacles should be placed only at trailheads to avoid creating an unnatural food source that may attract nuisance wildlife and to minimize waste in core habitat areas.

**Recommendation #1:** Understanding wildlife responses to recreation and the area of influence of human activities may help managers judge whether wildlife populations are experiencing stress due to interactions with humans and may aid in tailoring recreation plans to minimize long-term effects to wildlife from disturbance. CDFW recommends including an analysis of recreational usage of Bailey Canyon Wilderness Park in which current levels of traffic (hiker, biker, and dog) is compared to the expected increase in traffic as a result of new path installation in the final environmental document.

**Comment #2: Mountain Lion (*Puma concolor*)**

**Issue:** The Project site occurs within the range of mountain lion habitat.

**Specific impacts:** The Project as proposed may impact the southern California mountain lion population by temporarily and permanently increasing human presence, traffic, and noise.

**Why impacts would occur:** Mountain lions may occur within the Project footprint or in the immediate proximity to the Project. The Project may increase human presence (e.g., new development, public trail access), traffic, and noise as well as potential artificial lighting during Project construction and over the life of the Project. Most factors affecting the ability of the southern California mountain lion populations to survive and reproduce are caused by humans (Yap et al. 2019). As California has continued to grow in human population and communities expand into wildland areas, there has been a commensurate increase in direct and indirect interaction between mountain lions and people (CDFW 2013). As a result, the need to relocate

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or humanely euthanize mountain lions (depredation kills) may increase for public safety. Mountain lions are exceptionally vulnerable to human disturbance (Lucas 2020). Areas of high human activity have lower occupancy of rare carnivores. Mountain lions tend to avoid roads and trails by the mere presence of those features, regardless of how much they are used (Lucas 2020). Increased traffic could cause vehicle strikes. As human population density increases, the probability of persistence of mountain lions decreases (Woodroffe 2000).

**Evidence impact would be significant:** The mountain lion is a specially protected mammal in the State (Fish and G. Code, § 4800). In addition, on April 21, 2020, the California Fish and Game Commission accepted a petition to list an evolutionarily significant unit (ESU) of mountain lion in southern and central coastal California as threatened under CESA (CDFW 2020). As a CESA candidate species, the mountain lion in southern California is granted full protection of a threatened species under CESA. The Project may have significant impacts because no mitigation has been proposed for any unavoidable direct and indirect, permanent or temporal losses, of habitat for mountain lion.

**Recommended Potentially Feasible Mitigation Measure(s):**

**Mitigation Measure #1:** Due to potential habitat in the Project vicinity, within one year prior to Project implementation that includes site preparation, equipment staging, and mobilization, a CDFW-approved biologist knowledgeable of mountain lion species ecology should survey areas that may provide habitat for mountain lion to determine presence/absence and potential for natal dens within a half mile of the Project area. Caves and other natural cavities, and thickets in brush and timber provide cover and are used for denning. Females may be in estrus at any time of the year, but in California, most births probably occur in spring. Surveys should be conducted when the species is most likely to be detected, during crepuscular periods at dawn and dusk (Pierce and Bleich 2003). Survey results including negative findings should be submitted to CDFW prior to initiation of Project activities. The survey report should include a map of potential denning sites. The survey report should include measures to avoid impacts mountain lions that may be in the area as well as dens and cubs, if necessary.

**Mitigation Measure #2:** If potential habitat for natal dens are identified, CDFW recommends fully avoiding potential impacts to mountain lions, especially during spring, to protect vulnerable cubs. Two weeks prior to Project implementation, and once a week during construction activities, a CDFW-approved biologist should conduct a survey for mountain lion natal dens. The survey area should include the construction footprint and the area within 2,000 feet (or the limits of the property line) of the Project disturbance boundaries. CDFW should be notified within 24 hours upon location of a natal den. If an active natal den is located, during construction activities, all work should cease. No work should occur within a 2,000-foot buffer from a natal den. A qualified biologist should notify CDFW to determine the appropriate course of action. CDFW should also be consulted to determine an appropriate setback from the natal den that would not adversely affect the successful rearing of the cubs. No construction activities or human intrusion should occur within the established setback until mountain lion cubs have been successfully reared; the mountain lions have left the area; or as determined in consultation with CDFW.

**Mitigation Measure #3:** If "take" or adverse impacts to mountain lion cannot be avoided either during Project construction and over the life of the Project, the City should consult CDFW and must acquire a CESA Incidental Take Permit (pursuant to Fish & Game Code, § 2080 *et seq.*).

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**Recommendation:** CDFW recommends the City evaluate the mountain lion territory size and use of habitat within and surrounding the Project vicinity. The City should analyze the change (i.e. increase) in human presence and area of anthropogenic influence that will now be in mountain lion habitat and how it may impact mountain lion behavior, reproductive viability, and overall survival success. Based on these known anthropogenic impacts on mountain lions, CDFW also recommends the City provide compensatory mitigation for impacts to mountain lion. The CEQA document should justify how the proposed compensatory mitigation would reduce the impacts of the Project to less than significant. Finally, CDFW also recommends the City recirculate the document with these analyses included.

A1-6  
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**Comment #3: Impacts to Bat Species**

**Issue:** The Project includes activities such as grading and tree removal that may result in the removal of foraging and disturbance of roosting habitat for bats.

**Specific impacts:** The DEIR states, "One bat species, pallid bat (*Antrozous pallidus*), has low potential to occur because it roosts in trees; however, wintering and maternity roosts are not expected and individuals would be expected to leave if tree is disturbed." The pallid bat is designated California Species of Special Concern (SSC). Project activities include tree removal that may disturb or remove areas that provide foraging or roosting habitat and therefore has the potential for the direct loss of bats. Indirect impacts to bats and roosts could result from increased noise disturbances, human activity, dust, vegetation clearing, ground-disturbing activities (e.g., staging, mobilizing, and grading), and vibrations caused by heavy equipment.

**Why impacts would occur:** The removal of vegetation may potentially result in the loss or disturbance of foraging and roosting habitat for bats. Construction activities will temporarily increase the disturbance levels as well as human activity in the Project area. Moreover, the Project will permanently remove potential foraging habitat for bats. In addition, the new park and path installation will create a permanent increase in human presence in the Project vicinity. Lastly, because the general biological reconnaissance surveys were conducted during daytime hours, there is potential bats present on site would go undetected. This may cause the Project to impact individuals not previously known to reside in or around the Project area. Bats would require more species-specific and specific time-of-day surveys.

A1-7

**Evidence impacts would be significant:** Bats are considered non-game mammals and are afforded protection by state law from take and/or harassment, (Fish & G. Code, § 4150; Cal. Code of Regs, § 251.1). There are many bat species that can be found year-round in urban areas throughout the south coast region of California (Miner & Stokes, 2005). Several bat species are considered SSC and meet the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15065). Take of California Species of Special Concern could require a mandatory finding of significance by the City (CEQA Guidelines, § 15065).

**Recommended Potentially Feasible Mitigation Measure(s):**

**Mitigation Measure #1:** Prior to construction activities, CDFW recommends a qualified bat specialist conduct bat surveys within Project area (plus a 100-foot buffer as access allows) in order to identify potential habitat that could provide daytime and/or nighttime roost sites, and any maternity roosts. CDFW recommends the use of acoustic recognition technology to maximize detection of bat species to minimize impacts to sensitive bat species. A discussion of

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survey results, including negative findings should be provided to the City. Depending on the survey results, a qualified bat specialist should discuss potentially significant effects of the Project on bats and include species specific mitigation measures to reduce impacts to below a level of significance (CEQA Guidelines, § 15125). Surveys, reporting, and preparation of robust mitigation measures by a qualified bat specialist should be completed and submitted to the City prior to any Project-related ground-disturbing activities or vegetation removal at or near locations of roosting habitat for bats.

**Mitigation Measure #2:** If bats are not detected, but the bat specialist determines that roosting bats may be present at any time of year and could roost in trees at a given location, during tree removal, trees should be pushed using heavy machinery prior to using a chainsaw to remove them. To ensure the optimum warning for any roosting bats that may still be present, trees should be pushed lightly two or three times, with a pause of approximately 30 seconds between each nudge to allow bats to become active. A period of at least 24 hours, and preferable 48 hours, should elapse prior to such operations to allow bats to escape.

**Mitigation Measure #3:** If maternity roosts are found, work should be scheduled between October 1 and February 28, outside of the maternity roosting season when young bats are present but are yet ready to fly out of the roost (March 1 to September 30).

**Comment #4: Impacts to Oak Trees and Tree Replacement**

**Issue:** The Project proposes to remove 101 trees, including 10 coast live oak (*Quercus agrifolia*) trees. The Project's proposed mitigation MM-BIO-3 for impacts to oak trees may be insufficient to mitigate for impacts to oak trees. In addition, no mitigation is proposed for the removal of the other 91 trees.

**Specific impact:** The Project will directly remove individual oak trees. Project activities that result in the removal of trees may cause temporary or permanent impacts to wildlife that utilize the tree as habitat. In addition, Project activities that involve removal of trees have the potential to result in the spread of tree insect pests and disease into areas not currently exposed to these stressors. This could result in expediting the loss of trees in California which may support a high biological diversity including special status species.

**Why impacts would occur:** MM-BIO-3 states, "The City's Tree Preservation and Protection Ordinance (Chapter 12.20) identifies tree replacement requirements for tree removal associated with a development project. In total, ten protected trees may be removed. As such, they shall be replaced at a minimum with a 24-inch box tree, on a 1:1 basis with a like species." MM-BIO-3 would provide minimal mitigation for oak trees but the measures, as currently proposed, may be insufficient for mitigating impacts to protected trees and provides no mitigation for other trees removed on site. The proposed mitigation measures in the DEIR would result in an ultimate total net loss for of oak trees associated with the Project activities. A 1:1 mitigation ratio would not make up for the temporal loss of oak trees as well as the potential failure of the replacement oaks that will be planted. Moreover, all trees on site may provide habitat for wildlife within the Project vicinity and the mitigation leads to a total net loss of trees. These trees may provide adequate habitat for nesting birds and small mammals. Removal of trees on site may temporarily or permanently impact available habitat for wildlife in the area. The loss of all trees should be included in the mitigation efforts.

A1-7  
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A1-8

A1-9

A1-10

A1-11

A1-12

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Lastly, there is no proposed investigation and plan for managing tree pests or pathogens at the time of removal. This may result in the introduction of pests, pathogens, or diseases to areas where they previously have not been found.

A1-13

**Evidence impacts would be significant:** Oak trees provide nesting and perching habitat for approximately 170 species of birds (Griffin and Muick 1990). Coast live oak and old-growth oak trees (native oak tree that is greater than 15 inches in diameter) are of importance due to increased biological values and increased temporal loss. Due to the historic and on-going loss of this ecologically important vegetation community, oak trees and woodlands are protected by local and State ordinances. The Los Angeles County Oak Tree Ordinance was established to recognize oak trees as significant historical, aesthetic, and ecological resources. CDFW considers oak woodlands a sensitive vegetation community.

A1-14

Lastly, without a proper investigation and management plan, the Project may also result in an adverse effect, either directly or through habitat modifications, by exposing other habitats to insect and/or disease pathogens. Exposure to insect and/or disease pathogens may have a substantial adverse effect on any sensitive natural community identified in local or regional plans, policies, and regulations or by the CDFW or United States Fish and Wildlife Service (USFWS).

A1-15

**Recommended Potentially Feasible Mitigation Measure(s):**

**Mitigation Measure #1:** An infectious tree disease management plan should be developed and implemented prior to initiating Project activities. All trees scheduled for removal should be identified and counted to provide total numbers and species type. In addition, trees scheduled for removal resulting from the Project should be inspected for contagious tree diseases including but not limited to: [thousand canker fungus](#) (*Geosmithia morbida*), [Polyphagous Shot Hole Borer](#) (*Euwallacea spp.*), and [goldspotted oak borer](#) (*Agrius auroguttatus*) (TCD 2020; UCANR 2020; UCIPM 2013). To avoid the spread of infectious tree diseases, diseased trees should not be transported from the Project site without first being treated using best available management practices relevant for each tree disease observed.

**Mitigation Measure #2:** Replacement oaks should be of the same species and come from nursery stock grown from locally sourced acorns, or from acorns gathered locally, preferably from the same watershed in which they were planted.

A1-16

**Mitigation Measure #3:** Given that the DEIR does not provide justification for how a mitigation ratio of 1:1 would adequately reduce impacts to below a level of significance while considering temporal loss, special status trees, size of trees, potential mitigation failure, etc. (see Recommendation #1 below), CDFW recommends replacing native trees, including oak trees, with at least a 3:1 ratio. CDFW also recommends replacing non-native trees with at least a 1:1 ratio with native trees.

**Recommendation #1:** CDFW recommends the DEIR provide adequate and complete explanation why the chosen mitigation ratio is sufficient to mitigate for permanent loss of 101 trees on site. The DEIR should address the following:



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1. How the chosen ratio accounts for impacts to trees on a species-specific level;
2. How oaks have been mitigated at the chosen mitigation ratio given their special status;
3. Whether other native or non-native tree species will be mitigated in the same way;
4. How the chosen mitigation ratio mitigates for the temporal loss of trees;
5. How the ratio addresses impacts to wildlife for the loss of habitat;
6. How the mitigation addresses trees of various sizes (diameter at breast height (DBH)) as well as any potential understory vegetation; and,
7. How the mitigation ratio addresses potential mitigation failures if replacement trees do not survive.

A1-16  
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**Recommendation #2:** CDFW recommends that the City recirculate the DEIR for more meaningful public review and assessment of the City's mitigation ratio. Additionally, the City should recirculate the DEIR if the proposed mitigation measure (i.e., 1:1 replacement ratio of oak trees) would not reduce potential effects to less than significant and new measures must be required [CEQA Guidelines, § 15073.5(b)(2)].

**Additional Comments and Recommendations**

Human-Wildlife Interface. Due to the location of the Project site at the foothills of the San Gabriel mountains and at the edge of the black bear (*Ursus americanus*) and mountain lion range (*Puma concolor*), CDFW recommends the City require the use of bear-proof trash cans for this and all new developments in the foothills. Bears or mountain lions spotted in residential, suburban or urban areas should be reported to the South Coast Regional Office (858) 467-4201 or [AskR5@wildlife.ca.gov](mailto:AskR5@wildlife.ca.gov) during normal business hours. After-hours or weekend sightings should be reported first to local police or sheriff officers, who often can respond and secure a scene quickly and then contact CDFW as needed.

A1-17

CDFW considers improper storage of human food and garbage to be the primary cause of bear conflicts with humans. This requirement is necessary for the local waste management agency to provide each house these special cans. These trash cans require the use of special trucks and must be specifically contracted. The City should require this development, and all individual houses, use bear-proof trash cans.

Human interactions are one of the main drivers of mortality and increasing development and human presence in this area could increase the need for public safety removal and/or vehicle strikes of mountain lions. Therefore, any new development project should analyze the potential for mountain lion that are known to occur in the San Gabriel Mountains and their foothills and may be impacted by development and human activity in the Project area (see Comment #2).

A1-18

Lake and Streambed Alteration (LSA) Agreement. The Proposed Project would involve the creation of two storm drain systems. Two on site catch basins are proposed within the southern end of North Sunnyside Avenue to capture runoff generated from the Project site. Two additional catch basins would be located northeast of the Project site, within Carter Avenue to capture off-site flows before runoff enters the project site via the North Sunnyside Avenue extension. Streets A, B, and C would include two catch basins each, and would each capture and convey surface runoff to the east. A total of 14 catch basins will be located on the Project site. Lastly, a 63,500-cubic foot retention storage gallery, will be located within the public park.

A1-19

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Although no watercourses or wetlands were found on site, CDFW is concerned regarding the maintenance of these stormwater facilities. It is unclear the size of these basins and if these basins will be above or below ground. Open air catch basins may create a water resource for wildlife so maintenance activities may adversely impact biological resources that utilize the runoff and catch basins within the Project area. As a Responsible Agency under CEQA, CDFW has authority over activities in streams and/or lakes that will divert or obstruct the natural flow, or change the bed, channel, or bank (including vegetation associated with the stream or lake) of a river or stream, or use material from a streambed, this includes maintenance activities within a watercourse. For any such activities, the project applicant (or "entity") must provide written notification to CDFW pursuant to Fish and Game Code Section 1600 *et seq.*

A1-19  
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CDFW's issuance of a LSA Agreement for a project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. As a Responsible Agency, CDFW may consider the environmental document of the local jurisdiction (Lead Agency) for the project. To minimize additional requirements by CDFW pursuant to section 1600 *et seq.* and/or under CEQA, the DEIR should fully identify the potential impacts to the biological resources utilizing the watercourse and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the LSA Agreement. Please visit CDFW's [Lake and Streambed Alteration Program](#) webpage for information about LSA Notification (CDFW 2021a) for a Routine Maintenance Agreement. Project-related changes in upstream and downstream drainage patterns, runoff, and sedimentation should be included and evaluated in the DEIR and notification.

Nesting Birds. CDFW recommends avoiding any construction activity during nesting season. If not feasible, CDFW recommends modifying MM-BIO-1 by expanding the time period for bird and raptor nesting from February 1 through August 31 to January 1 through September 15. If the Project occurs between January 1 through September 15, a nesting bird and raptor survey should be conducted as stated in MM-BIO-1, prior to any ground-disturbing activities (e.g., staging, mobilization, grading) as well as prior to any vegetation removal within the Project site.

A1-20

It should be noted that the temporary halt of Project activities within nesting buffers during nesting season does not constitute effective mitigation for the purposes of offsetting Project impacts associated with habitat loss. Additional mitigation would be necessary to compensate for the removal of nesting habitat within the Project site based on acreage of impact and vegetation composition. CDFW shall be consulted to determine proper mitigation for impacts to occupied habitat depending on the status of the bird species. Mitigation ratios would increase with the occurrence a California Species of Special Concern and would further increase with the occurrence of a CESA-listed species.

Data. CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations [Pub. Resources Code, § 21003, subd. (e)]. Accordingly, please report any special status species detected by completing and submitting [CNDDB Field Survey Forms](#) (CDFW 2021b). This includes all documented occurrences of mountain lion, San Diego desert woodrat, and potential occurrences of Crotch's bumble bee, and other special status species. The City should ensure the data has been properly submitted, with all data fields applicable filled out, prior to Project ground-disturbing activities. The data entry should also list pending development as a threat and then update this occurrence after impacts have occurred. The City should provide CDFW with confirmation of data submittal.

A1-21

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**Mitigation and Monitoring Reporting Plan.** Per Public Resources Code section 21081.6(a)(1), CDFW has provided the City with a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation and Monitoring Reporting Plan (MMRP; Attachment A). A final MMRP shall reflect results following additional plant and wildlife surveys and the Project's final on and/or off-site mitigation plans.

A1-22

**Filing Fees**

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the City of Sierra Madre and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required for the underlying Project approval to be operative, vested, and final (Cal. Code Regs., tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089).

A1-23

**Conclusion**

We appreciate the opportunity to comment on the Project to assist the City of Sierra Madre in adequately analyzing and minimizing/mitigating impacts to biological resources. CDFW requests an opportunity to review and comment on any response that the City of Sierra Madre has to our comments and to receive notification of any forthcoming hearing date(s) for the Project [CEQA Guidelines, § 15073(e)]. If you have any questions or comments regarding this letter, please contact Felicia Silva, Environmental Scientist, at [Felicia.Silva@wildlife.ca.gov](mailto:Felicia.Silva@wildlife.ca.gov) or (562) 292-8105.

A1-24

Sincerely,

DocuSigned by:  
*Erinn Wilson-Olgin*  
Erinn Wilson-Olgin  
Environmental Program Manager I  
South Coast Region

ec: CDFW  
Erinn Wilson-Olgin, Los Alamitos – [Erinn.Wilson-Olgin@wildlife.ca.gov](mailto:Erinn.Wilson-Olgin@wildlife.ca.gov)  
Victoria Tang, Los Alamitos – [Victoria.Tang@wildlife.ca.gov](mailto:Victoria.Tang@wildlife.ca.gov)  
Ruby Kwan-Davis, Los Alamitos – [Ruby.Kwan-Davis@wildlife.ca.gov](mailto:Ruby.Kwan-Davis@wildlife.ca.gov)  
Felicia Silva, Los Alamitos – [Felicia.Silva@wildlife.ca.gov](mailto:Felicia.Silva@wildlife.ca.gov)  
Julisa Portugal, Los Alamitos – [Julisa.Portugal@wildlife.ca.gov](mailto:Julisa.Portugal@wildlife.ca.gov)  
Cindy Hailey, San Diego – [Cindy.Hailey@wildlife.ca.gov](mailto:Cindy.Hailey@wildlife.ca.gov)  
CEQA Program Coordinator, Sacramento – [CEQACommentLetters@wildlife.ca.gov](mailto:CEQACommentLetters@wildlife.ca.gov)

State Clearinghouse, Office of Planning and Research – [State.Clearinghouse@opr.ca.gov](mailto:State.Clearinghouse@opr.ca.gov)

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State of California – Natural Resources Agency  
 DEPARTMENT OF FISH AND WILDLIFE  
 South Coast Region  
 3383 Ruffin Road  
 San Diego, CA 92123  
 (858) 467-4201  
[www.wildlife.ca.gov](http://www.wildlife.ca.gov)

GAVIN NEWSOM, Governor  
 CHARLTON H. BONHAM, Director



**Attachment A: Draft Mitigation and Monitoring Reporting Plan**

CDFW recommends the following language to be incorporated into a future environmental document for the Project. A final MMRP shall reflect results following additional plant and wildlife surveys and the Project's final on and/or off-site mitigation plans.

Biological Resources (BIO)			
	Mitigation Measure (MM) or Recommendation (REC)	Timing	Responsible Party
MM-BIO-1-Trail Installation	Educational materials and signage shall be made available to trail users to keep aware of the impacts that human disturbance brings to open spaces. Hikers shall be made aware of the impacts that they have on surrounding habitat (such as noise or smells), particularly during breeding seasons.	Prior to Project construction and activities	City/Project Applicant
MM-BIO-2-Trail Installation	The City shall install appropriate public information signage at trailheads to: 1) educate and inform the public about wildlife present in the area; 2) advise on proper avoidance measures to reduce human-wildlife conflicts; 3) advise on proper use of open space trails in a manner respectful to wildlife; and, 4) provide local contact information to report injured or dead wildlife. Signage shall be written in the language(s) understandable to all those likely to recreate and use the trails. Signage shall not be made of materials harmful to wildlife such as spikes or glass. The City shall provide a long-term maintenance plan to repair and replace the signs.	Prior to Project construction and activities	City/Project Applicant
MM-BIO-3-Trail Installation	Restrictions on types of activities allowed in some areas, such as prohibiting dogs or restricting use to trails near active breeding habitat, will aid in minimizing disturbance. Pets shall be kept on leash and on trails at all times. Hikers shall be encouraged to clean up after their dogs and discourage animal waste as it tends to lead to wildlife avoidance.	Prior to Project construction and activities	City/Project Applicant

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MM-BIO-4-Trail Installation	Trash receptacles shall be placed only at trailheads to avoid creating an unnatural food source that may attract nuisance wildlife and to minimize waste in core habitat areas.	Prior to Project construction and activities	City/Project Applicant
REC-1-Trail Installation	Understanding wildlife responses to recreation and the area of influence of human activities may help managers judge whether wildlife populations are experiencing stress due to interactions with humans, and may aid in tailoring recreation plans to minimize long-term effects to wildlife from disturbance. In an environmental document, CDFW recommends including an analysis of recreational usage of San Rafael Hills in which current levels of traffic (hiker, biker, and dog) is compared to the expected increase in traffic as a result of trail improvements.	Prior to Project construction and activities	City/Project Applicant
MM-BIO-5- Impacts to Mountain lion - surveys	Due to potential habitat within the Project footprint, within one year prior to Project implementation that includes site preparation, equipment staging, and mobilization, a CDFW-approved biologist knowledgeable of mountain lion species ecology shall survey areas that may provide habitat for mountain lion to determine presence/absence and potential for natal dens. Caves and other natural cavities, and thickets in brush and timber provide cover and are used for denning. Females may be in estrus at any time of the year, but in California, most births probably occur in spring. Surveys shall be conducted when the species is most likely to be detected, during crepuscular periods at dawn and dusk (Pierce and Bleich 2003). Survey results including negative findings shall be submitted to CDFW prior to initiation of Project activities. The survey report shall include a map of potential denning sites. The survey report shall include measures to avoid impacts mountain lions that may be in the area as well as dens and cubs, if necessary	Prior to Project construction and activities	City/Project Applicant
MM-BIO-6- Impacts to Mountain lion -	If potential habitat for natal dens are identified impacts to mountain lions shall be fully avoided, especially during spring, to protect vulnerable cubs. Two weeks prior to Project implementation, and once a week during construction activities, a CDFW-approved	Prior to Project construction and activities	City/Project Applicant

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<b>avoiding natal dens</b>	biologist shall conduct a survey for mountain lion natal dens. The survey area shall include the construction footprint and the area within 2,000 feet (or the limits of the property line) of the Project disturbance boundaries. CDFW shall be notified within 24 hours upon location of a natal den. If an active natal den is located, during construction activities, all work shall cease. No work shall occur within a 2,000-foot buffer from a natal den. A qualified biologist shall notify CDFW to determine the appropriate course of action. CDFW shall also be consulted to determine an appropriate setback from the natal den that would not adversely affect the successful rearing of the cubs. No construction activities or human intrusion shall occur within the established setback until mountain lion cubs have been successfully reared; the mountain lions have left the area; or as determined in consultation with CDFW.		
<b>MM-BIO-7- Impacts to Mountain lion take permit</b>	If "take" or adverse impacts to mountain lion cannot be avoided either during Project construction or over the life of the Project, the City will consult CDFW to determine if a CESA ITP is required.	Prior to Project construction and activities	City/Project Applicant
<b>REC-2- Impacts to Mountain lion surveys</b>	The City should evaluate the mountain lion territory size and use of habitat within and surrounding the Project vicinity. The City should analyze the change (i.e. increase) in human presence and area of anthropogenic influence that will now be in mountain lion habitat and how it may impact mountain lion behavior, reproductive viability, and overall survival success. Based on these known anthropogenic impacts on mountain lions, CDFW also recommends the City provide compensatory mitigation for impacts to mountain lion. The CEQA document should justify how the proposed compensatory mitigation would reduce the impacts of the Project to less than significant. Finally, CDFW also recommends the City recirculate the document with these analyses included.	Prior to Project construction and activities	City/Project Applicant

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<b>MM-BIO-8- Impacts to bat species</b>	Prior to construction activities, a qualified bat specialist shall conduct bat surveys within these areas (plus a 100-foot buffer as access allows) in order to identify potential habitat that could provide daytime and/or nighttime roost sites, and any maternity roosts. A acoustic recognition technology shall be utilized to maximize detection of bat species to minimize impacts to sensitive bat species. A discussion of survey results, including negative findings shall be provided to the City. Depending on the survey results, a qualified bat specialist shall discuss potentially significant effects of the Project on bats and include species specific mitigation measures to reduce impacts to below a level of significance (CEQA Guidelines, § 15125). Surveys, reporting, and preparation of robust mitigation measures by a qualified bat specialist shall be completed and submitted to the City prior to any Project-related ground-disturbing activities or vegetation removal at or near locations of roosting habitat for bats.	Prior to Construction and/or ground disturbing activities	City/Project Applicant
<b>MM-BIO-9- Impacts to bat species</b>	If bats are not detected, but the bat specialist determines that roosting bats may be present at any time of year and could roost in trees at a given location, during tree trimming, trees shall be pushed using heavy machinery prior to using a chainsaw to remove branches. To ensure the optimum warning for any roosting bats that may still be present, trees shall be pushed lightly two or three times, with a pause of approximately 30 seconds between each nudge to allow bats to become active. A period of at least 24 hours, and preferable 48 hours, shall elapse prior to such operations to allow bats to escape.	Prior to Construction and/or ground disturbing activities	City/Project Applicant
<b>MM-BIO-10- Impacts to bat species</b>	If maternity roosts are found, work shall be scheduled between October 1 and February 28, outside of the maternity roosting season when young bats are present but are yet ready to fly out of the roost (March 1 to September 30).	Prior to Construction and/or ground disturbing activities	City/Project Applicant

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<b>MM-BIO-11- Impacts to Trees</b>	An infectious tree disease management plan shall be developed and implemented prior to initiating Project activities. All trees scheduled for removal shall be identified and counted to provide total numbers and species type. In addition, trees scheduled for removal resulting from the Project shall be inspected for contagious tree diseases including but not limited to: <a href="#">thousand canker fungus</a> ( <i>Geosmithia morbida</i> ), <a href="#">Polyphagous Shot Hole Borer</a> ( <i>Euwallacea</i> spp.), and <a href="#">goldspotted oak borer</a> ( <i>Agrilus auroguttatus</i> ) (TCD 2020; UCANR 2020; UCIPM 2013). To avoid the spread of infectious tree diseases, diseased trees shall not be transported from the Project site without first being treated using best available management practices relevant for each tree disease observed.	Prior to Project construction and activities	City/Project Applicant
<b>MM-BIO-12- Impacts to Oak Trees and Tree Replacement</b>	Replacement oaks shall be of the same species and come from nursery stock grown from locally sourced acorns, or from acorns gathered locally, preferably from the same watershed in which they were planted.	Prior to Project construction and activities	City/Project Applicant
<b>MM-BIO-13- Oak Tree Replacement</b>	Given that the DEIR does not provide justification for how a mitigation ratio of 1:1 would adequately reduce impacts to below a level of significance while considering temporal loss, special status trees, size of trees, potential mitigation failure, etc. (see Recommendation #1 below), CDFW recommends replacing native trees, including oak trees, with at least a 3:1 ratio. CDFW also recommends replacing non-native trees with at least a 1:1 ratio with native trees.	Prior to Project construction and activities	City/Project Applicant
<b>REC-3-Ratio Justification</b>	CDFW recommends the DEIR provide adequate and complete explanation why the chosen mitigation ratio is sufficient to mitigate for permanent loss of 101 trees on site. The DEIR should address the following:  <ol style="list-style-type: none"> <li>1. How the chosen ratio accounts for impacts to trees on a species-specific level;</li> <li>2. How oaks have been mitigated at the chosen mitigation ratio given their special status;</li> </ol>	Prior to Project construction and activities	City/Project Applicant

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	<ol style="list-style-type: none"> <li>3. Whether other native or non-native tree species will be mitigated in the same way;</li> <li>4. How the chosen mitigation ratio mitigates for the temporal loss of trees;</li> <li>5. How the ratio addresses impacts to wildlife for the loss of habitat;</li> <li>6. How the mitigation addresses trees of various sizes (diameter at breast height (DBH)) as well as any potential understory vegetation; and,</li> <li>7. How the mitigation ratio addresses potential mitigation failures if replacement trees do not survive.</li> </ol>		
<b>REC-4- Recirculation</b>	CDFW recommends that the City recirculate the DEIR for more meaningful public review and assessment of the City's mitigation ratio. Additionally, the City should recirculate the DEIR if the proposed mitigation measure (i.e., 1:1 replacement ratio of oak trees) would not reduce potential effects to less than significant and new measures must be required [CEQA Guidelines, § 15073.5(b)(2)].	Prior to Project construction and activities	City/Project Applicant
<b>REC-5-Human Wildlife Interface</b>	CDFW recommends the City require the use of bear-proof trash cans for this and all new developments in the foothills. There have been sightings of black bear in the Project vicinity. Bears or mountain lions spotted in residential, suburban or urban areas should be reported to the South Coast Regional Office (858) 467-4201 or <a href="mailto:AskR5@wildlife.ca.gov">AskR5@wildlife.ca.gov</a> during normal business hours. After-hours or weekend sightings should be reported first to local police or sheriff officers, who often can respond and secure a scene quickly and then contact CDFW as needed.  CDFW considers improper storage of human food and garbage to be the primary cause of bear conflicts with humans. This requirement is necessary for the local waste management agency to provide each house these special cans. These trash cans require the use of special trucks and must be specifically	Prior to Project construction and activities	City/Project Applicant

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	<p>contracted. The City should require this development, and all individual houses, use bear-proof trash cans.</p> <p>Human interactions are one of the main drivers of mortality and increasing development and human presence in this area could increase the need for public safety removal and/or vehicle strikes of mountain lions. Therefore, any new development project should analyze the potential for mountain lion that are known to occur in the San Gabriel Mountains and their foothills and may be impacted by development and human activity in the Project area (see Comment #2).</p>		
<b>REC-6-LSAA</b>	<p>CDFW's issuance of an LSA Agreement for a Project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. As a Responsible Agency, CDFW may consider the CEQA document from the County for the Project. To minimize additional requirements by CDFW pursuant to Fish and Game Code section 1600 et seq. and/or under CEQA, the CEQA document shall fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the LSA Agreement.</p> <p>To compensate for any on- and off-site impacts to wetlands or riparian resources, additional mitigation conditioned in any LSA Agreement may include the following: erosion and pollution control measures, avoidance of resources, protective measures for downstream resources, on- and/or off-site habitat creation, enhancement or restoration, and/or protection, and management of mitigation lands in perpetuity.</p>	Prior to Project construction and activities	City/Project Applicant
<b>REC-7-Nesting Birds</b>	<p>CDFW recommends avoiding any construction activity during nesting season. If not feasible, CDFW recommends modifying BIO-1 by expanding the time period for bird and raptor nesting from February 1 through August 31 to January 1 through</p>	Prior to Project construction and activities	City/Project Applicant

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	<p>September 15. If the Project occurs between January 1 through September 15, a nesting bird and raptor survey shall be conducted as stated in BIO-1, prior to any ground-disturbing activities (e.g., staging, mobilization, grading) as well as prior to any vegetation removal within the Project site.</p> <p>It shall be noted that the temporary halt of Project activities within nesting buffers during nesting season does not constitute effective mitigation for the purposes of offsetting Project impacts associated with habitat loss. Additional mitigation would be necessary to compensate for the removal of nesting habitat within the Project site based on acreage of impact and vegetation composition. CDFW shall be consulted to determine proper mitigation for impacts to occupied habitat depending on the status of the bird species. Mitigation ratios would increase with the occurrence a California Species of Special Concern and would further increase with the occurrence of a CESA-listed species.</p>		
<b>REC-8-Data</b>	<p>CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations [Pub. Resources Code, § 21003, subd. (e)]. The City shall ensure that all data concerning special status species within the Project site be submitted to the CNDDB by completing and submitting <a href="#">CNDDB Field Survey Forms</a>. This includes all documented occurrences of Catalina mariposa lily, American badger, and Yerba mansa Herbaceous Alliance, and potential occurrences of Crotch's bumble bee, California red-legged frog, and other SSC. The City shall ensure the data has been properly submitted, with all data fields applicable filled out, prior to Project ground-disturbing activities. The data entry shall also list pending development as a threat and then update this occurrence after impacts have occurred. The City shall provide CDFW with confirmation of data submittal.</p>	Prior to Project construction and activities	City/Project Applicant

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<b>REC-9- Mitigation and Monitoring Plan</b>	Per Public Resources Code section 21081.6(a)(1), CDFW has provided the City with a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation and Monitoring Reporting Plan (MMRP; Attachment A). A final MMRP shall reflect results following additional plant and wildlife surveys and the Project's final on and/or off-site mitigation plans.	Prior to approval of CEQA document	City/Project Applicant
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A1-25  
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## Response to Comment Letter A1

Agency  
California Department of Fish and Wildlife (CDFW)  
October 1, 2021

- A1-1** The comment provides an introduction to comments that follow. The comment does not raise any specific issues related to the adequacy of the EIR.
- A1-2** The comment provides an introduction to California Department of Fish and Wildlife's (CDFW) role as a State agency and its function. The comment does not raise any specific issues related to the adequacy of the EIR.
- A1-3** The comment provides a summary of the project description and project location. The comment does not raise any specific issues related to the adequacy of the EIR.
- A1-4** The comment provides a preface to the comments that follow. The comment does not raise any specific issues related to the adequacy of the EIR.
- A1-5** The comment states that the park proposed at the southern boundary of the project site, including the pedestrian path, would increase recreational activity and access to the Bailey Canyon Wilderness Park and associated trail and is concerned with the potential increased impacts as a result.

The proposed pedestrian path and public park would be located entirely within the confines of the project site and would not substantially increase passive recreational opportunities or attract substantially greater numbers of recreationalists to the Bailey Canyon Wilderness Park. Bailey Canyon Wilderness Park has limited parking currently available at the Bailey Canyon trailhead and is already frequented by recreationalists in the region. It should be noted that the proposed park would not result in additional physical access to the Bailey Canyon Wilderness Park, as the entrance and parking lot for the Bailey Canyon Wilderness Park is located approximately 250 feet east of the from the southernmost portion of the project site. However, proposed public park's location along the southern boundary of the site provides enhanced recreational opportunities in the vicinity of the Bailey Canyon Wilderness Park to the east. In addition, the proposed sidewalk along the northern side of Carter Avenue just outside of the proposed project site, would provide pedestrian access to the entrance/parking lot of the Bailey Canyon Wilderness Park, off of Carter Avenue (see EIR Section 3.3.12, Construction, for details). These clarifications have been made to Final EIR Chapter 3, Project Description; Final EIR Section 4.11, Land Use and Planning; and Final EIR Section 4.16, Recreation. Given that the proposed on-site passive park and pedestrian path would largely serve the proposed project's residents and existing residents in the immediate neighborhood, and would not induce additional patronage to the Bailey Canyon Wilderness Park, introduction of the proposed park and on-site pedestrian pathway would not result in the degradation of habitat, adversely affect wildlife, or increase human and wildlife interaction. As such, no additional mitigation beyond that identified in the DraftEIR is required and recommended Mitigation Measures #1 through #4, and Recommendation #1, as provided by the comment, would not be required to mitigate potential impacts.

- A1-6** The comment states that the project may impact the southern California mountain lion population by temporarily and permanently increasing human presence, traffic and noise.

The project site is located adjacent to residential neighborhoods to the south and west, the Mater Dolorosa Retreat Center to the north, and the Bailey Canyon Wilderness Park to the east-northeast (which includes several miles of hiking trails to the east and northeast of the project), all of which create a substantial amount of anthropogenic disturbances in the vicinity. Female mountain lions typically avoid areas of human activity for their natal dens.<sup>2</sup> Since there is already extensive human activity in the project vicinity that currently deters mountain lion natal dens from being established here, project construction and the long-term residential housing would not create a substantial difference in the potential of the species to breed in the area. Further, as discussed in Draft EIR Section 4.4, Biological Resources, no wildlife corridor connection or habitat linkage to other large undeveloped areas to the south of the project site currently exist. The project site also lacks suitable habitat for mountain lion, contains no water resources, and is currently disturbed with compact soils, which further deters mountain lion natal dens on the site. As such, no additional mitigation beyond that identified in the EIR is required, and recommended Mitigation Measures #1 through #3, and the suggested Recommendation, as provided by the comment, would not be required to mitigate potential impacts.

**A1-7** The comment states that the project would include activities such as grading and tree removal that may result in the removal of foraging and disturbance of roosting habitat for bats. The comment also states that indirect impacts to bats and roosts could result from increased noise disturbances, human activity, dust, vegetation clearing, ground-disturbing activities and vibrations from heavy equipment.

As described in Draft EIR Section 4.4, Biological Resources, and the Biological Resources Report provided as Appendix C1 of the EIR, per the California Natural Diversity Database (CNDDB), the pallid bat would have a low potential to occur on the site because wintering and maternity roosts are not expected, and individuals would be expected to leave if the tree is disturbed, as summarized in the comment. Therefore, direct impacts as a result of tree removal, and indirect impacts associated with loss of foraging habitat, noise, dust, construction activities and human presence are unlikely and would not require mitigation. All other species of bats are not expected to occur on site due to lack of suitable habitat.

Regarding the bat surveys conducted in relation to the proposed project, the daytime surveys allowed for the site and surrounding area to be surveyed for natural (e.g., caves, cliffs with crevices, and large trees with large cavities) and unnatural (e.g., bridges and buildings with unblocked openings to internal spaces) locations capable of supporting winter and maternal roosting by bats. None of these features were identified on the project site or in the immediately adjacent areas, so maternal and winter roosting colonies are not expected. Individual bats of certain species may use the trees on site for day and nocturnal roosting, but as discussed in the Draft EIR, the individuals would be expected to leave the tree when it is disturbed and there are numerous other trees within the surrounding residential area, as well as native trees within Bailey Canyon Wilderness area, that an individual could use.

Because impacts to bats would be less than significant, no additional mitigation beyond that identified in the Draft EIR is required, and recommended Mitigation Measures #1 through #3, as provided by the comment, would not be required to mitigate potential impacts.

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<sup>2</sup> Center for Biological Diversity and the Mountain Lion Foundation. 2019. A Petition to List the Southern California/Central Coast Evolutionarily Significant Unit (ESU) of Mountain Lions as Threatened under the California Endangered Species Act (CESA). Accessed September 2021. <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=171208&inline>.

**A1-8** The comment states that removal of coast live oak trees, in addition to other trees on site would result in a potentially significant impact, and that mitigation measure MM-BIO-3 may not sufficiently mitigate impacts related to tree removal. Please see Global Response GR-2, regarding loss of trees.

Coast live oaks are not a special status species under CEQA, and there are currently no State or federal regulations in place specific to the protection of coast live oaks. However, coast live oaks are protected under the Tree Preservation and Protection Ordinance, if they exceed a diameter of four inches as measured at four and one-half feet above natural or established grade. Additionally, all of the potentially disturbed protected trees were evaluated for their potential for preservation in place or relocation. Trees identified as candidates for preservation in place and relocation typically exhibit good health (new growth and vigor) and structure (trunk/branching); have no uncorrectable, outwardly detectable defects; and show no signs or symptoms of serious pest infestation or species-specific pathogens. Based on the on-site trees' health, structure, observable defects, and tree location, three trees are considered potential candidates for relocation. As discussed in Draft EIR Section 4.4.5, Impacts Analysis, in Section 4.4, Biological Resources, it is possible that some trees would be preserved at the project site. However, to provide a conservative analysis, per Final EIR Section 4.4.5, it has been assumed that all 105 trees, 14 of which are considered protected trees under the City Tree Preservation and Protection Ordinance, would be removed as part of the project. It should be noted that the City's ordinance does not require tree relocation. In addition, there is no guarantee that relocated trees will remain in good health and be viable plant material to be planted back into the landscape after transplanting. As discussed in Draft EIR Section 4.4.5, according to the City's Tree Preservation and Protection Ordinance, any protected tree located on the project site that requires removal must be replaced on a one-to-one basis with a like species. The City's Tree Preservation and Protection Ordinance identifies tree replacement requirements for tree removal associated with a development project, such as the proposed project. In addition, 10 trees located within the off-site improvement area will have direct impacts as construction is anticipated within the tree protection zone. Thus, due to removal of 14 protected trees on-site and direct impacts 10 additional protected trees, the project would result in potentially significant impacts (Impact BIO-3). Implementation of MM- BIO-3, Protected Tree Replacement, would reduce the impacts to the City's protected trees to less than significant by requiring the 1:1 replacement of those protected trees impacted by development and conducting a 5-year monitoring program to ensure their continued viability as well as requiring an arborist to be present on-site during the proposed widening of Carter Avenue. The proposed landscape plan would incorporate more trees on-site compared to existing conditions. In addition, the proposed project would implement MM-BIO-1, Nesting Bird Avoidance, which would reduce impacts related to nesting birds during vegetation clearing, such as tree removal. Therefore, although the project will require the removal of 105 trees, through compliance with the City's Tree Preservation and Protection Ordinance (per MM-BIO-3), and implementation of the proposed landscape plan, that will provide for the replacement of the removed trees such that the overall number of trees will exceed existing conditions, impacts to existing protected trees would be less than significant, and no additional mitigation would be required to reduce impacts.

**A1-9** The comment states that removal of coast live oak trees, in addition to other trees on site, could impact wildlife that use the trees for habitat. As stated in Draft EIR Section 4.4, mitigation measure MM-BIO-1 would provide for construction-related avoidance of nesting birds during the nesting season. If construction activities must be initiated during the migratory bird-nesting season, an avian nesting survey of the project site and contiguous habitat within 500 feet of all impact areas must be conducted

for protected migratory birds and active nests. The avian nesting survey shall be performed by a qualified wildlife biologist within 72 hours prior to the start of construction in accordance with the Migratory Bird Treaty Act and California Fish and Game Code. If an active bird nest is found, the nest shall be flagged and mapped on the construction plans along with an appropriate no disturbance buffer, which shall be determined by the biologist based on the species' sensitivity to disturbance (typically 50 feet for common, urban-adapted species, 300 feet for other passerine species, and 500 feet for raptors and special-status species). The nest area shall be avoided until the nest is vacated and the juveniles have fledged. The nest area shall be demarcated in the field with flagging and stakes or construction fencing. A qualified biologist (with the ability to stop work) shall serve as a construction monitor during those periods when construction activities will occur near active nest areas to ensure that no inadvertent impacts on these nests occur. Other species such as bats are not expected to occur on site. Additionally, the pallid bat is anticipated to have a low potential to occur on site; therefore, no mitigation is required specific to pallid bat and impacts related to tree removal.

- A1-10** The comment states that removal of coast live oak trees, in addition to other trees on site, could result in the spread of insect pests and disease, thus affecting other trees in the vicinity. As disclosed in the Arborist Report prepared for the project, provided as Appendix C2 of the EIR, all of the potentially disturbed protected trees were evaluated for their potential for preservation in place or relocation. Trees identified as candidates for preservation in place and relocation typically exhibit good health (new growth and vigor) and structure (trunk/branching); have no uncorrectable, outwardly detectable defects; and show no signs or symptoms of serious pest infestation or species-specific pathogens. As analyzed in the Arborist Report (Appendix C2) and Final EIR Section 4.4.1, Existing Conditions, the trees include various trunk and branch maladies and health and structural conditions. As presented in Appendix A of Appendix C2, 32.5% of the individually mapped trees (38 trees) exhibit good health; 45.8% (53 trees) are in fair health; and 22.2% (26 trees) are in poor health. Structurally, 13.7% (16 trees) of the individually mapped trees are considered to exhibit good structure, 70.1% (82 trees) exhibit fair structure; and 16.2% (19 trees) have poor structure. The trees in good condition exhibit acceptable vigor, healthy foliage, and adequate structure, and lack any major maladies. Trees in fair condition are typical, with few maladies but declining vigor. Trees in poor condition exhibit declining vigor, unhealthy foliage, poor branch structure, and excessive lean. No pests or pathogens were observed on site. Therefore, based on the comprehensive arborist evaluation of the trees on site, the spread of pests, disease or pathogens would not occur as a result of tree removal, and no mitigation would be required.
- A1-11** The comment states that removal of coast live oak trees, in addition to other trees on site would result in a potentially significant impact, and that mitigation measure MM-BIO-3 may not sufficiently mitigated for impacts related to tree removal. Please refer to Response to Comment A1-8 and Global Response GR-2.
- A1-12** The comment states that removal of coast live oak trees, in addition to other trees on site, could impact wildlife that use the trees for habitat. Please refer to Response to Comment A1-9 and Global Response GR-2.
- A1-13** The comment states that removal of coast live oak trees, in addition to other trees on site, could result in the spread of insect pests and disease, thus affecting other trees in the vicinity. There is no indication that removal of trees could result in increased pests and disease at the project site. Please refer to Response to Comment A1-10.

- A1-14** The comment states that removal of coast live oak trees, in addition to other trees on site, could impact wildlife that use the trees for habitat. Please refer to Response to Comment A1-9.
- The comment also references the Los Angeles County Oak Tree Ordinance; however, the project is not subject to County policies, but is required to comply with the City of Sierra Madre Tree Preservation and Protection Ordinance. Please refer to Response to Comment A1-8 and Global Response GR-2. Moreover, coast live oaks are not a special status species under CEQA, and there are currently no State or federal regulations in place specific to the protection of coast live oaks.
- A1-15** The comment states that removal of coast live oak trees, in addition to other trees on site, could result in the spread of insect and/or disease pathogens, thus affecting other trees in the vicinity. There is no indication that removal of trees could result in increased pests and disease at the project site. Please refer to Response to Comment A1-10.
- A1-16** The comment suggests adding provided mitigation measures along with two recommendations to further mitigate impacts associated with tree removal. For reasons provided in Responses to Comments A1-1 through A1-15, and Global Response GR-2, and as disclosed in the comprehensive site-specific arborist evaluation performed for the project site (provided as Appendix C2 of the Final EIR) as well as the biological resources technical report (provided as Appendix C1 of the Draft EIR) and summarized in Final EIR Section 4.4, impacts associated with tree removal have been fully analyzed and adequate mitigation has been provided to reduce impacts to a level below significance. No additional mitigation measures would be required to mitigate impacts relative to tree removal.
- A1-17** The comment states that due to the project location, human presence and food waste could attract bears and mountain lions to the site, thus increasing the threat of human-wildlife interface. The project is located adjacent to residential neighborhoods to the south and west, the Mater Dolorosa Retreat Center to the north, and the Bailey Canyon Wilderness Park to the east-northeast, which have associated human presence and potential for food waste that could lead to human-wildlife interactions. Project construction and the long-term residential housing would not create a substantial increase in the potential of human-wildlife interactions based upon the existing use of the adjacent areas by humans. See also Response to Comment A1-6.
- A1-18** The comment states the potential increase of human-wildlife interaction could result in the need for public safety removal and/or vehicle strikes of mountain lions. Please see Responses to Comment A1-17 and A1-6.
- A1-19** The comment states that the introduction of stormwater conveyance facilities on site could result in the need to obtain a Lake and Streambed Alteration agreement from CDFW. As stated in the comment, no watercourses or wetlands were identified on the project site; therefore, no impacts to jurisdictional resources would occur, including any potential watercourses or wetlands that may be subject to CDFW jurisdiction. As such, a Lake and Streambed Alteration agreement would not be required. Additionally, stormwater facilities constructed as part of the project would collect and convey stormwater to the City's stormwater conveyance system in accordance with local, state, and federal stormwater standards and requirements.
- A1-20** The comment expresses concerns regarding impacts to nesting birds, and requests that the avoidance period for nesting birds be extended. The comment requests that the time period for bird and raptor nesting be changed from February 1 – August 31 to January 1 – September 15.

While this revision is not required to reduce potentially significant impacts to a level of less than significant, this change has been made to MM-BIO-1, in Final EIR Section 4.4.6, Mitigation Measures, of Section 44, Biological Resources.

- A1-21** The comment states that any special status species detected on the project site would need to be disclosed and populated on the CNDDDB Field Survey Forms to be incorporated in CDFW's database of known special status specie occurrences. Per the results of the biological resources analysis, including all focused and site-specific biological surveys conducted for the proposed project, no special status species were detected or identified on the project site; therefore, no entries into this database would be made.
- A1-22** The comment states that recommended mitigation provided as part of this comment letter should be incorporated in the project's Mitigation, Monitoring and Reporting Program (MMRP), including the MMRP provided as part of the comment letter (see Response to Comment A1-45). As stated in Responses to Comments A1-1 through A1-21, all potential impacts to biological resources have been identified in Draft EIR Section 4.4.6, and mitigation measures MM-BIO-1 through MM-BIO-3 would adequately mitigate potentially significant impacts to a level that is less than significant, and no additional mitigation would be required.
- A1-23** The comment accurately states that a filing fee to CDFW would be required as part of the proposed project's permit and entitlement process. The filing fee would be paid upon filing of the Notice of Determination by the City for the project.
- A1-24** The comment includes concluding remarks. The comment does not raise any specific environmental issues related to the adequacy of the Draft EIR.
- A1-25** The comment includes the recommended mitigation measures in the form of an MMRP. Please see Response to Comment A1-22.



Comment Letter T1

**From:** Gabrieleno Administration [<mailto:admin@gabrielenoindians.org>]  
**Sent:** Wednesday, September 22, 2021 9:20 AM  
**To:** Vincent Gonzalez <[vgonzalez@cityofsierramadre.com](mailto:vgonzalez@cityofsierramadre.com)>  
**Cc:** Andy Salas <[chairman@gabrielenoindians.org](mailto:chairman@gabrielenoindians.org)>  
**Subject:** AB52 Consultation-Meadows at Baily Canyon project at 700 N Sunnyside Ave in the City of SierraMadre

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Dear Vincent,

Thank you for your time during the AB52 consultation for the Meadows at Baily Canyon project at 700 N Sunnyside Ave in the City of Sierra Madre.

The information provided herein is to be kept confidential as part of AB52 which requires that any information – not just documents – submitted by a California Native American tribe during the environmental review process to not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public consistent with Gov. Code Sections 6254, subd.(r) and 6254.10. (Pub. Resources Code § 21082.3, subd. (c)(1)). We ask that the information be included and kept in a confidential appendix to be mentioned in the public document but not included. This confidential appendix shall be available for use to those associated to the project but no entity outside of the project.

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T1-2  
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[REDACTED]

Therefore, to avoid impacting or destroying Tribal Cultural Resources that may be inadvertently unearthed during the project's ground disturbing activities and pursuant to our consultation, we have provided to the Lead Agency substantial evidence that the proposed project may have a significant impact on our TCRs. . . "tribal cultural resources" are defined as (1) "sites, features, places, cultural landscapes, sacred places and objects with cultural value to a California Native American tribe" that are included in the state or local register of historical resources or that are determined to be eligible for inclusion in the state register; and (2) resources determined by the lead agency, in its discretion, to be significant on the basis of criteria for listing in the state register of historical resources. Pub Res C §21074(a). A lead agency's determination whether a resource meets the criteria for listing in the state register must be supported by substantial evidence and must consider the significance of the resource to the tribe. Pub Res C §21074(a)(2). A "cultural landscape" may qualify as a tribal cultural resource to the extent it is "geographically defined in terms of the size and scope of the landscape." Pub Res C §21074(b) Moreover, Public Resources Code ("PRC") Section 21084.2 states that "[a] project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment." A project that may have a significant effect on the environment requires appropriate mitigation. (PRC § 21082.3(b).) Through the consultation process, AB 52 authorized California Native American tribes to assist lead agencies in identifying, interpreting, and determining the significance of TCRs. (See AB 52, Legislative Digest.) Unless the environmental document includes protective measures agreed on during the consultation process, "if substantial evidence demonstrates" the project "will cause" a significant effect to a TCR, the agency must "consider" feasible mitigation measures "pursuant to" Pub Res C §21084.3(b).

T1-3

As well, Consultation is not deemed concluded for purposes of CEQA until the parties agree to measures to mitigate or avoid a significant effect on a tribal cultural resource, or when a party concludes, after a reasonable effort, that mutual agreement cannot be reached. (PRC §21080.3.2(b).) Any mitigation measures agreed on during the consultation process must be recommended by lead agency staff for inclusion in the environmental document and the mitigation monitoring and reporting program for the project pursuant to section 21082.3(a) of the PRC. Moreover, now that consultation has begun, as the lead agency, you may certify an EIR or adopt a mitigated negative declaration for the subject project (which may have a significant impact on a tribal cultural resource ) only after consultation has concluded. (PRC §21082.3(d).)

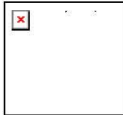
As part of the consultation, we have requested any and all information that the lead agency may possess or has access to attain regarding the history of the subsurface soils that will be impacted as part this project's ground disturbance activities. The key information we are requesting is information about whether the "original" soils of the project location have been "removed" and "replaced" by new soils (e.g. engineered, cleaned, imported) or have the original soils just

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been excavated, placed onsite and then "backfilled" into the same location. If documents exist about the original soils having been removed from the project's footprint and all new construction will be within soils that do not contain the original soils, our concerns for ground disturbance activities are reduced. In the absence of documentation or if it is known the original soils are still present within the project footprint, protective measures shall be created and implemented.

Please find attached the proposed mitigation measures for the subject project. Once you have reviewed them, please provide written notification to the Tribe stating whether and to what extent you will include and require the proposed mitigations for TCR for the subject project so that we may conclude our consultation, and if you do not agree with the mitigations as proposed, so that we may continue our consultation discussions in an effort to reach an agreement.

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



*The region where Gabrieleño culture thrived for more than eight centuries encompassed most of Los Angeles County, more than half of Orange County and portions of Riverside and San Bernardino counties. It was the labor of the Gabrieleño who built the missions, ranchos and the pueblos of Los Angeles. They were trained in the trades, and they did the construction and maintenance, as well as the farming and managing of herds of livestock. "The Gabrieleño are the ones who did all this work, and they really are the foundation of the early economy of the Los Angeles area ". "That's a contribution that Los Angeles has not recognized--the fact that in its early decades, without the Gabrieleño, the community simply would not have survived."*

↑  
T1-3  
Cont.



GABRIELEÑO BAND OF MISSION INDIANS - KIZH NATION



Mitigation Measures Proposed to Reduce Adverse Project Impacts to Tribal Cultural Resources

Subject: The Meadows at Baily Canyon located at 700 N Sunnyside Ave in the City of Sierra Madre

[Redacted text block]

T1-4

The California Environmental Quality Act ("CEQA") (among other applicable local, state and/or federal statutes and regulations) define the Kizh's Native American tribal, ancestral, cultural, religious, and historical knowledge about the project location as "expertise" regarding the project area, and the presence of places of significance to the Tribe, as well as the likely presence of TCRs on the project site (and any off-site project locations) *This information, knowledge, and data (as well as information from other relevant sources) that the Tribe confidentially shared with you during consultation constitutes substantial evidence that supports your adoption of the proposed TCR mitigation measures.*

T1-5

GABRIELEÑO BAND OF MISSION INDIANS - KIZH NATION | CRM | GABRIELEÑO v.7

CEQA amendments that became effective in 2015 made TCRs a separate and independent factor for consideration. In doing so, the Legislature deemed an ancestrally affiliated tribe's expertise to be essential to protecting TCRs, and to their competent and accurate identification – information considered to be legally necessary for a lead agency's evaluation of a proposed project's impacts to TCRs, project alternatives, avoidance, and whether mitigation measures would sufficiently reduce the adverse impacts.

Accordingly, the expertise that satisfies the lead agency's environmental evaluation of the project is exclusively the Kizh's because we are the tribe that is ancestrally affiliated with the project area. Our expertise cannot be replaced or substituted by an environmental consultant (i.e., archaeologist, paleontologist, historian, etc.). It follows then that our Tribe's expertise can neither be replaced or substituted by a non-ancestrally affiliated tribe or group, nor can the mitigation measures be carried out by a non-Kizh trained representative. As explained by the Office of Planning and Research Guidelines on AB 52, a critical element to mitigating a project's impacts on TCRs is to ensure *from the ancestrally affiliated Native American Tribe's point of view*, that any discovered TCRs or human remains are treated respectfully, and protected from disturbance and/or destruction.

That said, we request that you, as the project lead agency: (1) adopt and fully enforce the proposed TCR mitigation measures, which shall apply with the first phase of project activity that involves ground-disturbing activity; (2) include the mitigation measures in the project mitigation monitoring and reporting plan ("MMRP") (as required by CEQA); (3) adopt *and* fully enforce the proposed mitigation measures as conditions of project approval ("COA"); and (4) take any/all steps necessary to correct any instance of project non-compliance, any breach of a TCR mitigation measures, and/or TCR-related COA.

The Tribe's expertise of the project area and the likely presence of cultural resources there, the Tribe has determined and thus advises you that the proposed TCR mitigation measures (set forth below) are necessary to reduce (not eliminate) the project's adverse impacts to the Tribe's TCRs to a level that may be considered "less than significant," as required by CEQA (as well as other applicable statutes and guidelines). It is the Tribe's expert opinion that project approval without the proposed TCR mitigation measures will result in significant and irreparable harm to the Kizh's cultural, religious, and historical artifacts, ancestral remains, burial goods, and/or places of ceremonial/cultural significance.

T1-5  
Cont.

T1-6

GABRIEL BAND OF MISSOURI AND KANSAS NATIVE AMERICANS

PROPOSED TRIBAL CULTURAL RESOURCES MITIGATION MEASURES FOR THE  
GABRIELEÑO BAND OF MISSION INDIANS – KIZH NATION

TCR-1: Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities

- A. The project applicant/lead agency shall retain a Native American monitor from (or approved by) the Gabrieleño Band of Mission Indians – Kizh Nation (the “Kizh” or the “Tribe”) - the direct lineal descendants of the project location. The monitor shall be retained prior to the commencement of any “ground-disturbing activity” for the subject project, at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). “Ground-disturbing activity” includes, but is not limited to, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.
- B. A copy of the executed monitoring agreement shall be provided to the lead agency prior to the earlier of the commencement of any ground-disturbing activity for the project, or the issuance of any permit necessary to commence a ground-disturbing activity.
- C. The project applicant/developer shall provide the Tribe with a minimum of 30 days advance written notice of the commencement of any project ground-disturbing activity so that the Tribe has sufficient time to secure and schedule a monitor for the project.
- D. The project applicant/developer shall hold at least one (1) pre-construction sensitivity/educational meeting *prior to the commencement of any ground-disturbing activities*, where at a senior member of the Tribe will inform and educate the project’s construction and managerial crew and staff members (including any project subcontractors and consultants) about the TCR mitigation measures and compliance obligations, as well as places of significance located on the project site (if any), the appearance of potential TCRs, and other informational and operational guidance to aid in the project’s compliance with the TCR mitigation measures.
- E. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or “TCR”), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project applicant/lead agency upon written request.
- F. Native American monitoring for the project shall conclude upon the latter of the following: (1) written

T1-7

GABRIELEÑO BAND OF MISSION INDIANS - KIZH NATION | CRM - GA - 05/17

confirmation from a designated project point of contact to the Tribe that all ground-disturbing activities and all phases that may involve ground-disturbing activities on the project site and at any off-site project location are complete; or (2) written notice by the Tribe to the project applicant/lead agency that no future, planned construction activity and/or development/construction phase (known by the Tribe at that time) at the project site and at any off-site project location possesses the potential to impact TCRs.

T1-7  
Cont.

TCR-2: Discovery of TCRs, Human Remains, and/or Grave Goods

- A. Upon the discovery of a TCR, all construction activities in the immediate vicinity of the discovery (i.e., not less than the surrounding 50 feet) shall cease. The Tribe shall be immediately informed of the discovery, and a Kizh monitor and/or Kizh archaeologist will promptly report to the location of the discovery to evaluate the TCR and advise the project manager regarding the matter, protocol, and any mitigating requirements. No project construction activities shall resume in the surrounding 50 feet of the discovered TCR unless and until the Tribe has completed its assessment/evaluation/recovery of the discovered TCR and surveyed the surrounding area.
- B. The Tribe will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate in its sole discretion, and for any purpose the Tribe deems appropriate, including but not limited to, educational, cultural and/or historic purposes.
- C. If Native American human remains and/or grave goods are discovered or recognized on the project site or at any off-site project location, then all construction activities shall immediately cease. Native American "human remains" are defined to include "an inhumation or cremation, and in any state of decomposition or skeletal completeness." (Pub. Res. Code § 5097.98 (d)(1).) Funerary objects, referred to as "associated grave goods," shall be treated in the same manner and with the same dignity and respect as human remains. (Pub. Res. Code § 5097.98 (a), d)(1) and (2).)
- D. Any discoveries of human skeletal material or human remains shall be immediately reported to the County Coroner (Health & Safety Code § 7050.5(c); 14 Cal. Code Regs. § 15064.5(e)(1)(B)), and all ground-disturbing project ground-disturbing activities on site and in any other area where the presence of human remains and/or grave goods are suspected to be present, shall immediately halt and remain halted until the coroner has determined the nature of the remains. (14 Cal. Code Regs. § 15064.5(e).) If the coroner recognizes the human remains to be those of a Native American or has reason to believe they are Native American, he or she shall contact, within 24 hours, the Native American Heritage Commission, and Public Resources Code Section 5097.98 shall be followed.
- E. Thereafter, construction activities may resume in other parts of the project site at a minimum of 200 feet away from discovered human remains and/or grave goods, if the Tribe determines in its sole discretion that resuming construction activities at that distance is acceptable and provides the project

T1-8

GABRIEL BAND OF MISSONDIANS-KIZH NATON| CRM | GA | ONSv.7

manager express consent of that determination (along with any other mitigation measures the Tribal monitor and/or archaeologist deems necessary). (14 Cal. Code Regs. § 15064.5(f).)

- F. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or grave goods.
- G. Any historic archaeological material that is not Native American in origin (non-TCRs) shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, it shall be offered to a local school or historical society in the area for educational purposes.
- A. Any discovery of human remains and/or grave goods discovered and/or recovered shall be kept confidential to prevent further disturbance.

T1-8  
Cont.

TCR-3: Procedures for Burials, Funerary Remains, and Grave Goods:

- B. As the Most Likely Descendant (“MLD”), the Koo-nas-gna Burial Policy shall be implemented for all discovered Native American human remains and/or grave goods. Tribal Traditions include, but are not limited to, the preparation of the soil for burial, the burial of funerary objects and/or the deceased, and the ceremonial burning of human remains.
- C. If the discovery of human remains includes four (4) or more burials, the discovery location shall be treated as a cemetery and a separate treatment plan shall be created.
- D. The prepared soil and cremation soils are to be treated in the same manner as bone fragments that remain intact. Associated “grave goods” (aka, burial goods or funerary objects) are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later, as well as other items made exclusively for burial purposes or to contain human remains. Cremations will either be removed in bulk or by means necessary to ensure complete recovery of all sacred materials.
- E. In the case where discovered human remains cannot be fully recovered (and documented) on the same day, the remains will be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard should be posted outside of working hours. The Tribe will make every effort to divert the project while keeping the remains in situ and protected. If the project cannot be diverted, it may be determined that burials will be removed.
- F. In the event preservation in place is not possible despite good faith efforts by the project applicant/developer and/or landowner, before ground-disturbing activities may resume on the project site, the landowner shall arrange a designated site location within the footprint of the project for the respectful reburial of the human remains and/or ceremonial objects. The site of

T1-9

GABRIELINO BAND OF MISSION INDIANS - KAZAHTON|CRM|GANSV.7



reburial/repatriation shall be agreed upon by the Tribe and the landowner, and shall be protected in perpetuity.

- G. Each occurrence of human remains and associated grave goods will be stored using opaque cloth bags. All human remains, grave goods, funerary objects, sacred objects and objects of cultural patrimony will be removed to a secure container on site if possible. These items will be retained and shall be reburied within six months of recovery.
- H. The Tribe will work closely with the project’s qualified archaeologist to ensure that the excavation is treated carefully, ethically and respectfully. If data recovery is approved by the Tribe, documentation shall be prepared and shall include (at a minimum) detailed descriptive notes and sketches. All data recovery data recovery-related forms of documentation shall be approved in advance by the Tribe. If any data recovery is performed, once complete, a final report shall be submitted to the Tribe and the NAHC. The Tribe does NOT authorize any scientific study or the utilization of any invasive and/or destructive diagnostics on human remains.

T1-9  
Cont.

CONFIDENTIALITY: These TCR mitigation measures are the property of the Kizh and shall not be duplicated, reproduced, republished, or otherwise used for the benefit of any third party without the Kizh’s prior written consent. The information the Tribe shares during consultation is the confidential information of the Kizh and is not relevant, applicable, or transferable to any other Native American tribe or group.

PLEASE NOTE: Consistent with AB 52/SB 18, the Tribe shared substantial evidence during the formal consultation for this project as well as subsequent communications (if any). It is the Tribe’s understanding that as the lead agency for this project: (1) you agree to the proposed TCR mitigation measures enumerated above, and (2) that the proposed mitigations will be included in any environmental document adopted for the subject project. If any changes, revisions, omissions, or additions are made to the TCR mitigations set forth above, please provide written notice to the Tribe via email at [admin@gabrielenoindians.org](mailto:admin@gabrielenoindians.org) within ten (10) calendar days of our consultation. For any such notice, please include as the subject line, the name of the project, the City, and the phrase “MITIGATION NOTIFICATION.”

T1-10

If you have any questions, please contact our office at (626) 521-5827 or [chairman@gabrielenoindians.org](mailto:chairman@gabrielenoindians.org). Thank you in advance for your anticipated cooperation.

Consultation Date: \_\_\_\_\_

GABRIELINO BAND OF MISSION INDIANS - KIZH NATION | CRM | GAO | 05/17

GABRIELEÑO BAND OF MISSION INDIANS – KIZH NATION – ANCESTRAL TRIBAL TERRITORY



T1-11

**South Central Coastal Information Center**

California State University, Fullerton  
Department of Anthropology MH-426  
800 North State College Boulevard  
Fullerton, CA 92834-6846  
657.278.5395 / FAX 657.278.5542  
[sccic@fullerton.edu](mailto:sccic@fullerton.edu)

*California Historical Resources Information System  
Orange, Los Angeles, San Bernardino, and Ventura Counties*

[Redacted text block]

T1-12



Mr. Andrew Salas  
Tribal Chairman  
Kizh Tribal Office/Kizh Resources Management  
910 N. Citrus Avenue  
Covina, CA 91722

August 22, 2018

Re: proper CRM monitoring of properties

Dear Chairman Salas,

[Redacted text block]

T1-13

Sincerely yours,

A handwritten signature in cursive script that reads 'Gary Stickel'.

Gary Stickel, Ph.D.  
Principal Consulting Archaeologist  
Environmental Research Archaeologists:  
a Scientific Consortium

845 South Windsor Blvd., No. 1, Los Angeles, CA 90005  
Phone: (323) 937-6997; Email: dregarystickel@att.net



**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

**Assembly Bill No. 52**

**Section. 4.** Section 21074 is added to the Public Resources Code, to read:

**21074.** (a) "Tribal cultural resources" are either of the following:

(1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:

(A) Included or determined to be eligible for inclusion in the California Register of Historical Resources.

(B) Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.

(2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

(b) A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.

(c) A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a "nonunique archaeological resource" as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms with the criteria of subdivision (a).

T1-14

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.org](http://www.gabrielenoindians.org)

admin@gabrielenoindians.org

→ **Frank@NAHC Li...** Monday   
To: Gabrieleno Indians [Details](#)

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T1-15

## Response to Comment Letter T1

**Tribal Government  
Gabrieleño Band of Mission Indians- Kizh Nation  
September 22, 2021**

**T1-1** The comment acknowledges previous consultation between the City and the Gabrieleño Band of Mission Indians - Kizh Nation (Tribe) performed for the proposed project in accordance with Assembly Bill (AB) 52. The comment requests that information provided as part of this comment letter be kept confidential, and not included in the publicly disclosed portions of this Final EIR in accordance with California Government Code sections 6254(r) and 6254.10 and Public Resources Code section 21082.3(c)(1). The City will keep sensitive information presented within the comment letter and its attachments as part of an additional confidential appendix to this Final EIR (Confidential Appendix I2, Gabrieleño Band of Mission Indians - Kizh Nation Additional Confidential Information).

**T1-2** The comment cites Public Resource Code section 21080.3.1(a) and notes that the Tribe's affiliation with the project site means it has expertise concerning tribal cultural resources and the potential for project activities to impact those resources. The comment states that subsurface ground disturbance activities could impact tribal cultural resources. As such, the comment introduces confidential tribal archive information which has been included as Final EIR Confidential Appendix I2. The comment concludes that there is a high potential for project construction to impact tribal cultural resources.

**T1-3** This comment summarizes the tribal consultation process required under AB 52. As described in Draft EIR Section 4.18, Tribal Cultural Resources, the City and the Gabrieleño Band of Mission Indians - Kizh Nation engaged in the formal AB 52 consultation process prior to the release of the Draft EIR for public review. The City contacted all NAHC-listed traditionally geographically affiliated tribal representatives, including representatives of the Gabrieleño Band of Mission Indians - Kizh Nation, on March 30, 2021, to notify them of the proposed project, and invite them to consult under AB 52. The Gabrieleño Band of Mission Indians - Kizh Nation responded to the City's notification letter on April 5, 2021 with a request to engage in formal consultation. The City held a virtual meeting with the Gabrieleño Band of Mission Indians-Kizh Nation on May 20, 2021 to consult, and consultation between the City and the Tribe continued following that meeting. However, on July 15, 2021, after both the City and the Tribe agreed on the potential for the project to impact tribal cultural resources, and agreed on mitigation measures to reduce those impacts to a level of less than significant, the City concluded its consultation with the Gabrieleño Band of Mission Indians - Kizh Nation. The mitigation measures agreed upon by the City and the Tribe during formal consultation were included in the Draft EIR. The Draft EIR concluded that with incorporation of the measures agreed upon by the Tribe during the formal consultation process, impacts to tribal cultural resources would be reduced to less than significant.

The comment also states that the Tribe has requested any and all information that the City possesses or has access to regarding the history of the subsurface soils that will be impacted as part of the project's ground disturbance activities. On May 21, 2021, the City provided a copy of the Geotechnical Report prepared for the project to the Tribe, per the Tribe's request (see Confidential Appendix I1). As described in Draft EIR Chapter 3, Project Description, project-related grading would include 3,528 cubic yards of import. Similarly, Draft EIR Sections 4.7, Geology and Soils and 4.9, Hazards and Hazardous Materials, analyze the project site's existing soil conditions. For example, the project site was used for historical agricultural uses between 1938 and 2005; however, no further investigation or excavation is

recommended based on the analysis contained in Draft EIR Appendix F1, Phase I and Phase II Environmental Site Assessment (ESA). Additionally, the site contains artificial fill and terrace deposits, which underlie the project site and can be located from 5 to 18 feet below ground surface. Moreover, the project includes project design features PDF-GEO-1 through PDF-GEO-15, which describe proposed construction activities such as cut and fill grading activities, fill placement, and utility trenching and backfill. Finally, the comment introduces the Tribe's specific request for mitigation measures to reduce the project's potential impacts to tribal cultural resources. See Responses to Comments T1-5 through T1-15, below.

**T1-4** This comment describes the Tribe's affiliation with the project site and states that ground-disturbing project activities have the potential to impact tribal cultural resources. The comment includes confidential tribal archive information which has been included as Final EIR Confidential Appendix I2.

**T1-5** This comment notes that the Tribe's affiliation with the project site means it has expertise concerning tribal cultural resources, the potential for project activities to impact those resources, and appropriate mitigation measures to reduce the potential for impacts.

**T1-6** This comment requests that the Tribe's proposed mitigation measures be adopted by the City, included in the MMRP for the project, and made fully enforceable through project conditions of approval. See Responses to Comments T1-7 through T1-9, below, regarding the Tribe's proposed mitigation measures.

See also Response to Comment T1-3, above, regarding the initiation and conclusion of formal AB 52 consultation with the Tribe. Formal consultation with the Tribe concluded on July 15, 2021, this comment letter was received outside of the AB 52 consultation period. However, this letter has been responded to as a comment on the Draft EIR. Potential impacts to tribal cultural resources have been fully mitigated based on the inclusion of measures identified by the tribe during the AB 52 consultation process that was initiated by the City and concluded in accordance with the requirements of the law. As discussed in Draft EIR Section 4.18, with implementation of mitigation measure MM-TCR-1, impacts would be less than significant.

**T1-7** This comment proposes minor modifications to mitigation measure MM-TCR-1, Native American Monitoring, which was previously agreed to by the City and the Tribe during formal AB 52 consultation, included in the Draft EIR, and determined to reduce impacts to tribal cultural resources to a less than significant level. These minor modifications include expanding the types of ground disturbing activities applicable to this measure, specifying the timeline for monitoring, the addition of a pre-construction sensitivity/education meeting (similar to existing MM-CUL-1, found in Draft EIR Section 4.5.6, Mitigation Measures, of Section 4.5, Cultural Resources), and details for monitoring implementation and reporting. These minor modifications to MM-TCR-1, in Final EIR Section 4.16.6, Mitigation Measures, of Section 4.18, Tribal Cultural Resources, do not change the analysis or determination included in the Draft EIR's evaluation of potential impacts to tribal cultural resources, nor do they result in any new or different impacts than those previously disclosed. Thus, in response to the Tribe's request, the City has revised MM-TCR-1 and incorporated the revised measure into Final EIR Section 4.18. These revisions do not constitute a substantial change to the Draft EIR or require recirculation. It should also be noted that impacts to tribal cultural resources have been fully mitigated through the identification of measures during the AB 52 consultation that has been concluded and handled properly by the City. As discussed in Draft EIR Section 4.18, with implementation of mitigation measure MM-TCR-1, impacts to tribal cultural resources would be less than significant.



**T1-8** This comment proposes a new mitigation measure, MM-TCR-2, Discovery of TCRs, Human Remains, and/or Grave Goods. As described in Response to Comment T1-7, MM-TCR-1 was previously agreed to by the City and the Tribe during formal AB 52 consultation, included in the Draft EIR, and was found to reduce impacts to tribal cultural resources to a less than significant level. In addition, as discussed in Draft EIR Section 4.5.5, Impacts Analysis, in Section 4.5, Cultural Resources, with implementation of MM-CUL-4, impacts to human remains would be less than significant. The Tribe proposes modifications related to a decrease in the radius for discovery of tribal cultural resources from 100 feet to 50 feet. However, instead of adopting a new mitigation measure, the City has revised existing mitigation measure MM-TCR-1, Native American Monitoring, to include a smaller footprint (100 feet to 50 feet) for construction activities to cease upon the discovery of a tribal cultural resource. These minor modifications to MM-TCR-1, found in in Final EIR Section 4.16.6, do not change the analysis or determination included in the Draft EIR's evaluation of potential impacts to tribal cultural resources, nor does it result in any new or different impacts than those previously disclosed.

In addition, the Tribe proposes changes to also include a larger footprint (100 feet to 200 feet) to stop construction activities if human remains are to be discovered as well as stipulations to preserve discovered human remains in place and guidance on treatment of historic archaeological materials that are not of Native American origin. These proposed modifications are infeasible or outside of the Tribe's purview for purposes of consultation under AB 52. For example, a 200-foot footprint to stop construction activities is excessive and infeasible for project implementation as it would significantly interfere with construction of the proposed project and would not be required or necessary to avoid or lessen impacts to unanticipated discoveries of tribal cultural resources. The treatment of human remains is set forth in Public Resources Code Section 5097.98, and recommendations on the treatment and disposition of human remains are the responsibility of the most likely descendant who is designated by the Native American Heritage Commission and, as such, while the City has considered this request, it will adhere to and comply with the requirements of Public Resources Code Section 5097.98 with respect to the treatment and disposition of human remains, and will respectfully decline to incorporate these modifications. Similarly, whether human remains should be preserved in place should be determined by the most likely descendant designated by the Native American Heritage Commission. With respect to historic archaeological material that is not Native American in origin, the City respectfully declines as cultural resources have been addressed in Draft EIR Section 4.5.

Thus, in response to the Tribe's request, the City has included some modifications to MM-TCR-1 and incorporated the changes to this measure into Final EIR Section 4.18. These revisions do not constitute a substantial change to the Draft EIR or require recirculation and impacts to tribal cultural resources would remain less than significant.

**T1-9** This comment proposes a new mitigation measure, MM-TCR-3, Procedures for Burials, Funerary Remains, and Grave Goods. As described in Response to Comment T1-7, above, MM-TCR-1 was previously agreed to by the City and the Tribe during formal AB 52 consultation, included in the Draft EIR, and found to reduce impacts to tribal cultural resources to a less than significant level. The Tribe proposes modifications to tribal cultural resource mitigation to include additional provisions for discovery of Native American human remains and/or grave goods. However, the suggested provisions included in proposed MM-TCR-3 are addressed by existing State law and carried out through consultation with the most likely descendant. See Response to Comment T1-8, above.

- T1-10** This comment notes confidentiality requirements consistent with AB 52 and SB 18. As described in Responses to Comments T1-5 through T1-8, the City acknowledges the receipt of the substantial evidence and proposed mitigation measures. No further response is provided.
- T1-11** This comment provides additional information relating to the Tribe's ancestral tribal territory and is included as part of Final EIR Confidential Appendix I2.
- T1-12** This comment provides additional information relating to the Tribe's ancestral tribal territory and is included as part of Final EIR Confidential Appendix I2.
- T1-13** This comment provides additional information relating to the Tribe's ancestral tribal territory and is included as part of Final EIR Confidential Appendix I2.
- T1-14** This comment provides an excerpt of the Public Resources Code, specifically, Section 21074(a), which defines a tribal cultural resource under AB 52. This comment does not represent a concern with the adequacy of the Draft EIR's environmental analysis. As such, no further response is required.
- T1-15** This comment provides additional information relating to the Tribe's ancestral tribal territory and is included as part of Final EIR Confidential Appendix I2.

Comment Letter 11

**From:** alice whichello [\[mailto:alice\\_whichello@att.net\]](mailto:alice_whichello@att.net)  
**Sent:** Thursday, August 5, 2021 7:45 PM  
**To:** Vincent Gonzalez <[vgonzalez@cityofsierramadre.com](mailto:vgonzalez@cityofsierramadre.com)>  
**Subject:** Housing Project Meadows at Bailey Canyon

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Dear Mr. Gonzalez:

In order to preserve our mountain town from over development, our community and city leaders passed Measure V protecting the charm and uniqueness of our mountain town.

11-1

New Urban West is petitioning the city leaders to allow them to bypass this protective zoning law. Instead of building a few well placed homes that would blend into the environment, supporting our fragile ecosystem at the base of the mountains, New Urban wants to build a total of 42 mansion size homes, side by side, changing a land that is a wildlife area, into a urban suburb.

11-2

Our natural resources are limited, New Urban West's answer to the severe drought, we just came out of is, their homes will be using pre-purchased water from Los Angeles and for the City of Sierra Madre to use less water. What kind of solution is that to our limited water supply, if their mansions will be using another source for water, why do we have to use less of our own?

11-3

Please Mr. Gonzalez, the community and yourself and the other city leaders joined in, constructed and passed into law Measure V. I am sure as our Director of Planning and Community Preservation, you will uphold the wishes of our community by enforcing Measure V, rejecting New Urban West's petition to over develop our wildlife land.

11-4

Thank you so much for your time and attention.

Alice Whichello  
417 W. Sierra Madre Blvd. Apt. A  
Sierra Madre, CA 91024

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## Response to Comment Letter I1

Individual  
Alice Whichello  
August 5, 2021

- I1-1** The City notes that the comment relates to information on Measure V and does not raise an issue related to the adequacy of the Draft EIR. No further response is required.
- I1-2** The comment expresses concern that the proposed project bypasses Measure V (also known as Chapter 17.35, Voter's Empowerment, of the SMMC), and expresses concern regarding the project's compatibility with the surrounding environment and wildlife. As discussed in Draft EIR Section 4.11, Land Use and Planning, the proposed zoning and land use of the site would be changed from Institutional (I) to Specific Plan (SP). Furthermore, upon approval of the proposed zoning and General Plan amendment, the proposed project would be consistent with the City's zoning and General Plan. Moreover, the provisions under Measure V do not apply to the project site as the site is not located within the City's downtown "central core area" as defined under SMMC Section 17.35.050, Definitions. Thus, no land use conflict would occur in relation to Measure V.
- In addition, as discussed in Draft EIR Section 4.4, Biological Resources, impacts to biological resources were determined to be less than significant with implementation of mitigation measures MM-BIO-1, MM-BIO-2, and MM-BIO-3. Thus, the commenter's concern for impacts to the project site's ecosystem are addressed in the Draft EIR. No further response is required or provided.
- I1-3** The comment expresses concern regarding water supply and the project's net-zero water use. Please refer to Global Response GR-1. Current residents will not be required to use less of the City's water as a result of this project.
- I1-4** The City notes that the comment provides concluding remarks and general opposition to the project that do not raise new or additional environmental issues concerning the adequacy of the Draft EIR. No further response is required.

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Comment Letter 12

You will be the first City Commission to examine and consider documents that will have a great impact on the development of this city, involving the proposed housing development on the monastery property.

12-1

In the usual handling of City Land Use changes, the specific ordinances involved would make certain that the Citizens had adequate involvement in each step of the procedure.

The Developers of the "Meadows" project on the Monastery grounds, however, are attempting to evade careful scrutiny of their planned development, which is opposed by a large portion of Sierra Madre Residents. They are hoping to have their documents "bundled" rather than have separate issues examined separately.

At a recent City Council presentation, we were given a slide with the timeline for the consideration of this project. After the 60 day public comment period for the DEIR, and the time for responses to those comments, the timeline shows "Planning Commission Holds Public Hearing to Recommend whether to:

12-2

1. Certify the EIR
2. Amend General Plan
3. Amend Zoning Code
4. Adopt Specific Plan
5. Approve Development Agreement

We have argued that the initial, most basic step in the process should be the request for a zoning change. And, arguably, the most important.

In all other cases, the request of a property owner to change the Zoning established by our General Plan and Zoning ordinances would be the initial step in a project, under our ordinances § 17.64.030. Amendments initiated by property owners. Et sec.

12-3

IF the Planning Commission then found that the "public interest, convenience and necessity so require" the change, the next steps could be followed. If there is NOT an adequate basis to change our General Plan and zoning ordinances by rezoning the property, there is no need to debate the merits of the project.

12-4

The City Attorney has confirmed that the requirements of our ordinance are applicable in this case. Our Planning director has stated that his preference

12-5

would be to consider the zoning change separately, though he said that the developer preferred to bundle things.

↑ 12-5  
Cont.

We feel that, though there are many serious concerns with this project, the paramount issue is whether the applicant can show a sufficient basis to override the General Plan, created after years of study and effort, which is meant to "guide future development".

12-6

Separate examinations of both the question of rezoning and the various elements of the DEIR and the Specific Plan would allow the citizens reasonable opportunity to participate AND to feel that this important project had been adequately considered.

12-7

Attached are some of the many issues included in the Specific Plan that we also feel should be decided separately when reviewing the Plan. Rather than consider the document as a whole and have citizens discussing many various issues in a single hearing, it would be much more useful to consider separately some important elements.

12-8

The people will be greatly reassured if you would agree tonight that your decisions should not be bundled and that the rezoning, at the very least, will be heard as a separate matter.

Thank you

Barbara Velturo  
Protect Sierra Madre – Stop the Housing Project



THE PLANNING COMMISSION SHOULD CONSIDER THE DONATED LAND PORTION OF THE SPECIFIC PLAN SEPARATELY

In the beginning, the City and the Monastery have said that the monastery will donate 45 acres of land above the retreat center as a "concession" for being allowed oversized homes. The maps in their presentations originally only showed property directly above the rest of their parcel.

The Specific Plan shows all property directly above their property as well as a parcel that is NOT within Sierra Madre City Limits.

The parcel above the right side of their property on the Specific plan map is NOT owned by the Monastery but belongs to the City of Sierra Madre and is designated Open Space.  
APN: 5761-001-900 Recorded 1967

The 2 remaining parcels which they are now able to donate include  
APN: 5761-001-001 in Sierra Madre - 20 acres, designated Hillside Zone AND  
APN: 5760-027-013 in Unincorporated LA County - 16.74 acres zoned residential  
Maps are attached showing those parcels.

Is there ANY benefit to Sierra Madre owning Hillside land in Unincorporated LA County? Land that is in the highest severity level of Fire hazard? Land that is shown as landslide potential on a Seismic hazard map? Land that is directly above several Pasadena housing developments? Have they agreed to our rezoning it??

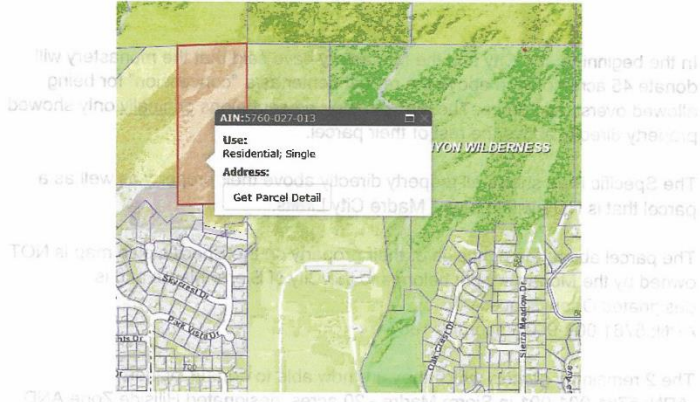
We can see a lot of negative consequences in our owning 16.74 Hillside acres in Unincorporated LA County - but NO positive ones!!

**The Planning Commission should consider this part of the Specific Plan separately and should refuse to accept land outside of our City that may pose a liability to us!**

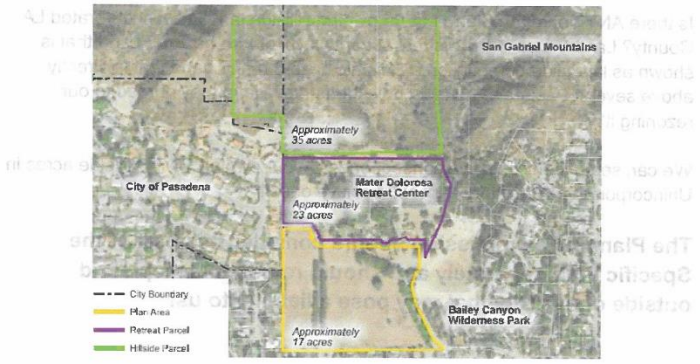
12-9

12-10

Parcels owned by the Monastery



Map from the Specific plan



I2-11

THE PLANNING COMMISSION SHOULD SEPARATELY CONSIDER THE WATER USE PLANNED BY THE DEVELOPMENT, IN LIGHT OF THE CURRENT DROUGHT AND DEPLETED CONDITION OF AREA RESERVOIRS AND THE GROUNDWATER TABLE.

12-12

The proposed development of 42 large homes and an unknown number of ADUs will use a significant amount of water. The Specific Plan also allows "permitted by right" Swimming pools at every property. There will be a great deal of water used to establish and maintain all the new plantings and the young trees planted to replace the 100 mature trees that will be removed according to their Specific Plan.

12-13

The project also intends to have "NET ZERO WATER USAGE", by "pre-buying" a large amount of water. They have not indicated that they have an agreement to buy that water from the Metropolitan Water District or when they intend to buy it (When the project is approved, as each property is constructed, as each property is sold?) Its computations are also based on the current cost of water in Sierra Madre. The MWD has been on the open market trying to buy water for its reserves at 2-3 times the going rate. IF they are willing to sell a large quantity, at what cost? And as less and less water becomes available (for us and for other area towns) will we ALL pay a price for New Urban West's "water grab??"

12-14

Is it morally and ethically acceptable for us to deliberately allow a developer to take more than our fair share of water, during an epic drought, solely for the financial benefit of a single landowner and developer??

This is the information included in their Specific Plan

"The Plan area will have net-zero water usage for the first 50 years after construction (i.e. the expected life of the homes) because an approximately \$540,000 amount of Metropolitan Water District potable water will be pre-purchased on behalf of the City.

The approximately \$540,000 amount was determined by using the following assumptions: • The cost to import one acre-foot (AF) of potable water to Sierra Madre is \$512 • The average single-family home uses approximately 0.50 AFY of potable water • The expected life of a home is 50 years. Given the above assumptions, the cost to deliver imported potable water to one single-family home in Sierra Madre over its life expectancy is \$12,800. Since the Plan area has 42 single-family homes, the cost to deliver potable water to the Plan Area is approximately \$540,000."

12-15

THE PLANNING COMMISSION MUST CONSIDER SEPARATELY WHETHER TO ALLOW HIGHER DENSITY THAN WAS NEGOTIATED

12-16

LESS LAND – SAME NUMBER OF HOUSES – HIGHER DENSITY THAN ORIGINALLY NEGOTIATED

THEY MUST HAVE SURVEYED!

At the initial presentation and all subsequent presentations, until now, the Monastery and the City said that the Project would encompass 20 ACRES - 17 acres for the housing development and 3 for the park which is required by our ordinances.

Well apparently they have surveyed because their Specific Plan tells a different story.

Their new map, with a slightly more irregular division between the development parcel and the Retreat Parcel and along the eastern side of the development, NOW shows that the Project total is 17 ACRES rather than 20, still 3 acres for the required park but now ALSO now a 1 acre landscaped buffer to protect the Monastery from the sights and sounds of the housing development that they say is most conducive to the serenity they need for their retreats.

12-17

17 TOTAL ACRES MINUS THE 3 ACRES FOR THE PARK AND THE 1 ACRE FOR THE MONASTERY'S LANDSCAPED BUFFER MEANS THERE ARE ACTUALLY 13 ACRES RATHER THAN THE 17 ACRES THAT THEY ORIGINALLY SAID WOULD CONTAIN 42 HOUSES.

42 HOUSES IN 17 ACRES IS DENSITY OF 2.47 HOMES PER ACRE

42 HOUSES IN 13 ACRES IS DENSITY OF 3.23 HOMES PER ACRE

ORIGINAL MAP



SPECIFIC PLAN MAP



I2-17  
Cont.

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## Response to Comment Letter I2

Individual  
Barbara Vellturo  
August 5, 2021

- I2-1** The comment expresses concern regarding general impacts associated with development, adequate citizen involvement, and bundling of environmental issues. Regarding impacts associated with development, as discussed in Draft EIR Section 4.11.5, Impacts Analysis, in Section 4.11, Land Use and Planning, with implementation of mitigation measure MM-BIO-3, environmental impacts associated with conflicts with existing plans and ordinances would be less than significant. Regarding citizen involvements, as discussed in Draft EIR Section 1.3, Environmental Procedures, various workshops were held during August of 2020. A scoping meeting was also held on July 14, 2021 from 6:00pm to 7:00pm. Regarding bundling of environmental issues, Chapter 4 of the Draft EIR included 20 subchapters, each organized by the 20 related environmental issue areas analyzed under the California Environmental Quality Act (CEQA).
- I2-2** The City notes that the comment provides background information associated with the discretionary actions be considered by the City for approval of the proposed project and argues that a zone change should occur as the initial step. As discussed in Draft EIR Section 3.3.8, the proposed project would require a General Plan land use amendment and zone change from Institutional (I) to Specific Plan (SP). In addition, as discussed in Draft EIR Section 3.3.9, Subdivision Map Act, a lot line adjustment would be processed to consolidate the two lots that make up the project site into one, and adjust the site's northern boundary farther to the north. Future actions would include the processing of a tentative tract map to subdivide the 17.30-acre project site to create a total of 42 residential lots, plus streets, landscape areas, parking, a public park, landscape buffer, and open space. As discussed in Draft EIR Section 3.3.11, the proposed project would include a Development Agreement, between the applicant and the City, which would govern development of the project site, including vesting the development standards in the Specific Plan, and confirming the project benefits of net-zero impact on water supplies, the proposed open space conservation easement, construction of the public park, and allocation of park credits. Lastly, the proposed project would involve the approval of a landscape maintenance district or similar public maintenance entity, for long-term maintenance of the proposed public park. The City notes that the comment does not raise any issues related to the adequacy of the Draft EIR and provides the opinions of the commenter.
- I2-3** The comment states that, per the City's Zoning Ordinance Section 17.64.030, Amendments, initiated by property owners, a project must request a General Plan land use designation and zone change as an initial step of a project. The City notes that the comment expresses the opinions of the commenter and does not raise an issue related to the adequacy of the Draft EIR. It should be noted that the ordinance requires property owners to submit a "Request for Zone Change" form, when applicable.<sup>3</sup> The project site is currently zoned and designated as Institutional (I). As discussed in Draft EIR Section 3.4, Discretionary Actions, under the proposed project, the land designation and zoning of the project site would be changed to Specific Plan (SP), which would then establish Residential Land (RL) and Open Space (OS) sections within the project site. Further, the Draft EIR analyzes the potential for environmental impacts resulting from the project as a whole, as the California Environmental Quality

<sup>3</sup> City of Sierra Madre 2021. Sierra Madre Municipal Code. Updated September 28, 2021.

Act and the State CEQA Guidelines require. The project includes the zone change, as well as the general plan amendment, adoption of the specific plan, and approval of the development agreement (see Response to Comment I2-2, above, for details regarding other actions and entitlements that would be required for approval of the proposed project). Since the comment does not raise an issue related to the adequacy of the Draft EIR, no further response is required or provided.

- I2-4** The comment provides information on Sierra Madre’s Zoning Ordinance 17.64.030. Please refer to Response to Comment I2-3.
- I2-5** The comment states that the City Attorney confirmed City’s Zoning Ordinance Section 17.64.030 is applicable to the proposed project. The City is unaware of such comment and the comment is unclear as to the details of when this comment was made. Please refer to Response to Comment, I2-3.
- I2-6** The comment states that there are many concerns associated with the project and that the project does not have sufficient basis to override the City’s General Plan. However, the project does not propose to override the General Plan. As discussed in Draft EIR Section 3.3.8, the proposed project would require a General Plan land use amendment and zone change from Institutional (I) to Specific Plan (SP), which is an allowable process under the General Plan. Please refer to See Response to Comment I2-2 for further details regarding other actions and entitlements that would be required for approval of the proposed project
- I2-7** The comment recommends that rezoning and adoption of the EIR and Specific Plan should occur separately. However, an EIR is required to analyze the potential environmental impacts that would result from the zone change, as well as the other portions of the project, including adoption of the Specific Plan. CEQA requires that lead agencies undertake environmental review of proposed actions (such as a proposed zone change) prior to considering approval of such actions, and that environmental review analyze the whole of the project. Please refer to Responses to Comments I2-2 and I2-3.
- I2-8** The comment recommends that various issues of the Specific Plan should be decided separately and provides an introduction to additional issues in attachment provided, which are addressed in Responses to Comments I2-9 through I2-17, below. The City notes that the comment provides an introduction to comments that follow as well as the opinions of the commenter that do not raise issues related to the adequacy of the EIR. No further response is required.
- I2-9** The comment provides an overview of the proposed open space conservation easement area to be located to the north of the Mater Dolorosa Retreat Center. The City notes that the comment provides background information and does not raise an issue related to the adequacy of the EIR. As discussed in Draft EIR Section 3.3, Project Description, the proposed open space conservation easement area would be approximately 35 acres. The text in Final EIR Section 3.3.3, Open Space Conservation Easement, has been revised to clarify the means of transfer of this open space hillside area, which would involve conveyance of this open space hillside land to the City, which would be effectuated through execution of a development agreement between the City and project applicant/landowner and conservation easement would be recorded.
- I2-10** The City notes that the comment expresses the opinions of the commenter related to the proposed 35-acre open space conservation easement area but does not raise any issue concerning the adequacy of the EIR. As discussed in Final EIR Section 3.2, Project Objectives, one of the objectives of the



proposed project is to preserve the hillside open space area by conserving approximately 35 acres north of the Mater Dolorosa Retreat Center to the City in order to preserve a portion of Bailey Canyon and the Bailey Canyon Trail, which would be used by wildlife movement up and down slope; preserve native vegetation communities and drainages; and preserve land adjacent to the Bailey Canyon stream. It should be noted that no development is proposed within this 35-acre open space hillside conservation area that would potentially result in impacts associated with wildfire, seismic hazards, or landslides, nor is the City proposing any land use action for the 35-acre hillside open space area. As the comment does not raise any issue concerning the adequacy of the Draft EIR, no further response is required or provided.

- I2-11** The comment provides background information associated with the open space hillside conservation easement area and information contained in the Specific Plan and does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. It should be noted that Figure 1-2, Vicinity Map, from the Specific Plan has been revised for clarification, in order to show the most recent boundaries of the proposed 35-acre open space hillside conservation easement area. No further response is required or provided.
- I2-12** The comment suggests that the proposed project's water use be separately considered. Please refer to Global Response GR-1. CEQA requires that lead agencies undertake environmental review of proposed actions (such as increase in water use). Therefore, environmental impacts associated with water use have been considered as a part of the environmental review process (see Final EIR Section 4.19, Utilities and Service Systems).
- I2-13** The comment expresses concern regarding water use associated with the proposed residences, potential accessory dwelling units (ADUs), swimming pools, and new plantings and trees. As discussed in Final EIR Section 4.19.5, Impact Analysis, of Section 4.19, Utilities and Service Systems, the proposed project would result in an increased demand of approximately 0.023 AF per day for the 134 residents associated with the project, or a total of 8.26 AFY of indoor water use. In addition, the proposed project's anticipated outdoor water use was calculated using the Maximum Applied Water Allowance (MAWA), which represents the maximum potential outdoor water use permitted by low impact design standards set by the California Building Code. MAWA uses average lot sizes, home sizes, and driveway sizes to calculate water usage associated with outdoor areas, and accounts for water evaporation rates. Per MAWA calculations performed by Ground Level Landscape Architecture, Inc, the outdoor water use associated with the project would be approximately 18.04 AFY. Therefore, the proposed project would result in an increased water demand of approximately 26.30 AFY (8.26 AFY associated with indoor water use and 18.04 AFY associated with outdoor water use). Although no swimming pools are proposed, future homeowners can potentially install swimming pools. However, any future installation would comply with city code requirements related to pool installation. Please see to Global Response GR-1. Regarding ADUs, see Response to Comment I28-5.
- I2-14** The comment expresses concern regarding the net-zero water impact associated with the proposed project, including social, ethical, and economic concerns. Please refer to Global Response GR-1. The City and notes that the comments related to social, ethical, and economic concerns do not appear to relate to any physical effect on the environment or the adequacy of the Draft EIR. No further response is required.

- I2-15** The comment restates information contained in the Specific Plan regarding the cost of the net-zero water impact associated with the proposed project. The City notes that the comment does not raise comments relating to the project’s physical effect on the environment or adequacy of the environmental impact analysis. No further response is required. However, it should be noted that Specific Plan Section 4.42 has been revised to provide more up to date information regarding the net zero water impact. Please also refer to Global Response GR-1.
- I2-16** The City notes that the comment is regarding the proposed density of the project, and that it does not appear to relate to any physical effect on the environment. No further response is required because the comment does not raise an issue related to the adequacy of the Draft EIR.
- I2-17** The comment expresses concern regarding the acreage and boundary of the proposed project. It should be noted that the project description, as well as the exact number of acres for each land use, have been refined since the initial presentations associated with the project. As discussed in Final EIR Section 3.3.1, Residential Development, future development of single-family residential uses would occur on approximately 9.19 acres of the 17.30-acre project site, and 3.39 acres of open space (including a 3.04-acre neighborhood public park). A 1.04-acre grading and landscape buffer would be located within the northern portion of the project site (see Figure 3-2, Conceptual Site Plan, of the EIR). As discussed in Final EIR Section 3.3.1 and Specific Plan Section 3.8.6, the gross density of the project is approximately 2.5 dwelling units per acre, which has been calculated using the entire project site (42 residences/17.30 acres). Additionally, as discussed in Final EIR Section 3.3.3, approximately 35 acres of open space hillside land, located north of the existing Mater Dolorosa Retreat Center would be conserved for the City and protected from future development by way of a conservation easement. The boundaries of the final proposed open space hillside conservation easement area are shown in Draft EIR Figure 3-4, Open Space Conservation Easement Area,. The final boundary of the proposed project site is accurately depicted in the Draft EIR figures, and the proposed project site described in Draft EIR Chapter 3, Project Description, served as the basis of the environmental impact analysis provided in the EIR. A few minor changes were made to Final EIR Section 3.3.3 to clarify the conditions of the open space conservation easement. No further response is required because the comment does not raise an issue related to the adequacy of any specific section of the Draft EIR.

Comment Letter 13

**From:** Andrea Van Wickle [<mailto:avanwickle@yahoo.com>]  
**Sent:** Tuesday, August 3, 2021 3:34 PM  
**To:** Vincent Gonzalez <[vgonzalez@cityofsierramadre.com](mailto:vgonzalez@cityofsierramadre.com)>  
**Subject:** Draft of EIR

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Dear Mr. Gonzalez,

I have one simple question. I couldn't get a straight answer from your staff so I thought you could help. How is this project "net-zero water impact"? Are they or are they not going to use Sierra Madre water? Are they somehow excluded from our water usage allotment? Doesn't Sierra Madre have to pay a higher price if we have to purchase additional water?

Please answer this question: Will these 42 home with close to 100 residents be consuming water from Sierra Madre?

Thank you, I hope you find time to respond.

Andrea Van Wickle  
[avanwickle@yahoo.com](mailto:avanwickle@yahoo.com)  
626-355-7012

13-1

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## Response to Comment Letter I3

Individual  
Andrea Van Wickle  
August 3, 2021

- I3-1** The comment includes questions regarding the project's net-zero water supply and general water supply associated with the project. Please refer to Global Response GR-1. The cost of increasing the water supply will be borne by the project's Applicant; the City's ratepayers will not pay more for water as a result of project implementation.

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Comment Letter I4

8/11/21

Dear Vincent.Gonzales and Jose Reynosa,  
These are my initial thoughts and although 7 pages I am really not finished yet. Ides continue to spring into my mind but here you go.  
Attached is the red flyer for the residents on Lima street and the outline will be used as a basis to give the residents facts, not misinformation. If there is something totally wrong please let me know So I can correct it  
Thanks,

I  
14-1  
I



Nancy Beckham  
337 North Lima street  
Sierra Madre  
626 355-1602  
nlbeckham48@gmail.com

Dear Neighbor,

A copy of the draft EIR (Environmental Impact Report) was made public on August 2 and is now available on the City of Sierra Madre website in the City Manager section. It is 140 pages but can be downloaded to your computer. It deals with the proposed 42 home development at the Mater Dolorosa Retreat Center or monastery. Due to the pandemic there has not been many opportunities to discuss this project amongst the neighbors, but we now have **60 days** to respond to concerns that must be addressed in the final EIR. If an issue is not raised it will not be addressed. Potential issues range from traffic, water usage, fire concerns, just to name a few. There are more. Although the city and the developer feel like they reached out to the residents by holding zoom meetings, scooping meetings, open houses, and allowing residents to speak at the city council meetings we finally have a document that spells out the plan. This "draft EIR" includes the real measurements, wall types, elevations etc. so the real work that needs residential comment begins. If the project goes forward and becomes part of our town we will live with the project for a long, long time.

14-2

Jim Sadd and I will be holding some informal neighborhood meetings for the residents of Lima to try and give you more information regarding the development, time for discussion, and how it might affect the northwest quadrant of Sierra Madre, Lima street specifically, and the town in general. If you feel you are well informed having attended city council meetings, scooping meetings there is no need for you to attend. However, we are going to offer 2 zoom meetings on Sunday, August 15, and August 22, at 7 pm, a Sunday afternoon gathering in my backyard at 5 pm at 337 North Lima Street, and at the same location on Tuesday, Thursday 8/24, 8/26 from 7-8pm. In order to receive the zoom link from Jim please email him at [jsadd@oxy.edu](mailto:jsadd@oxy.edu) so he can send you the link. If you are planning to attend the gatherings in my backyard please email me at [nbeckham48@gmail.com](mailto:nbeckham48@gmail.com) or just come. I have about 20 chairs for people to sit in, but not a lot of shade so come early to claim a spot. If you have a folding chair bring it as I have no idea how many people will come. Bring a bottle of frozen water so you can sip, listen, plan to discuss your thoughts and ideas. I will leave my gate open so you can just walk into my backyard and find a seat.

14-3

Looking forward to seeing you at any of these 5 possible gatherings. There is also a wealth of information at the City of Sierra Madre website under City Manager

Nancy Beckham  
337 North Lima Street  
626 355-1602  
[nbeckham48@gmail.com](mailto:nbeckham48@gmail.com)

Jim Sadd  
286 North Lima Street  
626 233-4074  
[jsadd@oxy.edu](mailto:jsadd@oxy.edu)



**Outline for Zoom/in-Person Meetings**


- 1. Background of the Monastery Project
  - A. Land purchased and owned by Mater Delorosa
  - B. Land purchased in early 1920's
  - C. Have been told to sell the land and send money to help the Catholic Church with their on-going lawsuits. See star news articles from June 20, 2021 "Wildfires and the Need for Housing" and "Sierra Madre of too many Sorrows".
    - 1. Money will also be used to improve current retreat center
    - 2. No one knows what the improved retreat center will look like.
    - 3. Developers will also earn money for their part in the creation of the project
  - D. Current zone for Monastery is Institutional
  - E. To build the houses the zone change to residential has to occur.
  - F. The City Council and Planning Commission can stop rezoning from occurring.
- II. Proposed project "The Meadows" as addressed in the MOU (memorandum of understanding).
  - A. City Manager Gabe Engeland negotiated an MOU with New Urban West for a 42-house project on 20 acres of land. This included a 3-acre park(required by the city) and a small parking lot on the east side of the park for residents of the development to use if having a gathering in the park. Three new streets will be built, and Sunnyside will be extended into the current monastery area. Each street will have homes one home in depth plus landscaping and retaining walls between homes approximately 5 feet from the outer walls of the proposed homes. As there is a change in elevation for each new street additional landscaping will be added at the back of each property.
  - B. Proposal is to create three parcels of land from the entire
    - 1. Do we need a park adjacent to Bailey Canyon?
    - 2. Could this park be partially a dog park?
      - a. People have been walking their dogs at the monastery for years.
      - b. Sierra Madre could use a large dog park. As currently we only have a tiny dog park that is not used because it is not

14-4

14-5

14-6

maintained by the city. It just has dirt and chain link fence surrounding the small area.	↑ 14-6
3. Homes Page 16 "The Meadows at Bailey Canyon development consists of 42 one and two- story detached single family dwellings on approximately nine acres of the Plan area. Typical floor areas range in size from approximately 2,700 to 4,000 square feet with a minimum lot size of 7,800 square feet"	14-7
a. although shown at various gatherings and workshops homes are to be either one or two stories.	14-8
b. concern is that only two-story homes were shown in specific plan.	14-9
c. Does this mean only two-story homes will be built?	
d. Does not say anywhere what the maximum size is.	
e. Also said the Specific Plan would show how many of each size (it does not) But when the Planning Commission asked if they would have to do design review of all 42 houses, Vincent said- there are 4 designs you would have to review. They have shown 4 designs - all 2 story. Once again 2 story only?????	14-10
f. Could a third of the lots be just sold to people so they could build their own homes...that would definitely get rid of the development :look that many object to as a development is definitely not Sierra Madre at all. , the CC and R;s would stipulate the zero water, solar panel etc. specified for the homes in this development by New Urban West.	14-11
 B A draft EIR was finally presented to the public on August 2, 2021, and it currently posted on the City of Sierra Madre's website under City Manager	
<b>B. Residents have 60 days to respond (date to end comments is Oct 2, 2021) to the city about concerns. Those concerns must be part of draft EIR as the developer must respond to those concerns.</b>	14-12
III. Actual proposal as it was presented in the draft EIR.	
A. Land for the project is not 20 acres. That was negotiated by the city manager in the MOU.	
1. Currently the proposed 42 homes will be placed on 13 , not 20 acres.	14-13
a. The lines of the acreage is more irregular than first proposed	
b. the Monastery wants one additional acre to create a buffer zone between the retreat center and the development	14-14

<p>acres</p>	<p>to maintain the serenity for their retreats .The 1 acre landscaped buffer zone will help with the noise and sounds of the housing development.</p> <p>c. Could monastery take that one acre from the land they are saving for their retreat center? They are keeping 23 for their retreat site. Donating 45 acres of hillside that cannot be used for homesites to the city for additional trails and open space, and 13 acres will now be donated to the project...not 20 acres that Gabe negotiated in good faith for this project.</p> <p>c. The 7 additional parking places are now included in the draft EIR specific plan</p> <p>2. Density</p> <p>a. 17 acres minus 1 additional (for the monastery) minus 3 acres for the proposed park equals <b>13 acres.</b></p> <p>b. . Density of project changed from 42 homes on 20 acres or 2.47 homes per acre</p> <p>c . Density based on 13 acres of land equals <b>3.23</b> homes per acre</p> <p>d. This has now translated to a very dense housing project</p> <p>3. Water usage</p> <p>a. Project is net zero in terms of water usage.</p> <p>b. Cost of 50 years of water will be built in the cost of the homes.</p> <p>c. The city water will not be impacted by these 42 new homes being built</p> <p>c. A HOA (Homeowners Association) is proposed by the developer to take care of the proposed landscaping. Between the streets and back sides of the homes. This was told orally but not written in the specific plan. The city will not be responsible for the care and maintenance of the flora and fauna of this project.</p> <p>d. Tree removal to build these 42 homes over 100 trees will have to be removed including about 10 California Oak trees which are a protected species. 1, with the LA County Arboretum approximately 3-4 miles away and with their expert horticulturalists why</p>	 <p>14-14 Cont.</p> <p>14-15</p> <p>14-16</p> <p>14-17</p> <p>14-18</p> <p>14-19</p>
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could those trees not be boxed up and either moved, watered, and maintained while the project continues at the monastery site, or remove the trees to the arboretum to be maintained there during the project.

- a. Jim Hendricks is a specialist with the California Oak trees
- b. Frank Mc Donough, head horticulturist should be at least approached so these old and established trees are not slaughtered and replaced with tiny saplings which is what the pictures reveal, especially during this time of climate crisis. This would help with the loss and the loss of carbon emissions from the heavy equipment to be used to bulldoze and create the new levels of land, lots and streets for the development.

14-19  
Cont.

IV. Traffic concerns

A. Sunnyside; Ingress and Egress for project.

- 1. Sunnyside is the entrance to the monastery.
- 2. Sunnyside will be both the ingress and the egress for this proposal.
- 3. Sunnyside has no sidewalks. above Alegria
- 4. Sunnyside will be greatly affected as both the ingress and egress.
- 5. Only one resident is in favor of this project. See signage on the street.

14-20

14-21

B. Carter

- 1. Fire Safety concerns for Carter
- 2. Fire Department Concerns about Carter becoming one of the ingresses/egresses.
- 3. . Carter adjacent to the monastery gate is very narrow 25' and the road is in terrible condition. The fire department already has a difficult time turning the fire trucks around in that location.
- 4. the monastery is going to create a two-lane road that will circle the Monastery property and end at the Monastery gate at Bailey Canyon. That means the road will go from approximately 44--

14-22

14-23

46	<p>46 feet in width on the Monastery land and then change to a single lane road 25' in width.</p> <p>5. The land on either side of Carter (@ 5 feet but split with the north and south side of the road.) The land is owned by the county.</p> <p>6. County is not interested in improving the street situation. Apparently, Gabe approached the county and they are not interested in improving that area not are the interested in adding sidewalks or widening it.</p> <p>7. Do not yet know who owns the street but it appears that the county owns the land on either side of Carter in the small area near Bailey Canyon. The attached plate map looks like Carter is owned at Oak Crest by the city, but not prior and then continues east of until Carter reaches Baldwin. (See attached plate map)</p> <p>8 There is no parking allowed currently on that part of Carter</p> <p>9. There are no sidewalks in this area on Carter.</p> <p>10. This area is already of great concern of the fire chief, especially after last year's Bobcat Fire.</p> <p>11. WAS THE COUNTY APPROACHED ABOUT WHAT THIS PROJECT WILL DO TO THIS STRETCH OF LAND? See B Carter #6 above</p> <p>12. Was the municipal water district approached about the impact of this project on this area that leads to the run off basins in Bailey Canyon? A gate exists here but nothing was mentioned in the specific plan. i</p> <p>C. North Grove</p> <p>1. North Grove is really a lane at this location (adjacent to Bailey Canyon) and would have a very difficult time absorbing additional traffic.</p> <p style="padding-left: 20px;">a. no sidewalks on North Grove.</p> <p style="padding-left: 20px;">b. North Grove is an interrupted street as it begins as a lane, is off set twice before reaching Sierra Madre Blvd, and just prior to Sierra Madre becomes an alley in width.</p> <p>D. Plan proposes ingress and egress of Carter to Baldwin with a right turn on Baldwin to get to town., and vice versa.</p> <p>E. . Carter (Carter to Baldwin)</p> <p style="padding-left: 20px;">1. Carter now will function as an ingress and an egress, will have to accept additional traffic throughout the day.</p>	<p>↑ 14-23 Cont.</p> <p>14-24</p> <p>14-25</p> <p>14-26</p> <p>14-27</p> <p>14-28</p> <p>14-29</p>
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- a. information written in the March 8 handout by the developer shows 398 trips per 42 homes. They have admitted they did not include Amazon deliveries, gardeners, activities for the retreat center 14-30
    - b. trips are more like 780 a day.
  - 2. Will parking be removed off Carter so residents cannot park in front of their home? 14-31
  - 3. Most cars will not travel to Baldwin but will turn down another neighborhood street to get to town faster. 14-32
  
- F. North Lima is first normal width residential street leaving the Bailey Canyon area.
  - 1. North Lima Street has no sidewalks above Grandview.
  - 2. People walk in the street, walk their dogs in the street, and children walk from home to home in the street.
  - 3. North Lima has an abundance of Edison poles that are serviced several times a year. 14-33
    - a. Edison trucks are very wide
    - b. residents cannot back their cars out of the driveways when the Edison trucks are on the street
    - c. When Edison comes to service the poles the residents have to park below Grandview and then walk up to their home
  - 4. North Lima street is an emergency access route by default that was used effectively during the Bobcat fire by all the firetrucks. 14-34
  - 5. North Lima will be impacted with additional traffic as a percentage of the 800 plus daily car trips created by 42 new homes will use North Lima to get to the downtown area.
  - 6. North Lima has very pronounced angle and cars pick up speed traveling down North Lima to the city proper. 14-35
  
- V. All streets in North West corridor.
  - A. No streets above Grandview have sidewalks including the north side of Grandview. 14-36
  - B All streets will be expected to absorb additional traffic. 14-37

C. Streets that will be impacted are West Alegria, West Fairview, West Grandview, Sunnyside, Carter, North Lima, North Grove, North Baldwin. Just to point out a few.

14-38

**D. WHY IS THERE NO DIRECT ACCESS TO MICHILINDA SO TRAFFIC CAN LEAVE THE MONASTERYH AND NOT IMPACT THE REST OF THE STREETS IN THIS NW QUADRANT OF THE CITY.**

**1. THERE ARE 2 FIRE ACCESS ROADS THAT END ON THE SMALL STREETS ADJACENT TO MICHILINDA**

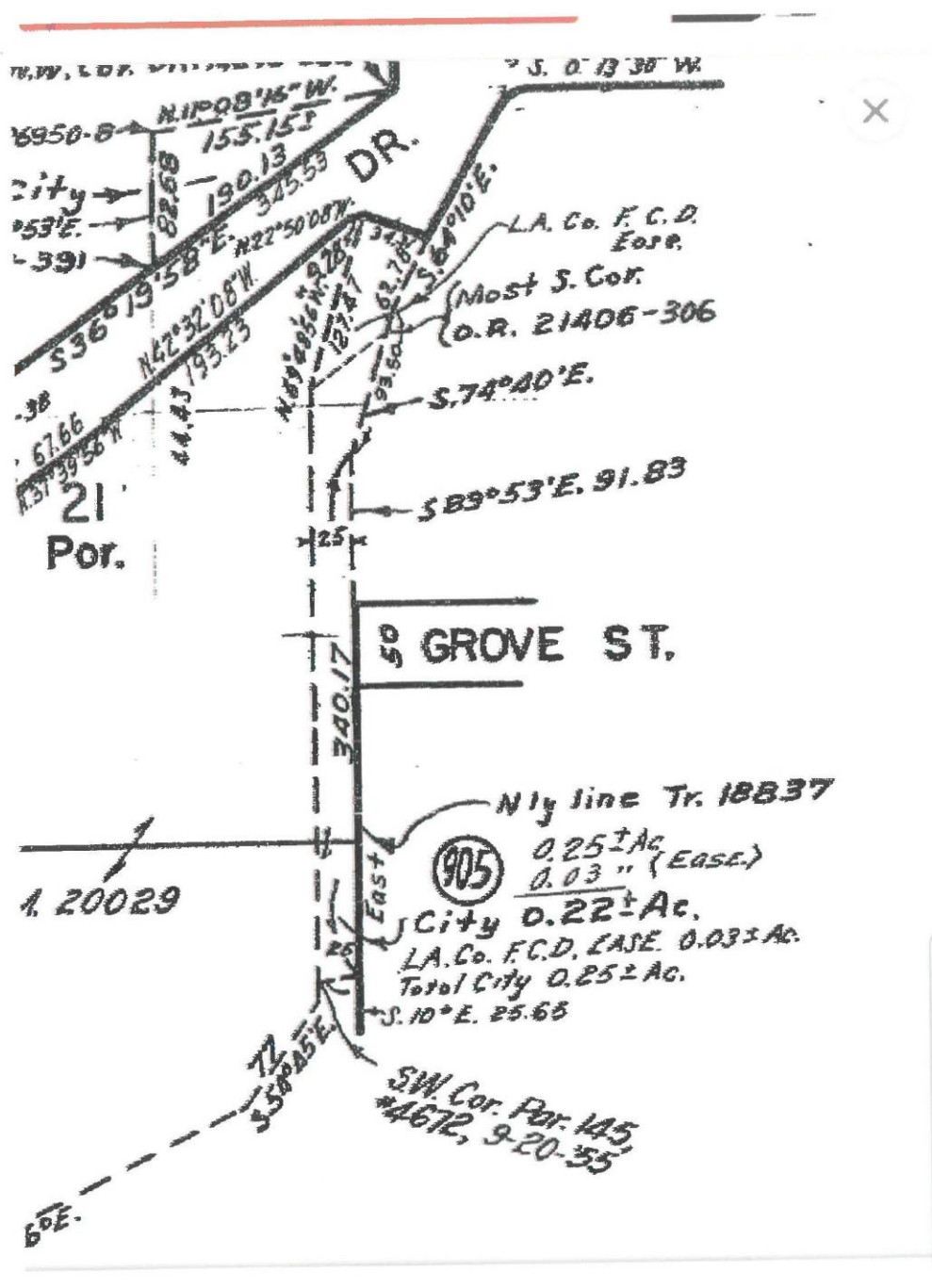
14-39

**2. WHY NOT IMPROVE BOTH OF THEM TO LET THE TRAFFIC OUT ONTO MICHILINDA, A STREET ALREADY DESIGNED FOR A GREAT DEAL OF TRAFFIC.**



14-40





14-40  
Cont.

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## Response to Comment Letter I4

Individual  
Nancy Beckham  
August 11, 2021

- I4-1** The comment is an introduction to comments that follow. No further response is required.
- I4-2** The comment is a letter to neighbors, prepared and distributed by the commenter and an resident, Jim Sadd. The letter provides information on the availability of the Draft EIR for public review and scoping meetings associated with the proposed project and does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. It should be noted that the commenter's reference to wall types and elevations is a reference to the Specific Plan. The Specific Plan and Draft EIR was made available on the City's website ([https://www.cityofsierramadre.com/cityhall/city\\_manager\\_s\\_office/transparency](https://www.cityofsierramadre.com/cityhall/city_manager_s_office/transparency)) for public review. In addition, it should be noted that in order to provide the public with ample time to provide their comments, the City extended the required comment period to a total of 64 days (August 2, 2021 to October 4, 2021). Regarding the commenters' concern regarding real measurements, wall types, elevations, and details regarding the size range of the proposed residences and acreage of each project component; the proposed wall and fence plan; and the proposed grading plan, along with existing and proposed elevations, were included in Draft EIR Chapter 3, Project Description, and minor clarifying edits were made in Final EIR Chapter 3. No further response is required or provided.
- I4-3** The comment provides information regarding neighborhood meetings held by members of the community to discuss the proposed project and does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. No further response is required or provided.
- I4-4** The City notes that the comment provides background information associated with the history of the proposed project site and background regarding the proposed project, prepared by the author of the comment. It should be noted that the background information associated with the history of the proposed project is from the commenter's own research and notes and are not associated with the Draft EIR. The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. No further response is required or provided.
- I4-5** The City notes that the comment provides background information associated with the proposed project and memorandum of understanding (MOU) associated with the project, prepared by the author of the comment. It should be noted that the proposed project site is 17.3 acres (not 20 acres, as stated by the commenter). The comment does not raise an issue related to the adequacy of the Draft EIR; therefore, no further response is required or provided.
- I4-6** The comment restates information associated with the project, asks if a park is needed, and asks if the proposed park should become a dog park. As discussed in Draft EIR Section 3.3, Project Description, the project would result in development of 3.39 acres of open space. This would include a 3.04-acre neighborhood public park. Regarding creation of three parcels, as discussed in Draft EIR Section 3.3.9, Subdivision Map Act, the Mater Dolorosa Retreat Center is on the same legal parcel as the project site, which is currently split within three different lots; however, a lot line adjustment would be processed to adjust the boundaries of the three existing lots that make up the Mater Dolorosa Retreat Center and

the project site. The lot line adjustment would consolidate the two southern lots that make up the project site as one lot and adjust the northern boundary of this new lot further to the north. The comment does not raise an issue related to the adequacy of the Draft EIR; therefore, no further response is required or provided.

**I4-7** The comment provides an accurate summary of the project. Final EIR Section 3.3.1, Residential Development, includes minor revisions for clarification, to state that the residential units range from 2,700 square feet to 4,000 square feet with a minimum lot size of 7,800 square feet. The Specific Plan sets out the standards that must be adhered to for future development. The exact size of each residences is not known at this time and as is standard, will be determined at the time the tentative tract map is prepared and submitted to the City for review. Architectural plan sets would be provided prior to issuance of building permits, which would specify the exact home. However, the final assignment of specific home sizes to specific lots would not change the limits of disturbance for the environmental analysis. The comment does not raise an issue related to the adequacy of the Draft EIR; therefore, no further response is required or provided.

**I4-8** The comment expresses concern that only two-story residences were depicted in the Specific Plan, but the Specific Plan text references that both one and two story detached single family homes would be developed. The Specific Plan sets out the standards that must be adhered to for future development. As discussed in Draft EIR Section 3.3.1, the proposed residences would be one or two stories and would comply with SMMC maximum building envelope of 25 feet. The project would include a mix of one- to two-story homes. However, which home would be one versus two stories is not known at this time and as is standard, will be determined at the time the tentative tract map is prepared and submitted to the City for review. Architectural plan sets would be provided prior to issuance of building permits, which would specify the exact number of stories. However, per the Specific Plan, no building shall exceed 25 feet in height. The comment does not raise an issue related to the adequacy of the Draft EIR; therefore, no further response is required or provided.

**I4-9** The comment expresses concern that only two-story residences would be developed. See Response to Comment I4-8. The comment does not raise an issue related to the adequacy of the Draft EIR; therefore, no further response is required or provided.

**I4-10** The comment expresses concern regarding the maximum size of the residences. See Response to Comment I4-7. Regarding the various designs mentioned by the commenter, the final design of the project has been chosen and is outlined in Draft EIR Chapter 3, Project Description, and the Specific Plan. Lastly, see Response to Comment I4-8 regarding height of proposed residences. The comment does not raise an issue related to the adequacy of the Draft EIR; therefore, no further response is required or provided.

**I4-11** The City appreciates the commenter's recommendation. It should be noted that custom lots are not proposed as a part of the proposed project and individual, unimproved lots are not proposed to be sold. The comment does not raise an issue related to the adequacy of the Draft EIR; therefore, no further response is required or provided.

**I4-12** The City notes that the comment provides information on the public review of the Draft EIR. The comment states that the final date as to when comments can be submitted is October 2, 2021. Please note that the correct date to submit final comments on the Draft EIR was October 4, 2021. This date was selected by the City in order to provide the public additional time to provide comments as part of the public review process.

- I4-13** The City notes that the comment provides background information associated with the acreage of the project site and does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. It should be noted that the proposed residential area would make up approximately 9.19 acres of the project site not 13 (see Draft EIR Section 3.3 and Figure 3-2, Conceptual Site Plan) and the boundaries of the proposed project have been slightly revised since the project was first proposed. The correct revised boundary is shown in the Draft EIR figures. The comment does not raise an issue related to the adequacy of the Draft EIR; therefore, no further response is required or provided.
- I4-14** The comment provides background and suggestions associated with the design of the project. As discussed in Draft EIR Section 3.3, 1.04 acres would be developed as a grading and landscape buffer at the northern portion of the project site. This land would be a part of the approximately 17.30-acre project site. The City notes that this comment's discussion of the acreage breakdown does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR; therefore, no further response is required or provided.
- I4-15** The comment states that 7 additional parking places are now included in the draft EIR Specific Plan. It is unclear which 7 additional parking spaces the commenter is referring to. However, as discussed in Draft EIR Section 3.3, Project Description, North Sunnyside Avenue would include parking on both sides while Carter Avenue would include parking on the west side of the street. Streets A, B, and C would also include parking on the south side of the streets. In addition, each residence would have a parking garage and driveway parking. Lastly, the proposed park would include a parking lot in the southeastern corner. The comment does not raise an issue related to the adequacy of the analysis provided in the Draft EIR. No further response is required or provided.
- I4-16** The comment states that the project would be a dense housing project with 3.23 dwelling units per acre. As discussed in Draft EIR Section 3.3.1, the gross density of the proposed project would be 2.5 dwelling units per acre, which is calculated using the proposed residential units and the total acreage of the project (42 residential units/17.30 acres = 2.5 dwelling units per acre). Additionally, according to the City's General Plan, residential high-density areas are defined as 13 to 20 units per acre. Therefore, the proposed project would not be considered a high-density project. The comment does not raise an issue related to the adequacy of the Draft EIR; therefore, no further response is required or provided.
- I4-17** The comment summarizes information associated with the net-zero water impact associated with the proposed project. The comment does not raise an issue related to the adequacy of the Draft EIR; therefore, no further response is required or provided.
- I4-18** The comment relates to maintenance of open space areas. As discussed in Draft EIR Section 3.3.2, Neighborhood Park and Open Space, the proposed open space would be maintained by the project's homeowner's association while the proposed public park would be maintained by a landscape maintenance district or similar public maintenance entity. A community facilities district may also be prepared for maintenance of the public park. The comment does not raise an issue related to the adequacy of the Draft EIR; therefore, no further response is required or provided.
- I4-19** The comment correctly states that the site contains 10 coast live oak (*Quercus agrifolia*) trees that meet the City definition of a protected tree. Based on site grading plans, all 10 trees are expected to require removal. The comment asserts that these 10 oak trees should be relocated and preserved at the LA County Arboretum. It should be noted that revisions have been made in the Final EIR

(see Section 4.4, Biological Resources) and Appendix C2, Arborist Report, as a result of the proposed off-site widening of Carter Avenue. However, these revisions and proposed off-site improvements do not raise new or additional environmental issues concerning the adequacy of the Draft EIR. Please refer to Global Response GR-2.

- I4-20** The comment provides information regarding Sunnyside Avenue and raises concerns regarding the impact to traffic on Sunnyside Avenue. Sunnyside Avenue is currently the primary entrance to the Mater Dolorosa Retreat Center and will serve as a two-way access for the proposed project. The comment states that Sunnyside Avenue does not have sidewalks above Algeria Avenue. Please note that Sunnyside Avenue has sidewalks on both sides of the street between West Algeria Avenue and Fairview Avenue. However, no sidewalks are present north of Fairview Avenue. According to the traffic conditions analysis (now provided as Appendix K of the Final EIR, development of the proposed project would result in approximately 430 daily vehicle trips on Sunnyside Avenue, with approximately 35 trips in the AM peak hour and 46 trips in the PM peak hour on a typical weekday. Nearby study intersections would experience no measurable difference in performance after development of the project, as shown in Table 7 in Appendix K, which has been added to the Final EIR for informational purposes. All the intersections will function well within the City’s standard. This information has been provided in response to this comment, and does not constitute new information under CEQA, nor does it change or modify the findings of the Draft EIR. Please refer to Global Response GR-6.
- I4-21** The comment states that only one resident is in favor of the project based on the presence of street signage. The comment does not raise any issue concerning the adequacy of the Draft EIR. No further response is required or provided.
- I4-22** The comment expresses fire safety concerns associated with Carter Avenue. Please refer to Global Response GR-4, and Global Response GR-5.
- I4-23** The comment states that the lane on Carter Avenue would transition from 44 to 46 feet in width to 25 feet in width. It is confirmed that Carter Avenue would transition from its existing 25 feet right-of-way to a 44.5 to 46 feet right-of-way within the proposed project site (see section 3.3.6.1 of the Draft EIR). In order to address commenters’ concerns related to safety issues along Carter Avenue and outside of the boundaries of the proposed project site, the project applicant is proposing off-site improvements to Carter Avenue, between the southeastern portion of the project site boundary and Lima Street (see Figure 3-11, Proposed Off-Site Improvements and Figure 3-12, Carter Avenue Offsite Improvement Plan, which have been added to the Final EIR). Please refer to Global Response GR-5.
- I4-24** The comment pertains to ownership of Carter Avenue and does not raise an issue related to the adequacy of the Draft EIR. As discussed in Final EIR Section 3.3.12, the applicant would acquire approximately 9 feet of public right-of-way in order to widen Carter Avenue to a total of 24 feet (10 feet for each travel lane plus one 4-foot curb along the southern boundary of Carter Avenue) and a 6-foot sidewalk on the north side of Carter Avenue. No further response is required or provided.
- I4-25** The comment states the existing conditions of Carter Avenue pertaining to parking and sidewalks and does not raise an issue related to the adequacy of the Draft EIR. No further response is required or provided.
- I4-26** The comment expresses concerns related to fire, and specifically to the Bobcat Fire, and asks if the fire chief was approached about the project. The Sierra Madre Fire Department, including the Sierra Madre

Fire Marshal, has reviewed the proposed project to assess the circulation system for emergency access and did not foresee any issues regarding emergency apparatus access.

- I4-27** The comment expresses concern associated with stormwater runoff into Bailey Canyon. As discussed in Draft EIR Section 4.10.1, Existing Conditions, in Section 4.10, Hydrology and Water Quality, the northeastern portion of the Mater Dolorosa Retreat Center, located north of the site, flows to the Bailey Canyon Debris Basin to the east and discharges into Arcadia Wash. The project site does not flow towards the Bailey Canyon Debris Basin. Therefore, the proposed project would not introduce runoff into the Bailey Canyon Debris Basin. Regarding the commenters question as to whether or not this has been reviewed by the water district, it should be noted that stormwater discharge is not regulated by the water district. The State Water Resources Control Board (SWRCB) and the Regional Water Quality Control Boards (RWQCBs) are responsible for enforcing water quality standards within the state. The RWQCB also regulates discharges from municipal separate storm sewer system (MS4) in the Los Angeles region under a National Pollutant Discharge Elimination System (NPDES) MS4 Permit. As discussed in Draft EIR Section 4.10.5, Impacts Analysis, the proposed project would comply with all applicable regulations related to stormwater and water quality.
- I4-28** The comment raises concern regarding traffic on North Grove Street. North Grove Street is expected to experience a negligible level of traffic generated by the project, as reflected in the traffic conditions analysis. Please refer to Global Response GR-6.
- I4-29** The comment raises concerns regarding increase in traffic between Carter Avenue and Baldwin Court. The project proposes Carter Avenue as one of two locations for access (Sunnyside Avenue being the other). Therefore, drivers will have a choice of streets and will not be limited in traveling to and from Carter Avenue. Please refer to Global Response GR-6.
- I4-30** The comment raises concerns regarding the circulation performance of Carter Avenue. Please refer to Global Response 5 (GR-5), Carter Avenue and Global Response GR-6.
- I4-31** The comment raises concern regarding parking on Carter Avenue. As discussed in Draft EIR Section 3.3.6.2, Internal Circulation, improvements to Carter Avenue would include parking on the west side of the Carter Avenue and would not prevent residents from parking in front of their residencies. Please refer to Global Response GR-5.
- I4-32** The comment states cars will not travel on Baldwin Avenue. Baldwin Avenue is identified as one of the streets that would provide regional access to and from the proposed project (Draft EIR Section 4.17.1, Existing Conditions, in Section 4.17, Transportation). Even if cars do not commonly use Baldwin Avenue, as the commenter states, Baldwin Avenue remains as a street that provides access to and from the proposed project site. Please refer to Global Response GR-6. The comment does not raise an issue related to the adequacy of the Draft EIR. No further response is required.
- I4-33** The comment provides an overview of existing conditions on Lima Street. It should be noted that portions of Lima Street, along the east, does have sidewalks. The commenter correctly states that some electric poles are also present within Lima Street. The existing conditions of Lima Street do not challenge the analysis provided in the Draft EIR. Please refer to Global Response GR-6. The comment and does not raise an issue related to the adequacy of the Draft EIR. No further response is required.

- I4-34** The comment expresses concern regarding the emergency access route and traffic on North Lima Street. North Lima Street will continue to be available for emergency access with the implementation of the proposed project. Additionally, the comment states the project will result in 800 additional daily trips on North Lima Street. Please note that as discussed in Appendix K of the Final EIR, approximately 100 project generated daily trips (10 in the peak hour) would be to/from the east and would use a combination of West Carter Avenue and North Lima Street. Please refer to Global Response GR-4, and Global Response GR-6.
- I4-35** The comment raises concern regarding traffic on North Lima Street. Although not required as part of the EIR's transportation analysis which CEQA limits to VMT, Appendix K, traffic conditions analysis, has been added as a part of the Final EIR for informational purposes in response to public comments and details the expected changes in traffic conditions (i.e., trips and traffic volume) with the proposed project. Per Final EIR Appendix K, traffic congestion levels will not be impacted by the project. Please refer to Global Response GR-6.
- I4-36** The City notes that the comment provides background information regarding parking on Grandview Avenue and does not raise an issue related to the adequacy of the EIR. No further response is required or provided.
- I4-37** The comment states that all streets located in the North West corridor will be expected to absorb additional traffic. Per Final EIR Appendix K, traffic congestion levels will not be impacted by the project. See Global Response GR-6.
- I4-38** The comment expresses concern regarding streets related to the North West corridor. See Response to Comment I4-37 and Global Response GR-6.
- I4-39** The comment raises concerns associated with traffic on Michillinda Avenue and questions why direct access cannot be added to Michillinda Avenue leaving the Monastery. From a transportation engineering perspective, there is no space to for implementing direct access to Michillinda Avenue without removing existing houses; therefore, this access option is not feasible. Please refer to Global Response GR-6.



Comment Letter 15

8/16/21  
Vickie

TO WHOM IT MAY CONCERN -

AFTER ALL RESEARCH & STUDY OF THE MEADOWS PLAN, I AM VERY MUCH IN SUPPORT OF THIS PROPOSAL.

WE WOULD ALL LOVE TO SEE THE PROJECT NOT DEVELOPED, BUT THAT IS NOT A CHOICE. THE PESSIMIST ORDER HEADQUARTERS BACK EAST CAN NO LONGER HOLD ON TO NON-INCOME PRODUCING LAND. I THINK THE PROPOSAL IS WELL THOUGHT OUT & SHOULD BE APPROVED.

~~WHO~~ WILL THERE BE TRAFFIC ISSUES? OF COURSE, NOISE: MOST LIKELY. BUT, IT STILL NEEDS TO BE DONE.

I HAVE LIVED IN SIERRA MADRE FOR 48 YEARS - I LIVE ONE STREET EAST OF SUNNYSIDE. I ADMIRE THE MINISTRY OF THE MINISTRY & HOPE



Vickie

THEY CAN STAY & CONTINUE THEIR WORK.

ONE OF THINGS THAT BOTHERS ME ABOUT THE OPPOSITION - THEY DONT SUGGEST ANY SOLUTIONS THAT ARE NOT PRACTICAL!

LETS NOT HAVE ANOTHER I.CARTER, THAT DIVIDED THE CITY, PRODUCED HORRIBLE ANGER, & FOR WHAT? IT LOOKS LIKE A GHOST TOWN NOW.

THANK YOU FOR LETTING ~~FOR~~ ME GIVE YOU MY OPINION.

RESPECTFULLY SUBMITTED,

VICKIE SHACKETT

↑  
15-3  
Cont.

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## Response to Comment Letter I5

Individual  
Vickie Shackett  
August 16, 2021

**I5-1** The comment expresses support for the proposed project but does not raise any issue concerning the adequacy of the Draft EIR. No further response is required or provided.

**I5-2** The comment addresses issues associated with traffic and noise, that were analyzed in Draft EIR Sections 4.13 and 4.17, respectively.

The City does not have transportation-specific noise ordinances. The City's General Plan identifies maintaining quiet residential character in objective Hz14. As stated in Draft EIR Section 4.13, Noise, project traffic on the roadway would result in a maximum noise level of 3 dB CNEL, which is not considered to be a substantial increase using FICON thresholds and therefore less than significant. Specifically, Draft EIR Section 4.13 identified potentially significant temporary noise impacts during construction activities and mitigation was incorporated to reduce impacts to a less than significant level. A significant impact would occur when construction takes place near the project boundaries, specifically impacting sensitive receptors such as the single-family residences to the west and south of the project site (see Draft EIR Table 4.13-5, Construction Noise Levels at Noise-Sensitive Uses). However, with the incorporation of mitigation measure MM-NOI-1, the City and/or the Construction Contractor would be required to implement noise reduction measures during all construction activities which would ensure compliance with the applicable noise limits and reduce impacts to a less than significant level. Noise reduction measures would include administrative controls, engineering controls, and noise barriers. Project construction and operational noise generation would be required to comply with the City of Sierra Madre's Code of Ordinances Title 9, Chapter 9.32. As concluded in Draft EIR Sections 4.13 and 4.17, the noise and traffic impacts of the project would be less than significant. Please refer to Global Response GR-6.

**I5-3** The comment provides concluding remarks, opinion, and general support for the project, and does not raise new or additional environmental issues concerning the adequacy of the Draft EIR. No further response is required or provided.

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Comment Letter 16

9/11/21

Dear Vincent,

Sorry this letter/comment is late, but we have been on vacation and have just returned to view all our mail.

16-1

We have had a chance to read the draft EAR and have the following comments/suggestions.

Sadly, Mater Dolorosa's headquarters in Chicago were bound and determined to make a profit on the subdivision of their land. We have been residents of Sierra Madre since 1982 and our feelings about our town echo many - keep as much open space as possible. As the headquarters refused any offer by the city to just buy the land, (shades of 1 Carter?), we would strongly support NOT changing the zoning and consider a hospice center or some other institutional usage. Back in the 90's a hard-fought battle was waged to develop (modify the General Plan to stop/predict hillside development. As this area is a little south of true hillside, it is still a gem to be preserved.

16-2

Turning to the EAR, the first downside is indeed changing the zoning and from the wording, looks like the "specific plan" regulations could supersede the city's it seems to say. So once approved, hard to impose any new regulations?

16-3

Next, the actual development is reviewed. Upon letter, and, at first glance, states that the project is a "77.3 acre residential development" inclusive of a 3 acre +/- neighborhood park. And 42 homes planned! Looking more closely, the 42 homes will be on 9 acres, so ~ 9,000+ sqft lot. The largest home could be 4000 sq ft just garage - not included in house size. From the lot map, they could be 11 homes squished in to a roughly 2-block area. The smallest home could be ~ 7700 sqft. How could space be maximized? Ah, 2-story! How many 2-story homes? From the suggested

16-4

models - they're all 2-story! For reference, our original home on So. Sunnyside was on a 9000 sq ft lot. It had a detached garage - the house was 1700 sq ft, one-story. After we sold it, it was enlarged to ~2500 sq ft - looks OK, but the yard is a lot smaller. The point is, 42 homes are way too many. If the plan goes forward do as much as possible to decrease the number of homes (30 may or less), limit size of homes, and/or push for mostly one-story.

16-4  
Cont.

The park is small. From the scale on the maps, the ~~width~~ <sup>depth</sup> of the park looks to be < 200 ft. Our current lot on Orange Grove Ave is 210 ft deep, our lot is nearly one acre. The width of the park looks to be ~1000-1200 ft. Looks like the park will be L shaped. That's not a lot of space for all the "enchanted" features proposed. If this project is approved, do so with a much larger park size - 5 acres or more. That's nice 75 acres above the retreat house to be donated, but it is already hillside and is not / should not be developed.

16-5

The next practical matters regarding traffic, water usage, sewer, slope, fire safety are addressed in the EIR and it all sounds so neat and complete. But, we are in a drought again, there was a BIG fire nearby, drainage could be an issue up there. We lived on Sunnyside in 93 and were about 7 big blocks away from Bailey Canyon abey, with Santa Ana's blowing. Our street was the byway for fire trucks racing up the hill to ultimately keep the fire ~17 ft away ~~from~~ from the retreat house. Due west of us ~ 1/2 mile away horses were being moved from the farms that made it to the Cator Canyon Dam on New York Drive. In our ~~own~~ current home, we remember the fire nearby Sierra Vista Park, ~ 1/2 mi away as the crow flies! We had fire insurance from before, but had no met, new policies were not being offered for awhile if ~~not~~ above 2M Blvd.

16-6

Lots of things to consider in the long term - but our message is think about quality of life, long term risks with more development, in a drought and fire zone. Opt for less tax revenues, opt for downsizing, opt for institutional size, if possible. Sincerely,  
Dreg and Denise Nelson

16-7

## Response to Comment Letter I6

Individual  
Greg and Denise Nelson  
August 11, 2021

- I6-1** The comment is an introduction to comments that follow. No further response is required.
- I6-2** The comment expresses opposition for the proposed zoning change associated with the project site. The comment does not raise any issue concerning the adequacy of the Draft EIR; therefore, no further response is required of provided.
- I6-3** The comment expresses concern regarding the zoning change associated with the proposed project. As discussed in Draft EIR Section 3.3.8, the proposed project would require a General Plan land use amendment and zone change from Institutional (I) to Specific Plan (SP). The Specific Plan prepared for the proposed project would include development standards for the project site. As discussed in Draft EIR Section 4.11, Land Use and Planning, the proposed project would not result in any environmental impacts associated with land use and planning.
- I6-4** The comment raises questions regarding acreage of the proposed project and the sizes of the proposed residential units. As discussed in Draft EIR Section 3.3, Project Description, the proposed project would result in development of approximately 17.30 acres, including 9.19 acres which would make up the proposed residential area, 3.39 acres of open space (including a 3.04-acre neighborhood public park), and a 1.04-acre grading and landscape buffer, to be located within the northern portion of the project site (see Draft EIR Figure 3-2, Conceptual Site Plan). Regarding lot sizes and stories proposed, see Responses to Comments I4-7 through I4-9, above. The comment does not raise any issue concerning the adequacy of the Draft EIR; therefore, no further response is required of provided.
- I6-5** The comment expresses concern associated with the proposed neighborhood park and 35-acre open space conservation easement area. Draft EIR Sections 3.3.1, Residential Development, and 3.3.2, Neighborhood Park and Open Space, discuss the proposed park, open space, and open space conservation easement associated with the proposed project. As discussed in these sections, the proposed project would include 3.39 acres of open space (including a 3.04-acre neighborhood public park), and a 1.04-acre grading and landscape buffer, to be located within the northern portion of the project site. The proposed project also proposes conservation of approximately 35 acres of open space hillside land, located north of the existing Mater Dolorosa Retreat Center through recording of a conservation easement (see Final EIR Figure 3-4, Open Space Conservation Easement Area). The open space area is currently owned by the Mater Dolorosa Retreat Center. Conveyance of this open space hillside land to the City would be effectuated through execution of a development agreement between the City and project Applicant/landowner and would be subject to record of conservation easements in favor of the City (see minor clarifying revisions in Final EIR Section 3.3.3, Open Space Conservation Easement). The comment does not raise any issue concerning the adequacy of the Draft EIR; therefore, no further response is required of provided.
- I6-6** The comment expresses concerns associated with traffic, water usage, sewer, fire safety, and drainage. Draft EIR Section 4.15.5, Impacts Analysis, in Section 4.15, Public Services, discusses the proposed project's potential impact to fire protection services. In addition, see Global Response GR-3, Very High

Fire Hazard Severity Zone, and Global Response GR-6. Water usage and drainage impacts associated with the proposed project are discussed in Draft EIR Section 4.19.5 and clarifying revisions have been made in Final EIR Section 4.19.5. See Response to Comment I4-27 regarding stormwater runoff into Bailey Canyon, specifically. Impacts to both Public Services and Utilities and Service Systems would be less than significant.

- I6-7** The comment provides concluding remarks that do not raise new or additional environmental issues concerning the adequacy of the Draft EIR. No further response is required of provided.



Comment Letter 17

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

From: kathy@ehrracing.com [mailto:kathy@ehrracing.com]  
Sent: Monday, August 23, 2021 8:01 AM  
To: Vincent Gonzalez <vgonzalez@cityofsierramadre.com>  
Subject: Meadows at Bailey Canyon

CAUTION: This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Dear Mr. Gonzales,

We are strongly opposed to the development planned for the Meadows at Bailey Canyon. Given our chronic drought conditions and our city's limited water supply, we don't understand how 42 new homes could possibly have a "net-zero water impact" and we believe the claim is misleading.

17-1

The property at the proposed site is some of the last open space in the area and is important to wildlife. It is also located in a high fire risk zone. We live on East Mira Monte Ave. and we have had difficulty getting fire insurance for our house, which has been recently remodeled and up to current fire codes and is not even in the foothills. There should be no more dwellings built in the foothills.

17-2

The traffic issues have also not been adequately addressed. The entrance/exit on the Bailey Canyon side is not adequate, nor was it designed for regular traffic use. The proposed plan does not include plans to rebuild that road, possibly because there is simply not enough real estate to widen it unless the existing small park sacrifices its real estate and many of its mature trees.

17-3

1

The sole purpose of selling and developing the land seems to be to fund the retreat center, not to directly benefit residents of our city, despite the proposed small park. There is already a park and hiking trails there. The retreat should find alternative funding or else close down.

17-4

We believe it is irresponsible to allow this development for all the reasons stated above and we hope the city will do what is in the best interest of all residents.

17-5

Sincerely,  
Kathy and Eoin Harty  
68 E. Mira Monte Ave.  
Sierra Madre, CA 91024  
626 836-4657  
Kathy@ehrracing.com

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## Response to Comment Letter I7

Individual  
Kathy and Eoin Harty  
August 23, 2021

- I7-1** The comment expresses general opposition for the proposed project as well as concerns regarding the net-zero water impact. Please refer to Global Response GR-1.
- I7-2** The comment raises concerns associated with wildfire and wildlife habitat. Per Draft EIR Section 4.20.5, Impact Analysis, in Section 4.20, Wildfire, with the implementation of project design feature PDF-WF-1, impacts to wildfire would be less than significant. In addition, per Final EIR Section 4.4.5, Impact Analysis, in Section 4.4, Biological Resources, with the implementation of mitigation measures MM-BIO-1, MM-BIO-2, and MM-BIO-3, impacts to biological resources would be less than significant.
- I7-3** The comment raises traffic issues, particularly egress and ingress issues. Please refer to Global Response GR-5, and Global Response GR-6.
- I7-4** The comment raises economic issues that do not appear to relate to any physical effect on the environment. The comment does not raise any issue concerning the adequacy of the Draft EIR. Therefore, no further response is required of provided.
- I7-5** The comment provides concluding remarks and general opposition to the project that do not raise new or additional environmental issues concerning the adequacy of the Draft EIR. Therefore, no further response is required of provided.

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Comment Letter 18

From: Allen Ma [mailto:allenmagm@gmail.com]  
Sent: Monday, August 2, 2021 12:12 PM  
To: Vincent Gonzalez <vgonzalez@cityofsierramadre.com>  
Subject: Meadows at Bailey Canyon Specific Plan Project DEIR Comments

CAUTION: This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Hello Mr. Gonzalez,

Please accept my below written comments for the subject DEIR.

18-1

**DEIR Figure 3-10 Grading Plan**

- Need to re-balance grading to eliminate introduction of new and foreign materials
- Side slopes adjacent to lots should remain the responsibility of property owners
- Need to evaluate if proposed grading at new park creates a ponding condition

18-2

**DEIR Figure 3-7 Proposed Drainage Plan**

- Proposed storm drain on Sunnyside Avenue does not address water quality

18-3

**DEIR Section 4 Environmental Analysis**

- Need to evaluate haul route and impact to local streets not designed for heavy and frequent loads

18-4

**DEIR Section 4.17 Transportation**

- Does not evaluate traffic impacts to Sunnyside Avenue and Lima Street from Orange Grove Avenue as potential alternate routes

18-5

**DEIR Section 4.19 Utilities and Service Systems**

- Los Angeles County Standard Urban Stormwater Mitigation Plan has been superseded
- Need to perform a Sewer Area Study to evaluate impacts to existing sewer system

18-6  
18-7

**DEIR Section 5.12 Pedestrian Facilities**

- Need to evaluate if any revisions to existing Sidewalk Master Plan are needed

18-8

**DEIR Appendix H**

- Does not provide source or basis of 2012 Base Year 31.01 Project TAZ VMT per Service Population determination
- Does not provide source or basis of 2040 Cumulative Year 30.47 Project TAZ VMT per Service Population determination
- Need to evaluate if any revisions to any existing traffic/VMT studies or models are needed

| 18-9

**Proposed MOU**

- Recitals: Delete verbiage to consider excess sized single family units
- Term: Recommend also adding an end date that would release all parties from MOU
- Applications Deposit: Recommend replacing dates with calendar days after an event/action
- Dedicated Open Space: Recommend open space to be dedicated to a non-governmental agency to be agreed by all Parties
- Development Agreement: Delete verbiage to consider varying development standards
- Termination: Recommend adding a provision the City may terminate agreement at any time and with or without a reason
- City Manager: Needs to be updated

| 18-10

I am available to further discuss the above comments should you have any questions. Thank you.

Allen Ma, P.E.

## Response to Comment Letter I8

Individual  
Allen Ma, P.E.  
August 2, 2021

- I8-1** The comment is an introduction to comments that follow. Therefore, no further response is required of provided.
- I8-2** The comment raises concerns regarding the grading plan associated with the proposed project. The existing site is fairly steep and slopes towards the south. Project grading is proposed at 12%, and proposed grading and streets cannot be modified to be steeper than 12% in order for the project site to be balanced (i.e. no import or export of soil). Additionally, per City requirements, the proposed park is intentionally designed to be sunken to detain water and eliminate the need to provide a drainage outlet to Crestvale Drive, and the detained water is will infiltrate into the ground, consistent with the detention area's design. The proposed secondary outlet would exit the park through Crestvale Drive.
- I8-3** The comment raises concerns regarding the proposed storm drain on Sunnyside Avenue. Please note that the first flush rain event will be diverted from the westerly drainage area and treated by the proposed underground retention gallery located underneath the park. As discussed in Draft EIR Section 4.10.5, Impact Analysis, of Section 4.10, Hydrology and Water Quality, with implementation of these project site improvements as well as compliance with all existing water quality regulations, the project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. Impacts to water quality or waste discharge requirements would be less than significant during operations.
- I8-4** The comment raises concerns regarding haul truck routes and impacts to local streets. According to Draft EIR Section 3.3.10, Grading Plan, assuming a haul truck capacity of 14 cubic yards per truck, earth-moving activities would result in approximately 252 round trips (504 one-way truck trips) during the Import Material to Balance Site phase. The Import Material to Balance Site would only take approximately 14 days. While there could be potential impacts to local streets, these impacts would be temporary and therefore less than significant because of the short haul truck schedule. Please refer to Global Response GR-6.
- I8-5** The comment raises concerns regarding traffic impacts to Sunnyside Avenue and Lima Street from Orange Grove Avenue. Orange Grove Avenue is located approximately 1-mile south of the proposed project site. As such, impacts to street segments that distance from the project site were not analyzed in the traffic analysis because segments near that intersection are not likely to experience direct traffic effects from the proposed project. As discussed in EIR Section 4.17.5, Impacts Analysis, in Section 4.17, Transportation, the proposed project would have a less than significant impact of the City's circulation system. While traffic may increase temporarily during construction, traffic associated with construction of the proposed project would cease upon completion. Please refer to Global Response GR-6.
- I8-6** The comment states that the Los Angeles County Standard Urban Stormwater Mitigation Plan (SUSMP) has been superseded. There has been no public notice regarding the suspension of the 2000 Los Angeles County SUSMP. The SUSMP addresses stormwater pollution from new development and redevelopment and includes a list of the minimum required Best Management Practices (BMPs). As

discussed in Draft EIR Section 4.19.2, Relevant Plans, Policies, and Ordinances, in Section 4.19, Utilities and Service Systems, low-impact development design principles would be integrated into the implementation of the proposed project to lessen water quality impacts.

- 18-7** The comment requests a “Sewer Area Study” to evaluate impacts to the existing sewer system. As discussed in Draft EIR Section 4.19.1, Existing Conditions, the sewer collection system is owned by the City and operated by the City’s Public Works Department. In addition, a Sewer System Management Plan (SSMP) has been prepared by the City, which provides instructions for how to efficiently manage wastewater. Furthermore, a Sewer Capacity Study will be prepared prior to the issuance of a construction permit to further demonstrate sufficient capacity within the City’s existing sewer system. The Sewer Capacity Study will be prepared by a licensed engineer, prior to giving approval for projects that can affect the capacity of the public sewer system.
- 18-8** The comment asks for evaluation of the need for potential revisions to the existing Sidewalk Master Plan as part of this project. Revisions to the existing Sidewalk Master Plan are not required as part of the proposed project. The Sidewalk Master Plan’s purpose is to provide an inventory of existing sidewalks and street segments with no sidewalk or discontinuous sections of sidewalks, to identify opportunities and constraints for future sidewalk considerations, to recommend changes to existing programs and policies, to build upon existing prioritization criteria for sidewalk repair and installation, and to identify potential funding sources for sidewalk repair and construction. The proposed sidewalks would comply with all SMMC standards regarding sidewalk planning and construction. Additionally, the suggestions in the Sidewalk Master Plan are not required to be implemented. Therefore, the proposed project would not result in the need for revisions to the Sidewalk Master Plan. Draft EIR Section 4.17.5, Impact Analysis, of Section 4.17, Transportation states that the project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities, and impacts would be less than significant.
- 18-9** The comment expresses concern regarding vehicle miles traveled (VMT) and existing traffic associated with the proposed project. Please refer to Draft EIR Appendix H of the for information regarding project related VMT, including source data and the analysis used to determine VMT per Service Population impacts. As discussed in Appendix H, the Southern California Association of Governments (SCAG) 2016 model was used for the analysis to predict the 2040 travel conditions in consideration of land development and transportation changes. SCAG updates their model every four to eight years. At the time the City adopted their VMT Guidelines, the authorized version (meaning it was calibrated to measure VMT) was from the SCAG 2016 RTP. That model used a base year of 2012, which is the year in which data was available for SCAG to calibrate/validate that the model was sufficiently replicating reality. The application of the model is for the future; namely, the model is coded with future inputs (land use and transportation system) to predict future conditions (in this case, future VMT). Therefore, the daily VMT per Service Population for Sierra Madre (2012) was used to estimate the 2012 base year. The low VMT zone is described in Appendix H as having a VMT per service population of 15 percent or more below the Northwest Region Baseline VMT.
- 18-10** The comment provides recommendations for the proposed MOU associated with the proposed project but does not raises issues that do not appear to relate to any physical effect on the environment. No further response is required or provided.



Comment Letter 19

From: Jody Gunn [mailto:gunn.jody.m@gmail.com]
Sent: Thursday, September 02, 2021 1:49 PM
To: Jose Reynoso <jreynoso@cityofsierramadre.com>
Subject: For City Planning Commission Meeting This Evening: Opposition to "Meadows" Development

CAUTION: This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Mr. Reynoso,

I am unable to attend the Planning Commission meeting this evening however I want my strong opposition to the project on the record. Please see that my comments are passed on to the Commission.

19-1

My opposition is based on the following strongly adverse impacts to our city, especially the Northwest area.

Traffic- I am a homeowner on West Grand View Ave. Over 700 additional daily car trips are forecast for the development, many of which would go down/up Sunnyside by way of Grand View. The street is already busy on workday mornings and late afternoons. Alverno additionally plans to add up to 400 additional students which will further clog nearby streets. This will completely change the character and livability of our street and lower property value.

19-2

Impact to Water Supply - We are in a severe, long-term drought. 41 new households would place an irresponsible additional burden on our water supply. We had a water moratorium previously for a reason. The same reasons apply today.

19-3

Wild Fire Risk - The proposed development is in a high risk fire area. City resources that are needed elsewhere for the existing residents would be occupied there instead.

19-4

Impact to overall livability and desirableness of Sierra Madre - Sierra Madre is almost unique among California cities in maintaining it's small town character and feel. Monrovia, Arcadia, Duarte, and most other nearby cities are counter examples. This makes Sierra Madre a joy to live in and maintains our competitive property values.

19-5

I know some type of development will go in the area by the former monastery. Other options must be considered.

19-6

Sincerely,

Jody Gunn

685 W Grand View Ave.

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## Response to Comment Letter I9

Individual  
Jody Gunn.  
September 2, 2021

- I9-1** The comment is an introduction to comments that follow and expresses opposition for the proposed project but does not raise any issue concerning the adequacy of the Draft EIR.
- I9-2** The comment expresses concern with traffic and increased daily car trips associated with implementation of the proposed project and cumulative increases resulting from an Alverno project. A list of cumulative projects is listed in Draft EIR Table 5-1, Cumulative Projects List,. The Alverno Heights Academy Master Plan Update was developed in 2011. An Initial Study/Mitigated Negative Declaration (IS/MND) was prepared evaluating the Alverno Heights Academy Master Plan and subsequently approved on July 7, 2011. The IS/MND analyzed construction of a multipurpose building, outdoor amphitheater, reconfiguration of two existing parking areas, augmentation of the existing non-regulation softball field to create a multipurpose field, and proposed landscaping and fencing. A 2021 addendum to the IS/MND for School Master Plan Update has been prepared to analyze some refinements to the original School Master Plan Update, including refinements of the improvements approved in 2021. Per the 2021 addendum to the IS/MND for School Master Plan Update, the enrollment of Alverno Heights Academy would stay at 400 students.<sup>4</sup> Therefore, as this project was analyzed in 2011 and the 2021 addendum includes minor revisions to those originally-analyzed updates, the Alverno project is not listed as a cumulative project for this proposed project and would not result in increased traffic. See Global Response GR-6 for additional information about traffic impacts.
- I9-3** The comment expresses the opinions of the commenter regarding the impact the proposed project would have on the water supply. See Global Response GR-1.
- I9-4** The comment addresses wildfire risks associated with the proposed project and states that the project would impact the City's fire prevention resources. Draft EIR Section 4.15.5, Impact Analysis, in Section 4.15, Public Services, analyzes impacts associated with fire potential, and this analysis determined that implementation of the proposed project would a less than significant impact on fire protection services.
- I9-5** The comment expresses the opinions of the commenter regarding the livability and desirableness of the City but does not raise an issue related to the adequacy of the Draft EIR.
- I9-5** The comment provides concluding remarks that do not raise new or additional environmental issues concerning the adequacy of the Draft EIR.

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<sup>4</sup> Sapphos Environmental, Inc. 2021. Alverno Heights Academy Master Plan Update. July 26, 2021. Accessed December 22, 2021. <https://www.cityofsierramadre.com/common/pages/DisplayFile.aspx?itemId=17973516>

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Comment Letter I10

**From:** Daniel Golden [<mailto:dangolden0@gmail.com>]  
**Sent:** Thursday, September 2, 2021 1:20 PM  
**To:** Jose Reynoso <[jreynoso@cityofsierramadre.com](mailto:jreynoso@cityofsierramadre.com)>; [publiccomment@cityofsierramadre.com](mailto:publiccomment@cityofsierramadre.com); Laura Aguilar <[laguilar@cityofsierramadre.com](mailto:laguilar@cityofsierramadre.com)>; Arline Golden <[arlinegolden@gmail.com](mailto:arlinegolden@gmail.com)>

**Subject:** Planning Commission as Advocate for All of Sierra Madre--To be read and recorded.

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Manager Reynoso, please share this email with all Planning Commission members, and ask the City Clerk to include it in the record. It is being submitted in advance of today's 3pm deadline. We would be grateful if you **emailed us your acknowledgement of receipt.**

I10-1

We are writing as concerned citizens and Sierra Madre taxpayers in advance of the Planning Commission meeting tonight, as we are unable to attend to voice our opposition to the Monastery Meadows project.

I10-2

**Please reject any efforts to change the zoning category of the Monastery property.**

I110-3

Here are our key points for your consideration:

1. We need the Commission to protect the interests of all residents of our city, and resist the approaches of the carpetbagging West Side developers who are trying to shape the public discussion of the Meadows project and circumvent significant and extensive community concerns.

I110-4

The Central Fact:

The original assumption that the only choice we had at the outset was to change zoning from an institutional to a residential development of the Monastery land was an invalid assumption, and one that was never explored or explained/communicated to the residents most affected by this change.

I110-5

The assumption never considered the negative consequences of increased risks of fire, death, water restriction, traffic and parking congestion entailed by changing from one institutional building to 42 residential houses, plus their possible add-on units, their pools, landscaping, and multiple other needs.

Following are just some of the obvious negative consequences of this change in zoning to the town of Sierra Madre as a whole and to its citizens.

I110-6

2. This project is, as the EIR itself reveals, **a true disaster on many levels--**

I 110-7

Specifically:

**SEVERELY INCREASED RISK OF FIRE AND DEATH**

-California is presently undergoing months of unremediated wildfires that we've been told will only spread and continue with climate change.

I 110-8

-Just the construction of the 42 units and possible add-ons and their landscaping would create months of smoke, dust, congestion, noise and worst of all--possible fire from mechanical sparks. The data from the National Fire Prevention Association underscore this risk issue.

-Adding so many more people in one crowded location creates more crowded and chaotic evacuation in the almost inevitable result of future fire.

I 110-9

-Location of this development up against the mountains and with little access/egress makes it even more difficult for Fire Dept/Police Dept. to evacuate residents, with possible injury or even death to both the residents and the Fire and Police Departments.

-To make matters worse, we would lose the space where fire helicopters gathered to fight the Bobcat fire, adding more risk of wildfire spread and possible death across our entire community.

I 110-10

**INCREASED NEED FOR WATER IN TIME OF CONTINUING DROUGHT**

-We are already being asked to restrict water, and seeing the results of continuing drought in dying trees and other fauna

I 110-11

-Adding 42 more units plus their potential add-on units, increased water and sewer needs, swimming pools, gardening and landscaping water usage would demand far more water than one institutional building with perhaps one pool and landscaping. The assurances from the prior City Manager that Sierra Madre will buy enough water to support itself for 50 more years are predicated on false assumptions--the City can't buy water if the state constrains or curtails any and all such arrangements.

I 110-12

**INCREASED CONGESTION, TRAFFIC, PARKING, AND IMPACT ON SCHOOLS, FIRE, POLICE, AND ALL CITY SERVICES**

I 110-13

-The additional residents of the 42 units (and potential add-ons) would have huge impact on our schools and all city services, as well as on traffic congestion and village parking. I 110-14

Who will end up paying for the increased needs of these services? I 110-15

-Additionally, the residents of the units will themselves require bringing in more people to clean their houses, maintain their swimming pools, gardens and landscape, provide nanny and tutoring services. I 110-16

Where will these people park? I 110-17

Will all this extra congestion and parking require installing traffic lights, which is one of the great benefits Sierra Madre has been able to live without? I 110-18

3. There is **no significant net gain in tax revenues for this city** should the Meadows project be approved and built--the County would get the lion's share of any property taxes in the new development. And even with one-time inbound owner construction fees assessed by Sierra Madre, the burden on our infrastructure and service deliverers (fire, sewer, police, EMT) would soon dangerously stretch both budgets and personnel. I 110-19

4. Without a zoning variance, the Meadows project cannot move forward. Thinly-veiled threats by project advocates of retaliatory litigation or of other even more inappropriate use of the 20 acre parcel **have no basis in real estate or civil law . One can develop one's own private property, so long as that development does not present a clear and present danger to the surrounding community. This development threatens the life of the entire city.** I 110-20

The Planning Commission can demonstrate its civic wisdom and big-picture perspective on the short and long-term needs of our city by rejecting efforts to make this zoning change. Please stop the Meadows development efforts. I 110-21



Daniel and Arline Golden

--

Dan Golden, PhD

Director, GOLDENWORDS College and Life Planning Consultants

278 East Alegria Avenue Sierra Madre, CA 91024

626.355.1919

Make Every Word...A GOLDENWORD

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## Response to Comment Letter I10

Individual

Daniel and Arline Golden, PhD

September 2, 2021

- I10-1** The comment requests the comment letter be shared with the Planning Commission. The comment does not raise an issue related to the adequacy of the Draft EIR.
- I10-2** The comment expresses opposition for the proposed project but does not raise any issue concerning the adequacy of the Draft EIR.
- I10-3** The comment expresses opposition to the zoning change associated with the proposed project but does not raise any issue concerning the adequacy of the Draft EIR.
- I10-4** The comment expresses the commenter's general opinion of the project Applicant and does not raise an issue related to the adequacy of the Draft EIR.
- I10-5** The comment expresses concern with the zoning change associated with the proposed project and argues it would have negative consequences on the area. The project site is currently zoned as Institutional (I) and would be changed to Specific Plan (SP) Impacts associated the Specific Plan and the future development of 42 residential units on fire risks and fire protection services, water supplies, traffic, *inter alia*, are analyzed and disclosed in the Draft EIR (see Section 4.15, Public Services; 4.19, Utilities and Service Systems; and 4.20, Wildfire).
- I10-6** The comment is an introduction to comments that follow. The comment does not raise an issue related to the adequacy of the Draft EIR.
- I10-7** The comment expresses the opinions of the commenter regarding the zone change and does not raise an issue related to the adequacy of the Draft EIR.
- I10-8** The comment expresses concern regarding the impact construction would have on wildfires. The potential impacts of the project on wildfire risk and fire protection services were analyzed in detail in Draft EIR Section 4.20, Wildfire. Project design feature PDF-WF-1 requires the project to comply with the recommendations outlined in the Fire Protection Plan (FPP) during construction and operations, which addresses fire safety associated with the proposed project. As stated in the FPP, measures include compliance with the enhanced ignition-resistant construction standards of the 2019 California Building Code (CBC) (Chapter 7A) and Chapter 5 of the UWI code; incorporation of fire prevention and landscaping standards, per Chapter 17.52 of the SMMC; vegetation management; project site access, including road widths and connectivity, would be consistent with the City's roadway standards and the 2019 CFC Section 503; and drainage and water quality improvements. In addition, the project would provide for at least 100 feet of a Fuel Modification Area (FMA) around all buildings and 200 feet on the 200 feet of FMA on the southern side of the project, 62 to 100 feet of FMA on the eastern side, and over 100 feet of FMA on the northern side. Additional information and analysis regarding wildfire are provided in Draft EIR Section 4.20, which concluded that impacts would be less than significant.

- I10-9** The comment raises concerns regarding emergency access and evacuation associated with fire protection. Additionally, information and analysis regarding wildfire is provided in Draft EIR Section 4.20, where impacts were found to be less than significant. Please refer to Global Response GR-4.
- I10-10** The comment expresses concern regarding the loss of use of the project site as a helicopter gathering space to assist fire protection services in firefighting, most recently in the Bobcat Fire in 2020. As analyzed in Draft EIR Section 4.15, Public Services, implementation of the proposed project would not require additional fire protection service, and with compliance with applicable codes and fire safety standards, the project would have a less than significant impact on fire protection services. Furthermore, project design feature PDF-WF-1 requires the project to comply with the recommendations outlined in the FPP during construction and operations, which would minimize fire risks associated with the proposed project. Implementation of the proposed project would redevelop the existing project site from undeveloped grassland to 42 new single-family homes. Redevelopment of the site and the project's potential impacts to wildfire were analyzed in Draft EIR Section 4.20, where impacts were determined to be less than significant. As detailed in the EIR, compliance with PDF-WF-1 and local regulations governing emergency response would ensure impacts such as the project's potential to substantially impair an adopted emergency response plan or emergency evacuation plan would be less than significant. It should also be noted that the project site is not a designated helicopter base or helipad. Helicopters may utilize any open areas for emergency operations during a wildfire suppression effort, including golf courses, parks, sports fields, parking lots, roads, and others. There are numerous other open space areas very near the project site that can be used, if determined necessary, for helicopter or other firefighting staging areas. Helicopters can access various water sources with their siphons or buckets and these water sources can be existing (pools and ponds) or provided dip tanks. Fire Agencies prepare pre-fire plans that include potential staging area and dip tank locations and account for changes across the landscape, including development of vacant parcels. Alternative staging areas and dip tank sites are available and will address the comment's opinion that loss of the Project site for this purpose will cause wildfire spread and loss of life. The Los Angeles County Fire Department has many fire department officially designated and maintained helicopter bases or helipads throughout the county, some of which are even equipped with hydrants.
- I10-11** The comment expresses concern associated with water supply and drought, particularly as it relates to flora and fauna. See Global Response GR-1. The proposed project would not result in drought such that flora and fauna would be affected.
- I10-12** The comment raises concerns regarding the water demand of the proposed project. See Global Response GR-1,. Regarding the project's water use compared to an Institutional land use, please refer to Final EIR Chapter 8, Alternatives. As discussed in this section, for both Alternative 2, Existing Zoning and Land Use Designation: Communal Residential Facility Alternative, and Alternative 3, Existing Zoning and Land Use Designation: Private School Alternative, impacts to utilities and service systems would be increased as compared to the proposed project.
- I10-13** The comment represents a heading for the comment letter and notes issues related to transportation and public services. The commenter further identifies specific concerns as shown in Responses to Comments I10-14 through I10-21. As such, this particular comment does not raise specific concerns related to the adequacy of the Draft EIR.

- I10-14** The comment argues the proposed project would impact public services, traffic, and parking in the City. According to Draft EIR Section 4.15, there would be less than significant impacts to public services. Fire services, police services, schools, parks and other public facilities (such as libraries) would be able to maintain services or mitigate impacts that would help these services maintain adequate services to the City and proposed project site. Please refer to Global Response GR-6 for information about traffic.
- I10-15** The comment raises a question regarding fees associated with increased demand for public services. As stated in Draft EIR Section 4.15, the development fees from the proposed project would offset the costs associated with the increased demand for public services.
- I10-16** The comment states that there would be potential transportation impacts resulting from increased employees traveling to and from the proposed project site. According to Draft EIR Section 4.17, Transportation, the VMT impact analysis accounted for both residents and employees would result in less than significant impacts. Please refer to Global Response GR-6. for information about traffic.
- I10-17** The comment raises issues that do not appear to relate to any physical effect on the environment, as parking is not considered an environmental impact under CEQA. As discussed in Draft EIR Section 3.3, Project Description, North Sunnyside Avenue would include parking on both sides while Carter Avenue would include parking on the west side of the street. Streets A, B, and C would also include parking on the south side of the streets. In addition, each residence would have a parking garage and driveway parking. Lastly, the proposed park would include a parking lot in the southeastern corner.
- I10-18** The comment raises a question regarding potential new traffic lights to be installed as a result of the proposed project. The proposed project would not require the installation of new traffic lights but would include installation of one stop sign at the southern boundary of the site, along Carter Avenue.
- I10-19** The comment raises economic issues that do not appear to relate to any physical effect on the environment or the adequacy of the Draft EIR.
- I10-20** The comment raises social and legal issues that do not appear to relate to any physical effect on the environment or the adequacy of the Draft EIR.
- I10-21** The comment provides concluding remarks and expresses opposition for the proposed project, and does not raise any issue concerning the adequacy of the Draft EIR.

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Comment Letter I11

Sept 7, 2021

**AMERICAN LEGENDS**

562 Woodland Drive  
Sierra Madre, CA 91024

**LETTER TO THE EDITOR**

**COULD YOU KILL THIS TREE?**

The Quercus agrifolia or Coastal Oak is one of 5 types of trees that is protected by the town of Sierra Madre. They can grow to an amazing height and can create a canopy of shade that extends to 6 times the size of the tree. At least that is the case of this tree.

Possibly planted near the time the Mater Delorosa purchased the land referred to as "The Monastery" in the early 1920's this tree has grown to a height of 40 feet and a width of 50 feet. It quietly looks over the entire meadow area, where it has stood for almost 100 years. It should have a green space created to surround it, park benches placed under it, and a light used to light it up at night for all to see and enjoy. What a magnificent space it could be. Instead the tree is quietly counting the days until it will be bulldozed by Urban West and replaced by 42 homes called "The Meadows at Bailey Canyon" Is this the fate it deserves?

This tree, "an additional nine more Coastal Oak trees, a "supposedly protected tree" in Sierra Madre, and another 91 additional trees are slated to be "bulldozed or removed. Of the total 101 trees awaiting the same death 10 are Morton Bay figs, 64 jacaranda trees, 34 Chinese Elm trees, and assorted other varieties. It might be possible to save an additional 64 mature trees, but not all the trees on the list for removal are worth the expense of boxing to replant.

However, a complete removal of all these trees to simply please the developer is also not the answer. One of the many concerns is that this housing development is not just a housing development but is a Specific Plan. That means it was created in conjunction with the city and the developer. If the planning commission accepts the plan as it currently is presented, none of the current rules and regulations to protect the trees on the property, the width of streets, or the updating of fire codes since the Bobcat Fire apply. Instead what the developer is proposing will be the set of rules the town will have to accept. "The Meadows at Bailey Canyon" should be just a housing development, not the "Specific Plan" it currently is. By making this change it would allow the housing development to be part of the rigorous scrutiny that all other projects have to pass in order to move forward. Think about it.

Attend the City Council meeting on September 7 in council chambers. and voice your thoughts and opinions. Nancy Beckham, Sierra Madre



I11-1

To the City Council + City Planning Commission -  
I am against the building of 42 homes on  
the grounds set forth in the attached letter.  
This will be delivered to your chambers before  
the hearing. - Ron Martineth

I11-2

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## Response to Comment Letter I11

Individual  
Ron Martineth  
September 7, 2021

- I11-1** The City acknowledges that the comment provides background information regarding the tree removal associated with the proposed project and includes the opinion regarding the tree removal. Please refer to Global Response GR-2.
- I11-2** The comment expresses opposition for the proposed project but does not raise any issue concerning the adequacy of the Draft EIR.

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Comment Letter I12

**From:** Ellen Carroll [<mailto:ecarroll2@roadrunner.com>]  
**Sent:** Tuesday, September 7, 2021 2:03 PM  
**To:** Vincent Gonzalez <[vgonzalez@cityofsierramadre.com](mailto:vgonzalez@cityofsierramadre.com)>  
**Subject:** FW: Meadows at Bailey Canyon Project & September 7 2021 meeting

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

After reading a letter to the editor in the Mountain Views News dated September 7, 2021, I was disturbed by the article regarding the trees and particularly the oak trees which are deemed to be remove from the Mater Dolorosa property to construct 42 homes. While I am not able to attend tonight's meeting, I want my objection to this to be noted and counted. Also, while it's interesting should a property owner want to remove an oak from his/her property, permits are required to do that. In this case, it sounds like the Developer is making the calls which may set a precedent for future projects.

I am hoping there is a good turnout at tonight's meeting and that the majority of those attending feel the same as I do regarding this project and also wanting to save the trees. Mater Dolorosa must

I12-1  
I12-2

have sufficient water to provide for the homes replacing these trees as new landscaping will be required even if it is drought tolerant.

Sincerely,

Ellen Carroll

↑  
I12-2  
Cont.

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**From:** Ellen Carroll <[ecarroll2@roadrunner.com](mailto:ecarroll2@roadrunner.com)>  
**Date:** Wednesday, July 7, 2021 at 3:54 PM  
**To:** <[vgonzalez@cityofsierramadre.com](mailto:vgonzalez@cityofsierramadre.com)>  
**Subject:** Meadows at Bailey Canyon Project & July 14 2021 meeting

Hi,

My name is Ellen Carroll. I am a long time resident of Sierra Madre residing at 2121 Santa Anita Ave. I am writing this email to state my objections to the above mentioned development.

My objections are as follows: one, it is located in a high fire prone area. Last year, I experienced almost being evacuated by the Bobcat fire. This was the first time a forest fire got close to jeopardize my property, which I believe is situated at a lower level than Mater Delorosa's develop will be. Secondly, due to the drought, California is facing major water shortages. This is not going away any time soon as climate changes are happening all over the State, not to mention the world. Thirdly, the development will put stress on those residents who live below and around Mater Dolorosa Retreat Center adding additional traffic and construction equipment. Finally, it will displace wildlife that make Bailey Canyon their home.

While development seems to be the answer to Mater Delarosa's financial situation, I believe that the Retreat Center has not looked into other options that would leave this section of Sierra Madre wild. I believe at one time there were discussions with other foothill communities on keeping the Foothills of San Gabriel Mountains free and open. These included reaching out to Nature Conservancy, Angeles Crest Chapter of the Sierra Club and the Audubon Society. I also understand there is the California Wilderness Coalition which focuses on preserving wild places.

Finally, I would hope that the environmental impact report reflects these concerns and takes into consideration other avenues to protect and save this area.

Sincerely,

Ellen Carroll

I12-3  
I12-4  
I12-5  
I12-6  
I12-7  
  
I12-8  
  
I12-9

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## Response to Comment Letter I12

Individual  
Ellen Carroll  
September 7, 2021

- I12-1** The comment expresses opposition for the proposed project and raises concerns regarding tree removal. See Global Response GR-2 .
- I12-2** The comment raises concerns regarding tree replacement and water supply See Global Response GR- 1 and Global Response GR-2.
- I12-3** The comment is an introduction to comments that follow and does not raise an issue related to the adequacy of the Draft EIR.
- I12-4** The comment states concerns related to the Bobcat fire and the project being located within a Very High Fire Hazard Severity Zone (VHFHSZ). Project design feature PDF-WF-1 requires the project to comply with the recommendations outlined in the FPP (FPP) during construction and operations to minimize the risk of wildfires and ensure adequate fire protection is available. As concluded in EIR Section 4.20, Wildfire, impacts related to wildfire would be less than significant. See Global Response GR-3.
- I12-5** The comment expresses concerns related to drought and water supply but does not raise an issue related to the adequacy of the Draft EIR. See Global Response GR-1.
- I12-6** The comment raises traffic related issues. Please refer to Global Response GR-6.
- I12-7** The comment states concern regarding the project's impact on wildlife habitat in Bailey Canyon. The proposed project would not have any indirect effects on Bailey Canyon, which is not part of the proposed project site. As discussed in Draft EIR Section 4.4, Impacts to biological resources would be less than significant with implementation of MM-BIO-1, MM-BIO-2, and MM-BIO-3.
- I12-8** The comment expresses the opinions of the commenter and economic concerns that do not raise an issue related to the adequacy of the Draft EIR.
- I12-9** The comment provides concluding remarks that do not raise any new or additional environmental issues concerning the adequacy of the Draft EIR.

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Comment Letter I13

**From:** Peter Smock [<mailto:peter48.geo@yahoo.com>]  
**Sent:** Thursday, September 9, 2021 5:54 PM  
**To:** Vincent Gonzalez <[vgonzalez@cityofsierramadre.com](mailto:vgonzalez@cityofsierramadre.com)>  
**Subject:** The Meadows Comment

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

I own my house at 393 Auburn Lane.

I have reviewed the EIR.

I think the project will be a huge positive for the city.

It will be a beautiful addition to our community while increasing the city's assessed value and providing a welcome boost to the city's revenues.

The environmental affects have been minimized. Traffic will increase minimally.

Finally, the monastery should be able to use their property.

Peter Smock

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I13-3

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## Response to Comment Letter I13

Individual  
Peter Smock  
September 9, 2021

- I13-1** The comment expresses support for the proposed project but does not raise any issue concerning the adequacy of the Draft EIR.
- I13-2** The comment notes that environmental effects have been minimized and traffic would increase minimally. As summarized in Table ES-1, Summary of Project Impacts, of the Executive Summary, environmental impacts disclosed in the Draft EIR were either determined to have no impact, a less than significant impact, or impacts were reduced to a less-than-significant level through identification of mitigation measures. The comment further states traffic will increase as a result of the proposed project. Please refer to Global Response GR-6.
- I13-3** The comment notes the Monetary should be able to use their property. This comment does not raise any issue concerning the adequacy of the Draft EIR.

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Comment Letter I14

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Gary Bosso  
Fairview Ave.

Interim City Manager Reynoso stated that the community is very responsive in drought, and that the timeline for approval and construction can allow for the resource to replenish.

Commissioner Dallas pointed out that as water usage drops, rates go up.

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Interim City Manager Reynoso stated that the water rate study included a cost of living increase and stated that any further increase must be done as a 218 process.

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I14-1  
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## Response to Comment Letter I14

Individual  
Gary Bosso  
September 14, 2021

**I14-1** This comment raises concerns about water supplies and potential water rate increases within the City. Please refer to Global Response GR-1, for a response addressing concerns on water supplies and the project's net-zero water use.

The commenter's concern for potential water rate increase is not within the scope of the required environmental analysis under CEQA. According to the State CEQA Guidelines, Section 15064(e) "economic and social changes resulting from a project shall not be treated as significant effects on the environment." Therefore, this portion of the comment does not contain specific concerns related to the adequacy of the environmental analysis in the Draft EIR. However, as detailed in Draft EIR Section 4.19, Utilities and Service Systems, analysis related to cost of service was conducted by utilizing the City's Comprehensive Water and Wastewater Cost of Service Study, which calculated an average water use per resident. Please see Appendix J, Comprehensive Water and Wastewater Cost of Service Study, of the Draft EIR.

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Comment Letter 115

**From:** Nancy Lingeman [<mailto:nancylingeman@yahoo.com>]  
**Sent:** Wednesday, September 15, 2021 1:00 PM  
**To:** Public Comment <[publiccomment@cityofsierramadre.com](mailto:publiccomment@cityofsierramadre.com)>  
**Subject:** Monastery Development

CAUTION: This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

To whom it may concern:

I would like to comment I was not able to make the last committee meeting, however, was able to stream it online through YouTube. I am a neighbor to the monastery on Edgeview Drive. This project proposal will have a direct impact on our property and I feel it has been very vague as plans seem to be forging ahead without much involvement from the community, which is really shocking. I wanted to comment regarding what our Fire Captain/Chief had mentioned about the field not being used for helicopter landings or for emergencies. During our Bobcat fire, which was not that long ago- my husband managed to take a picture of a helicopter in clear sight- so yes, helicopters do use this portion of land. And not only was that helicopter, we've had the Sheriffs and Search and Rescue as well.

My family was here in the 1993 fires as well and the fire almost went directly to the home just north of the monastery.

We would really appreciate that the city pay close attention not just to the monetary value of this project, but also the fire hazards and safety concerns. We have a scarcity of water as is, and I'm really reluctant about this developer being able to "pre purchase" water? What about the residents that are already being charged fees for this precious source?

Sincerely,  
Nancy Lingeman

Photos taken during Bobcat fire.

I15-1  
I15-2



115-3





Sent from my iPhone



I15-3  
Cont.

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## Response to Comment Letter I15

Individual  
Nancy Lingeman  
September 15, 2021

- I15-1** The comment expresses concern for impacts related to wildfires, fire hazards, safety and previous use of the site as a helicopter landing site. Draft EIR Section 4.20, Wildfire, analyzed impacts to wildfire and determined all impacts would be less than significant with implementation of project design feature PDF-WF-1, which requires the project to comply with the recommendations outlined in the Fire Protection Plan (FPP) during construction and operations. As detailed in the Draft EIR Section 4.9.5, Impact Analysis, of Section 4.9, Hazards and Hazardous Materials, compliance with PDF-WF-1 and local regulations governing emergency response would ensure impacts such as the project's potential to substantially impair an adopted emergency response plan or emergency evacuation plan would be less than significant. Regarding the loss of the site as a fire response/helicopter landing area, see Response to Comment I10-1.
- I15-2** This comment expresses concern for water supplies in the project site's vicinity and the proposed project's plans to "pre-purchase" water. Please refer to Global Response GR-1.
- I15-3** This comment consists of two photos taken of firefighting helicopters landing on the project site, as noted in Response to Comment I15-1. See Response to Comment I15-1.

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Comment Letter I16

**From:** Murphy, Deirdre [[mailto:murphy\\_deirdre@montebello.k12.ca.us](mailto:murphy_deirdre@montebello.k12.ca.us)]  
**Sent:** Thursday, September 16, 2021 1:19 PM  
**To:** Housing Element <[housingelement2021@cityofsierramadre.com](mailto:housingelement2021@cityofsierramadre.com)>; Public Comment <[publiccomment@cityofsierramadre.com](mailto:publiccomment@cityofsierramadre.com)>  
**Subject:** Draft SEIR

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

I would like to thank you for including the Safety Element that recommends avoiding expanding development into underdeveloped areas in a Very High Fire Severity Zones and keeping Sierra Madre as safe as possible during this hazardous fire season. Given the dreadful drought conditions that are continuing in our state the possibility of fires is only increasing.

I 116-1

Thank you  
Deirdre Murphy  
601 Woodland Drive  
Sierra Madre

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## Response to Comment Letter I16

Individual  
Deirdre Murphy  
September 16, 2021

- I16-1** The comment expresses the commenter's opinions regarding the Draft Safety Element Update (now the adopted Hazard Prevention Element) consistency with the proposed project. Please refer to Global Response GR-3 .

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Comment Letter I17

From: Arline Golden [mailto:arlinegolden@gmail.com]  
Sent: Thursday, September 16, 2021 2:14 PM  
To: Housing Element <housingelement2021@cityofsierramadre.com>; Public Comment <publiccomment@cityofsierramadre.com>  
Subject: Comments on draft SEIR for inclusion in deliberations and official records

CAUTION: This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Att: Ms Claire Lin  
Copy please to all members of the Planning Commission

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We write to urge the City and Commission to ensure that any and all reports generated pertinent to the Monastery Housing project confront our High Fire Severity Zone categorization.

As evacuees of last year's Bobcat conflagration, we urgently support the goals and amendments for the Safety Element, especially:

Hz 2.12 All new residential developments in hazard areas shall have at least two emergency evacuation routes (i.e., points of ingress and egress)

Objective Hz7: Avoid expanding development into undeveloped areas in Very High Fire Severity Zone

The proposers of the Monastery Housing Project are establishing potential fire entrapment of hundreds of families, both those within their project, if built, as well as families across the upper ridge of the City's adjacent streets.

There is nothing in the Monastery proposal that acknowledges the essential impossibility of establishing at least two emergency evacuation routes, given current street widths and topography.



I17-1

We need City officials and the Planning Commission to show their leadership in prohibiting the expansion of development in the undeveloped Monastery area planned for the construction of 42 homes, plus accessory units, garages and outbuildings.

117-2

Had the Santa Ana winds blown last year at the height of the Bobcat Fire, all this controversy would be moot, for the prevailing westerlies would have obliterated most properties across the reaches above Grandview and likely continuing at least into the upper Hastings Ranch area of Pasadena as well.

Avoiding a future fire catastrophe means curtailing any efforts to create what would be a massive tinderbox in the Northwest corner of the City. The safety of all City residents is paramount and depends on the rejection of this dangerously planned development project.

117-3

Thank for for ensuring that all members of the Planning Commission receive this email and that it gets read into the record of tonight's meeting.

Arline and Dan Golden

--

Arline Golden, Ph.D., President  
**Goldenwords Mgt. Communications**  
278 E. Alegria Ave.  
Sierra Madre, CA 91024  
626-355-1919

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## Response to Comment Letter I17

Individual

Arline and Daniel Golden, PhD

September 16, 2021

- I17-1** The comment expresses concern regarding the proposed project's impact on evacuation plans and the project's consistency with the Draft Safety Element Update (now the adopted Hazard Prevention Element). See Global Response GR-3 and Global Response GR-4.
- I17-2** The comment expresses opposition for the proposed project but does not raise any issue concerning the adequacy of the Draft EIR.
- I17-3** The comment expresses concern related to wildfire, particularly related to the Santa Ana winds. See Global Response GR-3. As discussed in Draft EIR Section 4.20.1, Existing Conditions, of Section 4.20, Wildfire, and Draft EIR Appendix F2, Fire Protection Plan, based on fire history, wildfire risk for the project site is associated primarily with a Santa Ana wind-driven wildfire burning or spotting onto the site from the north or east. The proximity of the project to large expanses of open space to the north and northeast, and the terrain within the San Gabriel Mountains, including multiple sub-drainages and canyons, has the potential to funnel Santa Ana winds, thereby increasing local wind speeds and increasing wildfire hazard in the vicinity of the project site. However, as discussed in Section 4.20.5, Impact Analysis, of Section 4.20, Wildfire, through implementation of measures outlined in the FPP (see Draft EIR Appendix F2), impacts associated with slope, prevailing winds, and other factors, that would cause the project to exacerbate wildfire risks would be less than significant.

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Comment Letter I18

**From:** Jose Reynoso <jreynoso@cityofsierramadre.com>  
**Sent:** Thursday, September 16, 2021 4:18 PM  
**To:** 'Jean Bardenheier'  
**Cc:** barbaravellturo@gmail.com; Vincent Gonzalez  
**Subject:** RE: Draft SEIR

Hi Jean,  
Thank you for submitting comments for the DEIR. Just for clarification, the SEIR is for the Housing Element and the DEIR pertains to the Monastery Property. Comments for the DEIR related to the Monastery should be sent directly to Director Gonzalez at [vgonzalez@cityofsierramadre.com](mailto:vgonzalez@cityofsierramadre.com). I have included Director Gonzalez in the response so he can add your comments to the Meadows DEIR.

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118-1  
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Thanks,  
Jose

Jose Reynoso  
Interim City Manager  
City of Sierra Madre  
232 W. Sierra Madre Blvd.  
Sierra Madre, CA 91024  
(626)355-7135  
[www.cityofsierramadre.com](http://www.cityofsierramadre.com)

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**From:** Jean Bardenheier [mailto:ankejean@earthlink.net]  
**Sent:** Thursday, September 16, 2021 2:20 PM  
**To:** Housing Element <housingelement2021@cityofsierramadre.com>; Public Comment <publiccomment@cityofsierramadre.com>  
**Cc:** barbaravellturo@gmail.com  
**Subject:** Draft SEIR

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Regarding the Draft SEIR for the proposed residential development on the Monastery property:

We are very appreciative of the City's acknowledgement in the Safety Element, of the vital importance of limiting development in High Fire Severity Zones. The concern expressed in Objective Hz 2.12 to ensure adequate ingress and egress is extremely necessary, since the only two-lane road serving the Monastery is Sunnyside, a quiet residential street. The "second entrance" is even less serviceable, a barely 20 foot wide road.

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We are grateful the City had the foresight to put this into the Safety Element.

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Sincerely,

Anke and Jean Bardenheier

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## Response to Comment Letter I18

Individual  
Anke and Jean Bardenheier  
September 16, 2021

- I18-1** The comment is provided by the City and clarifies the distinction between the Supplement EIR that was prepared for the update of the City's Housing Element (which is a part of its General Plan) and the EIR for the proposed project. The comment does not raise any issue concerning the adequacy of the Draft EIR.
- I18-2** The comment restates information contained in the Draft Safety Element (now the adopted Hazard Prevention Element). Additionally, the comment expresses concern about Carter Avenue as a secondary egress point. Please refer to Global Response GR-3, and Global Response GR-4.
- I18-3** The comment expresses support for the Draft Safety Element (now the adopted Hazard Prevention Element) but does not raise any issue concerning the adequacy of the Draft EIR. Please refer to Global Response GR-3.

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Comment Letter I19

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

From: Fan Qiu [mailto:fqiusm@aol.com]  
Sent: Monday, September 27, 2021 12:27 PM  
To: Vincent Gonzalez <vgonzalez@cityofsierramadre.com>  
Subject: Let's Preserve Sierra Madre

CAUTION: This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Sierra Madre has been my home for almost 30 years. I love it's small town atmosphere. I believe it's important to preserve it.

I I19-1

Our trees should be protected; we don't need increases of traffic (it's bad enough now); we are already having water shortages and how we are going to provide water for additional 42 large houses; plus we don't have extra resources handing the potential fire and earthquake problems. Overall the housing project will destroy our small town atmosphere and reduce the quantity of life of all Sierra Madre residents. We need preserve, reserve and protect peace of our homes, lives and environment.

I I19-4

I I19-5

I I19-6

Frances Qiu

Sent from my iPhone

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## Response to Comment Letter I19

Individual  
Frances Qiu  
September 27, 2021

- I19-1** The comment is an introduction to comments that follow.
- I19-2** The comment expresses concern regarding tree protection. See Global Response GR-2.
- I19-3** The comment expresses concern about increased traffic. See Global Response GR-6 .
- I19-4** The comment raises concerns about water supply for an additional 42 houses within the City. See Global Response GR-1.
- I19-5** The comment raises concern over fire and earthquake risk protection resources. Please refer to Draft EIR Section 4.15, Public Services, for details regarding impacts to public services and facilities as a result of project implementation. As concluded in Draft EIR Section 4.15, impacts to public services, including emergency response services, would be less than significant. Additionally, all new residential development would be required to meet California Building Code requirements for seismic safety. Regarding wildfire concerns, see Global Response GR-3.
- I19-6** The comment expresses opposition for the proposed project and provides concluding remarks that do not raise new or additional environmental issues concerning the adequacy of the Draft EIR.

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Comment Letter I20

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

From: Chris Leclerc [mailto:chris@canyoncanine.com]  
Sent: Monday, September 27, 2021 11:03 AM  
To: Vincent Gonzalez <vgonzalez@cityofsierramadre.com>  
Subject: "The Meadows"

CAUTION: This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Dear City Council Members and Planning staff;

By now you've heard it all...over and over. So I won't ask you to endure the litany of obvious reasons why this sell-out project is absolutely terrible for our community. It's the tip of an enormous iceberg that will initiate our fall on the slippery slope of extremely expedient change.

So I will say that this town has fallen under the spell of a statewide notion that every decent village owes the rest of the state some kind of favor and should therefore sacrifice all that is nice, for the "greater good". I do not agree, and I know better than to think it is mandatory. It's just easier for local politics.

I understand the notion of contributing to the greater good. It involves maintaining some semblance of a healthy, natural landscape with some space between - for all - for the greater good. It involves prioritizing the maintenance of what cannot be replaced (mature trees, open space) - for the greater good. It involves a bit of finesse (yes, even in local politics), to navigate what STATE says they can mandate. I get it...next time they offer handouts, we'll be left out, right? Well, clearly money has not been the answer, so let them leave us out and let's keep what cannot be bought.

This town doesn't have to succumb to 'upper' influence. In my America, we all have a say in what will take place in our respective communities. That's how it used to go here in Sierra Madre. Not so much anymore. State funds have apparently become far too much of a carrot for this horse (or donkey, as it were) to refuse and say NO!

So, here we go! Let's just get on with it. Destroy what is lovely and natural. Destroy what would provide for a good life for our children and grandchildren. Put all your efforts into belying up to the ones who can't care about what this community has been for many decades, thanks to the HARD WORK of those who came before us. Bring in the machines! Rip it all out and lay down the pavement. Makes me think of John Steinbeck's GRAPES OF WRATH.

1

So, so, so very sad.

The people who made this a great town would turn in their graves. Folks here used to say, "Sierra Madre stands apart from neighboring towns, because we care and want to preserve this charming way of life." Well - Now that this town wishes to be just like all the rest, let's just do it and stop pretending, shall we?

Heave HO ~ rip and GO, tear away the trees, tear away the remnants of wildlife's natural habitat...HAVE AT IT!

I hope you sleep well. And when it gets hotter than the hubs of hell because there is no shade, because there are no trees...only CONCRETE and synthetic pop-up cracker-box houses...don't complain to me.

Sincerely,  
--  
Chris Leclerc

Canyon Canine  
Dog Walking & Pet Sitting Services  
Sierra Madre, CA  
626-355-8333 / 626-533-9536

I20-1

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## Response to Comment Letter I20

Individual  
Chris Leclerc  
September 27, 2021

- I20-1** The comment provides general opposition to the project that do not raise new or additional environmental issues concerning the adequacy of the Draft EIR.

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Comment Letter I21

From: historianshouse <thehistorianshouse@gmail.com>  
Sent: Monday, September 27, 2021 8:05 AM  
To: Vincent Gonzalez  
Subject: Monastery

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

I was born and raised a Sierra Madrean. My sister is still there. My father a developer, Sierra Meadow Dr. was his development and because it was his, he lived amongst them, did what was right for the community in the preservation of the landscape and the safety of that neighborhood. His plan was ahead of its time in understanding the floods that occur after fires and understood water conservation. So far, these Monastery developers understand one thing, Profit. Sierra Madre is already land-locked, so how far will the city go to increase the tax base, higher up? The Catholic Church doesn't need the money, but again, it's a motivator. I would consider the below issues seriously before allowing the project.

I21-1

**1. TREES**

The developer's Specific Plan for the project named 'The Meadows at Bailey Canyon' calls for the removal of 100 irreplaceable mature trees, 10 of which are protected Coastal Oaks. Removing over 100 trees is a significant environmental impact, not only to the Monastery property, but to the neighboring community as well. Four goals and objectives of the City's General Plan relative to trees support PSM's position:

I21-2

Goal 1. Continued preservation and protection of existing trees.

Goal 2. Increase of the City's community forest.

I21-3

Objective R10. Maintaining and enhancing the City's significant tree resources.

Policy R10.2. Continue to develop tree preservation and protection measures.

**2. TRAFFIC**

Goal 3 of the Specific Plan is preservation of quiet neighborhoods with limited thru traffic. In reality, the project does nothing to preserve quiet surrounding neighborhoods to the east and south. It does, in fact, increase thru traffic by a minimum of 300-400 car trips a day. To get to the project, cars will have to travel local streets including Sunnyside, Lima, Carter, and Grove. There is no mention of traffic impacts on these streets. The EIR response only addresses traffic within the project itself and not its impact on the neighboring community.

I21-4

I21-5

**3. WATER**

The developer has promoted ‘net zero water usage’ as a big selling point, which, interestingly, means they will buy ‘up front’ 50 years’ worth of water. California and surrounding states are in an unprecedented drought. The Colorado River is the lowest it has ever been, and water usage is already being rationed for Nevada, Arizona, and Mexico. “Net zero” water usage implies no impact on local water supplies. It is unclear how the storage of water for the next 50 years would be achieved. Our City Council will be discussing a Mandatory Water Conservation Plan at the September 28 meeting. This is inconsistent with the General Plan Objective R12 – Optimizing the use of water resources. Building 42 large homes will be counter to this.

I21-6

I21-7

**4. FIRE**

The project site is located in a ‘very high fire hazard severity zone’, according to the Cal Dept of Forestry and Fire Protection and the Sierra Madre Fire Department. It is inconsistent with our General Plan that states, wisely, not to build in a high fire zone. Local streets can’t support emergency equipment. Parts of Sierra Madre have been evacuated three times in the last 35 years, and the incidence and intensity of wildfires have been increasing. Continuing to put families and homes in harm’s way is irresponsible.

I21-8

I21-9

**5. EARTHQUAKES**

The project is located near the Sierra Madre Fault as well as the Raymond and Clamshell Faults. In 1991, the Sierra Madre earthquake damaged one of the Monastery buildings beyond repair, and 22 homes in the proximity of Sunnyside were condemned, with damage to 403 structures, resulting in \$12.5 million in damages.

I21-10

Christie Michael Dimon

C. K. Dimon; Adjunct, Clatsop College

Construction Project Management PMI Historic Preservation

President; Board of Directors, NHOTIC  
 President; Board of Directors, Operation Resolve  
 541.429.1248

*Experience is one thing you can't get for nothing, it costs"*  
*Nōn nōbīs, Domine, nōn nōbīs, sed nōmīnī tuō dā glōriam*

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## Response to Comment Letter I21

Individual  
Christie M. Dimon  
September 27, 2021

- I21-1** The comment is an introduction to comments that follow and expresses general opposition for the project. The comment does not raise new or additional environmental issues concerning the adequacy of the Draft EIR.
- I21-2** The comment restates information regarding the removal of trees for project implementation. See to Global Response GR-2.
- I21-3** The comment restates Goal 1, Goal 2, Objective R10, and Policy R 10.2 of the Tree Preservation Element of the General Plan. Please refer to Global Response GR-2 and Draft EIR Section 4.11.5, Impact Analysis, of section 4.11, Land Use and Planning, regarding the project's consistency with the goals, objectives, and policies listed by the commenter.
- I21-4** The comment raises a general concern about noise impacts on the surrounding neighborhoods to the east and south. Please refer to Response to Comment I5-2.
- I21-5** The comment raises concerns regarding the impact to traffic on Sunnyside Avenue, Lima Street, Carter Avenue, and Grove Street. Please refer to Global Response GR-6.
- I21-6** The comment expresses concern regarding water supply and the project's net-zero water use. Additionally, the comment asks how 50 years of water will be stored. The additional supplemental water that could potentially be procured by the City as a result of the project will be stored in the Main San Gabriel Groundwater Basin and will be available to serve the public (see project design feature [PDF]-UTL-1 under Final EIR Section 3.3.14, Project Design Features). Please refer to Global Response GR-1.
- I21-7** The comment states that the project is inconsistent with the General Plan Objective R12, Optimizing the use of water resources. As concluded in Table 4.11-1 in Draft EIR Section 4.11, Land Use and Planning, the project would be consistent with the goal and impacts would be less than significant due to of the incorporation of water conservation measures including the use of native/drought-resistant landscaping and use of recycled water, and adherence to CALGreen requirements including the installation water-conserving and energy-efficient fixtures and appliances. Please refer to Global Response GR-7.
- I21-8** The comment incorrectly states that the General Plan Prohibits construction in VHFHSZ. Please refer to Global Response GR-3.
- I21-9** The comment expresses concern regarding emergency evacuation. Please refer to Global Response GR-4.
- I21-10** The City notes that the comment provides background information associated with faults near the project site. As concluded in Draft EIR Section 4.7, Geology and Soils, impacts related to seismic activity would be less than significant. Please refer to Response to Comment I36-7.

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Comment Letter I22

From: Sherry Wheelock  
 436 Grove St  
[Wheelock.sherry@gmail.com](mailto:Wheelock.sherry@gmail.com)

Thank you for the opportunity to comment on the DEIR for the "Meadows at Bailey Canyon"

Below are my comments. Please retain a copy for the administrative record.

Please respond to these comments in the Final EIR and please put me on the list of people to notify when the Final EIR is complete

I22-1

In today's environment we are having to look at housing development differently than we did when I moved to Sierra Madre 30 years ago. A project like the Meadows might have been attractive 30 years ago but that was before "Paradise", mega fires, severe droughts and questions of water supply. These are our new norms that should influence our decisions as we build for the future.

I strongly object to proposed housing development for multiple reasons:

I support all the issues put forward regarding the reasons the housing development in that space is a bad idea: trees, animal habitat, landslide and earthquake zones.

I22-2

My focus is on fire hazards and traffic concerns.

**Fire hazard:**

- Building houses in a High Fire Hazard Zone is a bad idea.
- Large houses on small lots have minimal defensible spacing.
- Lack of adequate egress during emergency evacuation for 84 cars (min 2 cars/house).
- Potential blocking fire personal to access staging points during emergency evacuation.
- Blocking emergency equipment due to inadequate street (Carter) to carry the demand.

I22-3

I22-4

I22-5

**Traffic on Carter:**

- Impact of two-way traffic on Carter at Bailey Canyon was **NOT** in the EIR.
- Very important issue as on weekends and holidays the park is full of hikers.
- No sidewalks for pedestrians that park on Grove and walk to BC.
- Grove is a narrow street and can NOT take two-way traffic when cars are also parked on the street plus pedestrians are using the street.
- Carter from Lima to the gate at monastery is **NOT** adequate and will be a disaster if not resolved.

I22-6

I22-7

I22-8

In an emergency egress situation, cars will fill the Carter exit and NO one will be able to enter, not even emergency providers. This could become a huge bottleneck and people living on Grove may find it difficult to leave their homes as the cars from the Meadows jam up.

I  
I22-9

SEIR reviewed by the Planning commission had the following:  
Objective Hz7: Avoid expanding development into undeveloped areas in Very High Fire Severity Zones.

I  
I22-10

I **totally** support Hz7 and I expect the City will adopt this into the General Plan.

I would also ask the city to work with one General Plan and one set of rules.

## Response to Comment Letter I22

Individual  
Sherry Wheelock  
September 27, 2021

- I22-1** The comment is an introduction to comments that follow.
- I22-2** The comment notes general opposition to the project for the following reasons: trees, animal habitat, landslide, earthquake zones, fire hazards, and traffic concerns. Analysis of these topics can be found in Draft EIR Sections 4.4, Biological Resources; 4.7, Geology and Soils; 4.11, Land Use and Planning; 4.17, Transportation; and 4.20, Wildfire. All impacts associated with these issues as analyzed in the Draft EIR were found to be less than significant. Please refer to Global Response GR-2.
- I22-3** The comment expresses general concern about building homes in a Very High Fire Hazard Severity Zone. Please refer to Global Response GR-3.
- I22-4** The comment expresses concern about defensible spacing on small lots. All buildings would have 100 feet of Fuel Modification Area (FMA) around each building from combination of irrigated greenbelts and paved roads. The project would be required to comply with all regulatory requirements of the SMMC and Fire Protection Plan (FPP), in accordance with PDF-WF-1. As concluded in Draft EIR Section 4.20, Wildfire, impacts related to wildfire would be less than significant.
- I22-5** The comment expresses concern over emergency evacuation, specifically about emergency egress, staging of emergency vehicles in an evacuation, and Carter Avenue being able to accommodate emergency equipment. Please refer to Global Response GR-4.
- I22-6** The comment questions whether two-way traffic on Carter at Bailey Canyon was addressed in the EIR and raises general concerns about pedestrian safety in and around Baily Canyon. It should be noted that, under SB 743, comments addressing concerns about increased traffic do not raise issues relating to the Draft EIR's transportation impacts analysis as LOS or other measures of vehicular roadway capacity and traffic congestion cannot be used to evaluate the adequacy of the Draft EIR or the project's impact on traffic and circulation under CEQA. Nonetheless, although not required as part of the EIR's transportation analysis which CEQA limits to VMT, Appendix K, Traffic Study, has been added to this Final EIR has been added for informational purpose in response to public comments and details the expected changes in traffic conditions (i.e., trips and traffic volume, with the proposed project). The report includes details on data collection (i.e., traffic counts) which were conducted at four intersections and six roadway segments in October 2020. Page 6 of Appendix K presents the trip distribution analysis for the project, and Table 7 indicates that congestion levels will not be impacted by the project at any location, including Carter Avenue. Please refer to Global Response GR-6 .
- I22-7** The comment expresses the opinion that two-way traffic is not feasible on Grove Street, when Grove Street is also accommodating parked cars and pedestrians. Improvements on Grove Street are not proposed as part of the project. Please refer to Global Response GR-6. North Grove Street is expected to experience a negligible level of traffic generated by the project, as reflected in the traffic conditions analysis and therefore this increase in traffic would not result in any safety issues along this roadway.

- I22-8** The comment expresses the commenter's opinions regarding the capacity of Carter Avenue from Lima Street to the entrance of the retreat center. Please refer to Global Response GR-5.
- I22-9** The comment expresses concern regarding emergency evacuation specifically on Carter Avenue. Please refer to Global Response GR-4.
- I22-10** The comment provides information about the future proposed objective for the General Plan update to avoid development in Very High Fire Hazard Severity Zones from the Draft EIR for the General Plan released in August of 2021. Please refer to Global Response GR-3.



Comment Letter I23

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

From: Stan Hunter [mailto:sschh@earthlink.net]  
Sent: Monday, September 27, 2021 9:00 AM  
To: Vincent Gonzalez <vgonzalez@cityofsierramadre.com>  
Subject: Monastery development

CAUTION: This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Dear Mr. Gonzales -

I have previously sent letters to the city highly critical of the development proposed at the monastery. This development is a very bad idea, it does nothing to improve the city - it actually far worsens it environmentally, visually, traffic-wise - it is strictly a money grubbing project for the monastery, which has historically (and personally) not opened it's doors nor cared one iota about Sierra Madre or its residents.

I  
I23-1

Please put a stop to this gross (on so many levels) development from happening.

Sincerely,  
Stanton Hunter  
410 Churchill Rd  
Sierra Madre, CA 91024

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## Response to Comment Letter I23

Individual  
Stanton Hunter  
September 27, 2021

- I23-1** The comment provides general opposition to the project that does not raise new or additional environmental issues concerning the adequacy of the Draft EIR. The comment expresses concern regarding visual impacts and traffic. For details regarding the analysis of those topics, please refer to Draft EIR Section 4.1, Aesthetics; EIR Section 4.17, Transportation; and Global Response GR-6.

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Comment Letter I24

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

From: margaret halpenny [mailto:halpennyster@gmail.com]

Sent: Sunday, September 26, 2021 9:13 PM

To: Vincent Gonzalez <vgonzalez@cityofsierramadre.com>

Subject: This meadows project is disgusting destroying these beautiful trees that create badly needed oxygen for the environment and the good families in Sierra Madre

I 124-1

CAUTION: This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Look to the future for the betterment of our families and friends not for the mighty dollar for few Tom Halpenny

Sent from my iPhone

I 124-2

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## Response to Comment Letter I24

Individual  
Tom Halpenny  
September 26, 2021

- I24-1** The comment provides general opposition to the project and expresses concern regarding tree removal, particularly as it relates to loss of oxygen. Please refer to Global Response **GR-2**. This amount of tree reduction proposed on site is not significant enough to result in any loss of oxygen production. In addition, as discussed in GR-2, the proposed landscape plan would incorporate more trees on-site compared to existing conditions.
- I24-2** The comment provides general opposition to the project that does not raise new or additional environmental issues concerning the adequacy of the Draft EIR.

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Comment Letter I25

**From:** Katrelya Angus [<mailto:glangus@verizon.net>]  
**Sent:** Monday, September 27, 2021 6:46 AM  
**To:** Vincent Gonzalez <[vgonzalez@cityofsierramadre.com](mailto:vgonzalez@cityofsierramadre.com)>  
**Subject:** Trees at the Meadows at Bailey Canyon

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Many of our trees are irreplaceable and are the true treasures of Sierra Madre. To cut down these trees is to destroy not only the beauty of our town, but to destroy wildlife habitats.

Please deny the proposed development.

Sincerely,

Katrelya Angus  
405 N. Canon Ave.  
Sierra Madre, CA 91024

I 125-1  
I 125-2  
I 125-3

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## Response to Comment Letter I25

Individual  
Katrelya Angus  
September 27, 2021

- I25-1** The comment expressed concern about the removal of trees. Please refer to Global Response GR-2.
- I25-2** The comment expresses concern that removal of trees will destroy wildlife habitat. As concluded in Draft EIR Section 4.4, Biological Resources, impacts to wildlife would be less than significant following implementation of identified mitigation measures.
- I25-3** The comment provides general opposition to the project that does not raise new or additional environmental issues concerning the adequacy of the Draft EIR.

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Comment Letter I26

**From:** Henry Leung <hleung32@gmail.com>  
**Sent:** Monday, September 27, 2021 8:18 AM  
**To:** Vincent Gonzalez  
**Subject:** Draft EIR Meadows at Bailey Canyon

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

To Mr. Vincent Gonzalez,

The following are comments related mostly to Section 8.6 Alternatives Impact Summary in the Draft EIR:

I 126-1

The alternatives for institutional projects referenced in Section 8.4.2 that would have conformed to the current Zoning (i.e. Senior Living Facility, High School), are referenced for comparison only and not an endorsement for them. It appears from this EIR that the alternative projects were considered having a greater impact on the surrounding community. It wasn't clear if anyone in the community was included as part of those studies.

I 126-2

In general, the proposed park is the main public benefit for the housing development. Though it was stated that a park was not considered in any alternative, then it would also be true for any proposal if it had similar amounts of area to do so. The park can be included with a high school or assisted living facility and the benefit would be the same. So if the alternatives had considered a reasonable sized building and not just the maximum buildable area per Code, then it can be assumed that a park could be included.

I 126-3

So when comparing the residential homes to either institutional project with no park included, what are the actual merits and community benefits? My argument is that the senior living facility would be of great benefit to the City. The current city's population is about 11,000 with approximately 22% over age 65. That's 2,400 residents that may consider a senior living facility in the future, especially one so close to home. This is also a great benefit for residents with older parents in need of these types of facilities. When considering community benefits as a whole, a residential project has little benefit compared to an assisted living facility.

I 126-4

The fire protection of 42 small structures as opposed to a single building is also concerning. With an institutional building type and current fire code requirements, it would be fully sprinklered and be required to have fire truck access around all the sides. The building materials and construction type would also require it to be of a higher standard for public safety, most likely concrete, concrete block and steel frame, etc. These requirements would mean that there is a greater distance between the institutional building and the existing homes. Unfortunately, the same is not true for residential homes. Houses have much lower standards based on code requirements (I assume plain wood frame construction). And since there will be 42 new property lines, they will be significantly closer to one another, particularly the existing homes that will be built along Sunnyside. This difference is completely disregarded in the report and is not correct when stating that institutional projects would have "similar" impacts to the proposed housing projects with regards to fire safety.

I 126-5

The term "net-zero" impact is used multiple times when referring to water use. This is misleading and not the true intent of a net-zero water impact project. Net-zero water use is a project that recycles all of its water, recycles its grey-water, captures rainwater, etc. Achieving a net-zero water building project is virtually impossible in Southern California since it does not rain enough, therefore water always has to come from somewhere else. The claim that the developer will pay for the amount of extra water used by the proposed project is not a "net-zero" impact. The assumption that the area will eventually recover from drought conditions, is very hopeful, but also just a guess. We are currently dealing with drought conditions that are unprecedented. No one can guarantee that the City's water supply will be replenished in the next 50 years.

I 126-6

It also appears that there is no expectation that new homeowners would be using less energy than the average household. This is also not a "no impact" implication. Private homeowners can effectively use as much water or electricity as they want and just pay for it. However, since we are all Southern California Edison customers, we are all well aware of the possibilities of brown-outs during peak summer hours. This is not a speculation; this is a fact that we all must consider our current electricity usage which is not mentioned at all in this report.

I  
I26-7  
I

Again, a single institution would have a significantly lower impact with energy and water consumption. It requires much less energy to heat and cool a single building with climate zones. It could also be required that any landscaping be drought tolerant reducing the need for watering plants. A single institution with profits and expenses to manage has much more incentive to reduce energy and water costs. The alternatives in question were presented as if they had similar impacts to the housing project when they clearly have more. These statements are not an endorsement for any building project, but I do not believe that this was a fair assessment of the alternatives.

I  
I26-8  
I

I  
I26-9  
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I  
I26-10  
I

-Henry Leung  
411 N. Sunnyside Avenue  
Sierra Madre, CA

## Response to Comment Letter I26

Individual  
Henry Leung  
September 27, 2021

- I26-1** The comment is an introduction to comments that follow.
- I26-2** The comment correctly acknowledges that the institutional use alternatives were found to result in greater impacts than the proposed project and asks how the community was involved in the process of identifying and analyzing alternatives. The CEQA Guidelines require that a “range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives” (14 CCR 15126.6[a]). While the development of project alternatives under CEQA is not a public process, the public is granted the opportunity to provide input on the scope of the Draft EIR, including potential project alternatives, during the NOP scoping period and associated public scoping meeting, which was held on July 14, 2021 from 6:00p.m. to 7:00p.m, and as part of the public review of the Draft EIR.
- I26-3** The comment expresses an opinion that the park is the main public benefit of the project and that it could be included in the other project alternatives. As explained in the reduced development scenario, the neighborhood park would not have the available funds to bring the park to fruition as a result of the decrease in development. For further information about what is required in alternatives analysis please refer to Draft EIR Section 8.1, Introduction, of Chapter 8, Alternatives.
- I26-4** The comment questions the merit and community benefit of the Reduced Development/No Park alternative and provided the opinion that the community residential facility alternative is preferable. The City acknowledges this opinion, but it does not raise new or additional environmental issues concerning the adequacy of the Draft EIR. For further information about what is required in alternatives analysis please refer to Draft EIR Section 8.1, Introduction, of Chapter 8, Alternatives.
- I26-5** The comment suggests that fire risks associated with the project would be increased compared to that of the other building standards of the proposed alternatives. As concluded in Section 8.6, Alternatives Impact Summary, all alternatives would result in less than significant impacts and would be required to prepare a Fire Protection Plan (FPP). The project will be built in accordance with California Building Code Standards as well as the California Fire Code which provides adequate safety standards for fire hazards. Information on the purpose of the FPP can be found in EIR Section 4.20.2, Relevant Plan, Policies, and Ordinances, in Section 4.20, Wildfire. Wildfire impacts associated with the proposed alternatives were determined to be less than significant and no further analysis is required.
- I26-6** The comment expresses concerns regarding water supply and the project’s net-zero water use. Please refer to Global Response GR-1.
- I26-7** The comment expresses concern that there is no expectation that residents of the project would use less water and energy and that an institution would have less water and energy usage. It is not anticipated that residents of the project would use less water and energy. However, as discussed in Draft EIR Section 4.6.2, Relevant Plans, Policies, and Ordinances, in Section 4.6, Energy, under

Title 24, new construction under the green building code standards would be required to implement measures to ensure energy and water efficiency. Please refer to Global Response GR-1. As discussed in Chapter 8, Alternatives, of the EIR, both Alternatives 2 and 3, would result in higher water usage than the proposed project.

**I26-8** The comment suggests that landscaping be required to be drought tolerant. As stated in Draft EIR Section 3.3.4, Conceptual Landscape Plan, the project landscaping plan would include drought tolerant tree and plant species.

**I26-9** The comment expresses the opinion that an institution would have more incentive to reduce energy and water usage. However, the level to which future users will be incentivized to reduce energy and water usage is too speculative to be factored into the alternatives analysis at this time. However, as discussed in Chapter 8, Alternatives, of the EIR, both Alternatives 2 and 3, would result in higher water usage than the proposed project.

**I26-10** The commenter's opinion is that Draft EIR Chapter 8 does not represent a fair assessment of project alternatives. However, the comment does not suggest any additional alternatives for consideration. The alternatives to the proposed project as analyzed in Draft EIR Chapter 8 were developed in accordance with CEQA Guidelines Section 15126.6. In developing the alternatives to be addressed in the Draft EIR, the potential alternatives were evaluated in terms of their ability to meet the basic objectives of the project, while reducing or avoiding the environmental impacts of the project identified in Chapter 4, Environmental Analysis, of the Draft EIR. In determining what alternatives should be considered in the Draft EIR, it is important to acknowledge the objectives of the project, the project's significant effects, and unique project considerations. These factors are crucial to the development of alternatives that meet the criteria specified in California Code of Regulations (CCR) Section 15126.6(a). Although, EIRs must contain a discussion of "potentially feasible" alternatives, the ultimate determination as to whether an alternative is feasible or infeasible is made by the lead agency's decision-making body, the Sierra Madre City Council (see PRC Section 21081[a][3]).



Comment Letter I27

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Good Morning Mr. Gonzalez:

As an ardent, committed and passionate preservationist residing in a Mills Act designed landmark home for more than 30 years in the lovely foothill community of Sierra Madre I am vehemently opposed any housing building at the “Meadows at Bailey Canyon” Mater Dolorosa Monastery. The impact of large home development including issues of traffic, fire, trees, water and earthquakes would destroy the reasons we love this village so much. ....silence, safety, sanctuary, nature, trails, friends, schools, family residences.

I request that you, the City of Sierra Madre manager and staff, and all Sierra Madre City council members deny this proposed housing development. Thank you.

Sincerely,

Valerie “Simmie” G. Salembier  
241 East Sierra Madre Blvd  
Sierra Madre, CA. 91024  
1923 George Jones Sierra Madre Dairy  
[Simsalembier@gmail.com](mailto:Simsalembier@gmail.com)

I27-1

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## Response to Comment Letter I27

Individual  
Valerie Salmbier  
September 27, 2021

- I27-1** The comment opposes to the project and expresses concern related to the project's impacts to traffic, fire, trees, water, and earthquakes. For more information on these topics, please refer to Final EIR Sections 4.17, Transportation; 4.20, Wildfire; 4.4, Biological Resources (and Appendix C2, Arborist Report); 4.19, Utilities and Service Systems; and 4.7, Geology and Soils. For additional information on tree removal, please refer to Global Response GR-2 and for additional information regarding traffic, please refer to Global Response GR-6.

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Comment Letter I28

CAUTION: This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Dear Vincent,

Per previous correspondence, we object to the DEIR for the following reasons:

- 1. There is not enough traffic circulation to mitigate heavy traffic congestion on Sunnyside Ave and surrounding narrow residential streets. The traffic study is not thorough and does not include pedestrian traffic and weekend parking counts that impact Grove and Carter (which is particularly heavy on the weekends).
- 2. The Meadows project is in a designated fire and earthquake hazard zone. The standards for residential construction are not as stringent as institutional and 42 homes would be more of a fire, earthquake, and evacuation hazard than a single institutional building with fireproof construction.
- 3. The current zoning is institutional, not residential. The zone change would open the property up to the new SB-9 and SB-10 bills which opens the floodgates for ADUs, encroachments in setbacks and lot coverage that exceeds current guidelines. This is a state mandate and any homeowner in this project would have the right to add ADU(s) and exceed current setback and lot coverage guidelines. There is no guarantee the Meadows would be capped at 42 single-family homes.
- 4. The alternative development illustrating the multi-story, high coverage hospital is unrealistic and deceiving. As pointed out before, there is a low impact, low traffic senior housing alternative which looks nothing like the alternative illustrated in the DEIR.

I 128-1  
I 128-2  
I 128-3  
I 128-4  
I 128-5  
I 128-6  
I 128-7

1

Thank you for your consideration to the above.

**Clyde F. Stauff, SIOR**  
Senior Executive Vice President | Greater Los Angeles  
Stauff/Gan Industrial Team  
[clyde.stauff@colliers.com](mailto:clyde.stauff@colliers.com)  
CA Lic. 00464008  
Direct: +1 949 724 5543 | Mobile: +1 714 264 8539  
3 Park Plaza, Suite 1200 | Irvine, CA 92614 | USA  
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## Response to Comment Letter I28

Individual  
Clyde Stauff  
September 27, 2021

- I28-1** The comment is an introduction to comments that follow.
- I28-2** The comment expresses concern about the traffic on Sunnyside Avenue. Please refer to Global Response GR-6.
- I28-3** This comment expressed concern about traffic impacts on pedestrian traffic and parking on Grove Street and Carter Avenue. Please refer to Response to Comment I4-31 and Global Responses GR- 5 and GR-6.
- I28-4** The comment expresses concern that the project site is located within an earthquake and Very High Fire Hazard Severity Zone (VHFHSZ) and that an institution would be subject to more stringent building standards to address these hazards. The project will be built to California Building Code Standards as well as the California Fire Code which provides adequate safety standards for earthquake and fire hazards. As concluded in Draft EIR Section 4.7.5, Impacts Analysis, in Section 4.7, Geology and Soils, with implementation of mitigation measures and project design features, hazards related to seismic activity would be mitigated to less than significant levels. As stated in Draft EIR Section 4.20, Wildfire, the project would be required to adhere to the design measures provided in the Fire Protection Plan (FPP) (Appendix F2) which includes measures such as using ignition resistant construction materials and fuel modification around homes. Please refer to Global Response GR-3.
- I28-5** The comment expresses concern that the zone changes of the site would result in growth inducement impacts because the zone change would allow additional accessory dwelling units (ADUs) and that the EIR does not adequately consider the development potential of the proposed project with the inclusion of ADUs.<sup>5</sup> As detailed in the SMMC Chapter 17.22, ADUs or “second units” are permitted in residential zones (including existing residential zones in the City), to meet the requirements under State law for ADUs and Junior ADUs. Thus, ADUs and Junior ADUs would be permitted should individual homeowners choose to undergo the process of permitting and constructing an ADU on their property; however, ADUs or further subdivision of lots are not proposed as part of the proposed project or Specific Plan and it is too speculative to assume when or how many (if any) individual homeowners would choose to construct an ADU in the future for purposes of environmental review.
- Thus, Draft EIR Chapter 3, Project Description, defines the project as including 42 detached single-family dwellings, which would be implemented by a future action for a tentative tract map process. Moreover, Draft EIR Section 4.14, Population and Housing, applies a conservative regional household size of 3.2 persons per household in its analysis of the project’s potential for population growth, despite the fact that City household size and population growth trends lower than the regional average. Thus, the Draft EIR estimates a (conservatively higher) potential population growth of 134 residents that could be generated from project implementation.
- I28-6** The comment expresses the opinion on that a hospital alternative is unrealistic and that there is another senior housing alternative that was not considered in the Draft EIR. Draft EIR Chapter 8,

<sup>5</sup> Atkins. 2021. Senate Bill (SB) No. 9. Housing development: approvals. Authored by State Senator Toni Atkins, President pro Tempore. Approved by Governor September 16, 2021. [https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill\\_id=20210220SB9](https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=20210220SB9)

Alternatives, does not include an alternative for a hospital. As stated in Draft EIR Chapter 8, a communal residential alternative (Alternative 2) assumes development of senior care facilities. Alternative 2 would not meet five of eight of the objectives, and impacts would be greater under Alternative 2 compared to the proposed project. Please refer to Response to Comment I26-10 regarding the development of alternatives to the proposed project.

**I28-7** The comment provides concluding remarks and does not raise new or additional environmental issues concerning the adequacy of the Draft EIR.



Comment Letter I29

---

**From:** Nancy Lingeman [<mailto:nancylingeman@yahoo.com>]  
**Sent:** Tuesday, September 28, 2021 10:15 AM  
**To:** Vincent Gonzalez <[vgonzalez@cityofsierramadre.com](mailto:vgonzalez@cityofsierramadre.com)>  
**Subject:** Fwd: Monastery Development

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Good morning, I had sent this email below a few weeks ago to the city for public comment- but also wanted to mention, since the spraying of ‘herbicide’, or ‘mainly salt’ by the monastery in late 2019- my husband has suffered breathing issues that he did not have prior. We currently have an ongoing investigation open with the L.A County of Agriculture since this all started, but due to Covid it has been difficult to get appointments.

Sent from my iPhone

I  
I29-1

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## Response to Comment Letter I29

Individual  
Nancy Lingeman  
September 28, 2021

- I29-1** The comment addresses the spraying of herbicide on the Mater Dolorosa property. The comment does not raise new or additional environmental issues concerning the adequacy of the Draft EIR.

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Comment Letter I30

-----Original Message-----  
From: m r [mailto:randalm2000@yahoo.com]  
Sent: Tuesday, September 28, 2021 11:27 AM  
To: Vincent Gonzalez <vgonzalez@cityofsierramadre.com>  
Subject: Comments on the DEIR for the "Meadows Project"

CAUTION: This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Hello Vincent,

We are writing about the following concerns we have:  
- Housing Project Safety due to Fires in the San Gabriel mountains,  
- and the Plan is not consistent with SM General Plan and Zoning ordinances.

I 130-1

Last year Bobcat fire is a typical problem for this type of development due to the fact that it does not have at least two emergency evacuation routes for these 42 new houses, the existing streets are not wide enough for emergency exits and fire trucks. As it stands now it is a giant "not a throughway" street with only one way in/out.

I 130-2

A nursing home or a hospital, would have been a better project for this site, as even mentioned by the priests/monks representatives during several of the meetings we attended to express our concern about this massive project over the past 2 years.

I 130-3

Thank you for your attention,

1

Randall Family  
605 Edgeview Dr.  
backyard to the Meadows Project

Protect Sierra Madre - Stop The Housing Project

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## Response to Comment Letter I30

Individual  
Randall Family  
September 28, 2021

- I30-1** The comment expresses concern regarding safety of proposed housing and consistency with the City's General Plan and Zoning Ordinance. Safety issues have been analyzed throughout various Draft EIR sections including Section 4.7, Geology and Soils; Section 4.9, Hazards and Hazardous Materials; and Section 4.20, Wildfire. Regarding consistency with the City's General Plan and Zoning Ordinance, please refer to Global Response GR-7.
- 130-2** The comment expresses concern that the project does not have at least two emergency evacuation routes and that existing streets are not wide enough for emergency exists and fire trucks. Please refer to Global Responses GR-4 and GR-5-.
- 130-3** The comment provides general opposition to the project and would prefer a hospital or nursing home alternative. This comment does not raise new or additional environmental issues concerning the adequacy of the Draft EIR.

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Comment Letter I31

**From:** Mary Hopkins [<mailto:marychopkins@verizon.net>]  
**Sent:** Tuesday, September 28, 2021 11:44 AM  
**To:** Vincent Gonzalez <[vgonzalez@cityofsierramadre.com](mailto:vgonzalez@cityofsierramadre.com)>  
**Subject:** meadows project

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

John and Mary Hopkins  
[jrhopkins@verizon.net](mailto:jrhopkins@verizon.net)  
[marychopkins@verizon.net](mailto:marychopkins@verizon.net)  
272 Ramona Ave  
Sierra Madre

We are very concerned about the meadows project. We walk every day in the neighborhood of north Lima and Oak Crest. The neighborhood is in NO way able to handle all the excessive traffic associated with the meadows project.

I 131-1  
I 131-2

I am wondering if you yourself, Mr. Gonzalez, are a longtime resident of Sierra Madre? There is no regard for preserving the quality of life which has been enjoyed in this town since its founding.

I 131-3

We are highly concerned about the destruction of open spaces.

I 131-4

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## Response to Comment Letter I31

Individual  
John and Mary Hopkins  
September 28, 2021

- I31-1** The comment provides general concern about the project and does not raise new or additional environmental issues concerning the adequacy of the Draft EIR.
- I31-2** The comment expresses concern over the impacts traffic would have on the surrounding community. Please refer to Global Response GR-6.
- I31-3** The comment expresses the commenter's opinion on the project's potential impact to the quality of life for City residents. This comment does not raise new or additional environmental issues concerning the adequacy of the Draft EIR.
- I31-4** The comment expressed concern about the destruction of open space. This comment does not raise new or additional environmental issues concerning the adequacy of the Draft EIR. Impact to biological resources were analyzed in Draft EIR Section 4.4, Biological Resources. With implementation of mitigation, impacts to biological resources were determined to be less than significant.

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Comment Letter I32

**From:** Nancy Beckham [<mailto:nbeckham48@gmail.com>]  
**Sent:** Tuesday, September 28, 2021 4:01 PM  
**To:** Vincent Gonzalez <[vgonzalez@cityofsierramadre.com](mailto:vgonzalez@cityofsierramadre.com)>; Jose Reynoso <[jreynoso@cityofsierramadre.com](mailto:jreynoso@cityofsierramadre.com)>  
**Subject:** Fwd: Public Comment- Regarding Alluvial Fan open space in Sierra Madre

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

----- Forwarded message -----  
**From:** Jane Tsong <[jtsong@wca.ca.gov](mailto:jtsong@wca.ca.gov)>  
**Date:** Tue, Sep 28, 2021 at 2:58 PM  
**Subject:** Public Comment- Regarding Alluvial Fan open space in Sierra Madre  
**To:** [PublicComment@CityofSierraMadre.com](mailto:PublicComment@CityofSierraMadre.com) <[PublicComment@cityofsierramadre.com](mailto:PublicComment@cityofsierramadre.com)>

Mayor Arizmendi, Mayor Pro Tem Goss, and Council Members Garcia, Kriebs, and Parkhurst,

Thank you for your commitment to serving the people of Sierra Madre. The community of Sierra Madre prides itself on being stewards of the San Gabriel Mountain Foothills, and the commitment to safeguard Sierra Madre's character and natural resources is enshrined as a guiding principle of the City's General Plan.

I  
↓  
I32-1

Watershed Conservation Authority’s mission is to expand the open space and recreational opportunities in the San Gabriel and Lower Los Angeles Rivers Watershed area consistent with the goals of flood protection, water supply, and groundwater recharge. It is in this spirit that I want to share a considerations for the Mater Dolorosa land, which is proposed as a site of a residential development.

I32-1  
Cont.

This development will be situated on *the very last large parcel of land in the Eastern San Gabriel foothills which retains a connection between the canyons and the alluvial fan*. Alluvial fans have particularly high rates of infiltration. There, water can sink deep into the ground and recharge aquifers. Keeping remaining recharge areas as undeveloped as possible is a critical part of protecting our region’s watersheds. This land was ranked very in high in conservation value in our agency’s Foothills Open Space Acquisition Study due to its watershed value, adjacency to protected lands, potential for habitat restoration, and for public access.

I32-2

The opportunity to optimize the recharge potential on any remaining undeveloped alluvial fan land has the potential to benefit all users of the Raymond Basin far into the future. It may also serve as a buffer to absorb flows from the mountains above in an era of climate change uncertainty. If this land is covered by houses and roads, it would be prohibitive to regain all these functions in full. Please give full consideration to an alternative scenario: to acquire the land for regional public benefit and to optimize its capacity to enhance biodiversity, aquifer recharge, as well as provide flood control.

I32-3

There are various funding opportunities for the purchase and management of conservation land and we would be happy to provide information. Thank you for your time.

Jane Tsong

Project Manager

Watershed Conservation Authority

I32-4



**Jane Tsong**  
Project Manager  
c/ 323-842-2991

*Connecting Communities Through Nature*



## Response to Comment Letter I32

Individual

Barbara Velturo and Jane Tsong

September 28, 2021

- I32-1** The comment is an introduction to comments that follow.
- I32-2** The comment states that the project site is the last large parcel that connects the canyon and the alluvial fan. The comment provides further information about the high infiltration rates that allow for groundwater recharge and that the site is ranked high in conservation value. As concluded in Draft EIR Section 4.10.5, Impact Analysis, of Section 4.10, Hydrology and Water Quality, the project would result in less than significant impacts to groundwater recharge. The project would introduce impervious surfaces to the site; however, the inclusion of open space, including the proposed park, and additional drainage features would continue to contribute to adequate groundwater recharge. In addition, the project would include a 63,500-cubic-foot retention gallery, to be located within the proposed park, which would consist of approximately 2,400 linear feet of 60-inch diameter perforated pipe surrounded by gravel bed and would be consistent with the City's Low-Impact Development (LID) Plan requirements found within Section 15.58.080, LID plan requirement, of the SMMC. The retention storage gallery would be approximately 24 inches below ground and would promote water quality treatment through infiltration. Stormwater that is not retained in the underground storage gallery retention system or infiltrated into the ground would be routed to the southeast corner of the proposed park and exit to Crestvale Drive via a surface culvert and to the MS4 downstream to Arcadia Wash. With implementation of these project site improvements as well as compliance with all existing water quality regulations, impacts related to hydrology would be less than significant.
- I32-3** The comment provides a suggestion for an alternative scenario that would retain the hydrologic functions of the site. Please refer to Draft EIR Section 4.10 for details regarding site hydrology and flooding impacts associated with project implementation. As concluded in this section, impacts associated with these issues were found to be less than significant. Additionally, the commentor suggests that the land be acquired for regional public benefit to optimize its biodiversity, recharge, and provide flood control. As explained in Draft EIR Chapter 8, Alternatives, alternatives to be considered in the alternatives analysis would need to feasibly attain most of the basic project objectives. For the proposed project analysis, the No Project/No Build alternative scenario was analyzed; however, this alternative does not meet the basic objectives of the project. Additionally, the Reduced Development Alternative scenario was analyzed and determined to be the environmentally superior alternative that meets most of the basic project objectives.
- I32-4** The comment offers to provide information about options for purchase and management of conservation land. This comment does not raise new or additional environmental issues concerning the adequacy of the Draft EIR.

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Comment Letter|33

From: Barbara Vellturo [mailto:barbaravellturo@gmail.com]
Sent: Tuesday, September 28, 2021 3:49 PM
To: Jose Reynoso <jreynoso@cityofsierramadre.com>; Aleks R. Giragosian <agiragosian@chwlaw.us>; Vincent Gonzalez <vgonzalez@cityofsierramadre.com>; PlanningCommission <PlanningCommission@cityofsierramadre.com>
Subject: Important information received from an environmental group.

CAUTION: This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

This information was submitted to the City Council and is an important consideration in the Environmental Impact of the Housing Project.

The Permanent impact, of the potential loss of this resource, HAS NOT been considered in the DEIR and MUST be considered and responded to, in the final EIR.

.....

Mayor Arizmendi, Mayor Pro Tem Goss, and Council Members Garcia, Kriebs, and Parkhurst,

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Thank you for your commitment to serving the people of Sierra Madre. The community of Sierra Madre prides itself on being stewards of the San Gabriel Mountain Foothills, and the commitment to safeguard Sierra Madre's character and natural resources is enshrined as a guiding principle of the City's General Plan.

Watershed Conservation Authority's mission is to expand the open space and recreational opportunities in the San Gabriel and Lower Los Angeles Rivers Watershed area consistent with the goals of flood protection, water supply, and groundwater recharge. It is in this spirit that I want to share a considerations for the Mater Dolorosa land, which is proposed as a site of a residential development.

This development will be situated on the very last large parcel of land in the Eastern San Gabriel foothills which retains a connection between the canyons and the alluvial fan. Alluvial fans have particularly high rates of infiltration. There, water can sink deep into the ground and recharge aquifers. Keeping remaining recharge areas as undeveloped as possible is a critical part of protecting our region's watersheds. This land was ranked very in high in conservation value in our agency's Foothills Open Space Acquisition Study due to its watershed value, adjacency to protected lands, potential for habitat restoration, and for public access.

The opportunity to optimize the recharge potential on any remaining undeveloped alluvial fan land has the potential to benefit all users of the Raymond Basin far into the future. It may also serve as a buffer to absorb flows from the mountains above in an era of climate change uncertainty. If this land is covered by houses and roads, it would be prohibitive to regain all these functions in full. Please give full consideration to an alternative scenario: to acquire the land for regional public benefit and to optimize its capacity to enhance biodiversity, aquifer recharge, as well as provide flood control.

There are various funding opportunities for the purchase and management of conservation land and we would be happy to provide information. Thank you for your time.

Jane Tsong
Project Manager
Watershed Conservation Authority

133-1

133-2

133-3

133-4

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## Response to Comment Letter I33

Individual  
Nancy Beckham  
September 28, 2021

**I33-1 through I33-4:** This comment letter is the same comment letter from Jane Tsong of the Watershed Conservation Authority that was included in Response to Comment Letter I32. Please see Responses to Comment Letter I32.

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Comment Letter I34

**From:** Nancy Beckham [<mailto:nbeckham48@gmail.com>]  
**Sent:** Tuesday, September 28, 2021 4:39 PM  
**To:** Vincent Gonzalez <[vgonzalez@cityofsierramadre.com](mailto:vgonzalez@cityofsierramadre.com)>; Jose Reynoso <[jreynoso@cityofsierramadre.com](mailto:jreynoso@cityofsierramadre.com)>  
**Subject:** Re: Public Comment- Regarding Alluvial Fan open space in Sierra Madre

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Vincent and Jose,  
Possible land conservancy was not addressed in the DEIR at all. Jane Tsong plans to come to a city council meeting and present the concerns she and her agency have with any building on that alluvial plan which is the Monastery. land. She will also be writing to you directly to align her concerns to the DEIR, by October 4.  
Thanks,  
Nancy Beckham

I I34-1  
I I34-2

On Tue, Sep 28, 2021 at 4:16 PM Vincent Gonzalez <[vgonzalez@cityofsierramadre.com](mailto:vgonzalez@cityofsierramadre.com)> wrote:

Thank you for your comment. I forwarded to the environmental consultant for inclusion in response to comments in the DEIR for The Meadows project.

I I34-3

Vincent Gonzalez

Director of Planning and Community Preservation Department

**From:** Nancy Beckham [mailto:[nbeckham48@gmail.com](mailto:nbeckham48@gmail.com)]  
**Sent:** Tuesday, September 28, 2021 4:01 PM  
**To:** Vincent Gonzalez <[vgonzalez@cityofsierramadre.com](mailto:vgonzalez@cityofsierramadre.com)>; Jose Reynoso <[jreynoso@cityofsierramadre.com](mailto:jreynoso@cityofsierramadre.com)>  
**Subject:** Fwd: Public Comment- Regarding Alluvial Fan open space in Sierra Madre

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

----- Forwarded message -----  
**From:** Jane Tsong <[jtsong@wca.ca.gov](mailto:jtsong@wca.ca.gov)>  
**Date:** Tue, Sep 28, 2021 at 2:58 PM  
**Subject:** Public Comment- Regarding Alluvial Fan open space in Sierra Madre  
**To:** [PublicComment@CityofSierraMadre.com](mailto:PublicComment@CityofSierraMadre.com) <[PublicComment@cityofsierramadre.com](mailto:PublicComment@cityofsierramadre.com)>

Mayor Arizmendi, Mayor Pro Tem Goss, and Council Members Garcia, Kriebs, and Parkhurst,

Thank you for your commitment to serving the people of Sierra Madre. The community of Sierra Madre prides itself on being stewards of the San Gabriel Mountain Foothills, and the commitment to safeguard Sierra Madre’s character and natural resources is enshrined as a guiding principle of the City’s General Plan.

Watershed Conservation Authority’s mission is to expand the open space and recreational opportunities in the San Gabriel and Lower Los Angeles Rivers Watershed area consistent with the goals of flood protection, water supply, and groundwater recharge. It is in this spirit that I want to share a considerations for the Mater Dolorosa land, which is proposed as a site of a residential development.

This development will be situated on *the very last large parcel of land in the Eastern San Gabriel foothills which retains a connection between the canyons and the alluvial fan*. Alluvial fans have particularly high rates of infiltration. There, water can sink deep into the ground and recharge aquifers. Keeping remaining recharge areas as undeveloped as possible is a critical part of protecting our region’s watersheds. This land was ranked very in high in conservation value in our agency’s Foothills Open Space Acquisition Study due to its watershed value, adjacency to protected lands, potential for habitat restoration, and for public access.

The opportunity to optimize the recharge potential on any remaining undeveloped alluvial fan land has the potential to benefit all users of the Raymond Basin far into the future. It may also serve as a buffer to absorb flows from the mountains above in an era of climate change uncertainty. If this land is covered by houses and roads, it would be prohibitive to regain all these functions in full. Please give full consideration to an alternative scenario: to acquire the land for regional public benefit and to optimize its capacity to enhance biodiversity, aquifer recharge, as well as provide flood control.

134-4

There are various funding opportunities for the purchase and management of conservation land and we would be happy to provide information. Thank you for your time.

Jane Tsong

Project Manager

Watershed Conservation Authority

↑  
134-4  
Cont.  
↓



**Jane Tsong**  
Project Manager  
c/ 323-842-2991

*Connecting Communities Through Nature*



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## Response to Comment Letter I34

Individual  
Nancy Beckham  
September 28, 2021

**I34-1 through I34-4:** This comment letter is the same comment letter from Jane Tsong of the Watershed Conservation Authority that was included in Response to Comment Letter I32. Please see Responses to Comment Letter I32.

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Comment Letter I35

-----Original Message-----  
From: DARLENE PAPA [mailto:ipobelle@verizon.net]  
Sent: Wednesday, September 29, 2021 7:28 AM  
To: Vincent Gonzalez <vgonzalez@cityofsierramadre.com>  
Subject: EIR & the Monastery Project

CAUTION: This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Dear City Council,

Please, if you value our wonderful Sierra Madre community, do NOT support the project as presented.

As is, this project very negatively impacts traffic, trees, wildlife, and water:

As is, the traffic situation, already bad, will be worse, increasing pollution and accidents.

As is, removal of 100 mature trees, 10 protected oak trees, is a truly significant loss.

As is, increased traffic, people, and decreased trees is a huge upset to our community's wildlife habitats, already badly compromised.

As is, the increase in water usage is totally counter to our efforts to conserve.

Please reevaluate this project. We can do better.

Thank you,  
Darlene Papa  
91 W. Montecito Ave.

I 135-1  
I 135-2  
I 135-3  
I 135-4  
I 135-5  
I 135-6

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## Response to Comment Letter I35

Individual  
Darlene Papa  
September 29, 2021

- I35-1** The comment expresses opposition to the proposed project as presented and cites concern for impacts to traffic, trees, wildlife, and water. The specific concerns are outlined, below, as shown in Responses to Comments I35-2 through I35-6.
- I35-2** The comment raises concern for existing traffic within the project site’s vicinity and the project’s potential impacts to traffic congestion, subsequent air quality pollution, and safety.
- The Draft EIR addresses the commenters concerns in Draft EIR Sections 4.17, Transportation, and 4.3, Air Quality. Please refer to Global Response GR-6 for information on traffic impacts. Draft EIR Section 4.17 details consistency with existing General Plan policies and objectives highlighting the need for safety. Moreover, the project would include sidewalks along the proposed streets to promote pedestrian safety and mobility within the project site and local vicinity and would not result in a hazardous roadway design or unsafe roadway configuration. Thus, impacts associated with transportation were found to be less than significant. Finally, as described in Draft EIR Section 4.3, potential health impacts related to carbon monoxide (CO) hotspots from mobile source emissions (i.e., vehicular traffic) were determined to not be cumulatively considerable and would result in less than significant impacts.
- I35-3** The comment expresses concern for the removal of mature trees on the project site, including protected oak trees, as a result of the proposed project. Please refer to Global Response GR-2
- I35-4** This comment states the proposed project would impact the community’s wildlife habitat. As described in Draft EIR Section 4.4, Biological Resources and Section 4.10, Land Use and Planning, the project is in compliance with the City’s General Plan and would not remove high quality wildlife habitat. Thus, the project would have a less-than-significant impact on resident wildlife, consistent with Goal 1 of Chapter 2, Section 2 of the General Plan. Additionally, the project would not impact any wildlife corridors; therefore, no wildlife passages would be affected, consistent with Policy R5.2. As such, the project would be consistent with wildlife protection policies of the General Plan.
- I35-5** This comment notes concern for water usage and potential conflict with conservation efforts. The proposed project would not substantially increase demand of the City’s water supply such that the relocation or construction of new or expanded water supply facilities would be needed, as further detailed in Draft EIR Section 4.19, Utilities and Service Systems. Moreover, the City is expected to meet future demands for normal year, single dry years, and five consecutive drought years from 2025 through 2045. For more discussion on water usage, please see Global Response GR-1.
- I35-6** This comment requests a reevaluation of the project’s environmental impacts. As detailed above, Responses to Comments I35-1 through I35-5, the Draft EIR adequately analyzed the proposed project’s impacts as required under CEQA. Furthermore, as a result of these responses to comments, “substantial revisions” requiring recirculation of the Draft EIR, as set forth in CEQA Guidelines, Section 15073.5, were not required.

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Comment Letter I36

From: missastrocats [mailto:astrocats@gmail.com]
Sent: Tuesday, September 28, 2021 7:47 PM
To: Vincent Gonzalez <vgonzalez@cityofsierramadre.com>
Subject: DIER Meadows Project

CAUTION: This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Hello

It is inconceivable to me that you are going forward with this project at this time.

The drought is far worse than ever before. We bought our house about 43 years ago and all the bushes and hedges that were on the property at that time are still here and we NEVER had to water them EVER and now they are dying. We have no lawn - just dirt in front and back. We lost our gorgeous old Silver Maple trees that dwarfed our house. Trees that lived here for over 70 years. This drought is not going to end. Climate warming is real and worsening.

I36-1

Sunnyside Ave is an extremely quiet street. There is very little traffic. We hear the birds, see the deer and bears.

I36-2

If we wanted to live next to cookie cutter houses we would move to the Inland Empire.

Fires are increasing every year. We used to worry about them in the summer and fall but now we worry year round. Had the Santa Anas come up during the Bobcat fire every house above Grandview all the way to Hastings Ranch could have been lost.

I36-3

If those houses are built all of Sierra Madre will suffer from water rationing and traffic congestion. We who live next to the property will encounter unheard of noise of building construction for a very long time.

I36-6

We are quite aware that there is an earthquake fault under that property as we all remember the large quake in 1991 that damaged or demolished so many homes including the Beloved Monestary.

I36-7

It's just not a good idea.

I36-8

Barbara McCallon

490 N Sunnyside Ave
Sierra Madre
astrocats@gmail.com

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## Response to Comment Letter I36

Individual  
Barbara McCallon  
September 29, 2021

- I36-1** The comment expresses opposition to the proposed project and cites concern about drought conditions for the project area. The commenter also describes existing conditions and concerns related to the commenter's property, which is not a part of the project site. As such, no response is required. However, as further detailed in Draft EIR Section 4.19, Utilities and Service Systems, the proposed project would not substantially increase demand of the City's water supply such that the relocation or construction of new or expanded water supply facilities would be needed. Moreover, the City is expected to meet future demands for normal year, single dry years, and five consecutive drought years from 2025 through 2045. For more discussion on water usage, please see Global Response GR-1.
- I36-2** The comment notes existing noise conditions of Sunnyside Avenue, expresses concerns related to traffic and wildfire, and opposes the project's design. However, the comment does not express concern with the adequacy of the Draft EIR's analysis related to noise, as detailed in Draft EIR Section 4.13, Noise. Please refer to Global Response GR-6 for a discussion related to traffic. In addition, as discussed in Draft EIR Section 4.4, Biological Resources, with implementation of mitigation, impacts to biological resources would be less than significant. The proposed project would be implemented with the adoption of a Specific Plan, which includes design guidelines subject to the approval of City decision makers.
- I36-3** The comment represents a general concern for wildfire in the project area. Wildfire was analyzed in Draft EIR Section 4.20, Wildfire. Impacts related to wildfire were determined to be less than significant. In addition, the project would be required to comply with project design feature PDF-WF-1, which includes compliance with the project's Fire Protection Plan (FPP), included as Draft EIR Appendix F2.
- I36-4** The comment states implementation of the proposed project would mean the City will suffer from water rationing. Please see Global Response GR-1. It should be noted that water rationing by the City's residents would not occur with implementation of the proposed project.
- I36-5** The comment states the project would result in traffic congestion. Please refer to Global Response GR-6.
- I36-6** The comment notes concern for construction noise as a result of the project. As stated in Response to Comment I36-2, above, the Draft EIR analyzed noise impacts in Draft EIR Section 4.13. Potentially significant temporary noise impacts during construction activities were disclosed and mitigation was incorporated to reduce impacts to a less than significant level. A significant impact would occur when construction takes place near the project boundaries, specifically impacting sensitive receptors such as the single-family residences to the west and south of the project site (see Table 4.13-5, Construction Noise Levels at Noise-Sensitive Uses, of the Draft EIR). However, with the incorporation of MM-NOI-1, the City and/or the Construction Contractor would be required to implement noise reduction measures during all construction activities which would ensure compliance with the applicable noise limits and reduce impacts to a less than significant level. Noise reduction measures would include administrative controls, engineering controls, and noise barriers.

- I36-7** This comment notes concern with an earthquake fault located within the project area. Draft EIR Section 4.7, Geology and Soils, states the project site is not located on a known active, potentially active, or inactive fault as delineated on the Alquist-Priolo Earthquake Fault Zoning Map. However, the closest earthquake fault to the project site is the Sierra Madre Fault, located approximately 700 feet to the north. As detailed in Draft EIR Section 4.7 and Appendix E, the potential for ground rupture on the project site is considered low. Furthermore, the proposed project would be required to comply with all existing regulations, including the CBC and the SMMC in order to ensure seismic safety. In addition, the project would comply with project design features PDF-GEO-1 through PDF-GEO-15, and MM-GEO-1 which includes project specific recommendations from the geotechnical investigation (included as Draft EIR Appendix E).
- I36-8** This comment expresses opposition to the proposed project and does not express concern with the adequacy of the Draft EIR.

Comment Letter I37

**From:** Daniel Golden <dangolden0@gmail.com>  
**Sent:** Tuesday, September 28, 2021 3:08 PM  
**To:** Vincent Gonzalez  
**Cc:** Stop Housing Project; Preserve Sierra Madre; Barbara Velturo; Alexander Arrieta  
**Subject:** Comment on DEIR: Unacceptable Fire Risks

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Thank you for the opportunity to comment on the DEIR for the "Meadows at Bailey Canyon"

Below are my comments. Please retain a copy for the administrative record.

Please respond to these comments in the Final EIR and please put me on the list of people to notify when the Final EIR is complete.

I strenuously object to the proposed housing development. It is inconsistent with many of the Policies and Values of our city's General Plan. **I am especially concerned with the massive fire dangers attendant on the actual construction of the Monastery Project, and continuing if actually built.**

There should be no dispensation for the developer, nor override of crucial goals and amendments for the Safety Element, notably:

Objective Hz 2.12: All new residential developments in hazard areas shall have at least two emergency evacuation routes (i.e., points of ingress and egress)

Objective Hz7: Avoid expanding development into undeveloped areas in Very High Fire Severity Zone

The developers have failed to address important prevention and mitigation issues linked to the risks of construction itself, as supported by data from the report, **Fires in Structures Under Construction or Renovation**, published by the *National Fire Prevention Association*. On average, there are some 3650 fires generated on such sites EVERY YEAR over the past decade. 10 fires per day!

The fire risk Zoning of the Monastery area should prevent construction of any kind, of course. City and Developer would face significant legal exposure should construction be approved and any emergent fires on site be carried into adjacent neighborhoods in all directions.

Even a privately-contracted fire pumper, staffed 24/7 by qualified fire personnel and supported by sufficient water tankers would not ameliorate risk sufficiently during construction. And, Once this

I37-1

I37-2

I37-3

I37-4

I37-5

I37-6

pumper resource were to be removed post-site development, the increased burden on City and County firefighting assets would continue in perpetuity.

↑ I37-6  
| Cont.

Failure to attend to major fire risk analysis is one of many flaws in the developer's Specific Plan. We must not let the project secure approval and create a potential tinder box in the entire Northwest Quadrant of our City.

↑ I37-7

Daniel Golden

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Dan Golden, PhD

Director, GOLDENWORDS College and Life Planning Consultants

278 East Alegria Avenue Sierra Madre, CA 91024

626.355.1919

Make Every Word...A GOLDENWORD

## Response to Comment Letter I37

Individual  
Daniel Golden  
September 28, 2021

- I37-1** The comment requests the following comments (Comments I37-2 through I37-7) be included in the responses to comments of the Final EIR. As shown, the commenter's request has been recorded as part of this Final EIR. Furthermore, the Final EIR will be included as part of a future public hearing on the proposed project for the City's consideration and review.
- I37-2** The comment expresses opposition to the proposed project and states the project is inconsistent with the City's General Plan, particularly noting concern with wildfire hazards. Draft EIR Section 4.20, Wildfire, analyzed the project's potential impacts related to wildfire, which were determined to be less than significant. In addition, as detailed in the EIR, the project would be required to comply with project design feature PDF-WF-1, which requires implementation of the requirements outlined in the Fire Protection Plan (FPP), included as Appendix F2 of the EIR. Per Draft EIR Section 4.20, compliance with the FPP would include implementation of evacuation requirements, implementation of an FMA, annual vegetation management, and on-going/as-needed fuel modification maintenance. In addition, prior to bringing lumber or combustible materials onto the site, site improvements within the active development area shall be in place, including utilities, operable fire hydrants, an approved, temporary roadway surface, and construction phase fuel modification zones established. These features would be approved by the fire department or their designee prior to combustibles being brought on site. Furthermore, vegetation management would be implemented as an interim fuel modification zone (FMZ) throughout the construction phase as there may be periods of time where structures are exposed to wildland fuels, consistent with the FPP. These features would reduce impacts related to wildfire. Please refer to Global Response GR-7.
- I37-3** The comment notes two Safety Element policies mentioned are of the Draft Safety Element Update (now the adopted Hazard Prevention Element). Please refer to Global Response GR-3.
- I37-4** The comment raises concern for the project's potential risk to construction-related fires. The risks associated with fire and wildfire have been analyzed throughout the Draft EIR, including under Draft EIR Sections 4.9, Hazards and Hazardous Materials; 4.15, Public Services; 4.11, Land Use and Planning; and 4.20. As such, the comment's concern has been adequately addressed in the Draft EIR. Furthermore, the project includes the adoption of project design feature PDF-WF-1, included as Appendix F2 of the Draft EIR, which requires the project to comply with recommendations outlined in the FPP for both construction and operations. The project would be required to comply with the pre-construction requirements outlined in the FPP. Pre-construction requirements would occur before any lumber or combustible materials would be brought onto the site. Requirements include site improvements, including utilities, operable fire hydrants, a temporary roadway surface, and construction phase fuel modification established. The project would be designed and constructed in accordance with all applicable provisions of the City's Fire Code, the California Building Code, and compliance would be ensured through the plan check process provided by the City of Sierra Madre Fire Department prior to the issuance of building permits. Finally, in the event of an unforeseen fire during construction, the project would be adequately served by fire protection services as further detailed in Draft EIR Section 4.15.

- I37-5** The comment notes that the project site is designated as a Very High Fire Hazard Severity Zone by the California Department of Forestry and Fire Protection (CAL FIRE) and states development of the project should not occur. The comment further raises concern for the wildfire risk to surrounding communities as a result of project development. Draft EIR Section 4.20 adequately addresses the commenter's concern related to risk exacerbation and exposure of people and structures. Please refer to Global Response GR-3 and Response to Comment I37-2. No change or addition to the environmental analysis is required.
- I37-6** The comment expresses concern that fire personnel and equipment would not reduce wildfire risk. Please see Response to Comment I37-5 for a response related to wildfire concerns. In addition, please see Draft EIR Section 4.15, Public Services, for a discussion related to fire protection services associated with the proposed project.
- I37-7** The comment presents concerns already addressed previously in Response to Comment Letter I37, related to failure to attend to of major fire risk analysis. See Responses to Comments I37-1 through I36-6, above.

Comment Letter 138

**From:** Daniel Golden <dangolden0@gmail.com>  
**Sent:** Tuesday, September 28, 2021 3:14 PM  
**To:** Vincent Gonzalez  
**Cc:** Stop Housing Project; Preserve Sierra Madre; Alexander Arrieta; Barbara Vellturo  
**Subject:** Comment on DEIR: Tree Destruction

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Thank you for the opportunity to comment on the DEIR for the "Meadows at Bailey Canyon"

Below are my comments. Please retain a copy for the administrative record.

138-1

Please respond to these comments in the Final EIR and please put me on the list of people to notify when the Final EIR is complete

I strenuously object to the proposed housing development. It is inconsistent with many of the Policies and Values of our city's General Plan, and any zoning changes or accommodations to the outside developers are unwarranted. **I am especially concerned with the fate of a huge number of trees slated for removal.**

138-2

101 mature trees will be removed, including 10 protected Oaks. The Oaks will be replaced with smaller Oaks and other small trees (requiring a great deal of water to become established--water that is not apparently accounted for in the questionable "net zero" pre-purchase arrangement suggested in the Specific Plan). SM has a Forest Management Plan with a mission to preserve "Canopies" for their environmental and aesthetic benefit.

138-3

The Specific Plan to swap these mature specimens for 24" boxed trees fails to factor in the massive loss of oxygen production that will be immediately generated. It would take 15 or more years for boxed trees to develop sufficient caliper to emit barely 35% of the oxygen created by the original stand of large mature trees. These large trees each generate over 270 lbs of oxygen per year--so long as they are not summarily uprooted and discarded by the developer. Remove the trees and you lose sufficient oxygen for some 60 families per year. My research, including studies published in the journal of Arboriculture and Urban Forestry, points out the devastating effects on community air quality from such profligate destruction.

138-4

Simply stated, trees grow air, inhibit particulate settling, preserve wildlife, keep ground temperatures in check, absorb storm runoff, help to prevent many human lung disorders, and more. The new housing development, if approved, would actually and desperately itself need the offset of the canopy of mature trees on the property to help alleviate massive creation of heat island conditions--hardscape with foundations, driveway pads, sidewalks and paved streets supplanting the current breathable meadow space.

138-5

Summary removal of the trees without sufficient atmospheric impact analysis is one of many flaws in the developer's Specific Plan. We must not let the project and the destruction of crucial arboreal resources occur.

138-6

Daniel Golden

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Dan Golden, PhD

Director, GOLDENWORDS College and Life Planning Consultants

278 East Alegria Avenue Sierra Madre, CA 91024

626.355.1919

Make Every Word...A GOLDENWORD



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## Response to Comment Letter I38

Individual  
Daniel Golden  
September 28, 2021

- I38-1** This comment requests the following comments (Comments I38-2 through I38-6) be included in the responses to comments of the Final EIR. As shown, the commenter's request has been recorded as part of this Final EIR.
- I38-2** The comment expresses concern for the removal of trees on the project site and inconsistency with Policies and Values of the General Plan. Please refer to Global Response GR-2 and Global Response GR-7.
- I38-3** The comment identifies the number of trees on the project site proposed for removal and raises concern for water supplies to support the planting and growth of new trees. As described in Draft EIR Section 4.19, Utilities and Service Systems, the proposed project would not substantially increase demand of the City's water supply such that the relocation or construction of new or expanded water supply facilities would be needed. Moreover, the City is expected to meet future demands for normal year, single dry years, and five consecutive drought years from 2025 through 2045. For more discussion on water usage, please see Global Response GR- 1. Water uses associated with proposed landscaping has been incorporated in the water use calculations (see GR-1 and Final EIR Section 4.19).
- Additionally, the comment suggests that the project is inconsistent with the City's Forest Management Plan and goal of tree canopy preservation. Please refer to Global Response GR-2 and Final EIR Section 4.10.5, Impact Analysis, of Section 4.10. Land Use and Planning..
- I38-4** This comment raises concern for the removal of mature trees as a result of the project and its impact on oxygen generation for the surrounding community. The Draft EIR adequately analyzed the project's impacts related to tree removal currently existing on site. Related to concerns regarding loss of oxygen associated with tree removal, see Response to Comment I24-1. As such, no response is required.
- I38-5** This comment provides a general comment about the many benefits of trees. Please refer to Global Response GR-2 The comment does not express any specific concerns related to the adequacy of the environmental analysis and therefore no further response is required or provided.
- I38-6** This comment expresses opposition to the proposed project. Moreover, the comment requests an "atmospheric impact analysis" be prepared to adequately analyze the project's potential impacts related to tree removal. As noted in Response to Comment I38-4, the commenter's request is not required under CEQA and, thus, no change or addition is required as part of the Final EIR.

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Comment Letter I39

**From:** Michael Charters <mmlcharters@gmail.com>  
**Sent:** Wednesday, September 29, 2021 12:53 PM  
**To:** Vincent Gonzalez  
**Subject:** Proposed development at Bailey Canyon

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

TO Victor Gonzalez, Director of Planning and Community Preservation

I am appalled at the apparent lack of concern on the part of city managers for the proposed egregious violations of the Sierra Madre General Plan regarding the development at Bailey Canyon. I want my comments to be added to others and retained as part of the administrative record of the city. I join those many other members of our city's population who are opposing in the strongest terms this prospective development. There are so many examples where the developers are proposing to do things that the city's general plan specifically does not endorse, and in many instances prohibits. What is the purpose of a general plan if it is just disregarded willy nilly to advance only the interests of outside developers? If the proposal was for a smaller development, say 10-15 houses, and preserving a much larger percentage of the open area, I would be in support, but the proposal as it stands is grotesque, and it is beyond my imagination that the city managers can possibly condone or endorse it. A project of this immense size and impact should at the very least have been put as a referendum to the residents of the city, especially to the people who live in the immediate area and will be most affected. I can't imagine what it would be like for years to have large trucks and other heavy equipment rumbling up and down our quiet streets on a daily basis.

139-1

139-2

139-3

I object to this project as it is currently being described for a number of reasons. At any time such a large increase in the demand on water resources for the city is something that should be looked at seriously, but right now in the midst of a drought that we have no idea of how long it will continue, this is a desperately dangerous undertaking. For several days last year we had to disrupt our lives and prepare to be evacuated from our homes because of the Bobcat fire, and fire danger is only increasing. This project is in a high fire danger zone, and the existence of 42 closely situated houses will present a grave risk in the event we are threatened by another fire. The roads around the area are not sufficient to evacuate all the people while at the same time trying to accommodate fire and rescue vehicles. The Draft Environmental Impact Report says little about how the city could respond to this hazard. It is also deficient in explaining why the removal of over 100 mature trees would be an acceptable undertaking, since the City has put great stock in preserving our tree life.

139-4

139-5

139-6

I would respectfully request that this project be put on hold in order that the city managers could receive impact statements and more accurately gauge the sentiments of the city residents as a whole regarding this project that is bound to alter the character of the city that we all love and that I personally have lived in for 35 years. Please give this matter your serious reconsideration, and act for the benefit of the city and not for that of developers.

139-7

Michael Charters  
286 E. Alegria Ave.  
Sierra Madre, CA 91024  
[mmlcharters@gmail.com](mailto:mmlcharters@gmail.com)

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## Response to Comment Letter I39

Individual  
Michael Charters  
September 29, 2021

- I39-1** This comment requests the following comments (Comments I39-2 through I38-7) be included in the responses to comments of the Final EIR. As shown, the commenter's request has been recorded as part of this Final EIR for the City decision makers' review and consideration.
- Additionally, the comment states the project is inconsistent with the City's General Plan. Please refer to Global Response GR-7.
- I39-2** This comment expresses support for a project alternative of 10 to 15 homes with the preservation of a larger percentage of open space. Draft EIR Chapter 8, Alternatives evaluated alternatives to the proposed project. The Draft EIR did consider a Reduced Development Alternative (Alternative 4). Under Alternative 4, a total of 34 detached single-family residential units would be proposed (representing a 20% reduction from the proposed project); however, this alternative would not meet some of the objectives as outlined in Chapter 3 of the Draft EIR. Thus, an alternative that reduces the number of units further, to 10 to 15 homes, would similarly not meet the project objectives, and would be rejected on that ground.
- Additionally, the comment states the proposed project's approval should be decided by the voters of the City of Sierra Madre via referendum. As outlined in Chapter 3, Project Description, of the Draft EIR, the project's discretionary approvals are not subject to a vote by the City's voting residents.
- I39-3** The comment notes concern with the project's size and potential impacts related to construction traffic and construction noise. Although the comment does not state specific concerns with the adequacy of the EIR's environmental analysis, please see Draft EIR Sections 4.1, Aesthetics; 4.13, Noise; and 4.17, Transportation for more information on these topics.
- I39-4** The comment expresses concern for drought conditions in the project area. Please see Global Response GR- 1.
- I39-5** The comment raises concern for the project site's location within an area designated as a Very High Fire Hazard Severity Zone and the risk of exposing people and structures to wildfire. Please refer to Global Response GR-3 and Global Response GR-4.
- I39-6** The comment states the Draft EIR is deficient in explaining consistency with the City's policies and regulations governing tree preservation. Please refer to Global Response GR-2 .
- I39-7** The comment requests the proposed project be put on hold for the community concerns to be adequately addressed. These responses to comments represent the due diligence under CEQA to consider and review environmental topics of concern through the public review process.

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Comment Letter I40

**From:** H Grace Charters <graciecharters@me.com>  
**Sent:** Thursday, September 30, 2021 8:16 AM  
**To:** Vincent Gonzalez  
**Subject:** Monastery development plan objection

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Dear Mr. Gonzalez,

I'm writing to lodge my objection to the proposed development plan at the Mater Dolorosa monastery. Along with other members of the Sierra Madre community, I'm concerned that the development as proposed will negatively impact Sierra Madre and its citizens. I object to the destruction of trees and a wildlife habitat. I also would call your attention to the potential wildfire hazards having many new build houses so close to the mountains. Furthermore, over development can excessively urbanize and be detrimental to the small town feel that makes Sierra Madre so special.

My parents live in Sierra Madre and I have lived here my whole life. My husband and I are now raising our two children here. I truly love Sierra Madre and would hate to see it change for the worse.

Thank you so much for the work you do and for your consideration of this email.

All the best,

Gracie Charters  
119 North Lima Street  
Sierra Madre, CA 91024

[graciecharters@me.com](mailto:graciecharters@me.com)  
(626) 372-5172

I 140-1  
I 140-2  
I 140-3  
I 140-4

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## Response to Comment Letter I40

Individual  
Gracie Charters  
September 30, 2021

- I40-1** The comment presents general opposition to the project and does not raise new or additional environmental issues concerning the adequacy of the Draft EIR.
- I40-2** The comment expresses concern about the removal of trees and destruction of wildlife habitat, and wildfire risk. As concluded in Draft EIR Section 4.4, Biological Resources, impacts to wildlife would be less than significant following implementation of identified mitigation. Additionally, Draft EIR Section 4.20, Wildfire, analyzed project impacts associated with wildfire risk. With implementation of PDF-WF-1, the project would implement a project-specific FPP which would reduce wildfire impacts to a less-than-significant level. Regarding tree removal, please refer to Global Response GR-2.
- I40-3** The comment expresses general opposition related increased development in the area and does not raise new or additional environmental issues concerning the adequacy of the Draft EIR.
- I40-4** The comment provides concluding remarks and general opposition to the project that do not raise new or additional environmental issues concerning the adequacy of the Draft EIR.

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Comment Letter I41

**From:** ashley wilson <kaiyamalia33@gmail.com>  
**Sent:** Wednesday, September 29, 2021 3:53 PM  
**To:** Vincent Gonzalez  
**Subject:** 500 Grove Street - New development

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

I live at 500 Grove Street. I am concerned about how specifically the traffic for the new planned development will impact my family and neighbors. If the specific plan is the preservation of quiet neighborhoods with limited thru traffic what are the plans for this? The project appears to do nothing to preserve quiet surrounding neighborhoods to the east and south of the project. It does, in fact, increase thru traffic by a minimum of 300-400 car trips a day. To get to the project, cars will have to travel local streets including Sunnyside, Lima, Carter and Grove. There is no mention of traffic impacts on these streets. The EIR response only addresses traffic within the project itself and not its impact on the neighboring community. Please consider my concerns.

I41-1  
I41-2  
I41-3

Sincerely,

Ashley Waterhouse Wilson  
500 Grove Street

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## Response to Comment Letter I41

Individual  
Ashley Wilson  
September 29, 2021

- I41-1** The comment raises concerns about the noise and traffic conflicting with the preservation of quiet neighborhoods. Please refer to Response to Comment I5-2.
- I41-2** This comment expresses concern about traffic impacts to the surrounding community specifically on Sunnyside Avenue, Lima Street, Carter Avenue, and Grove Street. The comment raises concern regarding traffic on Sunnyside Avenue, Lima Street, Carter Avenue, and Grove Street. Please refer to Global Response GR-6. It should be noted that under CEQA, an increase in traffic is no longer used to assess whether a project would have a significant effect on traffic under CEQA. Rather, CEQA now requires that the transportation impacts of a project be assessed solely through the calculation of VMT, and for which, this project was determined to have a less than significant impact. As discussed in Global Response GR-6, Appendix K to this Final EIR includes a Traffic Study, which was prepared strictly for informational purposes and discusses the expected changes in traffic conditions. As discussed in Appendix K, the performance of the study intersections, as measured by LOS, would result in no measurable difference as a result of the project, and all of the intersections will function well-within the City's standards.
- I41-3** The comment provides concluding remarks that do not raise new or additional environmental issues concerning the adequacy of the Draft EIR.

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Comment Letter I42

**From:** Caroline Brown <madresierra@earthlink.net>  
**Sent:** Wednesday, September 29, 2021 9:33 AM  
**To:** Vincent Gonzalez  
**Subject:** Comment Letters to Draft EIR: Meadows at Bailey Canyon housing development  
**Attachments:** drafr EIR Arborist.docx; drafr EIR-open space.docx; drafr EIR-miscellaneous observations.docx

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

To: Vincent Gonzales

Fr: Caroline Brown

Re: Draft EIR comments for Meadows at Bailey Canyon housing development

I have attached three letters for the comment period for the Draft EIR for the housing development: The Meadows at Bailey Canyon

- 1--Arborist report
- 2--Open Space
- 3--Miscellaneous observations

I42-1

September 10, 2021

To: Vincent Gonzales, Sierra Madre Development Services Department

Fr: Caroline Brown, Sierra Madre, CA

Re: Draft EIR for housing project/The Meadows at Bailey Canyon—Arborist Report

I find that the Arborist Report is flawed on a few major concerns regarding the presence of Coast Live Oak on the subject site. Ten Coast Live Oaks are referred to in the descriptive report but **11** are listed on the tree inventory.

142-2

Although these oak trees are scattered among non-native trees to the eastern edge of the project site, the Arborist Report fails to recognize the grouping of **11** *Quercus agrifolia*--Coast Live Oak--as an important extension of the intact oak woodland to the immediate east into Sierra Madre's Bailey Canyon Wilderness Park. They also connect to the Passions of the Cross garden to the immediate north.

142-3

Oak woodlands are a complex ecosystem, home to an abundance of wildlife species—insects, birds and mammals—that cannot exist without the food source and shelter of oak trees. These are well covered by the concerns expressed in the Fish and Wildlife report on the Biological values of the site.

142-4

As one segment of 11 trees in an adjacent oak woodland is removed it puts greater pressure on the next exposed edge and as such, marches on to decrease this valuable habitat.

These are not simply **11** individual trees. In the report they are mentioned only as somewhat weakened in health but not what they present in value as a group but in the inventory are given a good or fair status.

142-5

Taken as individual trees they are graded by the significance of diameter at breast height (DBH) for the highest replacement value. Replacement of oak trees scattered about the new housing development creates nothing more than garden specimens that do not hold the same value as a grouping of trees in an intact woodland.

The replacement metric is only referred to in the report as one to one. This falls far short of the replacement metric in the City Tree Ordinance, which can go as high as 6 to one depending on the health of the tree.

142-6

With only a one to one replacement a calculation cannot possibly be accurate for mature oaks that have been on the Monastery property before the 1920s. Tree #61 is 54" DBH



with a height of 40 ft and a spread of 50 ft. The smallest DBH oak of 2" and a height of 8 ft and width of 6 ft does not allow for an observation of recruitment. Over the years this area has been plowed over for brush control and no doubt lost many, many oak seedlings that would have been beneficial to wildlife.

I42-7

The arborist report proposes a 1:1 tree replacement with 24" box *Q. agrifolia* that I find to be whole inadequate given the entire matrix of tree replacement that is in the city tree ordinance.

I42-8

I have analyzed these 11 (not 10) *Q. agrifolia* trees are listed in the tree inventory as follows:

	DBH (diameter at breast height)	Height	Width	Health	Replacement
#1:	8"	20'	12'	Fair	3 or 2 trees
#2:	33"	25'	20'	Good	5 or 4 trees*
#3:	26"	25'	20'	Good	5 or 4 trees*
#4:	12"	15'	15'	Fair	4 or 3 trees
#15:	12"	25'	30'	Fair	4 or 3 trees
#22:	2"	8'	6'	Fair	1 tree
#30:	6"	20'	10'	Fair	2 to 1 trees
#31:	8"	20'	10'	Fair	3 to 2 trees
#33:	9"	15'	15'	Fair	3 to 2 trees
#43:	4"	12'	8'	Fair	1 tree
#61:	54"	40'	50'	Fair	5 to 4 trees*

I42-9

- The city tree replacement matrix allows for additional evaluation for specimen trees. In the past the Tree Commission had found, with the city arborist's expert advice. Tree replacement values as high as 7 to 1.

I42-10

A calculation for replacement of removed *Q. agrifolia* on the subject property should go from a 1/1 which would equal 11 trees to approximately 36 (26) replacement of boxed specimen *Q. agrifolia* or possibly *Q. engelmannii*, the city oak tree not found on the site but which would do very well there.

I  
I42-11  
I

All in all, I find that the property should be required to keep the oak trees in situ and work the proposed housing lots around them. They should not be removed.

I  
I42-12  
I

September 10, 2021

To: Vincent Gonzales, Sierra Madre Development Services Department

Fr: Caroline Brown, Sierra Madre, CA

Re: Draft EIR for housing project/The Meadows at Bailey Canyon—  
Considerations for Open Space Donation

Early in the public presentations for the project, the map outlined (tentative) of hillside area for Open Space donations to the City of Sierra Madre created a false sense of the total land proposed to be donated. The developers are proposing this donation as part of a process of acquiring the land use changes from Institutional to Residential for the project known as The Meadows at Bailey Canyon.

I42-13

Included in the “donation” area is a portion of an Open Space parcel already owned by the city: APN 5761-001-900. It is approximately 20 acres which is added to the apparently generous total of approximately 35 acres. They cannot indicate as part of their donation property which they do not own. This error underscores the uncertainty that the entire Draft EIR is in any way adequate to address the overwhelming negative impact on the City of Sierra Madre as a whole and especially the surrounding residential areas and existing Open Space.

I42-14

(It appears that this has been corrected in the Draft EIR map, but it is not shown as a correction.)

There is one parcel that is in the Hillside Management Zone and would accrue to the City efforts to provide viewshed, watershed, wildlife and habitat protection that is in fact owned by the monastery within the Corporate Boundary of the City: APN 5761-001-001. It is immediately to the west of the city owned parcel APN 5761-001-900.

I42-15

Another parcel owned by the monastery that is being offered is in the corporate boundary of the City of Pasadena: APN 5760-027-013. It is not in the best interest of the City of Sierra Madre to acquire land in another city as a matter of policy as pertains to liability.

I42-16

Without doing a lot line adjustment that would require surveying there is a portion of the Monastery property behind the retreat house that is merely drawn off into the total open space donation from APN 5761-002-008. It would not appreciably increase the city effort at Open Space protection to acquire hillside property this close to the existing monastery structure. There is no need for this lot line adjustment.

If the housing development is allowed the Monastery will acquire a new APN. This should continue to include the portion of APN 5761-002-008 that is currently behind the Retreat Center to the boundary with APN 5761-001-900 and APN 5761-001-001.

I  
142-17  
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September 10, 2021

To: Vincent Gonzales, Sierra Madre Development Services Department

Fr: Caroline Brown, Sierra Madre, CA

Re: Draft EIR for housing project/The Meadows at Bailey Canyon—  
Errors of General Concern

The Draft EIR for the housing project at 700 Sunnyside—The Passionist Fathers' Monastery--proposal for a 42-tract housing development to be known as The Meadows at Bailey Canyon presents a few errors. Errors of fact or omission give rise to question accuracy in areas that I could not peruse with any expertise.

142-18

No mention in history of project site area of Sierra Madre earthquake in June, 1991— that caused over \$5 million in damage to the Monastery building. The Passionist Fathers Order decided to demolish rather than repair. Additionally, the city website on earthquake hazards list the following information regarding that earthquake that pertains to the area of the current proposal for these 42 houses: there were 22 homes condemned, many in west Sierra Madre on Sunnyside and Lima Streets. Sunnyside is the main access street for the development coming in from the south and Lima dead ends into west Carter at the eastern corner of the Bailey Canyon parking lot.

142-19

142-20

There are a number of USGS professional papers written on the 125-mile long Sierra Madre fault: One, authored by Ricard Crook and others, of the western San Gabriel mountains and the Sierra Madre fault contains information pertinent to this development.

142-21

The State of City of Sierra Madre Natural Hazard Mitigation Plan has not been referenced in the preparation of this Draft EIR. It would have brought forward for discussion many issues that the city has faced over the years to assist in a more carefully thought out explanation of facts on the ground.

142-22

The State of California has in place the Alquist-Priolo Earthquake Fault Zones that governs residential development within a prescribed distance of any earthquake fault. Local agencies must regular development projects within earthquake fault zones Was a current office California Geological Survey consulted to see if the proposed development at 700 Sunnyside falls within such a zone.

142-23

The biology report found no water course on the subject site so it is uncertain why the property developer chose to call the project a meadow. All water flow to the site from Bailey Canyon stream would have been disrupted years ago by Los Angeles County Department of Public Works. A debris basin for flood control was built in the 1920s and 1930s. However, it had been known historically, though not mentioned in the Draft EIR, that the Monastery grounds did have a water tunnel into the north west edge into the chaparral covered foothills that fed a water feature, a religious grotto, in that area. It is not mentioned how this water will be disrupted by the building of houses and placement of streets in the development.

142-24

142-25

In the introductory narrative of the EIR on page ES 2.1 there is a reference to a location stating that the project is neighbor to Colby Canyon and Colby Canyon trail, immediately to the north. This must be from another report that migrated into the report for the Meadows at Bailey Canyon. Colby Canyon is off of Hwy 2, in the Angeles National Forest 10 miles above the junction of the 210 freeway and California Hwy 2 exit in La Canada/Flintridge. The community of La Canada/Flintridge is 12 miles from Sierra Madre.

142-26

With the use of the name of Bailey Canyon in The Meadows at Bailey Canyon housing development, it comes as a surprise that in section 4.16-2 the Draft EIR there is a statement that the closest active recreational opportunity is The Mt Wilson Trail, a half mile distance to the east. There is no mention of the Bailey Canyon Trail immediately to the east of the Monastery. This trail leads from the City Open Space above the Oak Grove Nature area above the debris basin. The trail leads into Angeles National Forest, before continuing on into the Sierra Madre Historical Wilderness that includes the major sections of the Mt. Wilson Trail. How could it possibly be overlooked, that Bailey Canyon Trail head is immediately to the eastern boundary of the monastery. This park and trail provides immense pleasure and recreational opportunity for residents and visitors to Sierra Madre alike.

142-27

Traffic circulation is of acute interest to the residents in the neighborhoods to the west, south and east of the proposed housing project. Traffic congestion is a concern of community safety. One serious short coming to the safety of this project is the proposed use of a section of "road" at the southeastern corner of the Monastery property. As it currently exists, the western portion of Carter Ave. between Lima and Grove, extended to the gate leading to the Monastery, is narrow and negotiated by residents and Bailey Canyon Park users with extreme caution, no two cars passing at the same time, no on street parking, needless-to-say emergency vehicles are at even a greater disadvantage.

142-28

This paved "road" is actually a city lot, 25 ft in width, APN 5761-003-905. It would have to be widened. To widen this road land from the Los Angeles County Public Works parcel APN 5761-003-906 would have to occur. The city has use of that land for the Bailey Canyon Wilderness Area parking lot and nature garden. The border area to the northern edge of the city lot is forested with mature, but not native, cedar trees and provides a natural barrier to the Wilderness area and the neighborhood to the south.

142-29

An additional impediment occurs in this city owned lot or "road" in that there is an access easement over the western end of this lot of 0.03 +/- acres to the Los Angeles County Flood Control District. This is for access to the Bailey Canyon Debris basin for maintenance purposes. This is an insurmountable problem for providing safe and adequate circulation for the added traffic that this project proposes.

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The State Clearing House was given the entities to notify for this project. The San Gabriel Rivers and Mountains Conservancy was listed but that is not the conservancy that has jurisdiction for Sierra Madre City areas of Open Space preservation concern, which is the city land above Grand View. That would be the Santa Monica Mountains Conservancy. It appears that they were not notified of this project as they are not listed. The Santa Monica Mountains Conservancy has been instrumental in guiding the Sierra Madre Mountain Conservancy in its Open Space goals. They should have been notified. The Water Conservation Authority was not notified as well.

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## Response to Comment Letter I42

Individual  
Caroline Brown  
September 29, 2021

- I42-1** The comment is an introduction to comments that follow.
- I42-2** The comment identifies a minor typographical error in the Arborist Report prepared for the project, provided as Appendix C2 of the Draft EIR. Section 3.1 of the Arborist Report incorrectly stated there are 10 coast live oak trees on the project site. There are actually 11 coast live oaks on the project site, but only 10 of the coast live oak trees are protected under the City's Tree Preservation and Protection Ordinance. The eleventh tree is not protected under the Ordinance because it does not have a trunk that "exceeds a diameter of four inches as measured at four and one-half feet above natural or established grade" as required by the Ordinance. This error has been corrected in the Arborist Report and Final EIR Section 4.4, Biological Resources. It should be noted that revisions have been made in the Final EIR (see Section 4.4, Biological Resources) and Appendix C2, Arborist Report, as a result of the proposed off-site widening of Carter Avenue; however, these revisions and proposed off-site improvements do not raise new or additional environmental issues concerning the adequacy of the Draft EIR.
- I42-3** The comment states that the Arborist Report fails to identify the extension of the intact woodland. As stated in Section 5.2 of the Arborist Report (Appendix C2), there are 0 indirect tree impacts expected within 25 feet of the proposed project footprint. It should be noted that revisions have been made in the Final EIR (see Section 4.4, Biological Resources) and Appendix C2, Arborist Report, as a result of the proposed off-site widening of Carter Avenue. Per the Final EIR, 10 trees located within the off-site improvement area will have direct impacts as construction is anticipated within the tree protection zone within Bailey Canyon Wilderness Park. However, MM-BIO-3, included in Section 4.4.6, Mitigation Measures, of the Final EIR, would still be implemented to reduce impacts to trees to less than significant. These revisions and proposed off-site improvements do not raise new or additional environmental issues concerning the adequacy of the Draft EIR.
- I42-4** The comment gives background information about the importance of oak woodland ecosystems and tree health. Please refer to Global Response GR-2.
- I42-5** The comment states that the 11 coast live oak trees as a whole represent more value than just the removal of 11 individual trees and that removal of the 11 coast live oak trees would put pressure on the new exposed edge of the adjacent oak woodland. Please refer to Global Response GR-2. In addition, aside from a few oak trees located close by in the northeastern portion of the site, the 11 oak trees present on-site are dispersed throughout the site (see Appendix B of Appendix C2, Protected Tree Report). As such, as these protected trees are largely not grouped together, replacing the oaks throughout the project site would not degrade their collective habitat value. The replacement oak trees would provide a similar benefit to those that are already located on the site.
- I42-6** The comment questions the adequacy of the 1:1 replacement ratio. The 1:1 replacement ratio is established by City of SMMC, Section 12.20.115, which states, "Protected trees that prevent reasonable development shall be replaced within one year of removal by a minimum of one tree of the same species, or a suitable alternative species approved by the city arborist which serves a comparable

function (shade, screening, erosion control, etc.) as that of the *tree* removed. Minimum replacement *tree* size shall be not less than fifteen gallons and not larger than forty-eight-inch box, as determined by mitigation guidelines developed by the commission and established by resolution of the city council.” The Protected Tree Report (Appendix C2) stated that this as the recommendation for the replacement and is in compliance with the City Municipal Code. Please refer to Global Response GR-2.

- I42-7 The comment provides general background information about oak seedlings on the project site. However, this comment does not raise any specific issues concerning the adequacy of the Draft EIR.
- I42-8 The comment questions the adequacy of the 1:1 tree replacement ratio. Refer to Response to Comment I42-6.
- I42-9 The comment suggests that nine of the eleven coast live oak trees proposed to be removed and replaced at a 1:1 ratio be replaced instead at a much higher ratio. However, the 1:1 replacement ratio established by the SMMC is adequate. Refer to Response to Comment I42-6.
- I42-10 The comment suggests that replacement ratios as high as 7 to 1 be applied to some of the trees proposed for removal. However, the 1:1 replacement ratio established by the SMMC is adequate. Refer to Response to Comment I42-6.
- I42-11 The comment suggests that a higher tree replacement ratio be applied such that at least 36 new coast live oak trees are provided. Refer to Response to Comment I42-6.
- I42-12 The comment generally opposes the removal of oak trees at the project site. This comment does not raise any specific environmental issues concerning the adequacy of the Draft EIR. Please refer to Global Response GR-2.
- I42-13 The comment questions the amount of land the project will dedicate to the City as open space. Information on the designated open space area can be found in Draft EIR Chapter 3, Project Description, and Figure 3-4. A few minor changes were made to Final EIR Section 3.3.3 to clarify the conditions of the open space conservation easement. This comment does not raise new or additional environmental issues concerning the adequacy of the Draft EIR.
- I42-14 This comment states that the donation area is inclusive of a parcel that is already owned by the City as well as land currently owned by the Retreat Center. This is not correct. All parcels within the designated open space area are currently owned by the Mater Dolorosa Retreat Center. Please refer to Response to Comment I42-15, below, for further details.
- I42-15 The comment states that one of the parcels for the proposed designated open space area is not currently within the City of Sierra Madre city limits and is concerned about potential liability associated with the City acquiring land in another jurisdiction. The parcel referenced by the comment is not within the City of Pasadena but in unincorporated County of Los Angeles. The land would be designated as open space but would not be acquired by the City of Sierra Madre. This parcel is currently owned by the Mater Dolorosa Retreat Center and would continue to be owned by the Mater Dolorosa Retreat Center after approval of the project. No lot line adjustment or future annexation of this parcel is proposed or would be required. The parcel would be preserved as open space and development would not be permitted under the development agreement and conservation easement.

- I42-16** The comment questions the necessity of a lot line adjustment for APN 5760-027-013. However, no lot line adjustment is proposed for this parcel. See Response to Comment I42-15.
- I42-17** This comment expresses general concerns regarding the assignment of assessor's parcel numbers. This comment does not raise any specific issue relating to the adequacy of the Draft EIR.
- I42-18** The comment is introductory and does not raise any specific issues relating to the adequacy of the Draft EIR.
- I42-19** The comment expresses concern regarding two faults on the project site and that information about the 1991 earthquake was not included. As discussed in Draft EIR Section 4.5, Cultural Resources, the 1987 Whittier Earthquake and more recently the 1991 Sierra Madre Earthquake, 5.8 magnitude, drastically damaged the Monastery building. It should be noted that while the Geotechnical Report (Draft EIR Appendix E) does not mention the 1991 earthquake specifically, it does mention that the site has previously experienced ground shaking and is expected to experience ground shaking in the future. It should also be noted that the Geotechnical Report does list the faults surrounding the property within the report and notes that there are no known active faults on site. Please see Draft EIR Section 4.7, Geology and Soils, for analysis regarding seismicity. Regarding the commenter's concern about damage to the Mater Dolorosa Retreat Center, it should be noted that, due to the age of the Mater Dolorosa Retreat Center, this existing building was not constructed to current building code standards. The proposed project would be required to adhere to the most current CBC standards to minimize the effects of earthquakes and other geotechnical hazards.
- I42-20** The comment expresses concern related to seismic hazards and previous seismic events that occurred near the project site. The comment requests an independent study investigating seismic hazards. However, a report analyzing existing geologic conditions, constraints, impacts on the proposed development, and potential mitigation measures was prepared by GeoSoils Consultants Inc and provided in Appendix E of the Draft EIR. Additionally, please see Draft EIR Section 4.7 for analysis regarding seismicity.
- I42-21** The comment generally references the fact that research relating to the Sierra Madre fault is relevant to the proposed project. Both the Draft EIR and the Geotechnical Report prepared (see Draft EIR Appendix E) acknowledge the Sierra Madre fault and address its potential to impact the project site.
- I42-22** The comment states that the Draft EIR should have referenced the City of Sierra Madre Natural Hazard Mitigation Plan. The Draft EIR does not reference the Natural Hazard Mitigation Plan and instead referenced and relied upon the City's more recent Local Hazard Mitigation Plan, prepared in 2020.
- I42-23** The comment asks if the project site was found to be in a Alquist- Priolo Earthquake Fault Zone. As stated in Draft EIR Section 4.7.5, Impacts Analysis, the project site is not located on any known active, potentially active, or inactive fault traces or within a State of California Earthquake Special Study Zone or Alquist-Priolo Zone. Please refer to Response to Comment I36-7.
- I42-24** The comment questions the naming of the project to include the word meadow when there was no water course found on the site. The comment does not raise any specific issue concerning the adequacy of the Draft EIR.

- I42-25** The comment asks whether a water tunnel on the Mater Dolorosa Retreat Center would be disrupted by project implementation. It is not clear what the comment means by a water tunnel. As stated In Draft EIR Section 4.10, impacts related to alteration of drainage patterns would be less than significant on or off site (refer to Draft EIR Figure 3-7, Proposed Drainage Plan). In addition, as discussed in Draft EIR Section 4.4.5, Impacts Analysis, of Section 4.4, Biological Resources, no wetlands, other jurisdictional waters, or riparian habitat were observed on the project site. Lastly, an existing water supply system is present within the project site and is shown in Draft EIR Figure 3-8, Proposed Water System. As discussed in Draft EIR Section 3.3.7.2, Proposed Water System, the existing 8-inch water main in the eastern portion of the project site would be removed and reconstructed as a 12-inch water main in within Carter Avenue.
- I42-26** The comment identifies incorrect references to Colby Canyon and Colby Canyon Trail in Draft EIR Section ES.2.1, Project Objectives. This typographical error has been corrected in the Final EIR (see Section ES.2.1).
- I42-27** The comment identifies an incorrect statement in Draft EIR Section 4.16, Recreation, that the closest trail to the project site is the Mt Wilson Trail. The Bailey Canyon Trail is the closest trail to the project site. This error has been corrected in the Final EIR Section 4.16.
- I42-28** The comment expresses general concern about the traffic impacts, specifically at the end of Carter Avenue at the entrance to the Mater Dolorosa Retreat Center property. Please refer to Global Response GR-4, and Global Response GR-5/
- I42-29** The comment is concerned with a portion of Carter Avenue that is not within the project site and that is not anticipated to be impacted by the project. Please refer to Global Response GR-5.
- I42-30** The comment is concerned with a Los Angeles Flood Control District easement that is not part of the project site and that is not anticipated to be impacted by the project. No improvements at this location are proposed as part of this project. Please refer to Global Response GR-5.
- I42-31** The comment is concerned with project-related notifications being provided to the San Gabriel Rivers and Mountains Conservancy, the Santa Monica Mountains Conservancy, and the Water Conservation Authority. The Notice of Preparation for the Draft EIR was distributed to all agencies and entities that require notice under law, or that have requested notification. The City has made a good faith effort to ensure all parties who may wish to provide input during the public participation process associated with the Draft EIR preparation be included as part of the CEQA noticing for the project. The Sierra Madre Mountains Conservancy, also mentioned by the commenter, was notified of the project.

Comment Letter I43

**From:** Katrelya Angus [mailto:qlangus@verizon.net]  
**Sent:** Thursday, September 30, 2021 8:55 AM  
**To:** Vincent Gonzalez <vgonzalez@cityofsierramadre.com>  
**Subject:** Meadows Project

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

The Meadows Project must be denied because the trees are needed. They are an integral part of Sierra Madre and are part of our precious and limited wildlife corridor, as birds and other animals live in them and use them. I also remember making my Stations every Good Friday at the Monastery, and being amongst the trees was a part of my worship as I commemorated Jesus' tragic death. Walking through the trees to get to the monastery and return back to my car was also a part of my worship.

Furthermore, the wildlife coming to and from Bailey Canyon need the trees. To cut down the trees to make room for development is unconscionable.

Best Regards,

Katrelya Angus  
405 N. Canon Ave.  
Sierra Madre, CA 91024

626-355-7837

[qlangus@verizon.net](mailto:qlangus@verizon.net)

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## Response to Comment Letter I43

Individual  
Katrelya Angus  
September 30, 2021

**I43-1** The comment expresses opposition to the proposed project and cites the removal of trees from the project site. The commenter suggests the project site provides a wildlife corridor for birds and animals.

Draft EIR Section 4.4, Biological Resources, analyzed the project's potential to substantially interfere with the movement of native resident or migratory fish or wildlife species or migratory wildlife corridors and the project's potential to impede the use of native wildlife nursery sites (see Threshold 4 in Draft EIR Section 4.4). The Draft EIR notes the project site is located within 460 feet of the base of the San Gabriel Mountains and notes the potential for wildlife movement in the project site. However, the project site's location surrounded by residential development to the west and south and fenced retention basin to the west limit the potential for the site to serve as a wildlife corridor or nursery site. Although wildlife have been observed on site, Draft EIR Section 4.4 determined no wildlife corridor connection or habitat linkage to other large undeveloped areas to the south of the project site exist; therefore, impacts would be less than significant and no mitigation would be required.

Lastly, the comment suggests the wildlife from Bailey Canyon need access to trees. The project would result in the removal of existing trees on site; however, with the implementation of the project's landscape plan and mitigation measure MM-BIO-3 (Protected Tree Replacement), and the project's compliance with the City's Tree Preservation and Protection Ordinance, impacts to biological resources associated with tree removal would be less than significant. Please also see Response to Comment A1-8 and A1-9 regarding tree removal and indirect impacts to wildlife and Global Response GR-2.

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Comment Letter I44

**From:** Jean Bardenheier [<mailto:ankejean@earthlink.net>]  
**Sent:** Thursday, September 30, 2021 1:45 PM  
**To:** Vincent Gonzalez <[vgonzalez@cityofsierramadre.com](mailto:vgonzalez@cityofsierramadre.com)>  
**Cc:** 'Barbara Velturo' <[barbaravelturo@gmail.com](mailto:barbaravelturo@gmail.com)>; 'Alexander Arrieta' <[alexanderarrieta23@gmail.com](mailto:alexanderarrieta23@gmail.com)>  
**Subject:** COMMENTS ON DEIR MEADOWS AT BAILEY CANYON

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Anke and Jean Bardenheier  
471 North Sunnyside Avenue  
Sierra Madre, CA 91024  
[ankejean@earthlink.net](mailto:ankejean@earthlink.net)

Dear Mr. Gonzalez,

Thank you for the opportunity to comment on the DEIR of the proposed development "Meadows at Bailey Canyon"

Below are my comments. Please retain a copy for the administrative record.

Please respond to these comments in the Final EIR and please put us on the list of people to notify when the Final EIR is complete.

We strongly object to the proposed housing development. It is clearly inconsistent with the Sierra Madre General Plan.

Individual areas of concern that, unless addressed, revised, and altered, actually mandate Rejection of the EIR (AND THE PROJECT) include:

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| 144-1  
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1. The proposal entails a Zoning Change to Residential, which clearly violates the General Plan that the rest of us must follow.

I 144-2

2. The development is contrary to the City's Safety Element Goal of avoiding expansion into Very High Fire Risk Severity Zones. We know very well that the proposed area IS in such a zone, since we at North Sunnyside near the Monastery entrance had our fire insurance cancelled by one carrier and needed to shop around anxiously for weeks to find a new insurance carrier willing to take the risk. We were also evacuated during a previous fire in the local mountains. If a fire happens, it will happen there, and it will ignore the newest fire safety construction codes, which can't protect from shifting winds and flying embers igniting fires in several spots at the same time. We are guaranteed to have more drought and more fires in the coming years.

I 144-3

3. The two mandated emergency evacuation routes per Objective Hz 2.12 are non-existent. Right now, there's only Sunnyside, which is a two lane road with no sidewalks. Grove is a narrow road, already challenged with current traffic, not suitable for any kind of evacuation. To claim otherwise is inaccurate at best, and clearly misleading.

I 144-4

4. The traffic considerations in the EIR are totally inadequate and tragic underestimates and fail to consider the dramatic traffic volume increases from several key sources. Online shopping and home delivery absolutely exploded during the pandemic and will not go away, but rather will further increase. It already has on our street. This giant wave of additional traffic to the new homes will be accompanied by a barrage of additional support personnel for the proposed high-end homes, such as cleaners, gardeners, pool service, and others. There's just no end to it. All of this new flood of traffic will have to flow through the other streets of Sierra Madre and be funneled into North Sunnyside as the final common path. All of the residents of the city will have to cope with this. The resultant congestion and traffic volumes will prove vastly greater than the light-handed estimates in the DEIR. This level of unacceptability applies to the described 42 home project. Of course, the EIR has failed to consider, and must consider, the explosive compounding of these problems as additional households can be brought online via ADU's and SB9-permitted development activities of the homeowners in the project. Every buyer could easily convert a garage into an ADU. SB-9 could result in even more new households, and the City could not prevent any of it.

I 144-5  
I 144-6

Sincerely,

Anke and Jean Bardenheier



Virus-free. [www.avast.com](http://www.avast.com)

## Response to Comment Letter I44

Individual  
Anke and Jean Bardenheier  
September 30, 2021

- I44-1** This comment requests the following comments (Comments I44-2 through I44-5) be included in the responses to comments of the Final EIR. As shown, the commenter's request has been recorded as part of this Final EIR.
- Additionally, the comment expresses opposition to the proposed project and states the project is inconsistent with the City's General Plan. Please refer to Global Response GR-7.
- I44-2** The comment states the proposed zone change would be inconsistent with the General Plan. Please refer to Global Response GR-7.
- I44-3** The comment states the proposed project would conflict with the City's Safety Element of the General Plan. The policies mentioned are of the Draft Safety Element Update (now the adopted Hazard Prevention Element). Please refer to Global Response GR-3.
- The comment also notes the existing fire hazards for the project site and surrounding area. Draft EIR Section 4.20, Wildfire, addresses the commenter's concern regarding fire hazard designations, safety standards, the potential to exacerbate fire hazardous conditions, and emergency evacuations. Impacts were determined to be less than significant and included as part of the project's design is Appendix F2, the Fire Protection Plan (FPP), which outlines requirements to reduce fire risk during construction and operation. Furthermore, the analysis found in Draft EIR Section 4.19, Utilities and Service Systems, which has been revised in the Final EIR to include some clarifications, determined the project site would be adequately served by water, including during drought conditions. Please refer to Global Response GR-4.
- I44-4** As stated in Response to Comment I44-3, the Safety Element objective noted in this comment is not from the existing Safety Element of the 2015 General Plan. Please refer to Global Response GR-3. Please refer to Global Response GR-4, regarding emergency evacuation routes. No change or addition is required of the environmental analysis.
- I44-5** This comment expresses concern for traffic congestion as a result of the project. Considering the commenter's statement that an increase of online shopping deliveries would result as part of the project and adversely impact traffic is too speculative to be analyzed in the Draft EIR, and therefore, such analysis is not required under CEQA. Please refer to Global Response GR-6.
- I44-6** The comment states the Draft EIR does not adequately consider the development potential of the proposed project with the inclusion of accessory dwelling units (ADUs) and Senate Bill (SB) 9. Please refer to Response to Comment I28-5.

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Comment Letter I45

From: alice whichello [mailto:[alice\\_whichello@att.net](mailto:alice_whichello@att.net)]  
Sent: Thursday, September 30, 2021 1:11 PM  
To: Vincent Gonzalez <[vgonzalez@cityofsierramadre.com](mailto:vgonzalez@cityofsierramadre.com)>  
Subject: DEIR for the meadows at Bailey Canyon

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Alice Whichello  
471 W. Sierra Madre Blvd.  
Apt. A  
Sierra Madre 91024  
[alice\\_whichello@att.net](mailto:alice_whichello@att.net)

Thank you for the opportunity to comment on the DEIR for the "Meadows at Bailey Canyon". Below are my comments. Please retain a copy for the administrative record. Please respond to these comments in the Final EIR and please put me on the list of people to notify when the Final EIR is complete.

I 145-1

The purposed housing development is inconsistent with the Policies and Values of our General Plan. I am very concerned with

1. The developers are asking for a change in zoning, a change in our General Plan and a change in the regulations that other residents have to follow.
2. Larger houses on small lots, concrete walls between each. Not SM character and not consistent with the neighborhood. No information on the number of lots or houses of each size, no plans or elevations shown.
3. Fire hazard and contrary to the City's new policy in the SM Safety Element (proposed but not yet adopted) to avoid developing in High Fire Hazard Safety Zone.
4. Traffic on Carter street - No study in DEIR of serious pedestrian safety issue. SM Ordinance requires 30 ft width for Streets.
5. Water - will give the City \$\$ for all the water 42 houses will use in 50 years - (at today's price and with no guarantee that water will ever be available.)
6. Earthquakes - Fault zones above and below the city. Many branches unknown. Previous Earthquake severely damaged original monastery, just above where the development will be built.
7. Landslide - area above the retreat center is designated a landslide Zone on Seismic Hazard maps.
8. Trees - 101 mature trees will be removed, including 10 protected Oaks. The Oaks will be replaced with smaller Oaks and other small trees (requiring a great deal of water to become established) SM has a Forest Management Plan with a mission to preserve "Canopies" for their environmental and aesthetic benefit. 101 large canopied trees will be destroyed.
9. Views of the neighborhood and city residents. They say their large 2 story houses and 6 ft concrete walls won't impact views, but have provided no plans or studies to validate that statement.

I 145-2  
I 145-3  
I 145-4  
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I 145-6  
I 145-7  
I 145-8  
I 145-9

Thank you very much for your time and attention to this very important matter.

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## Response to Comment Letter I45

Individual  
Alice Whicello  
September 30, 2021

- I45-1** This comment requests the following comments (Comments I45-2 through I45-9) be included in the responses to comments of the Final EIR. As shown, the commenter's request has been recorded as part of this Final EIR.
- I45-2** The comment states the project is inconsistent with the City's General Plan. Draft EIR Section 4.11, Land Use and Planning, includes a consistency analysis (see Table 4.11-1). The comment also states that the small lot size and lot fencing is inconsistent with the existing community character. Please Refer to Global Response GR-7.
- I45-3** The comment raises concern with fire hazards and with the proposed Draft Safety Element (now the adopted Hazard Prevention Element) updated policies. Under existing City policy, development is not prohibited within a Very High Fire Hazard Severity Zone. Please refer to Global Response GR-3.
- I45-4** This comment states the Draft EIR does not analyze the project's potential impacts to traffic along Carter Avenue. Please refer to Global Response GR-6.
- Additionally, the comment states the City requires roadway width to be 30 feet. Please refer to Global Response GR-5.
- I45-5** This comment raises concern with water usage and cost of water. Please see Global Response GR-1.
- I45-6** This comment raises concern for the project's risk to earthquakes and ground shaking. The Draft EIR analyzes the project site's existing conditions and outlines regulatory compliance measures as well as design features for the project in Draft EIR Section 4.7, Geology and Soils. Impacts were determined to be less than significant with mitigation incorporated. Mitigation measure MM-GEO-1 would reduce impacts to unstable soils or ground failure by removing and recompacting artificial soil. Regarding the commenter's concern about damage to the Mater Dolorosa Retreat Center, it should be noted that, due to the age of the Mater Dolorosa Retreat Center, this existing building was not constructed to current building code standards. The proposed project would be required to adhere to the most current CBC standards to minimize the effects of earthquakes and other geotechnical hazards.
- I45-7** This comment states that the area above the Mater Dolorosa Retreat Center is designated a landslide zone. Draft EIR Section 4.7 determined the project site is located outside of a potential landslide zone. No physical changes are being proposed to the area above the Mater Dolorosa Retreat Center. The project site does not contain slopes susceptible to landslides and is not located within a seismic hazard zone; thus, the potential for earthquake-induced landslides is considered low. However, as noted above in Response to Comment I45-6, mitigation is incorporated to reduce potential for soil collapse. As such, the Draft EIR analyzed the commenter's concern.

**I45-8** The comment correctly identifies the number of trees on the project site proposed for removal. The comment raises concern for water supplies to support the planting and growth of new trees. It should be noted that revisions have been made in the Final EIR (see Section 4.4, Biological Resources) and Appendix C2, Arborist Report, as a result of the proposed off-site widening of Carter Avenue. These revisions and proposed off-site improvements do not raise new or additional environmental issues concerning the adequacy of the Draft EIR. For more discussion on water usage, please see Global Response GR- 1. Please refer to Global Response GR-2 for additional information regarding tree removal.

**I45-9** This comment questions whether the proposed homes and fencing will impact views. Additionally, the commenter states the Draft EIR does not provide a proposed plan set.

Please see Specific Plan Figures 3-11a, Wall and Fence Plan, and 3-11b, Wall and Fence Imagery, for details on the proposed walls. Regarding the commenter's concern for visual impacts, Draft EIR Section 4.1, Aesthetics, determined the project site is located within an "urbanized area" as defined in Public Resource Code section 21071. As such, the Draft EIR analyzed potential impacts based on the project's consistency with applicable zoning and other regulations governing scenic quality. As detailed further in Section 4.1, the Draft EIR determined impacts would be less than significant.



Comment Letter I46

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**From:** Nancy Beckham <nlbeckham48@gmail.com>  
**Sent:** Sunday, October 3, 2021 7:04 PM  
**To:** Jose Reynoso; Vincent Gonzalez  
**Subject:** Letters directed at the draft EIR  
**Attachments:** Tree article 2...docx; They called it Paradise 2.docx

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Hi Jose and Vincent

I am attaching and sending several letters I worked on over the weekend regarding the draft EIR.

There will be a few more but I wanted to turn these in as there are some missing pieces that will accompany the last few I will send on Monday. The missing pieces I will have on Monday.

Enjoy.

Nancy Beckham

I  
I46-1

**Could you kill this tree?**

The Quercus agrifolia or Coastal Oak is one of 5 types of trees that is protected by the town of Sierra Madre. They can grow to an amazing height and can create a canopy of shade that extends to 6 times the size of the tree. At least that is the case of this tree. Possibly planted near the time the Mater Delorosa purchased the land referred to as "The Monastery" in the early 1920's this tree has grown to a height of 40 feet and a width of 50 feet. It quietly looks over the entire meadow area, where it has stood for almost 100 years. It should have a green space created to surround it, park benches placed under it, and a light used to light it up at night for all to see and enjoy. What a magnificent space it could be. Instead the tree is quietly counting the days until it will be bulldozed by Urban West and replaced by 42 homes called The Meadows at Bailey Canyon" Is this the fate it deserves?

This tree, 'an additional nine more Coastal Oak trees, a "supposedly protected tree" in Sierra Madre, and another 91 additional trees are slated to be "bulldozed or removed. Of the total 101 trees awaiting the same death 10 are Morton Bay figs, 64 jacaranda trees, 34 Chinese Elm trees, and assorted other varieties . It might be possible to save an additional 64 mature trees, but not all the trees on the list for removal are worth the expense of boxing to replant.

However, a complete removal of all these trees to simply please the developer is also not the answer. But how could Coastal Oaks, a protected tree be protected everywhere else in Sierra Madre except at the monastery. How can the town have a Forest Management Plan that especially calls out for the saving of mature trees

This Mission statement is as follows:

146-2

One of the many concerns is that this housing development is not just a housing development but is a **Specific Plan**. That means it was created in conjunction with the city and the developer. if the planning commission accepts the plan as it currently is presented, none of the current rules and regulations to protect the trees on the property, the width of streets, or the updating of fire codes since the Bobcat Fire apply. Instead what the developer is proposing will be the set of rules the town will have to accept.

"The Meadows at Bailey Canyon" should be just a housing development, not the "**Specific Plan**" it currently is. By making this change it would allow the housing development to be part of the rigorous scrutiny that all other projects have to pass in order to move forward. Think about it. Attend the City Council meeting on September 7 in council chambers. and voice your thoughts and opinions.

146-3

Nancy Beckham

The City of Sierra Madre’s Mission to grow and perpetuate the community forest is embodied in the Community Forest Master Plan. This mission is expressed through these overarching goals:

- Conserve and expand tree canopy cover equal to no net loss, with a gradual increase over time.
- Foster increased public awareness and education regarding the environmental value of trees as green infrastructure
- Promote increased shade-tree canopy for energy conservation, storm water capture, and improved air quality
- Encourage species selection appropriate for local environmental conditions and sustainability
- Preserve and enhance community aesthetics and property values through increased canopy cover and diversity
- Apply Best Management Practices for planting, maintaining, and responding to changed environmental conditions in the community forest



146-4

They called it Paradise

A small town in the forested hills emerged at the base of the Foothills near the Sierra Nevada Range in Butte County. As the setting was idyllic, offering clean air and gorgeous scenery, the people called it Paradise. As the town thrived more people came, stayed, and called it home. The town grew, but grew so much the ingresses and egresses of the town were overlooked and were basically forgotten about until disaster struck. On November 8, 2018 disaster struck as 95% of the town was lost. Fueled by a sea of tinder created by 5 years of drought, and propelled by 40 mph powerful gusts of wind, the flames grew and traveled rapidly. Burning a football field or an acre a second. In less than 24 hours, the fire had swept through the town of Paradise and other communities, leaving a charred ruin in its wake. "The residents could not get out because as the town had grown, there were not enough roads going in and out of the town. "Over the course of 17 days, the Camp Fire, named for its origin along Camp Creek Road, killed 85 people, burned more than 150,000 acres, and leveled more than 18,000 buildings — a hospital, houses, businesses, schools — making it the most destructive and deadliest wildfire in California history." As Wikipedia stated....."The fire forced the evacuation of Paradise, Magalia, Centerville, Concow, Pulga, Butte Creek Canyon, Berry Creek and Yankee Hill and threatened the communities ..The total statistics were 153,336 acres burned or 240 square miles caused by an Electrical transmission fire from a PG&E killing 85 people and destroying 18,804 buildings. Although Sierra Madre is a small town, the location of where this housing development will take place suffers from the same problem; It does not have two legitimate ingresses and egresses. It really has only one Sunnyside, and it is in a severe fire area where development is no longer allowed. . The statute called *Hz2.12 states all new residential developments in hazard areas shall have at least two emergency evacuation routes of points of ingress and egress.*

146-5

On September of 2020, the Bobcat fire broke out in the hills behind Monrovia and came back down the canyon towards Sierra Madre, Altadena, and Arcadia. It was finally contained by December 18.2020 after having burned 115,796 acres in the central San Gabriel

146-6

Mountains. Evacuation orders for residents were announced in Sierra Madre, Monrovia, Bradbury, and Duarte, along with evacuation warnings for those in Arcadia, Pasadena and Altadena. The fire then grew westward and threatened the Mount Wilson Observatory by September 15. It approached within 500 feet (152 m) of the observatory as firefighters worked to protect the structure. The fire came so close that the paint bubbled on the building from the heat. By September 17, the fire rapidly expanded to the north into Pleasant View Ridge Wilderness due to moderate coastal winds, leading to mandatory evacuations in Antelope Valley as the fire approached Juniper Hills. The fire was exacerbated by very dry vegetation from over 5 years of drought and rugged topography that made it more difficult to access. An estimated 6000 structures were threatened and there were 6 injuries.

146-6  
Cont.

The Monastery Housing Development site is considered to be in a Severe Fire Hazzard Area. The city decided that after the Bobcat Fire of 2020 that no further development should occur in Severe Fire Areas. That is stipulated in the general plan in Objective Hz7., That stipulation states *Avoid expanding development into undeveloped areas in Very High Severity Zones. After the evacuations of just over a year ago, why is this development even being considered? It should have been eliminated before any discussions ever began given its location. Consider the worst-case scenario. 42 homes were built at the Meadows and a fire breaks out at the Monastery .The hill ignites quickly as the drought conditions still exist. As homes are evacuated via Sunnyside and Carter. fFre trucks try to get into the property by using the debris basin gate while the residents are trying to evacuate using both Sunnyside and Carter. So as the residents trying to exit using Carter, the firetrucks block traffic trying to gain access to put the fire out. Instant nightmare but this possibility could occur. The statute called Hz2.12 states all new residential developments in hazard areas shall have at least two emergency evacuation routes of points of ingress and egress. If the winds had blown in another direction in September of 2020, the monastery would have been destroyed in the fire as well as parts of Sierra Madre .What more proof does anyone need than the two weeks we lived through in early September of 2020. Do we really want to become another Paradise?*

146-7

Where are the Sidewalks?

The looming specter of the proposed Meadows Housing Development of 42 homes on land the Mater Delorosa purchased in the early 1920's has found me re-thinking several long-held concerns regarding city management and maintenance. The lack of sidewalks above Grandview and on the north side of West Grandview is now becoming one of my main concerns. Since I moved to Sierra Madre in 2008, I was struck by how it felt that the city had forgotten to put in sidewalks in the upper northwest quadrant of town. Sidewalks have always made pedestrians feel safer while walking on streets whether it was with their dogs, taking an early morning walk, walking from neighbor to neighbor, or simply walking their children to and from school. In many cases the residents have made their own sidewalks in the dirt, because the city has not had an active program to put sidewalks in for its residents. However, I took a hard look at North Lima a few weeks ago and realized the residents have adjusted to this situation by walking their dogs in the street, walking from neighbor to neighbor in the street, taking morning walks in the street, and children walk down the center of the street to the elementary school with or without their parents. Because the elevation of North Lima is quite pronounced above Grandview, safety becomes another concern as the mere weight of the cars allows them to speed up until the first stop sign at Grandview. I decided to do some research and discovered the city actually had a master plan for installing sidewalks, and maintaining sidewalks. Here is just some of what I found.

"One Goal of the Sidewalk Master Plan" is listed below:

"The Sierra Madre Sidewalk Master Plan is intended to be a broad planning document that can be referenced when sidewalk considerations confront the Public Works Department. Resources and funding will most likely prevent the city from accomplishing all recommendations of this plan immediately. The primary goal of this plan is continuous improvements towards a safe, accessible, useful, aesthetically pleasing and sustainable system of walkways throughout the city.

Also recognized in the continuation of the Master Sidewalk Plan was:

Sidewalks are the pedestrian arteries of the city and the safety of those pedestrians using the sidewalks is a significant concern to the community. As is the case with any other segment of city-owned infrastructure, the city is generally considered to be responsible for the safety of persons using the sidewalks.

Further exploration of this 42-page Master Sidewalk Plan revealed:

A sidewalk inspection program paired with a plan for maintenance and installation provides economic benefits to the city by preventing claims and minimizing the expense of litigation. Aside from the prevention of accidents, inspection programs and maintenance/installation plans may allow cities to take advantage of certain governmental immunities that are not otherwise available to those entities without such programs. "

Clearly the city recognizes the need and recognizes the safety issues sidewalks address, but the question is the why has there been no aggressive sidewalk program to have them installed throughout this area? My home and my next-door neighbor's home were built in 1922. Both will be 100 years old next year, and neither have sidewalks. Why has the city neglected this area for so long? Why did the developer who had a Draft EIR created fail to even consider what increased traffic would do to these neighborhood streets? A point in fact, with the exception of one home whose owner installed their own sidewalk as part of a total landscape remodel for installing drought tolerant plants a few years ago, both sides of North Lima up to Carter have very few sidewalks. If the city's plan was to have residents put in their own sidewalks when the property was

146-8

involved with a major renovation, or when the homes were bought and sold this has not occurred in Sierra Madre. In fact, had someone from the city told me when I moved into Sierra Madre I needed to put in a sidewalk in front of my home it would have been installed years ago. Instead I walk my dog in the street, I walk to my neighbor's home in the street, I walk with my grandchildren in the street, and I go on morning walks in the street because no sidewalks have ever been installed above Grandview. The sad comment is that if there has been a program in place no one has ever heard about it. Why is that? Why did the draft EIR neglect the current situation let alone what will occur with 400 additional trips leaving the housing development throughout the day.

↑  
I46-8  
Cont.

The thought of additional traffic or approximately 800 cars a day generated from 42 homes that MIGHT BE BUILT IF THIS HOUSING PROJECT ON THE MONASTERY LAND GOES FORWARD further concerns me. The current infrastructure of the streets that will be impacted by this development are woefully not ready to accept extra traffic. Can you imagine the law suit generated from one child walking in the street to school being hit by a car speeding down Lima, because that was where the child had to walk because the street has no sidewalks? Think about it. This is a real "wake-up call" for the city. This also must be addressed by the developer. Where are the bike lanes for bikers, as well as proposed sidewalks to help the current residents who are expected to absorb 400 more daily trips of the 800 generated on a daily basis. Sunnyside, the other ingress and egress will be impacted in the exact same way. Whether the Housing Development is accepted or not, for safety reasons sidewalks should be installed throughout the city. Better be safe and start installing sidewalks in an aggressive fashion so something like this does not have a chance to occur. However this should have been part of the draft EIR. It was not. Why? Please answer this question

I46-9

Nancy Beckham

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## Response to Comment Letter I46

Individual  
Nancy Beckham  
October 3, 2021

- I46-1** The comment notes the submittal of additional comment letters related to the adequacy of the Draft EIR. The commenter indicated more comments would be submitted prior to the end of public review. No response is required.
- I46-2** The comment describes a specific oak tree currently located on the project site and is concerned with the tree's removal, as well as the removal of other trees on the project site. The comment suggests instead of removal, the project could save existing trees with the possible boxing of existing trees to be replanted on site. The commenter's suggestion will be noted for the decision makers to consider in their review of the Final EIR. Please refer to Global Response GR-2 .
- I46-3** The comment objects to the use of a Specific Plan to entitle the proposed project. Please refer to Global Response GR-7.
- I46-4** The comment represents an excerpt of the goals related to the City's Community Forest Master Plan. The comment does not contain particular concerns related to the adequacy of the Draft EIR. See Global Response GR-2 . In addition, the project's consistency with the City's Community Forest Master Plan is discussed in Draft EIR Section 4.11, Land Use and Planning. A few minor revisions were made in Final EIR Section 4.11 to account for off-site widening of Carter Avenue. These revisions and proposed off-site improvements do not raise new or additional environmental issues concerning the adequacy of the Draft EIR.
- I46-5** The comment describes the Camp Fire that occurred in 2018 that burned down the town of Paradise, California. The comment also raises concern with the project site's ingress and egress points and states only Sunnyside Avenue is an adequate evacuation route. The comment referenced proposed policy Hz2.12 of the Draft Safety Element of the General Plan (now the adopted Hazard Prevention Element). Please refer to Global Response GR-3 for information regarding the Hazard Prevention Element and Global Response GR-4, for information about ingress/egress and evacuations.
- I46-6** This comment describes the Bobcat Fire that occurred in 2020. The City acknowledges the wildfire history of the project site's vicinity. Discussion related to impacts associated with wildfire is included in Draft EIR Section 4.20, Wildfire. This comment does not contain questions or concerns related to the adequacy of the Draft EIR's environmental analysis.
- I46-7** The comment states the project is within a Very High Fire Hazard Severity Zone (VHFHSZ) and expresses general concern related to wildfire, evacuation, and consistency with the City's General Plan Safety Element. Please refer to Global Response GR-3 and Global Response GR-4.
- I46-8** The comment includes remarks concerning existing sidewalk conditions and lack of sidewalks on Grand View Avenue, North Lima Street, as well as along the commenter's street. The comment also references the City's Sidewalk Master Plan.

Draft EIR Section 4.17, Transportation, analyzed potential impacts related to pedestrian safety and consistency with General Plan goals and policies addressing the circulation system. The proposed project would include a landscaped parkway and sidewalk on the west side of North Sunnyside Avenue and Carter Avenue, and a sidewalks within the south sides of proposed A, B, and C Streets, enhancing pedestrian safety and mobility, consistent with Objective L51 and Policy C30.3. In addition, in order to address commenters' concerns related to safety issues along Carter Avenue and outside of the boundaries of the proposed project site, the project applicant is proposing off-site improvements to Carter Avenue (see Global Response GR-5 for details). Further, as discussed in Draft EIR Section 4.11, Land Use and Planning, the project would provide an internal circulation system that would facilitate safe and efficient access to the site from North Sunnyside Avenue while minimizing traffic impacts to adjacent residential streets. Moreover, the Draft EIR analyzed the project's potential to substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) and determined impacts would be less than significant. Minor edits were made in Final EIR Section 4.11 and Section 4.17.5, Impact Analysis, of Section 4.17, Transportation, to explain the proposed off-site widening of Carter Avenue. Nonetheless, the Draft EIR adequately considered project-related impacts to pedestrian safety and the circulation network (i.e., sidewalks).

- I46-9** The comment is concerned with the number of daily vehicle trips generated by the proposed project and associated impacts to pedestrian and bicycle safety. The comment incorrectly states that the project will generate 800 daily vehicular trips. Please refer to Global Response GR-6. Furthermore, the comment's concerns related to pedestrian and bicycle safety are addressed in Draft EIR Section 4.17.5, Impacts Analysis, as well as in Response to Comment I46-8, above.

Comment Letter I47

Sept 30, 2021

Dear Jose and Vincent, and Urban West

I really studied Carter when it was proposed to be used as an ingress and an egress before I wrote my letter to the Mt View News on September 11, 2021. However, I received an additional map created by Urban West the end of last week. After very careful inspection I realized the Carter ingress/egress situation is far worse. As we all know the proposed homes are terraced as the land is quite steep because that land is the beginning of the foothills. It is even steeper than the grade on North Lima Street. What I did not realize is the proposed two-lane road that will come down the hill towards the Monastery Gate at Carter will become less in width as it comes down the hill. It will start at 46' in width at the top, but as the attached map indicates the road shrinks in width as it approaches the gate. At the gate itself it will be 44' in width. The other additional problem is that as a car travels down that hill gathering speed, the driver then has to turn left to actually reach the gate. At the gate the road then becomes 20' in width that is paved road (2 1/2' of dirt on either side of the paved roadway for a total of 25'). My article was called An Accident Waiting to Happen, but this is much more serious than I ever imagined.

I am now directly addressing the DEIR

I47-1

Dear Urban West. You knew Carter being used as an egress and ingress was problematic at best because the street is only a maximum of 25' in width and there is not more land available to purchase to add to the street's width. You knew the city standard was that had a street was to be 30' in width with some type of pedestrian walkway. City street ordinances state that "16.32.035 - Street standards—Modification of same. (Ord. 1229 § 2, 2005)

**Except as otherwise required by Chapter 15.24 of this code, the city's public street standards shall require at least thirty feet of road and a pedestrian walkway**

Notwithstanding Sections 16.32.020 and of this code, the city council may determine, upon approval of a parcel or tentative tract map creating streets, that adjustment of the city's public street standards as to those streets is justified by other benefits to the policies stated in Section 17.52.010 of this code and that such adjustments do not unduly impact circulation and parking.

I47-2

Once again, the normal standard is a two-lane city street must have 30 feet of road easement to accommodate the two lanes. That 30 feet does not exist on W. Carter in this area near Bailey Canyon.

Knowing full well this was the situation, you still proposed to use Carter in this fashion. What are you going to do about it? You need to find 10 more feet of land in order to use Carter for that purpose. What are you going to do to find more land? Please articulate what your plan is if you still plan to use Carter as an ingress and an egress. However, to have a two-lane road on a very steep hill that measured 46 in width at the top and allow it to taper to 44' in width coming down the hill until the road meet the Monastery gate in unbelievable, but to then include the left turn is not only treacherous but deadly it its own right. What do you plan to do about this.? There is a 12% grade a driver has to negotiate while the car picks up speed just driving down the hill due to the weight of the car. . You have a huge piece of property to work with, but then you do this. Why? How do you plan to mitigate this situation?  
 Furthermore, at the now open gate the Carter road then becomes 20 feet in **width that is paved**. The city ordinance reveals the minimum required is 30 feet. That **LAND DOES NOT EXIST up there so why did you propose it? Please address this question.**

147-3

**However, how can a road be created that goes from 44'-46' in width and end up at the Carter Gate having driven down a 12% steep hill and having to make a left turn and arrive at a 20' roadway with cars now driving in both directions? What do you plan to do about this situation.? What kind of mitigation do you plan to use to rectify this situation? Who has the right of way, the cars going into the Monastery or the cars coming out of the Monastery? We are not talking about a few cars a day, but about 400 cars daily as that is half of the estimated 800 car daily trips projected for this housing development plus the traffic going to Bailey Canyon for people going hiking or biking in this wilderness area. . See attached Urban West Map revealing the narrowing of the monastery road at the monastery gate on Carter**

Furthermore, one of the areas the draft EIR failed to even consider were those people who ride bikes into the "Little Carter" area let alone the is the pedestrian walkways and missing sidewalks, especially on streets such as Sunnyside, Lima, Carter, and Grandview. There are more streets that will be impacted, but these are the streets will be severely impacted. By increased traffic. Grandview only has a sidewalk on the south side of the street, but there is space to build one on the north side. Lima has never had sidewalks, but given the additional traffic it will receive from cars driving downhill into the city of Sierra Madre, sidewalks will become necessary for the safety of the residents. What do you plan to do about this additional traffic and the lack of sidewalks? Please explain. Finally, Sunnyside also does not have sidewalks right outside the monastery gate on Sunnyside. How are you going to address that situation? Please explain? Finally, the stretch of Carter from Lima to Baldwin also has no sidewalks. IF traffic does use "Little Carter" (from the monastery gate to Lima) as one of the ingresses and egresses what will you do about the lack of sidewalks on Carter from Lima to Baldwin.? Please explain

147-4

Was there a reason bicycles and the people who ride bikes into the Bailey Canyon area were not even considered? How do you explain this omission? Where are the pedestrian paths done in a reasonable and safe fashion for people trying to get into Bailey Canyon? If you tell me you took care of this because you will have additional parking near the new park on the monastery land, that also adds to the mess of the 44 foot road meeting the 20 foot road, but now, children

147-5

dogs and people will now have to cross the street somewhere to get to Bailey Canyon for a morning walk....A good EIR would have addressed this omission. Was there a reason pedestrians and pedestrian safety was omitted from the draft EIR? Please explain this omission and explain to me how you plan to resolve this omission? Another EIR? Why in the housing development area are there no bike lanes for potential residents? Did you forget to realize large homes will have children in the homes as well as adults who might like to ride a bike around their new community. Please address this concern in your response to this draft EIR. Thank you.

Nancy Beckham  
337 North Lima Street  
Sierra Madre CA 91024

See attachments of updated plate map of Carter and Urban West's Map of streets and pads.

↑  
147-5  
Cont.

↓  
147-6



## Response to Comment Letter I47

Individual  
Nancy Beckham  
September 30, 2021

**I47-1** The comment expresses general concerns relating to the project's ingress/egress, particularly related to Carter Avenue. Please refer to Global Response GR-5 .

**I47-2** The comment raises concerns regarding the design of the Carter Avenue ingress/egress and potential safety hazards to motorists and pedestrians under existing conditions, and that those hazardous conditions would be exacerbated with implementation of the proposed project. The comment states that Carter Avenue is only 25 feet in width and cannot be made wider, which comes into conflict with City ordinance 16.32.035 – Street standards—Modification of same.” Please refer to Global Response GR-5. In addition, in order to address commenters' concerns related to safety issues along Carter Avenue and outside of the boundaries of the proposed project site, the project applicant is proposing off-site improvements to Carter Avenue. As discussed in Final EIR Section 3.3.12, Off-Site Improvements, and Global Response GR-5, the Applicant would widen Carter Avenue to a total of 24 feet (10 feet for each travel lane plus one 4-foot curb along the southern boundary of Carter Avenue) and a 6-foot sidewalk on the north side of Carter Avenue, for a total width of 30 feet.

**I47-3** This comment expresses safety and circulation concerns about Carter Avenue, located just outside of the project site. More specifically, the comment expresses concern about the width of Carter Avenue being creating a safety hazard as the proposed extension of Carter Avenue narrows in width at the entrance point of the project site. The comment further expresses concern that the portion of Carter Avenue just outside the project site does not comply with City Standards. Please refer to Global Response GR-5 and Response to Comment I47-2.

The comment questions which cars would have right of way; the cars going into the Monastery or the cars coming out of the Monastery. As described in Specific Plan Section 3.4.3, Proposed Streets, North Sunnyside Avenue will be a public street with one vehicular lane in each direction providing primary vehicular access to and from the project site and public park, internal circulation for the residential area, and access through the project site to the Mater Dolorosa Retreat Center. A sliding gate will be located at the Mater Dolorosa Retreat Center's entrance on the northern end of the North Sunnyside Avenue extension, just north of the project site boundary. Due to the low thru traffic anticipated entering the Mater Dolorosa Retreat Center, a queue of cars is not expected to form south of the gate within the project site. North Sunnyside Avenue will have a maximum 56.5-foot right-of-way with curbs and gutters, parking and planting areas on both sides, and a sidewalk on the west side. North Sunnyside Avenue is depicted in cross sections A and B in Figure 3-4, Street Cross Sections, of the Specific Plan and Draft EIR Figure 3-6, Proposed Street Sections.

Finally, the comment raises concern about increasing traffic as a result of the proposed project and provides an attachment of the proposed project plan. Please refer to Global Response GR-6.

The comment references an attachment to the proposed project plan (see Response to Comment I47-6). The comment does not raise new or additional environmental issues concerning the adequacy of the Draft EIR.

**I47-4** The comment expresses concern about Carter Avenue and specifically mentions impacts on bicyclists, pedestrian safety, and traffic. In order to address commenters' concerns related to safety issues along Carter Avenue and outside of the boundaries of the proposed project site, the project applicant is proposing off-site improvements to Carter Avenue. As discussed in Final EIR Section 3.3.12, Off-Site Improvements, and Global Response GR-5, the Applicant would widen Carter Avenue to a total of 24 feet (10 feet for each travel lane plus one 4-foot curb along the southern boundary of Carter Avenue) and a 6-foot sidewalk on the north side of Carter Avenue, for a total width of 30 feet. Please refer to Global Response GR-5 and Global Response GR-6.

**I47-5** The comment states that bicyclists and their safety were not considered and asks why there are no bike lanes proposed with the project. The City does not have a bicycle master plan and no planned bicycle facilities are identified within or near the project site. Sierra Madre Boulevard does provide existing bicycle lanes. However, Sierra Madre Boulevard is located approximately 0.6 miles south of the project site. Therefore, any bicycle improvements proposed within the project site or vicinity of the project site would not have nearby existing bicycle facilities or infrastructure to provide a connection. Additionally, according to Final EIR Section 4.17.5, Impact Analysis, in Section 4.17, Transportation, although no bicycle facilities and improvements are proposed under the project, the project would not impact existing bicycle facilities in the vicinity of the project, including the existing bicycle lanes within Sierra Madre Boulevard. Please refer to Global Response GR-5.

Additionally, the comment asks how pedestrians could get to Bailey Canyon in a reasonable and safe fashion. According to Draft EIR Section 3.3.2, Neighborhood Park and Open Space, a pedestrian path extending from the east side of Carter Avenue would provide pedestrian access to Bailey Canyon Wilderness Park. According to Draft EIR Section 4.17.4, the proposed project would involve development of a 3.03-acre dedicated neighborhood park, to be located within the southern portion of the site (see Figure 3-3, Proposed Park Conceptual Plan, in Chapter 3, Project Description, of this Draft EIR). The proposed park would involve pedestrian paths as well as enhanced connectivity to the Bailey Canyon Wilderness Park to the east. In addition, the proposed project would include a landscaped parkway and sidewalk on the west side of North Sunnyside Avenue, and a sidewalk between proposed A, B, and C Streets, enhancing pedestrian safety and mobility, consistent with Objective L51 and Policy C30.3. In addition, as stated in Final EIR Section 3.3.12, the proposed project would include off-site improvements to Carter Avenue, between the southeastern portion of the project site boundary and Lima Street, which would include a 6-foot sidewalk on the north side of Carter Avenue.

**I47-6** The comment references an attachment which accurately depicts the proposed grading plan included as Figure 3-10 of the Draft EIR and does not raise new or additional environmental issues concerning the adequacy of the Draft EIR. No further response is required.



Comment Letter I48

**From:** Evan and Mary <marynevans@earthlink.net>  
**Sent:** Thursday, September 30, 2021 10:15 PM  
**To:** Vincent Gonzalez  
**Subject:** Please Oppose The Meadows Proposal As It Stands.....  
**Attachments:** MeadowsLtr ES.pdf

CAUTION: This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Greetings:

My wife and I strongly oppose The Meadows development proposal involving the Passionist Fathers' Monastery.

We each have strong feelings, so we are each sending you an individual letter. Here is my letter.

We do not feel that the community will benefit from the proposal as it is now and ask that you please support our concerns and oppose it.

I48-1

Thank you, Evan Steinberg

328 Auburn Ave  
Sierra Madre, CA 91024  
September 30, 2021

To: Victor Gonzalez,  
Director of Planning and Community Preservation,  
City Hall,  
232 W. Sierra Madre Blvd.  
Sierra Madre, CA 91024

Re: Concerns About The Meadows at Bailey Canyon (Monastery) Development

My wife and I moved to Sierra Madre in September 1977, and have greatly enjoyed living here for the 44 years since then. We used to regularly attend the annual fundraiser at the Passionist Fathers Monastery, and enjoyed walking through their grounds. Unfortunately, we do not feel their plan to sell property to developers to build 42 homes would be good for the community. We therefore do not support them in this plan as it has been proposed, and recommend that that you oppose it.

148-2

Our concerns are several, based on the elements of the Environmental Impact Report.

Traffic is already a problem in Sierra Madre with its many schools, made worse recently by pandemic measures. Drop-off and pick-up times create significant problems. Multiple streets, especially Lima, Sunnyside, Grove St., and Carter, would experience a significant increase in traffic. Unfortunately, the EIR has no comments about possible effects on our village, and addresses only travel within the proposed project.

148-3

Water is a precious commodity, especially now during severe drought conditions. The developer alleges what they call "net zero water usage". We question that they can deliver on that claim, and wonder what current and future costs would be involved in any attempt to do so.

148-4

In addition to drought, recent prolonged high temperatures have increased the risk of wildfires. Both the Sierra Madre Fire Department and the California Dept of Forestry and Fire Protection consider the proposed location a very high fire hazard severity zone. New homes in this area would put people and structures at significant risk, contrary to the recommendation of our General Plan which recommends not to build in a high fire zone. We also wonder how well local streets would support emergency equipment.

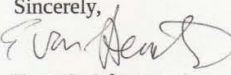
148-5

Part of what makes Sierra Madre so appealing is our foothill location, with multiple plants and trees that are great for walking and hiking. The proposed project would result in the removal of 100 mature trees; 10 of these are protected Coastal Oaks. It is hard to see a significant environmental benefit from losing so many trees. Again, our General Plan recommends exactly the opposite, to develop tree preservation and protection measures.

148-6

Again, we strongly recommend that that you oppose the proposed Monastery Development, The Meadows at Bailey Canyon. We appreciate your consideration.

148-7

Sincerely,  
  
Evan Steinberg

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## Response to Comment Letter I48

Individual  
Evan Steinberg  
September 30, 2021

- I48-1** This comment expresses general opposition to the proposed project and notes the attached letter accompanying the comment (see Responses to Comments I48-2 thru I48-11).
- I48-2** The City expresses general opposition to the project but does not raise new or additional environmental issues concerning the adequacy of the Draft EIR.
- I48-3** This comment states traffic congestion is an existing issue within the City. Additionally, the comment states existing condition issues of vehicle drop off around schools. As stated in Draft EIR Section 4.15, Public Services, the nearest school (Sierra Madre Elementary School) is located 0.48 miles southeast of the project site. The Draft EIR analyzed the project's potential contribution to vehicle miles traveled (VMT), including impacts related to trips other than home-based trips. Please refer to Global Response GR-6. Lastly, the comment suggests the Draft EIR does not consider the impacts to the "village ... and addresses only travel within the proposed project." However, the Draft EIR analyzed off-site traffic impacts (in terms of VMT) in Section 4.17, Transportation, and cumulative transportation effects in Draft EIR Chapter 5. The cumulative impacts analysis was based on the project's potential to result in cumulatively considerable adverse impacts when considered in conjunction with the related (cumulative) projects presented in Table 5-1, Cumulative Projects List. As such, the Draft EIR analyzed the full scope of transportation impacts as required by CEQA. For additional discussion related to traffic, see Global Response GR-6.
- I48-4** The comment questions the project's water use and proposed net-zero water impact. Please see Global Response GR-1 .
- I48-5** The comment states that the project is located within a Very High Fire Hazard Severity Zone (VHFHSZ), and expresses concern related to wildfire hazards and emergency equipment. Please refer to Global Response GR-3 and Global Response GR-4.
- I48-6** This comment expresses concern regarding the project's proposed removal of existing trees on site. The comment states the City's General Plan intends for tree preservation and protection measures. Please refer to Global Response GR-2 . It should be noted that revisions have been made in the Final EIR (see Section 4.4, Biological Resources) and Appendix C2, Arborist Report, as a result of the proposed off-site widening of Carter Avenue. However, MM-BIO-3, included in Section 4.4.6, Mitigation Measures, of the Final EIR, would still be implemented to reduce impacts to trees to less than significant. These revisions and proposed off-site improvements do not raise new or additional environmental issues concerning the adequacy of the Draft EIR.
- I48-7** The comment provides concluding remarks and states general opposition to the project.

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Comment Letter I49

**From:** Deirdre Murphy <dedeannmurphy@gmail.com>  
**Sent:** Sunday, October 3, 2021 12:37 PM  
**To:** Vincent Gonzalez  
**Subject:** DEIR input for the Meadows at Bailey Canyon

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Thank you for taking my comments concerning this matter. Please retain a copy for the administrative records. Please respond to these comments in the Final EIR and please put me on the list of people to notify when the Final EIR is complete.

I49-1

I wholeheartedly object to the entire proposed housing development. It is MORE than inconsistent with our General Plan. Citizens, the same citizens who elected all of you spent an enormous amount of time on the General Plan so please honor and respect the amount of hard work that went into preserving Sierra Madre.

I49-2

A change in zoning, especially in light of the newly signed SB 9 and SB 10 would prove disastrous if zoning was even being considered being changed. Now more than ever we are determined to keep the zoning Institutional.

I49-3

The proposed cookie cutter homes are inconsistent with the eclectic architecture of Sierra Madre - once again in opposition to General Plan guidelines.

I49-4

The impact on Traffic flow has not been adequately examined but provides only a cursory outline inconsistent with the mock ups provided by NUW. Further, given that 30 feet width streets are indicated in the General Plan, it is once again in violation of what is safest for Sierra Madre.

I49-5

Water. Please please do not insult us with the promise of "not interfering with SM water sources" when EVERY current news report and environmental statistic indicates that no one is in a position to say there will be water. We are in a massive drought which SM itself is currently unprepared for. This is a huge issue and we need to conserve water not increase taxing our limited water sources.

I49-6

This area is in a fault zone and HIGH FIRE Zone. This is CRUCIAL. We are in the midst of increasing fire emergencies the likes of which are unprecedented in California. Our frontline fire fighters do not deserve to have this added calamity when as we know, fires in Sierra Madre are threatening and dangerous as it is.

I49-7

The oak trees and forest on this property are unprecedentedly unique and fecund. The Oaks are sacred. They are a refuge for the many animals that call the Monastery grounds their home. We have an obligation to protect these Oaks and the wildlife that lives among them. Sierra Madre has made a previous commitment to the Forest and the trees in this city which we need to abide by.

I49-8

On a personal note, I feel we were never provided ample opportunity to explore other options for this parcel of land. We need room for low income housing and our older population is increasing in Sierra Madre. Why not a Senior Care Home in the aesthetic of the Monastery so we are caring for our most vulnerable? NOT multi million dollar McMansions.

I have also had cause, as a 23 year resident of Sierra Madre to feel insulted with the unctuous appeals for the "Meadows Project". It is insulting to see flyers of how the Monastery is "feeding the poor" while avariciously feeding its own pocket. By all means build it is their property but please, build something more in line with "church policy"- our old folk need out support. Further, a survey I completed was so biased toward the project that I was disgusted with the guise of legitimate opinion seeking. The entire onslaught smacks of slick self serving avarice and our current city council appears to be on the side of the greed.

Can we not as a community, 50 years down the line, BE the city that chose small town interest over greedy developers set on destroying the very quaintness we all fell in love with in this village?

I have never seen Sierra Madre this disgusted and disappointed with our elected officials. Shame on you.

Thank you  
Sincerely  
Deirdre Murphy  
601 Woodland Drive  
Sierra Madre

|49-9

## Response to Comment Letter I49

Individual  
Deirdre Murphy  
October 3, 2021

- I49-1** The comment is an introduction to comments that follow. As shown below, Responses to Comments I49-1 through I49-9 are included as part of the Final EIR for City decision makers' review and consideration.
- I49-2** This comment expresses general opposition to the proposed project and the concern that the project is inconsistent with the City's General Plan. Please refer to Global Response GR-7 .
- I49-3** The comment expresses concern with the potential of SB 9 and SB 10 to result in impacts if the project site is zoned for residential uses. See Response to Comment I28-5.
- I49-4** The comment states general opposition to the architectural style of the proposed project. The City notes that this comment expresses the opinions of the commenter. The design guidelines of the Specific Plan outline site planning and design, architectural design, and landscape design standards that would be implemented as a design of the project in order to ensure that development is consistent with surrounding development and that the proposed project would not significantly degrade views of the project site from nearby public locations. In addition, as discussed in Section 4.1.5, Impact Analysis, of Section 4.1, Aesthetics, the project's impacts to aesthetics would be less than significant.
- I49-5** The comment states the Draft EIR has not adequately analyzed the project's impact to traffic flow. Please refer to Global Response GR-6.

Furthermore, the comment raises concern for transportation safety with regards to roadway width. Although the commenter did not cite the specific SMMC section, Chapter 3 (Project Description) of the Draft EIR outlines the internal circulation components of the project site in subsection 3.3.6.2, featuring the following:

North Sunnyside Avenue would transition from a width of 40 feet at its existing terminus to a varying 54- to 56.5-foot right-of-way within the project site, with curbs and gutters, parking and planting areas on both sides, a landscaped parkway and sidewalk on the west side, and tree plantings on the east side of the street. Carter Avenue would transition from its existing 25-foot right-of-way to a varying 44.5- to 46-foot right-of-way within the project site and would have curbs and gutters, and planting areas on both sides, parking on the west side of the street, and a sidewalk on the west side of the street. A pedestrian path extending from the east side of Carter Avenue would provide pedestrian access to Bailey Canyon Wilderness Park. Lastly, three additional streets that run east to west would be provided within the project site. This includes Streets A, B, and C (see Figure 3-2, Conceptual Site Plan). Street A would have a maximum 38.5-foot right-of-way and a sidewalk and parking on the south side of the street. Streets B and C would have a maximum 42.5-foot right-of-way and a sidewalk and parking on the south side of the streets. The proposed street sections are shown in Figure 3-6, Proposed Street Sections (Draft EIR page 3-4).

In addition, in order to address commenters' concerns related to safety issues along Carter Avenue and outside of the boundaries of the proposed project site, the project applicant is proposing off-site widening to Carter Avenue, between the southeastern portion of the project site boundary and Lima Street, which would ensure that Carter Avenue would comply with existing code within and outside of the project site (see Final EIR Section 3.3.12 and Global Response GR-5 for details).

**I49-6** The comment is concerned about water supplies in drought conditions. Please see Global Response GR-1.

**I49-7** The comment states the project site is located within an earthquake fault zone. Draft EIR Section 4.7, Geology and Soils, states the project site is not located on a known active, potentially active, or inactive fault as delineated on the Alquist-Priolo Earthquake Fault Zoning Map. The closest earthquake fault to the project site is the Sierra Madre Fault, located approximately 700 feet to the north. As detailed in Draft EIR Section 4.7 and Appendix E, the potential for ground rupture on the project site is considered low. The proposed project would be required to comply with all existing seismic safety regulations, including the California Building Code and the SMMC in order to ensure seismic safety. In addition, the project would comply with project design features PDF-GEO-1 through PDF-GEO-15, which includes project specific recommendations from the geotechnical investigation (included as Appendix E).

This comment also states that the project site is designated as a Very High Fire Hazard Severity Zone (VHFHSZ) by the California Department of Forestry and Fire Protection (CAL FIRE) and states development of the project should not occur. The comment further raises concern for the wildfire risk to surrounding communities as a result of project development. Please refer to Global Response GR-3.

**I49-8** The comment discusses the importance of the oak trees on site and states a desire to protect them for wildlife habitat. Please refer to Global Response GR-2.

**I49-9** This comment states a desire to discuss more alternatives for the proposed project, including a senior care home. Draft EIR Chapter 8, Alternatives, assesses potential alternatives to the proposed project in compliance with State CEQA Guidelines section 15126.6(a) and (b). The Draft EIR includes alternatives considered but rejected, alternatives under consideration for the City's decision makers to review and consider, as well as an assessment on the environmentally superior alternative. The commenter's suggestion closely aligns with Alternative 2, Existing Zoning and Land Use Designation: Communal Residential Facility Alternative. This alternative assumes development of group homes, developmentally disabled, or senior care facilities, consistent with the existing Institutional zoning and General Plan land use designation of the project site. See Response to Comment I26-10 for further discussion related to alternatives.

The comment further provides commentary about the project site's owners, the project applicant, and the Sierra Madre City Council, as well as general opposition to the project, which are not related to the adequacy of the environmental analysis. No response is required.



Comment Letter I50

**From:** judywm <judywm@webb-martin.com>  
**Sent:** Sunday, October 3, 2021 4:06 PM  
**To:** Vincent Gonzalez  
**Subject:** New Urban West

CAUTION: This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

I am writing this letter to object to the project proposed by the New Urban West to develop the Monastery.

In their project update October 2021, they refer to the Monastery asking the city of Sierra Madre to "restore the plan "to build a new community. There wasn't an "original plan" and as to it being less Impactful "NOT", Compatible "NOT", and certainly "NOT" consistent with the original planning rules for Sierra Madre.

1. They did not do extensive research on the history of Sierra Madre as they said they did or they would not proceeded with the project!
2. There is no diverse design and single levels instead of 2 stories would have been more desired as the 47 homes surrounding the project with approximately 1500 sq. ft. instead of the 1500 to 3800 sq. ft purposed.
3. Respectful of neighbors, light traffic noise? They said 31 trips in the am and 42 in the pm. What about trips to the market, school, work, visiting friends, etc. and that is assuming only one adult is working ?
4. Water! This is a mute point! We don't have the water and prepaying won't work as we don't know what the cost will be in 5 years, 10 years, or 20 years or if we will have any water at all! We are in an unprecedented drought and it will only be getting worst. In our General Plan our objective R 12 is to optimize the use of water.
5. The area is in a high fire risk severity zone. R 3-2 and R 3-3 We need to mitigate flood and fire in natural open space.
6. Earthquake! We have 3 major fault lines running very near the Project. In 1991, the Sierra Madre earthquake destroyed the church on the property and condemned 22 homes with damage to 403 structures.
7. Trees! The General Plan calls for goals and policies for preservation and protection of existing trees. They want to remove over 100 trees of which 10 are coastal oaks. The canopy of mature trees are important to our health and aesthetics for net oxygen.
8. Zone changes can have serious implications to our town. Because of SB
- 9 and 10 more houses can be built on the lots so the overall impact would be much greater than their report says.
9. The ingress and egress is not available for two streets because the Carter street is only 25 ft wide and it must be 30 ft. and there is no room to add the extra 5 feet to make it legal.
10. The lower level of the property is a natural alluvial fan and is needed to protect us from floods and to put water in our aquifer.
11. Sierra Madre set back from the street is 25 feet, but the project is asking for 20 feet with 5 feet on the side (looking like a condo subdivision from the street) The lots are too small and will overwhelm the area. All the garages are in front and will look like Orange County with cookie cutter fronts.
12. They are offering 100% electric but at what price will the buyers be willing to pay for high electric costs.
13. They didn't address the potential pedestrian problems for walkers and lack of sidewalks in the NW Sierra Madre

There are too many problems with this project and we should deny it!!  
 Thank you,

Judy Webb-Martin, judywm@webb-martin.com, 626-688-2273

150-1

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## Response to Comment Letter I50

Individual  
Judy Webb-Martin  
October 3, 2021

- I50-1** This comment expresses general opposition to the proposed project. The comment states the project is inconsistent with the planning rules of Sierra Madre. It is assumed that the comment is concerned with consistency between the proposed project and the City's General Plan and Zoning Code. The proposed project would require amendments to both the General Plan and Zoning Code. Please refer to Global Response GR-7.
- I50-2** The comment states that the project applicant has not researched the history of Sierra Madre. However, this comment does not raise any general or specific issue with the environmental review and the adequacy of the Draft EIR. An overview of existing setting of the project site and its surroundings was provided throughout Chapter 4 of the Draft EIR.
- I50-3** The comment provides opinions and objections to the project's proposed design. The proposed project would be implemented with the adoption of a Specific Plan, which includes design guidelines subject to the approval of City decision makers. For additional response regarding character compatibility, see Response to Comment I49-4.
- I50-4** This comment questions how the Draft EIR calculated anticipated daily and peak hour trips generated by the proposed project. As described in Draft EIR Section 4.17, Transportation, the proposed project would generate 396 daily trips, 31 AM peak trips and 42 PM peak-hour trips. Draft EIR Section 4.17 determined the proposed project of 42 single-family detached homes would generate a daily trip rate of 9.44 vehicular trips per dwelling unit. Trip rates are calculated from the Institute of Transportation Engineers Trip Generation 10<sup>th</sup> edition manual. This represents a conservative estimate of vehicular trips associated with the proposed project and, thus, accounting for work trips, school trips, and others. Considering the commenter's statement that an increase of online shopping deliveries would result as part of the project is speculative, and therefore, not required by CEQA. Please refer to Global Response GR-6.
- To the extent the comment is concerned with traffic noise, off-site traffic noise is analyzed under Draft EIR Section 4.13.5, Impact Analysis, of Section 4.13, Noise. Please refer to Response to Comment I5-2.
- I50-5** This comment raises concern for water supplies and drought conditions. Please see Global Response GR-1. Additionally, the comment cited General Plan Objective R12. As shown in Draft EIR Table 4.11-1, Project's Consistency with City of Sierra Madre's General Plan Goal and Policies, the project was found to be consistent with this objective.
- I50-6** The comment states that the project is located within a Very High Fire Hazard Severity Zone. Additionally, the comment notes General Plan policies R3.2 and R3.3 and states the project needs to mitigate flood and fire hazards. Below are the two policies as defined in Chapter Two, Resource Management, of the City's General Plan:

General Plan Policy R3.2    Ensure that wildland open space, including the areas of the City designated as High Fire Hazard Severity Zone, is left in its natural state

with the exception of brush abatement for public safety in order to aid the City in fighting fires

General Plan Policy R3.3 Ensure that natural open space within the Very High Fire Hazard Severity Zones remains undeveloped so as to mitigate the flood cycles that follow wild land fires in the natural open space

As shown above, the two policies referenced are specifically related to “wildland open space” and “natural open space” neither of which are applicable to the project site, which is not designated as Natural Open Space (NOS) or Constructed Open Space (COS). Wildfire risk and flooding are analyzed in the Draft EIR within Sections 4.10, Hydrology and Water Quality, and 4.20, Wildfire. Impacts related to risk of flooding were found to be less than significant. For additional information about Very High Fire Hazard Severity Zones and how it relates to this project, please refer to Global Response GR-3.

**I50-7** The comment states the project site is located near earthquake faults and notes past earthquake history within the vicinity of the project site. The Draft EIR analyzes the project’s potential impacts related to earthquake zones. Draft EIR Section 4.7, Geology and Soils, states the project site is not located on a known active, potentially active, or inactive fault as delineated on the Alquist-Priolo Earthquake Fault Zoning Map. However, the closest earthquake fault to the project site is the Sierra Madre Fault, located approximately 700 feet to the north. As further detailed in Draft EIR Section 4.7, impacts to seismic hazards were found to be less than significant with incorporation of PDF-GEO-1 through PDF-GEO-15 and MM-GEO-1. No change or addition to the environmental analysis is required.

**I50-8** The comment notes the City’s General Plan includes goals and policies for preservation and protection of existing trees and expresses general concerns associated with loss of trees, such as loss of oxygen. Please refer to Global Response GR-2 . Regarding the commenter’s concern related to oxygen generation, refer to Response to Comment I24-1.

**I50-9** The comment is concerned with the potential of SB 9 and SB 10 to result in impacts associated with the proposed zone change. See Response to Comment I28-5.

**I50-10** This comment states the project site’s roadway design as proposed is not sufficient or compatible with the adjoining streets. In particular, the commenter notes Carter Avenue needs to be 30 feet wide to connect with adjoining streets. In order to address commenters’ concerns related to safety issues along Carter Avenue and outside of the boundaries of the proposed project site, the project applicant is proposing off-site widening to Carter Avenue, between the southeastern portion of the project site boundary and Lima Street, which would ensure that Carter Avenue would comply with existing code within and outside of the project site (see Final EIR Section 3.3.12 and Global Response GR-5 for details).

**I50-11** The comment states the project site under existing conditions is needed to protect the surrounding community from floods and is used to replenish the groundwater aquifer. As discussed in Response to Comment I50-6, above, impacts related to flooding were found to be less than significant. Moreover, as detailed in Draft EIR Section 4.10, the project is not anticipated to substantially decrease groundwater supplies with the proposed redevelopment of the site. Impacts were found to be less than significant.

- I50-12** This comment expresses opposition to the project’s proposed design standards. The comment does not reflect concern with the adequacy of the environmental analysis; thus, no response is required. Please refer to Global Comment 7 (GR-7) General Plan Consistency regarding the project’s proposed design standards.
- I50-13** The comment states the proposed project would offer 100% electric power for operations and questions the cost. Although the comment was not specific, Draft EIR Section 4.6, Energy, cites “electrical service in the City ... is provided by the Clean Power Alliance. As of October 2020, Sierra Madre residents and businesses are receiving 100% Green Power (100% renewable energy) as their default rate product. Customers also have the option to purchase the Lean Power rate which is 36% renewable energy and Clean Power rate which is 50% renewable energy” (Draft EIR page 4.6-1). Regarding the commenter’s question about cost, State CEQA Guidelines section 15064(e) states “economic and social changes resulting from a project shall not be treated as significant effects on the environment.” The project’s electricity cost is not within the scope of required environmental analysis. Therefore, this comment does not contain any specific concerns related to the adequacy of the environmental analysis in the Draft EIR. No changes or additions to the project description or environmental document are required in response to this comment.
- I50-14** This comment states the Draft EIR does not address pedestrian safety and that the project’s proposed design lacks sidewalks. The project would include sidewalks along the proposed streets to promote pedestrian safety and mobility within the project site and local vicinity. Moreover, Draft EIR Section 4.17, Transportation, includes analysis on the project’s consistency with pedestrian safety policies. As a result, the analysis determined the project would not result in a hazardous roadway design or unsafe roadway configuration and impacts were found to be less than significant. In addition, in order to address commenters’ concerns related to safety issues along Carter Avenue and outside of the boundaries of the proposed project site, the project applicant is proposing off-site widening to Carter Avenue, between the southeastern portion of the project site boundary and Lima Street, which would ensure that Carter Avenue would comply with existing code within and outside of the project site (see Final EIR Section 3.3.12 and Global Response GR-5 for details).
- I50-15** The comment expresses general opposition to the proposed project and does not contain any specific concerns related to the adequacy of the environmental analysis in the Draft EIR.

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Comment Letter I51

**From:** Evan and Mary <marynevans@earthlink.net>  
**Sent:** Thursday, September 30, 2021 10:15 PM  
**To:** Vincent Gonzalez  
**Subject:** Objections to the Meadows proposal  
**Attachments:** MeadowsLtr MS.pdf

CAUTION: This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Greetings:

My husband and I strongly oppose The Meadows development proposal involving the Passionist Fathers' Monastery.

We each have strong feelings, so we are each sending you an individual letter. Here is my letter.

We do not feel that the community will benefit from the proposal as it is now and ask that you please support our concerns and oppose it.

Thank you, Mary Steinberg

I51-1

328 Auburn Ave  
Sierra Madre, CA 91024  
September 30, 2021

To: Victor Gonzalez,  
Director of Planning and Community Preservation,  
City Hall,  
232 W. Sierra Madre Blvd.  
Sierra Madre, CA 91024

Re: Concerns About The Meadows at Bailey Canyon (Monastery) Development

My husband and I moved to Sierra Madre in September 1977, and have greatly enjoyed living here for the 44 years since then. We used to regularly attend the annual fundraiser at the Passionist Fathers Monastery, and enjoyed walking through their grounds. Unfortunately, we do not feel their plan to sell property to developers to build 42 homes would be good for the community. We therefore do not support them in this plan as it has been proposed, and recommend that that you oppose it.

Our concerns are several, based on the elements of the environmental impact report (EIR).

Traffic is already a problem in Sierra Madre with its many schools, made worse recently by pandemic measures. Drop-off and pick-up times create significant problems. Multiple streets, especially Lima, Sunnyside, Grove St., and Carter, would experience a significant increase in traffic. Unfortunately, the EIR has no comments about possible effects on our village, and addresses only travel within the proposed project.

Water is a precious commodity, especially now during severe drought conditions. The developer alleges what they call "net zero water usage". We question that they can deliver on that claim, and wonder what current and future costs would be involved in any attempt to do so.

In addition to drought, recent prolonged high temperatures have increased the risk of wildfires. Both the Sierra Madre Fire Department and the California Dept of Forestry and Fire Protection consider the proposed location a very high fire hazard severity zone. New homes in this area would put people and structures at significant risk, contrary to the recommendation of our General Plan which recommends not to build in a high fire zone. We also wonder how well local streets would support emergency equipment.

Part of what makes Sierra Madre so appealing is our foothill location, with multiple plants and trees that are great for walking and hiking. The proposed project would result in the removal of 100 mature trees; 10 of these are protected Coastal Oaks. It is hard to see a significant environmental benefit from losing so many trees. Again, our General Plan recommends exactly the opposite, to develop tree preservation and protection measures.

Again, we strongly recommend that that you oppose the proposed Monastery Development, The Meadows at Bailey Canyon. We appreciate your consideration.

Sincerely,

*Mary Steinberg*  
Mary Steinberg

151-1



## Response to Comment Letter I51

Individual  
Mary Steinberg  
September 30, 2021

- I51-1** This comment letter represents a form letter prepared by the commenter's husband, Evan Steinberg. Please see Response to Comment Letter I48 for discussion.

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Comment Letter I52

**From:** marcielle brandler <marcielleb@hotmail.com>  
**Sent:** Sunday, October 3, 2021 10:08 AM  
**To:** Vincent Gonzalez; Karen Rowinsky  
**Subject:** I too am against ruining our little town.

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Please reconsider all the building and the tearing out of long-standing trees in Sierra Madre. This housing project will damage the charm and safety of our already-crowding town. Marcielle Brandler, resident since 2006.

I52-1

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## Response to Comment Letter I52

Individual  
Marcielle Brandler  
October 3, 2021

- I52-1** This comment expresses general opposition to the proposed project. and does not raise concerns with the adequacy of the Draft EIR and environmental analysis.

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Comment Letter I53

**From:** Barbara Ontiveros <barbont215@gmail.com>  
**Sent:** Saturday, October 2, 2021 7:23 AM  
**To:** Vincent Gonzalez  
**Subject:** Monastery property

CAUTION: This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

I am vehemently opposed to the monastery project for so many reasons.  
It is a dangerous and greedy undertaking. In the middle of a drought (and California is always in a drought) to build all those huge houses for the wealthy to purchase is a travesty. Think of the water they would need for those sizes of houses!  
And there is the fire danger. They would be in a very precarious fire hazard zone.  
The traffic those houses would add to our quiet town would be unmanageable.  
Please deny the progress of this project.  
Barbara Ontiveros  
111 e Sierra Madre blvd.  
Sierra Madre

I  
|  
| I53-1  
|  
| I53-2  
| I53-3  
| I53-4  
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## Response to Comment Letter I53

Individual  
Barbara Ontiveros  
October 2, 2021

- I53-1** This comment expresses opposition to the proposed project and expresses concerns associated with water supplies in drought conditions. Please see Global Response GR- 1.
- I53-2** This comment notes that the project site is designated as a Very High Fire Hazard Severity Zone by the California Department of Forestry and Fire Protection (CAL FIRE). Please refer to Global Response GR-3.
- I53-3** The comment states the project would generally result in traffic congestion. Please refer to Global Response GR-6.
- I53-4** This comment restates opposition to the project and does not raise concerns with the adequacy of the Draft EIR and environmental analysis.

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Comment Letter I54

**From:** Laura Aguilar <laguilar@cityofsierramadre.com>  
**Sent:** Thursday, September 30, 2021 7:59 PM  
**To:** deb sheridan  
**Subject:** Re: Draft EIR Comments

Hi, Deb.

Email is acceptable. Please send to Vincent Gonzalez at VGonzalez@cityofsierramadre.com by 5:00pm.

Regards,

Laura M. Aguilar  
City Clerk  
Administrative Services Manager  
(626) 836-6756

On Sep 30, 2021, at 7:39 PM, deb sheridan <debsheridan2000@yahoo.com> wrote:

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Another Question Madam Guru of all facts - I just read that our responses must be given to Vince Gonzalez "in writing" by 5 pm on Monday. It occurred to me that "in writing" might mean a real letter, although his email address is listed. Just wanted to make sure email is okay.

I 154-1

Thanks,  
Deb Sheridan

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## Response to Comment Letter I54

Individual  
Deb Sheridan  
September 30, 2021

- I54-1** This comment asks whether comments on the Draft EIR may be submitted via email. The comment does not include any comments or questions regarding environmental review. The City has responded to the comment and confirmed that email submission is acceptable. In addition, the Notice of Availability distributed for the proposed project outlined steps for email submissions of public comments.

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Comment Letter I55

**From:** Stephanie Allison <svallison34@gmail.com>  
**Sent:** Friday, October 1, 2021 12:54 PM  
**To:** Vincent Gonzalez  
**Subject:** My comment on the DEIR for the "Meadows Project "

CAUTION: This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Dear Mr. Gonzalez:

I've been a resident of Sierra Madre since 1965. I live one block over from Sunnyside on Gatewood Lane and am totally against this project for 42 homes. My main concern is for fire safety. Plus we already have a water shortage in our town. We have always been able to keep this area free for helicopter rescue efforts. Not to mention the fact that this will destroy all the wildlife, trees, and just completely destroy so much of our natural green space in our little town. Also, there will be more traffic and congestion (air pollution from all the cars going up and down Sunnyside) now in this small area and on Sunnyside street. Nor is this project consistent with our Sierra Madre General Plan and Zoning ordinances.

I55-1  
I55-2  
I55-3  
I55-4

Sincerely,

Stephanie Allison  
490 Gatewood Lane  
Sierra Madre, CA  
[svallison34@gmail.com](mailto:svallison34@gmail.com)

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## Response to Comment Letter I55

Individual  
Stephanie Allison  
October 1, 2021

- I55-1** This comment expresses general opposition to the proposed project but does not include any specific comments relating to the environmental review or adequacy of the Draft EIR.
- I55-2** The comment notes concern with fire safety, water supplies, and previous use of the site as a helicopter landing area. Please see Global Response GR-1 for information regarding water supply and Global Response GR-3 , for information regarding hazards within a Very High Fire Hazard Severity Zone. Regarding the loss of the site as a fire response/helicopter landing area, see Response to Comment I10-1.
- I55-3** The comment states the project would result in traffic congestion. Please refer to Global Response GR- 6. As described in Draft EIR Section 4.3, Air Quality, potential health impacts related to carbon monoxide (CO) hotspots from mobile source emissions (i.e., vehicular traffic) were determined to not be cumulatively considerable and would result in less than significant impacts. In addition, with implementation of MM-AQ-1, air quality impacts would be less than significant. No change or addition is required.
- I55-4** This comment states the proposed project is not consistent with the City's General Plan and site's zoning. Please refer to Global Response GR-7.

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Comment Letter 156

**From:** Sarkis Baltayian <sbaltayian@gmail.com>  
**Sent:** Sunday, October 3, 2021 6:31 PM  
**To:** Vincent Gonzalez  
**Subject:** Monastery Housing Development  
**Attachments:** Baltayian-Sierra Madre letter-housing development.docx

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

From:  
Sarkis Baltayian  
522 Sierra Keys Drive  
Sierra Madre, CA 91024  
October 3, 2021

To:  
Vincent Gonzalez  
[vgonzalez@cityofsierramadre.com](mailto:vgonzalez@cityofsierramadre.com)

Thank you for the opportunity to comment on the DEIR for the "Meadows at Bailey Canyon."

Below are my comments. Please retain a copy for the administrative record.

Object to the proposed housing development. It is inconsistent with the Policies and Values of Sierra Madre's General Plan. I am especially concerned with the following issues:

1. That area is not zoned for single family homes. Sierra Madre residents do not agree with a change of zoning.
2. They are planning on building large houses on small lots, increasing the density of the population to uncomfortable and dangerous levels, contrary to the proposed Sierra Madre Safety policy to avoid developing in High Fire Hazard Safety Zone.
3. The area in question is a buffer to the wildfire zone of the mountains. That buffer zone will be gone, plus the new homes will be in a high fire danger zone themselves.
4. The traffic will be unbearable to the population currently living on N. Sunnyside Ave. and on W. Carter Ave. This will cause an increase in motor vehicle accidents, as well as a serious pedestrian safety issue. A small sample of that is seen once a year on Good Friday, when multitudes visit the Stations of the Cross or Via Crucis at the Monastery.
5. Water will be even more scarce than it is now. Proponents say that there will be a zero balance impact on water supply, but everyone knows that it is impossible. The environmental impact for the water supply in Sierra Madre will be great.

I 156-1  
I 156-2  
I 156-3  
I 156-4  
I 156-5  
I 156-6

6. A large number of mature trees will be removed and replaced with smaller trees requiring a great deal of water to become established. Sierra Madre has a Forest Management Plan with a mission to preserve "canopies" for their environmental and aesthetic benefit. A total of 101 large canopied trees will be destroyed.

156-7

I have been living in Sierra Madre with my wife and children since 1987. I know that I am not the only one with these concerns and that many others can echo these words as well.

156-8

Respectfully,

Sarkis Baltayan

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## Response to Comment Letter I56

Individual  
Sarkis Baltayian  
October 3, 2021

- I56-1** This comment requests the following comments (Comments I56-2 through I56-8) be included in the responses to comments of the Final EIR. As shown, the commenter’s request has been recorded as part of this Final EIR.
- I56-2** This comment expresses opposition to the proposed project but does not include any specific comments relating to the environmental review or adequacy of the Draft EIR.
- I56-3** This comment expresses opposition to the proposed zone change and states the project is inconsistent with the City’s General Plan. Please refer to Global Response GR-7.
- Additionally, the comment states the project would conflict with “proposed Sierra Madre Safety policy to avoid developing in High Fire Hazard Safety Zone”. Please refer to Global Response GR-3.
- I56-4** This comment states the project site is currently used as a buffer to the wildfire zones. Please refer to Global Response GR-3.
- I56-5** This comment states the project would generate traffic that would result in safety hazards. Draft EIR Section 4.17, Transportation, details consistency with existing General Plan policies and objectives highlighting the need for safety. Moreover, the project would include sidewalks along the proposed streets to promote pedestrian safety and mobility within the project site and local vicinity and would not result in a hazardous roadway design or unsafe roadway configuration. Thus, impacts were found to be less than significant. Please refer to Global Response GR-6 for information about traffic impacts.
- I56-6** The comment raises concern for water supplies. Please see Global Response GR-1.
- I56-7** This comment notes the project’s proposed removal of trees on site and cites the City’s Forest Management Plan intent to preserve tree canopies. Please refer to Global Response GR-2.
- I56-8** This comment expresses opposition to the proposed project but does not include any specific comments relating to the environmental review or adequacy of the Draft EIR.

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Comment Letter I57

**From:** mtrogdon1@aol.com  
**Sent:** Sunday, October 3, 2021 8:51 PM  
**To:** Vincent Gonzalez  
**Subject:** Monastery Housing Project

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Mr. Gonzalez,

I am writing to express my anger at the proposed Monastery Housing Project. I do not think the city has considered how this project will affect the citizens of Sierra Madre.

I 157-1

In particular I am very concerned about this development's water usage. We are currently in an unprecedented years-long drought with steep water restrictions in effect and more probably to come. How anyone can plan to build forty-two new big houses during a drought is incomprehensible. The developers plan to buy water in advance so they won't affect Sierra Madre's current drought situation?! How is water purchased in advance? How can these developers guarantee that water "pre-purchased" will be available when the forty plus homeowners need it? I'm pretty sure that that water will come from our supplies and that will mean less (of very little) water for us current residents. And the developers will claim that they would purchase outside water if only there was some to purchase. And we'll all suffer.

I 157-2

I'm also concerned about the number of trees this new "Meadows" will take down. And the fire danger of bringing so many new houses into a town up against a mountain with big wildfire danger. But let's not preserve, let's build and make the developers (who don't live here) rich! Shame on this city!

I 157-4

Miriam Trogdon  
286 E. Alegria Ave.  
Sierra Madre, CA 91024  
626-372-5170

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## Response to Comment Letter I57

Individual  
Mirian Trogdon  
October 3, 2021

- I57-1** This comment expresses opposition to the proposed project but does not include any specific comments relating to the environmental review or adequacy of the Draft EIR.
- I57-2** The comment raises concern for water supplies. Please see Global Response GR-1.
- I57-3** This comment notes the project's proposed removal of trees on site. Please refer to Global Response 2 GR-2.
- I57-4** The comment expresses concern for wildfire risk. Please see Global Response GR-3. Finally, the comment shares opinions and commentary regarding the project applicant. The commenter's opposition to the proposed project will be included in this Final EIR for the City decision makers' review and consideration.

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Comment Letter I58

**From:** Lauren Yee <laureneyee@gmail.com>  
**Sent:** Sunday, October 3, 2021 8:44 AM  
**To:** Vincent Gonzalez  
**Subject:** Opposed to Meadows at Bailey canyon

CAUTION: This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Hello Mr. Gonzalez,  
I am a resident of Sierra Madre and I strongly oppose the development of the Meadows at Bailey Canyon for the numerous reason my neighbors have already expressed to you. This is in a high fire, earthquake zone during a drought, and goes against many of the goals and policies of our City's General Plan. It would be terrible to remove the at least 100 mature trees, and traffic will increase along Sunnyside and Carter by 300-400 cars per day. I also have major concerns about the fire hazard the actual construction site will pose to the existing neighborhoods. Please take these concerns and others in to consideration.

I58-1

My address is 86 East Mira Monte Ave.

Best regards,  
Lauren Yee  
247-736-5058

Sent from my iPhone

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## Response to Comment Letter I58

Individual  
Lauren Yee  
October 3, 2021

- I58-1** This comment expresses general opposition to the project and highlights a number of concerns including wildfire, earthquakes, drought, inconsistency with the City's General Plan, tree removal, and traffic. Please refer to Global Response GR-3 for information regarding the project site being located within a VHFHSZ. The project site is not located on a known active, potentially active, or inactive fault as delineated on the Alquist-Priolo Earthquake Fault Zoning Map. As discussed in Draft EIR Section 4.7, Geology and Soils, impacts to seismic hazards were found to be less than significant with incorporation of PDF-GEO-1 through PDF-GEO-15 and MM-GEO-1. Regarding the commenter's concern for water supplies in drought conditions, please see Global Response GR-1. For discussion related to inconsistency with the City's General Plan, please see Global Response GR-7. Please refer to Global Response GR-2 for information about impacts of tree removal. With regard to traffic congestion, please refer to Global Response GR-6.

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Comment Letter I59

**From:** Roro11 <rasowma@roadrunner.com>  
**Sent:** Sunday, October 3, 2021 11:24 AM  
**To:** Vincent Gonzalez  
**Subject:** The Meadows at Bailey Canyon

CAUTION: This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

From: Rosalie Curry  
292 W. Montecito Ave, #T. Sierra Madre, Ca 91024

I am not in favor of this project for our City.

This is an extremely bad choice for the City of Sierra Madre.  
There is no way, you as administrators can guarantee the residents that it will not impact our city or our future. This project is totally, unjustified and unfair to the people who live here now.  
This project will be one big set of problems, the water shortage here in our city, the future electricity shortages, the fire issues. We are not equipped to handle more traffic, nor do we want it!!!  
We don't need more issues to deal with in our small community. This community does not need to be burdened with more problems and more costs.  
Please take these real issues into consideration, because they matter to the residents!  
Thank you.

I59-1  
I59-2  
I59-3  
I59-4

Sent from my iPad

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## Response to Comment Letter I59

Individual  
Rosalie Curry  
October 3, 2021

- I59-1** This comment expresses general opposition to the proposed project but does not include any specific comments relating to the environmental review or adequacy of the Draft EIR. . The Draft EIR is an informational document intended for the use by the City of Sierra Madre, other public agencies, and members of the general public in evaluating the potential environmental effects of the proposed The Meadows at Bailey Canyon Specific Plan Project (project or proposed project). California Environmental Quality Act (CEQA) Section 21002 requires that an EIR identify the significant effects of a project on the environment and provide measures or alternatives that can mitigate or avoid these effects. This Draft EIR evaluates the environmental effects associated with development of the project and discusses the manner in which the project’s significant effects can be reduced or avoided through the implementation of mitigation measures or feasible alternatives to the proposed project. In accordance with Section 15130 of the CEQA Guidelines, this Draft EIR also includes an examination of the effects of cumulative development. In addition, these responses to each comment on the Draft EIR represent a good-faith, reasoned effort to address the environmental issues identified by the commenter.
- I59-2** The comment implies the project will exacerbate water shortages, electricity shortages, and fire issues. Please see Global Response GR-1 and Final EIR Section 4.19, Utilities and Service Systems, for discussion on water supplies. Final EIR Section 4.19 also discusses electricity services. Additionally, please see Global Response GR-3 for impacts related to fire hazards.
- I59-3** The comment implies the project will worsen existing traffic congestion. Please refer to Global Response GR-6.
- I59-4** This comment expresses general opposition to the proposed project but does not include any specific comments relating to the environmental review or adequacy of the Draft EIR.

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Comment Letter I60

**From:** Brian Bielanski <bbielanskiwfg@gmail.com>  
**Sent:** Saturday, October 2, 2021 11:56 AM  
**To:** Vincent Gonzalez  
**Subject:** Approve The Meadows at Baily Canyon

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

We live at 299 E. Sierra Madre Blvd.

Please approve this project.

--  
Brian Bielanski

I  
I60-1

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## Response to Comment Letter I60

Individual  
Brian Bielanski  
October 2, 2021

- I60-1** This comment expresses support for the proposed project but does not include any specific comments relating to the environmental review or adequacy of the Draft EIR.

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Comment Letter I61

From: Claire McLean <ctmpeace2u@gmail.com>  
Sent: Saturday, October 2, 2021 10:23 AM  
To: Vincent Gonzalez  
Subject: Stop Monastery Housing Project

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Hi Vincent -

Here are some of my reasons why I do not support the Monastery Housing Project:

I61-1

1. TREES

The developer's Specific Plan for the project named The Meadows at Bailey Canyon calls for the removal of 100 irreplaceable mature trees, 10 of which are protected Coastal Oak. Removing over 100 trees is a significant environmental impact, not only to the Monastery property, but to the neighboring community as well. Four goals and objectives of the City's General Plan relative to trees support PSM's position:

I61-2

Goal 1. Continued preservation and protection of existing trees.

Goal 2. Increase of the City's community forest.

Objective R10. Maintaining and enhancing the City's significant tree resources.

Policy R10.2. Continue to develop tree preservation and protection measures.

2. TRAFFIC

Goal 3 of the Specific Plan is preservation of quiet neighborhoods with limited thru traffic. The project is labeled "consistent" by repeating the same responses for above two goals. In reality, the project does nothing to preserve quiet surrounding neighborhoods to the east and south. It does, in fact, increase thru traffic by a minimum of 300-400 car trips a day. To get to the project, the cars will have to travel local streets including Sunnyside, Lima, Carter and Grove. There is no mention of the impact of traffic on these streets. The response only addresses traffic within the project itself and not its impact on the community.

I61-3

3. WATER

The developer has assured the City of net zero water usage, which means the buyers of the new homes will purchase water for the next 50 years. California and surrounding states are in an unprecedented drought. The Colorado River is the lowest it has ever been, and its water usage is already being rationed for Nevada, Arizona, and Mexico. "Net zero" water usage seems impossible to predict, regardless of the algorithms used. It is unclear how storage of water for the next 50 years would be achieved. Our City Council will be discussing a Mandatory Water Conservation Plan at the September 28 meeting. This is inconsistent with the General Plan Objective R12 - Optimizing the use of water resources. Building 42 large homes will be counter to this.

I61-4

4. FIRE

The project site is located in a very high fire hazard severity zone, according to the Cal Dept of Forestry and Fire Protection. It is inconsistent with our General Plan that we do not build in a high fire zone. Local streets can't support emergency equipment. Parts of Sierra Madre have been evacuated three times in the last 35 years, and the incidence and intensity of wildfires has been increasing.

I61-5

5. EARTHQUAKES

The project is located near the Sierra Madre Fault as well as the Raymond and Clamshell Faults. In 1991 the Sierra Madre earthquake damaged one of the Monastery buildings beyond repair and 22 homes in the

I61-6

proximity of Sunnyside were condemned, with damage to 403 structures, resulting in \$12.5 million in damages.

Thank you. Please make the right decision.

Claire McLean  
420 W. Sierra Madre Blvd.  
Apt. N  
Sierra Madre, CA 91024  
--

"In every walk with nature one receives far more than he seeks." ~ John Muir

↑  
I61-6  
Cont.



## Response to Comment Letter I61

Individual  
Claire McLean  
October 2, 2021

- I61-1** This comment expresses general opposition to the proposed project and notes the attached letter accompanying the comment (see Responses to Comments I61-2 thru I61-11). The comment does not express concerns related to the adequacy of the Draft EIR.
- I61-2** The comment opposes the removal of mature trees on the project site, including protected oak trees, as a result of the proposed project. Please refer to Global Response GR-2.
- I61-3** This comment raises concern with the project's consistency with the City's General Plan Circulation Element Goal 3, "Preservation of quiet neighborhoods with limited thru traffic". The comment further states the land use consistency analysis found within Draft EIR Section 4.11, Land Use and Planning, Table 4.11-1, does not address the "preservation of quiet neighborhoods." Please refer to Response to Comment I5-2.
- Furthermore, the comment states traffic congestion would occur as a result of the project along Sunnyside Avenue, Lima Street, Carter Avenue, and Grove Street. Please refer to Global Response GR- 6. See Response to Comment I41-2.
- I61-4** This comment raises concern about net zero water being feasible, given that California and many other states experience drought, and that the project is not consistent with the General Plan Objective R12. For more discussion on water usage, please see Global Response GR-1 and see Global Response GR-7 for information about consistency with the General Plan. Furthermore, the comment states the City Council discussed a Mandatory Water Conservation Plan at the September 28, 2021 meeting. According to the City's Municipal Code, a Mandatory Water Conservation Plan, codified as Chapter 13.24, is a policy declaration to comply with sections of the California Water Code and requires mandatory water conservation during a period of necessity. Final EIR Section 4.19, Utilities and Service Systems, addresses this section of the SMMC and states the City has also adopted Water Efficient Landscape and Low Impact Development Ordinances to require water conservation efforts associated with development and redevelopment. Given this, and as detailed in Global Response GR-1, above, the Draft EIR adequately analyzed the project's impact to water supplies.
- I61-5** The comment states that the City General Plan does not permit construction in Very High Fire Hazard Severity Zones. However, this is incorrect. Please refer to Global Response GR-3 .
- I61-6** This comment notes concern with earthquake faults located within the project area. Draft EIR Section 4.7, Geology and Soils, states the project site is not located on a known active, potentially active, or inactive fault as delineated on the Alquist-Priolo Earthquake Fault Zoning Map. However, the closest earthquake fault to the project site is the Sierra Madre Fault, located approximately 700 feet to the north. As detailed in Draft EIR Section 4.7 and Appendix E, the potential for ground rupture on the project site is considered low. Furthermore, the proposed project would be required to comply with all existing regulations, including the California Building Code and the SMMC in order to ensure seismic safety. In addition, the project would comply with project design features PDF-GEO-1 through PDF-GEO-15, which includes project specific recommendations from the geotechnical investigation (included as Appendix E) and implement MM-GEO-1 to reduce seismic hazards.

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Comment Letter I62

From: sealgrl@yahoo.com
Sent: Friday, October 1, 2021 8:43 PM
To: Vincent Gonzalez
Subject: Comments on the DEIR for the Meadows Development

CAUTION: This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

My name is Linda Hernandez, resident of 440 N Sunnyside Ave. email: sealgrl@yahoo.com. Please record my comments as public record.

I have spent over 30 years in Sierra Madre, mostly as a renter, but now as a homeowner. I have attended many City Council meetings over the years. We have spent a great deal of time developing a General Plan and Zoning ordinances that would protect the residents of this town. I have been involved in voting for our representation for many years. We do expect that you hear our concerns and do what is right for our City.

162-1
162-2
162-3
162-4
162-5
162-6

1. Why are "we" agreeing to the re-zoning of this property? it is quite clear there has been a scare tactic from day one, that an institutional setting would be far more detrimental to the city and neighbors. However, under current zoning, an institutional setting will be subject to much more stringent regulations. Please know that there are many, many residents adjacent to Sunnyside (the most severely impacted area) that are NOT against an institutional setting.
-if you do change the zoning, why are you allowing the developers to dictate what the number and size of the homes in the development are to be? WHY do they get to buy changes that the rest of your citizens would never get approved for?

2. The traffic studies were "conducted" during a pandemic. Computer modeling seems inappropriate for such a small segment of street. None of the residents have observed surveyors conducting any kind of traffic study. In addition, while the traffic generated by homeowners dropped, the increased traffic of delivery trucks doubled during the pandemic.
-Please note the the Monastery has gotten into the habit of busing it's Retreat members into the grounds, rather than have them drive up Sunnyside. The neighbors on Sunnyside have been complaining about the traffic during retreats for many years, which likely has generated FAR less than the projected 700 + car trips per days projected for Sunnyside.
-If this project is approved, the residents on Sunnyside will petition for speed bumps to be installed above Grandview to slow the increased traffic. We already have people and delivery carriers that speed up and down the street. The emergency/fire crews have to back down the street in response to calls. Large delivery trucks have to do the same. Sunnyside cannot support the additional traffic impact without some major changes.
-In addition, this project must have TWO routes in and out that can support the projected traffic, due to it being in a high fire zone.

3. Net zero water rights. We are in a drought. How can we expect anyone can buy water rights for the next 50 year, when it is projected that we will run out of water MUCH sooner than that? I would like to go on record saying that is a ridiculous proposal.

I ask that you NOT change the current zoning for this property unless these concerns can be adequately addressed. Which they have not been.

Sincerely,
Linda Hernandez

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## Response to Comment Letter I62

Individual  
Linda Hernandez  
October 1, 2021

- I62-1** This comment requests the following comments (Comments I62-2 through I62-6) be included in the responses to comments of the Final EIR. The comment expresses general support for the city's current General Plan and Zoning Code. However, these comments are not related to the adequacy of the environmental analysis contained in the Draft EIR.
- I62-2** The comment opposes the proposed zone change of the project site. As described in Draft EIR Chapter 3, Project Description, the proposed project would require a General Plan land use amendment and zone change from Institutional to Specific Plan. Please refer to Global Response GR-7.
- I62-3** This comment is concerned that the Draft EIR's methodology for assessment of traffic impacts did not factor in traffic pattern changes due to the COVID-19 pandemic. In addition, the comment suggests speed control devices such as speed bumps be installed above Grand View Avenue. Finally, the comment highlights concern for impacts to fire protection services and response times. Please refer to Global Response GR-6.
- Lastly, in regard to the concern for impacts to fire protection services, Draft EIR Section 4.15, Public Services, analyzed the potential operational impacts to fire protection services and determined existing services and response times were sufficient. Additionally, Draft EIR Section 4.17, Transportation, determined less than significant impacts relative to geometric design hazards and inadequate emergency access. In addition, Grand View Avenue is located approximately 0.3 miles south of the project. Therefore, providing speed bumps along that roadway or above would not be necessary to reduce any existing traffic impacts associated with the project.
- I62-4** The comment suggests two routes for ingress and egress access to the project site. In addition, the comment notes the project site's location within a fire hazard zone. Please refer to Global Response GR-3 and Global Response GR-4.
- I62-5** The comment questions the feasibility of the net-zero water program and expresses opposition to the project. Please see Global Response GR-1.
- I62-6** This comment expresses general opposition to the proposed land use and zoning changes and is not related to the adequacy of the environmental analysis contained in the Draft EIR.

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Comment Letter I63

**From:** Randy Boyd · Cobraside Distribution <randy@cobraside.com>  
**Sent:** Sunday, October 3, 2021 1:15 PM  
**To:** Public Comment  
**Cc:** Vincent Gonzalez  
**Subject:** DEIR input for the Meadows at Bailey Canyon

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

I wholeheartedly object to the entire proposed housing development. It is MORE than inconsistent with our General Plan. Citizens, the same citizens who elected all of you spent an enormous amount of time on the General Plan so please honor and respect the amount of hard work that went into preserving Sierra Madre.

I  
163-1

A change in zoning, especially in light of the newly signed SB 9 and SB 10 would prove disastrous if zoning was even being considered being changed. Now more than ever we are determined to keep the zoning Institutional.

I  
163-2

The proposed cookie cutter homes are inconsistent with the eclectic architecture of Sierra Madre- once again in opposition to General Plan guidelines.

I  
163-3

The impact on Traffic flow has not been adequately examined but provides only a cursory outline inconsistent with the mock ups provided by NUW. Further, given that 30 feet width streets are indicated in the General Plan, it is once again in violation of what is safest for Sierra Madre.

I  
163-4

Water: Please please do not insult us with the promise of “not interfering with SM water sources” when EVERY current news report and environmental statistic indicates that no one is in a position to say there will be water. We are in a massive drought which SM itself is currently unprepared for. This is a huge issue and we need to conserve water not increase taxing our limited water sources.

I  
163-5

This area is in a fault zone and HIGH FIRE Zone. This is CRUCIAL. We are in the midst of increasing fire emergencies the likes of which are unprecedented in California. Our frontline fire fighters do not deserve to have this added calamity when as we know, fires in Sierra Madre are threatening and dangerous as it is.

I  
163-6

The oak trees and forest on this property are unprecedentedly unique and fecund. The Oaks are sacred. They are a refuge for the many animals that call the Monastery grounds their home. We have an obligation to protect these Oaks and the wildlife that lives among them. Sierra Madre has made a previous commitment to the Forest and the trees in this city which we need to abide by.

I  
163-7

On a personal note, I feel we were never provided ample opportunity to explore other options for this parcel of land. We need room for low income housing and our older population is increasing in Sierra Madre. Why not a Senior Care Home in the aesthetic of the Monastery so we are caring for our most vulnerable? NOT multi million dollar McMansions.

I  
163-8

I have also had cause, as a 23 year resident of Sierra Madre to feel insulted with the unctuous appeals for the “Meadows Project”. It is insulting to see flyers of how the Monastery is “feeding the poor” while avariciously feeding its own pocket. By all means build it is their property but please, build

I  
↓

something more in line with "church policy"- our old folk need out support. Further, a survey I completed was so biased toward the project that I was disgusted with the guise of legitimate opinion seeking. The entire onslaught smacks of slick self serving avarice and our current city council appears to be on the side of the greed.

Can we not as a community, 50 years down the line, BE the city that chose small town interest over greedy developers set on destroying the very quaintness we all fell in love with in this village?

I have never seen Sierra Madre this disgusted and disappointed with our elected officials. Shame on you.

Randy Boyd  
601 Woodland Drive  
Sierra Madre, CA, 91024

**Cobraside Distribution Inc.**

**Please make note that Cobraside is currently operating Mondays thru Thursdays.**

3639 San Fernando Road  
Glendale, CA, 91204  
818-548-9001 (phone)  
818-548-9002 (fax)  
[randy@cobraside.com](mailto:randy@cobraside.com)



↑  
I63-8  
Cont.  
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## Response to Comment Letter I63

Individual  
Randy Boyd  
October 3, 2021

- I63-1** This comment is the same comment as Response to Comment I49-2. Please see Response to Comment Letter I49 for more discussion. No further response is provided.
- I63-2** This comment is the same comment as Response to Comment I49-3. Please see Response to Comment Letter I49 for more discussion. No further response is provided.
- I63-3** This comment is the same comment as Response to Comment I49-4. Please see Response to Comment Letter I49 for more discussion. No further response is provided.
- I63-4** This comment is the same comment as Response to Comment I49-5. Please see Response to Comment Letter I49 for more discussion. No further response is provided.
- I63-5** This comment is the same comment as Response to Comment I49-6. Please see Response to Comment Letter I49 for more discussion. No further response is provided.
- I63-6** This comment is the same comment as Response to Comment I49-7. Please see Response to Comment Letter I49 for more discussion. No further response is provided.
- I63-7** This comment is the same comment as Response to Comment I49-8. Please see Response to Comment Letter I49 for more discussion. No further response is provided.
- I63-8** This comment is the same comment as Response to Comment I49-9. Please see Response to Comment Letter I49 for more discussion. No further response is provided.

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Comment Letter I64

September 30, 2021

To: Vincent Gonzales, Sierra Madre Development Services Department

Fr: Caroline Brown, President, Sierra Madre Mountain Conservancy;  
Albert Metzger, Vice-president; Kevin Moore, Secretary; Scott Hood, Treasurer; Board  
Members Marcia Bent, Lynne Collmann, Marguerite Shuster; Sharon Pevsner;  
David Williams

Re: Draft EIR for The Meadows at Bailey Canyon—Open Space Donation Earlier Misidentified

We need to point out that in the public meetings there was a map outlining an area of hillside for Open Space donation to the City of Sierra Madre that included portions of Open Space that was already part of the city Open Space. This appears to still be on the supporter website.

Figure 1-2, page 5 the hillside parcel called out for donation in the Meadows Specific Plan, included an area that is a portion of an Open Space parcel already owned by the city: APN 5761-001-900. The project map shows a 20-acre portion as a donation of city owned open space which is not the Monasteries to donate.

In the Draft EIR, Figure 3-4, Proposed Open Space Dedicated area, there is a different plot outlined which appears to have corrected this. The total donation proposed would have to be updated. It is unclear what acreage is being considered for donation.

As per our 1980 Articles of Incorporation, we are a non-profit 510 (c) (3). In cooperation with the City of Sierra Madre, land that we acquire through donation or Open Space funding purchase (Proposition A) is given to the City of Sierra Madre while we hold the conservation easements in strict accordance with the Conservation Easement document for each APN.

In 2002 the City granted the Conservancy a Conservation Easement to the Bailey Canyon Wilderness Park land acquired by the City in 1967. It is required of the Sierra Madre Mountain Conservancy, as per our Articles of Incorporation and our 501 (c) (3) that we complete a yearly survey to see that the land is being conserved per the language of the conservation easements.

I64-1

I64-2

One of two other parcels that the Meadows at Bailey Canyon is proposing to donate to the City is in unincorporated Los Angeles County not in Sierra Madre's Corporate Boundary. We believe that to maintain conservation easement control over Open Space in another jurisdiction would not be in the best interest of the city or the Conservancy. In the past Conservancies have lost their non-profit status if they were unable to maintain the status of the easements they were bound to control.

The Santa Monica Mountains Conservancy owns APN 5862-015-903, 40 acres acquired in 2002, adjacent to the Sierra Madre Historical Wilderness area. As a state agency, they would be in a better position to acquire the parcel discussed in the preceding paragraph outside the City of Sierra Madre Corporate Boundary for Open Space protection.

Additionally, there is a proposed lot line redrawn above the Monastery Retreat house which would place acreage now in APN 5761-002-008 into the open space donation. This would place an unknown acreage into their open space donation. To identify it for purposes of stewardship of the conservation easement would be very difficult. We believe this acreage should remain as part of the remaining parcel that includes the Retreat House, meditation gardens and other structures (caretakers housing, etc.).



I64-2  
Cont.

## Response to Comment Letter I64

### Individual

**Caroline Brown, President, Sierra Madre Mountain Conservancy**

**Albert Metzger, Vice-President**

**Kevin Moore, Secretary**

**Scott Hood, Treasurer**

**Board Members Marcia Bent,**

**Lynne Collmann,**

**Marguerite Shuster,**

**Sharon Pevsner, and**

**David Williams**

**September 30, 2021**

**I64-1** This comment states the proposed open space conservation easement spans a portion of already City-owned open space (APN 5761-001-900), approximately 20-acre in size. Please see Response to Comment I42-14.

The comment cites Figure 1-2 of the Specific Plan and states Figure 3-4, Proposed Open Space Conservation Easement Area, of the Draft EIR appears to be different from the Specific Plan. As described in Draft EIR Chapter 3, Project Description, the project proposes approximately 35 acres of open space hillside land to be preserved. Conveyance of the open space hillside land to the City would be effectuated through execution of a development agreement between the City and the project applicant/landowner. It should be noted that Figure 1-2, Vicinity Map, from the Specific Plan has been revised for clarification, in order to show the most recent boundaries of the proposed 35-acre open space hillside conservation easement area.

**I64-2** This comment describes how the Sierra Madre Mountain Conservancy acquires and holds lands in the vicinity of the project site. This comment is not related to the adequacy of the Draft EIR's environmental analysis. However, the comment states the project includes proposed land dedications outside of the City of Sierra Madre boundaries. Please see Responses to Comment I42-13 through I42-17. No further response is provided.

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Comment Letter I65

**From:** Susan Neuhausen <neuhausen.susan@gmail.com>  
**Sent:** Sunday, October 3, 2021 4:41 PM  
**To:** Vincent Gonzalez  
**Cc:** Barbara Vellturo; Alexander Arrieta  
**Subject:** DEIR for the "Meadows at Bailey Canyon"  
**Attachments:** DEIR neighborhood\_SLN.docx; DEIR Water comment\_SLN.docx; DEIR traffic comments\_SLN.docx; DEIR\_Fire danger\_SLN.docx; DEIR environmental impact\_SLN.docx

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

October 3, 2021

Dear Vincent:

Thank you for the opportunity to comment on the DEIR for the "Meadows at Bailey Canyon." Below are my comments and questions on environmental impact. Please retain a copy for the administrative record.

Please respond to these comments in the Final EIR, and put me on the list of people to notify when the Final EIR is complete.

Please see the attached five separate documents on my concerns related to:

- Fire
- Traffic
- Environmental Impact
- Water
- Neighborhood consistency

Sincerely,  
Susan Neuhausen  
491 Grove St  
[neuhausen.susan@gmail.com](mailto:neuhausen.susan@gmail.com)

I  
I65-1  
I

Date: October 3, 2021

To: Vincent Gonzalez

From: Susan Neuhausen  
491 Grove St  
Neuhausen.susan@gmail.com

Re: DEIR for the "Meadows at Bailey Canyon"

Thank you for the opportunity to comment on the DEIR for the "Meadows at Bailey Canyon." Below are my comments and questions on how this project deviates from the General Plan. Please retain a copy for the administrative record.

Please respond to these comments in the Final EIR, and put me on the list of people to notify when the Final EIR is complete.

I object to the proposed housing development. It is inconsistent with the Policies and Values of our General Plan.

First, this project does nothing to address the affordable housing needs of the community. If these 42 houses were on the market now, they would likely sell for between \$2M to \$4M. By the time they are completed in 2025, it will be much more. Given that Sierra Madre is mandated to build affordable housing, please comment on why this project is acceptable when it does not address the needs of the community.

Objectives of the General Plan, as stated in Chapter 17.20 (One-Family Residential Zone), include: "A) to encourage development that preserves the small town, mountainous flavor of this closely-knit foothill community; C) To encourage architectural diversity while maintaining architectural accord with the character of the existing neighborhood; and G) To encourage appropriate scale and size of new construction and reconstruction that is compatible with the existing neighborhood and surroundings.

The Meadows at Bailey Canyon does not meet the criteria of A, C, or G. In regard to A, this will be the first subdivision in the city where all the houses are built by a single developer with a limited set of plans and larger houses on smaller lots, the end result being cookie-cutter rather than eclectic like the rest of Sierra Madre. A subdivision of \$2M+ tract houses is not maintaining the architectural variety or small-town spirit of Sierra Madre.

In regard to C, the character of the existing neighborhood is such that more than 90% are single-story homes and, at most, two houses near each other are of similar design. The developers for the proposed project have avoided answering the question of how many houses will be single story and how many will be two stories, and in fact, have only presented a minimum number of floor plans and all were for two-story houses. This suggests that the vast majority, if not all, will be two-story houses.

In regard to G, all the homes in the area adjoining the proposed project are under the maximum allowable gross floor area under Section 17.20.125. For the Meadows at Bailey Canyon, we do not know the sizes of the lots other than that they range from 7800 square feet to 9500, which affects the size of the house that can be built. Under residential zoning, the maximum size of a house on a 7800-square foot lot including the garage cannot be more than 2574 square feet (33%), yet the developer is proposing that their minimum house is 2900 square feet (including the garage), which covers 37% of the lot; this is not allowable under the General Plan. The largest house plan of 4250 plus 200 square foot garage = 4450 square feet, which would require a lot size of 13,000 square feet -- significantly larger than they have proposed.

I65-2

I65-3

I65-4



Because this project is being proposed under the Specific Plan rather than needing to be zoned residential, the Specific Plan supersedes any provisions of the General Plan that all other residents need to abide by.

Please answer the following:

1. Given that the project is proposed under the Specific Plan, what guarantees are there that they will not change additional items/sizes/scope, etc. after approval?
2. What prevents them from developing additional acreage moving forward?
3. If the objective of the Sierra Madre General Plan is to preserve the look and feel of Sierra Madre, why is this project proposal being considered for approval under a Specific Plan, which allows for the developer to not abide by requirements that all other residents of our community follow.

I  
165-5  
I

Date: October 3, 2021

To: Vincent Gonzalez

From: Susan Neuhausen  
 491 Grove St  
 Neuhausen.susan@gmail.com

Re: DEIR for the “Meadows at Bailey Canyon”  
 Traffic and safety

Thank you for the opportunity to comment on the DEIR for the “Meadows at Bailey Canyon.” Below are my comments and questions on traffic and safety. Please retain a copy for the administrative record.

Please respond to these comments in the Final EIR, and put me on the list of people to notify when the Final EIR is complete.

I object to the proposed housing development. It is inconsistent with the Policies and Values of our General Plan. I am concerned about the traffic and safety impact.

The project DEIR states that there will be access at Sunnyside and Carter Streets, as there need to be two egress points. However, the egress at Carter does not meet the standards of the City Plan, which stipulates that the road needs to be 30’ wide. Carter is currently an asphalt road that is 20’ wide at the entrance to the proposed project and a maximum of 24’ wide from residential property lines to the Bailey Canyon fence.

1. The Fehr and Peers Traffic forecast used the SCAG model, which included fewer car trips because of Covid, not reflecting that things likely will be back to normal by 2025 when this project is completed. The expectation is that with the project, there will be an additional 400 car trips per day, which does not include workers, deliveries, etc. This also is based on 42 houses and does not account for ADUs, which could add an additional 400 trips per day. How is the width of Carter suitable for 2-way traffic of this magnitude and what are the plans to deal with this issue?
2. In addition to the vehicular traffic, pedestrians/bicyclists/hikers use Carter all the time from Grove to Carter. This is a major concern for safety of pedestrians and bikers, and particularly at dawn and dusk when visibility is reduced and the vehicular traffic is likely to be highest. What are the plans to ensure their safety with this additional traffic?
3. In the event of a fire, fire engines would be on Carter and, given the width of the engines, there would not be room for cars to exit onto Carter. How would residents be able to evacuate in a timely manner? The Paradise Fire resulted in deaths because people could not get out in time.
4. On weekends, there are already an enormous number of cars lining nearby streets as well as pedestrians going back and forth to Bailey Canyon. In fact, Grove Steet basically becomes a one-lane road with cars parked on both sides. The addition of a park in the proposed project will only create more pedestrians. and cars given how little parking is proposed. What is the plan to manage parking?
5. During construction, there will be heavy construction equipment, cement mixers, asphalt trucks, semi-trucks with supplies (i.e., lumber, pipes, windows, flooring) – all these trucks and equipment being heavier than usual vehicular traffic. What is the plan for damage and repair of roads caused by heavy loads and oversized vehicles?

165-6

165-7

165-8

165-9

165-10

165-11

165-12

Date: October 3, 2021

To: Vincent Gonzalez

From: Susan Neuhausen  
 491 Grove St  
 Neuhausen.susan@gmail.com

Re: DEIR for the “Meadows at Bailey Canyon”

Thank you for the opportunity to comment on the DEIR for the “Meadows at Bailey Canyon.” Below are my comments and questions on environmental impact. Please retain a copy for the administrative record.

Please respond to these comments in the Final EIR, and put me on the list of people to notify when the Final EIR is complete.

I object to the proposed housing development. It is inconsistent with the Policies and Values of our General Plan. I am concerned about the environmental impact for the following reasons:

1. Noise and vibrations during construction. In the DEIR, Section *Impact H-1: Would the project generate substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?* **Answer: Significant unavoidable.**

In Section *Impact H-2: Would the project generate excessive groundborne vibration or groundborne noise levels?* **ANSWER: Significant unavoidable**

In their response to H-1, they only describe trying to mitigate the noise of vehicles. For all of us who live near the construction site, the sound of vehicles is only one noise. The noise of the laying down of the infrastructure, the building of the new roads, and the construction of 42 homes will be incessant. As to excessive groundborne vibration, this could very likely impact the integrity of our own homes and the soil surrounding our homes. Many of us work from home, have small children, and have animals who are frightened by loud noises. In addition, this will be totally disruptive to the bears, deer, coyotes, bobcats, birds, and other wildlife that live in the area—not to mention humans. They state that the noise level will be significant and unavoidable. The current residents live in Sierra Madre because in large part because it is so quiet and peaceful. This DEIR is basically telling the residents near the construction zone that the project will be under construction for many years – and tough luck. This noise level and vibration levels, which will go on over many years, are unacceptable to those of us who live near the proposed project.

How can you approve a project with UNACCEPTABLE environmental impacts?

2. Destruction of 101 trees including protected species of oak and trees over 100 years old. Trees are invaluable for helping to scrub carbon monoxide from the air and thus would help mitigate the 400 plus additional cars every day from the project. The larger the trees the better; and the existing trees have mature canopies. As part of the Forest Management Plan, the project can plant small trees, but that does nothing to mitigate the destruction of the canopy. The new trees will take many decades to achieve the same size, and not to mention a lot of water which is in short supply. The proposed plan is inconsistent with the City of Sierra Madre General Plan to preserve the essence of Sierra Madre.

How is it acceptable to increase the pollution in the area due to construction and to additional vehicular traffic and housing-related pollution yet allow the destruction of mature trees that aid in mitigation of air pollution?

165-13

165-14

165-15

165-16

3. Loss of habitat to native animal and bird species. Currently deer, coyote, rabbits, and countless other species live on the grounds of the proposed project, and bears and bobcats regularly traverse the area. This project represents a severe loss of their habitat. Already with the drought, rabbits, ground squirrels, voles, and rats have moved from Bailey Canyon and the monastery grounds into the adjacent neighborhoods, destroying vegetation including vegetable gardens. With the construction, it will only get worse. The obvious effect of this project will be a lessening of the quality of life for current residents of Sierra Madre who live near the proposed project.

How is the loss of habitat being addressed?

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165-17  
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I

Date: October 3, 2021

To: Vincent Gonzalez

From: Susan Neuhausen  
491 Grove St  
Neuhausen.susan@gmail.com

Re: DEIR for the "Meadows at Bailey Canyon"  
Net-zero water use

Thank you for the opportunity to comment on the DEIR for the "Meadows at Bailey Canyon." Below are my comments and questions on net-zero water use. Please retain a copy for the administrative record.

165-18

Please respond to these comments in the Final EIR, and put me on the list of people to notify when the Final EIR is complete.

I object to the proposed housing development. The net-zero water usage is not accounting for future availability of water and is not accounting for the potential of at least 42 additional housing units through the addition of ADUs.

165-19

The plan states that the developer will pay the cost for water now for the next 50 years. Considering that climate change has changed the rainfall patterns and Southern California and all of California and the west are already in a severe drought, please explain:

1. How do the calculations for water use change with the addition of up to 42 ADUs and with addition of swimming pools and other water features?
2. Under section Impact B2, the DEIR requires contractors to: "Water all active construction areas at least three times daily, or as often as needed to control dust emissions. Watering should be sufficient to prevent airborne dust from leaving the site. Increased watering frequency may be necessary whenever wind speeds exceed 15 miles per hour." Who is paying for and supplying water during construction?
3. What assurances can you provide that sufficient water will be available to meet the needs in the future given that there is a sustained drought such that the aquifers may not be refilled and sources of water to buy may not be available (i.e., Colorado River water)?
4. The plan pays in advance for water for 50 years. Houses last much longer than 50 years so what happens after 50 years? Will the project be deserted?
5. The water and sewer infrastructure in Sierra Madre is already in bad shape with issues with water pressure, leaking water pipes under the streets, water quality, and antiquated sewer system. What is the City's plan to deal with the added infrastructure burden of a minimum of 42 houses with the ability to have 42 additional ADUs?

165-20

165-21

Date: October 3, 2021

To: Vincent Gonzalez

From: Susan Neuhausen  
491 Grove St  
Neuhausen.susan@gmail.com

Re: DEIR for the "Meadows at Bailey Canyon"

Thank you for the opportunity to comment on the DEIR for the "Meadows at Bailey Canyon." Below are my comments and questions on Fire Danger. Please retain a copy for the administrative record.

Please respond to these comments in the Final EIR, and put me on the list of people to notify when the Final EIR is complete.

I object to the proposed housing development. It is inconsistent with the Policies and Values of our General Plan. I am concerned about fire danger.

The proposed project is in an area designated as the HIGHEST fire danger rating. In the Sierra Madre General Plan, Objective Hz7, it states: "Avoid expanding development into undeveloped areas in Very High Fire Severity Zones." The proposed project is to develop in a Very High Fire Severity Zone. This project is in direct conflict with the Sierra Madre General Plan.

1. How can Sierra Madre officials even consider this proposal when it is in direct conflict with the city's own General Plan?
2. Across the state, developments in areas such as these are being denied because of this danger. Shouldn't Sierra Madre follow the lead of other local and state governments? If not, why not?
3. This development adds 42 houses plus the potential for as many ADUs to the neighborhood. It increases the fire hazard to all of Sierra Madre and particularly to those of us living north of Grandview adjacent to Bailey Canyon. The proposed homes already will be above the lot coverage maximums in the City of Sierra Madre Building Codes for residential housing, and with the addition of ADUs, the density will be even higher. What is the justification for increasing risk of fire for the adjacent neighborhoods?
4. The exit for the proposed project is through Sunnyside and Carter. Carter is a narrow street and has size constraints due to Bailey Canyon to the north and residences to the south. In the event of a fire, with fire engines coming and going, exiting onto Carter will not be viable. That leaves only one exit which then endangers the lives of the residents in the subdivision. Is there a plan to mitigate this situation?

165-22

165-23

165-24

165-25

165-26

## Response to Comment Letter I65

Individual  
Susan Neuhausen  
October 3, 2021

- I65-1** The comment expresses general concerns about impacts relating to fire, traffic, water, and neighborhood consistency. The specific concerns of these five topics are attached as five attachments and have been addressed below.
- I65-2** The comment is a part of Attachment 1 of the Comment Letter I65. The comment expresses general opposition to the project and expresses concern related to inconsistencies with the City's General Plan. The commenter will be notified when the Final EIR is complete and available to the public. Regarding inconsistencies with the City's General Plan, please refer to Global Response GR-7.
- I65-3** The comment is a part of Attachment 1 of the Comment Letter I65. The comment expresses concern about affordable housing. While the project does not propose affordable housing units, one of the objectives of the project is to provide above-moderate income housing, in accordance with the City's 6<sup>th</sup> Cycle Regional Housing Needs Assessment (RHNA) (see Draft EIR Section 3.2, Project Objectives). The project would contribute to state-mandated RHNA housing goals and would be consistent with regional efforts to boost housing growth and meet regional housing needs, per Draft EIR Section 4.14.5, Impact Analysis, in Section 4.14, Population and Housing.
- I65-4** The comment is a part of Attachment 1 of the Comment Letter I65. The comment states that the project does not comply with the City's General Plan Chapter 17.20 objectives A, C, and G. It is assumed that the comment is referencing the SMMC Chapter 17.20 – R-1 One-Family Residential Zone. Under the proposed project, the project site would not be zoned as R-1 One-Family Residential Zone. Therefore, the section of the SMMC referenced by the comment would not apply to the proposed project. According to Draft EIR Section 3.4, Discretionary Actions, the approval of the project would require amendments to the City of Sierra Madre General Plan to change the land use designation for the project site from Institutional to Specific Plan and amendments to the Zoning Code to change the zoning designation for the project site from Institutional to Specific Plan. Therefore, the project would comply with all land use and zoning regulations. Regarding the comment's concerns as to how many homes would be one or two stories and the size of each home, please refer to Responses I4-7 through I4-9.
- I65-5** This comment is part of Attachment 1 of the Comment Letter I65. The comment is concerned that rezoning to Specific Plan would allow the project to supersede provisions of the General Plan. Specific concerns include whether the project would change additional items/sizes/scope after approval, developing additional acreage, and why the project is being considered only under a specific plan rather than under the general plan. As discussed in the Specific Plan, a specific plan was prepared to guide future development of the proposed project in order to create an orderly and compatibly development at the proposed project site, designed and constructed consistent in vision and guiding principles, in order to achieve a project that is consistent with the City in quality and character and look and feel. When a specific plan is adopted in accordance with the Sierra Madre Municipal Code (SMMC), the specific plan may effectively supersede portions or all of the current zoning regulations for specified parcels or plan area, and becomes an independent set of zoning regulations that provide specific direction to the type and intensity of uses permitted, and may define other types of design and

permitting criteria. The proposed Specific Plan is adopted by ordinance and serves as the primary zoning document for the project site. The Specific Plan supersedes any conflict with the Sierra Madre zoning regulations. Therefore, upon approval of the proposed project, the Specific Plan would be consistent with the SMMC. Please refer to Global Response GR-7.

- I65-6** This comment is part of Attachment 2 of the Comment Letter I65. The comment expresses general opposition to the project and general concerns related to General Plan consistency and traffic and safety which are addressed in Draft EIR Sections 4.11, Land Use and Planning, and 4.17, Transportation, respectively. Please refer to Global Response GR-7 for further discussion related to General Plan consistency. The commenter will be notified when the Final EIR is complete and available to the public.
- I65-7** This comment is part of Attachment 2 of the Comment Letter I65. The comment states that the Carter Avenue egress/ingress is 20' wide and therefore does not meet the 30' wide road requirement as mandated by the City. Please refer to Global Response GR-5. the project applicant is proposing off-site widening to Carter Avenue, between the southeastern portion of the project site boundary and Lima Street, which would ensure that Carter Avenue would comply with existing code within and outside of the project site (see Final EIR Section 3.3.12 and Global Response GR-5 for details).
- I65-8** This comment is part of Attachment 2 of the Comment Letter I65. The comment expresses concern that the number of car trips associated with the project would be higher than accounted for in the report prepared by Fehr & Peers as the report does not account for COVID-related conditions going back to normal, workers, deliveries, and accessory dwelling units (ADUs). Please refer to Global Response GR- 6. In addition, per the report prepared by Fehr & Peers, the SCAG model used for the analysis predicts 2040 travel conditions in consideration of land development and transportation changes. It also includes a work-from-home assumption to reflect anticipated changes in how people travel. The results of these assumptions lead to a conclusion that traffic levels will slightly decrease in the study area by 2040. To be conservative, the Fehr & Peers report assumed that the 2025 conditions will not decrease in comparison to existing (pre-COVID) conditions.
- I65-9** This comment is part of Attachment 2 of the Comment Letter I65. The comment raises concerns regarding pedestrian and bicyclists' safety on Carter Avenue due to the increased traffic from the proposed project. Please refer to Global Response GR-5 .
- I65-10** This comment is part of Attachment 2 of the Comment Letter I65. The comment raises concerns regarding an efficient evacuation in the event of a fire and the project's egress/ingress design. Please refer to Global Response GR-4 .
- I65-11** This comment is part of Attachment 2 of the Comment Letter I65. The comment provides information concerning parking and does not raise an issue related to the adequacy of the analysis provided in the Draft EIR. As discussed in Draft EIR Section 3.3, Project Description, North Sunnyside Avenue would include parking on both sides while Carter Avenue would include parking on the west side of the street. Streets A, B, and C would also include parking on the south side of the streets. In addition, each residence would have a parking garage and driveway parking. Lastly, the proposed park would include a parking lot in the southeastern corner.



- I65-12** This comment is part of Attachment 2 of the Comment Letter I65. The comment raises concerns in regard to physical impacts on roads from construction equipment of the proposed project, specifically heavy loads and oversized vehicles. Caltrans has the authority to issue a special use permit that allows the use and transportation of vehicle(s) or loads that exceed the California Vehicle Code maximum limitations (Caltrans 2021). As such, the proposed project has been permitted by Caltrans to transport heavy construction materials and equipment to and from the project site (see Draft EIR Section 3.5, Responsible Agencies).
- I65-13** This comment is part of Attachment 3 of the Comment Letter I65. The comment provides general remarks and general opposition to the project as well as general concerns related to General Plan consistency. Please refer to Global Response GR-7 .
- I65-14** This comment is part of Attachment 3 of the Comment Letter I65. The comment asks why the project would be approved when some noise impacts, including impacts to ambient noise levels and groundborne vibration, would be significant and unavoidable. There are no significant and unavoidable noise impacts as a result of the proposed project. According to Draft EIR Section 4.13, Noise, there would be potentially significant impacts regarding construction noise (Impact NOI-1) and residential HVAC operation noise (Impact NOI-2). Impacts NOI-1 and NOI-2 would be reduced to a level below significant with the implementation of mitigation measures MM-NOI-1 and MM-NOI-2, respectively.
- I65-15** This comment is part of Attachment 3 of the Comment Letter I65. The comment raises concerns about the removal of 101 trees to build the proposed project, and the project's inconsistency with the City's General Plan as a result of the tree removal. Please refer to Global Response GR-2 .
- I65-16** This comment is part of Attachment 3 of the Comment Letter I65. The comment raises concerns about increases in pollution as a result of construction, increased vehicular trips, and housing-related emissions, in addition to the removal of mature trees that help to mitigate air pollution. Regarding tree removal, please refer to Global Response GR-2. According to Draft EIR Section 4.3, Air Quality, with implementation of MM-AQ-1, impacts associated with air quality would be less than significant.
- I65-17** This comment is part of Attachment 3 of the Comment Letter I65. The comment is concerned about the loss of habitat associated with the construction of the proposed project. According to Draft EIR Section 4.4, Biological Resources, the project site consists of ornamental, non-native grassland, and paved roadways. As discussed previously, the project site does not support any native vegetation communities and the area appears to be regularly maintained, which limits the potential for many native plant species. No sensitive communities or riparian habitat occur on the project site (Appendix C1 of the Draft EIR) and the project would not impact these habitats. The loss of non-native grassland on the project site would not be significant impact either locally or regionally. Mountain lion may move through the project site, but it is not expected to have natal dens there or in the vicinity due to the existing development and human activity. Furthermore, the project site is not within any designated critical habitat. The project site does have ornamental trees and shrubs that could provide nesting habitat for common birds protected under the MBTA (16 USC Sections 703–712) and California Fish and Game Code Sections 3503, 3503.5, and 3513. However, implementation of MM-BIO-1, Nesting Bird Avoidance, would reduce impacts to nesting birds.
- I65-18** This comment is part of Attachment 4 of the Comment Letter I65. The comment is an introduction to comments that follow, related to the project's net-zero water impact. The commenter will be notified when the Final EIR is complete and available to the public.

- I65-19** This comment is part of Attachment 4 of the Comment Letter I65. The comment opposes the housing development and indicates that the net-zero water usage does not account for the future availability of water, particularly with the addition of ADUs. Please refer Global Response GR-1. Regarding concerns about ADUs, refer to response I28-5.
- I65-20** This comment is part of Attachment 4 of the Comment Letter I65. The comment raises concerns regarding water usage calculations, water usage during construction, if there would be sufficient water available, and long-term water needs (beyond 50 years). Please refer to GR-1.
- I65-21** This comment is part of Attachment 4 of the Comment Letter I65. The comment raises concerns about the current sewer and water infrastructure and its ability to support the proposed project. Draft EIR Section 4.19 analyzed the project's potential impacts to utilities, with a few clarifying changes made in the Final EIR Section 4.19. The project would involve the replacement and improvement of underground utility lines within the proposed project site. More specifically, the project would result in replacement of an existing 8-inch diameter water main in the eastern portion of the project site with a 12-inch diameter main within Carter Avenue. An existing 8-inch diameter sewer line in the southwest corner of the project site would also be replaced by new sewer system as shown in Figure 3-9, Proposed Wastewater System, in Chapter 3 of the Draft EIR. Therefore, the Draft EIR concluded that impacts to existing utility infrastructure would be less than significant. Furthermore, the project's proposed Development Agreement, as described in Draft EIR Section 3.3.11, would ensure applicable development fees are paid to provide water and sewer service. These fees may include a water impact fee, consistent with General Plan Policy L8.3. As such, the Draft EIR adequately addressed potential impacts as required by CEQA.
- I65-22** This comment is part of Attachment 5 of the Comment Letter I65. The comment provides general remarks and general opposition to the project and concerns related to General Plan consistency and fire danger which have been addressed in Draft EIR Sections 4.11, Land Use and Planning, and 4.20, Wildfire, respectively. Please also refer to Global Response GR-3 and Global Response GR-7. The commenter will be notified when the Final EIR is complete and available to the public.
- I65-23** This comment is part of Attachment 5 of the Comment Letter I65. The comment states that the proposed project is not compliant with Objective Hz7 of the Draft Safety Element (now the adopted Hazard Prevention Element) of the General Plan because it proposes housing developments in a Very High Fire Hazard Severity Zone. Please refer to Global Response GR-3, in regard to the Hazard Prevention Element.
- I65-24** This comment is part of Attachment 5 of the Comment Letter I65. The comment expresses concern related to General Plan consistency and danger (it is unclear what type of danger the commenter is referring to. Regarding General Plan consistency, please refer to Global Response GR-7 .
- I65-25** This comment is part of Attachment 5 of the Comment Letter I65. The comment states that the proposed project would put proposed project residents and adjacent neighborhoods at increased fire risk. As discussed in Draft EIR Section 4.20, through compliance with existing regulations and implementation of PDF-WF-1, which requires compliance with the FPP (see Draft EIR Section 4.20.4, Project Design Features), the proposed project would not result in significant impacts to wildfire. Please refer to Global Response GR- 3 in regard to how conversion of wildland to structures would impact the adjacent neighborhoods.
- I65-26** This comment is part of Attachment 5 of the Comment Letter I65. The comment raises concerns about adequate emergency egress/ingress from Sunnyside Avenue and Carter Avenue, in the event of a fire. Please refer to Global Response GR-4 and Global Response GR-5 .

Comment Letter I66

From: Lorna Brosio [mailto:lornacatb@gmail.com]
Sent: Monday, October 4, 2021 5:50 PM
To: Vincent Gonzalez <vgonzalez@cityofsierramadre.com>
Subject: DEIR

CAUTION: This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

From: Lorna Brosio
50 Esperanza Ave unit F
Sierra Madre, CA 91024
email Lornacatb@gmail.com

Thank you for the opportunity to comment on the DEIR for the "Meadows at Bailey Canyon".

Below are my comments. Please retain a copy for the administrative record.

Please respond to these comments in the Final EIR and please put me on the list of people to notify when the Final EIR is complete

I object to the proposed housing development. It is inconsistent with the Policies and Values of our General Plan. I am especially concerned with the following items that all parties should likewise be concerned:

- 1. Large houses on small lots, concrete walls between each. Not SM character and not consistent with the neighborhood. No Information on the number of lots or houses of each size, no plans or elevations shown.
2. Fire hazard and contrary to the City's new policy in the SM Safety Element (proposed but not yet adopted) to avoid developing in High Fire Hazard Safety Zone.
3. Traffic on Carter - No study in DEIR of serious pedestrian safety issue. SM Ordinance requires 30 ft width for Streets.
4. Water - will give the City \$\$ for all the water 42 houses will use in 50 years - (at today's price and with no guarantee that water will ever be available.)
5. Trees - 101 mature trees will be removed, including 10 protected Oaks. The Oaks will be replaced with smaller Oaks and other small trees (requiring a great deal of water to become established) SM has a Forest Management Plan with a mission to preserve "Canopies" for their environmental and aesthetic benefit. 101 large canopied trees will be destroyed.

I66-1
I66-2
I66-3
I66-4
I66-5
I66-6

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## Response to Comment Letter I66

Individual  
Lorna Brosio  
October 4, 2021

- I66-1** This comment requests the following comments (Comments I66-2 through I66-6) be included in the responses to comments of the Final EIR. As shown, the commenter's request has been recorded as part of this Final EIR.
- I66-2** The comment is concerned with the project's consistency with the policies and values of the City's General Plan. Please refer to Global Response GR-7 .
- I66-3** The comment notes the project site's location within a fire hazard zone and states the proposed development would conflict with proposed Draft Safety Element Update's (now the adopted Hazard Prevention Element) policies. Please refer to Global Response GR-3 .
- I66-4** The comment is concerned with pedestrian safety and traffic safety on Carter Avenue. Please refer to Global Response GR-5.
- I66-5** The comment questions the feasibility of the proposed net-zero water agreement. Please refer to Global Response GR-1, for a response addressing concerns on water supplies and the project's net-zero water use.
- I66-6** The comment notes the proposed removal of existing trees on site and the proposed landscape plan, which raises concern for water supplies and consistency with the City's Forest Management Plan. For discussion on water supplies, please see Global Response GR-1.

With regard to the City's Forest Management Plan and goal of tree canopy preservation, please refer to Global Response GR-2.

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Comment Letter I67

**From:** Teri Vessella [mailto:teri.vessella@yahoo.com]  
**Sent:** Monday, October 4, 2021 5:22 PM  
**To:** Vincent Gonzalez <vgonzalez@cityofsierramadre.com>  
**Subject:** EIR on the project at the top of Sunnyside

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Mr. Gonzalez,

I am appalled at the DEIR for this housing project. The report does not do justice to the impact the project will do to animal habitats. Just this weekend a family of bears were sleeping peacefully in a tree across the street from me. There is no way the bear, deer, and other animals will feel safe in our community.

| 167-1

Additionally, the report glosses over the increase in traffic and how it will affect the city. Would you want 700-800 more trips by your house every day????? I know the answer to that and you would not. The traffic will affect the street paving and ruin the community.

| 167-2

This report was CLEARLY skewed in favor of the development despite it being a "unbiased" group. Sierra Madre residents do not believe they were an independent group, and I, personally, am offended that the city would think I was naive enough to accept this report.

City Council-DO BETTER!

You know the residents are not in favor of this. Do not change zoning laws.

| 167-3

Sincerely,

Teri Vessella  
Sunnyside Resident

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## Response to Comment Letter I67

Individual  
Teri Vessella  
October 4, 2021

- I67-1** The comment expresses general opposition to the proposed project and is concerned with potential impacts to wildlife. As discussed in Draft EIR Section 4.4, Biological Resources, no wildlife corridor connection or habitat linkage to other large undeveloped areas to the south of the project site currently exist. Wildlife, such as black bear (*Ursus americanus*) and mountain lion, entering the existing residential areas would be at a higher risk of negative interactions with humans. However, the project site lacks suitable habitat, contains no water resources for suitable habitats, and is currently disturbed with compact soils. Given that the project site does not support natal bear or mountain lion dens and it is not a part of an existing wildlife corridor, impacts relating to bear and mountain lion interactions would not occur.
- I67-2** The comment is concerned with the proposed project's potential to result in traffic congestion. Please refer to Global Response GR-6.
- I67-3** This comment is generally concerned with the objectivity of the Draft EIR, however it does not identify any specific concerns or issues with the environmental analyses contained in the Draft EIR. The Draft EIR was prepared in accordance with CEQA (Public Resources Code, Section 21000 et seq.), the CEQA Guidelines (14 CCR Section 15000 et seq.), and the City's environmental review procedures. The City of Sierra Madre is the lead agency for the EIR and processing of the project. The Draft EIR provides decision makers, public agencies, and the public with detailed information about the potential for significant adverse environmental impacts to occur as a result of the proposed project. Prior to approving the proposed project, the City Council must certify that the Draft EIR is objective, complete, and consistent with CEQA's mandates. Responsible agencies (agencies other than the City of Sierra Madre) may also rely on the analysis of the EIR permits required for the project. The commenter's opposition will be noted for the decision makers to consider in their review of the Final EIR.

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Comment Letter I68

**From:** Nancy Beckham <nbeckham48@gmail.com>  
**Sent:** Monday, October 4, 2021 3:14 PM  
**To:** Jose Reynoso; Vincent Gonzalez  
**Subject:** Responses to the DEIR  
**Attachments:** Tree article for DEIR.docx; An Accident Waiting to Happen 2.docx

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Attached is the update on my tree removal article and an Accident Waiting to Happen. both were put in the Mt View News.

I I68-1

**Could you kill this tree?**

The Quercus agrifolia or Coastal Oak is one of 5 types of trees that is protected by the town of Sierra Madre. They can grow to an amazing height and can create a canopy of shade that extends to 6 times the size of the tree. At least that is the case of this tree. Possibly planted near the time the Mater Delorosa purchased the land referred to as "The Monastery" in the early 1920's this tree has grown to a height of 40 feet and a width of 50 feet. It quietly looks over the entire meadow area, where it has stood for almost 100 years. It should have a green space created to surround it, park benches placed under it, and a light used to light it up at night for all to see and enjoy. What a magnificent space it could be. Instead the tree is quietly counting the days until it will be bulldozed by Urban West and replaced by 42 homes called The Meadows at Bailey Canyon" Is this the fate it deserves?

This tree, 'an additional nine more Coastal Oak trees, a "supposedly protected tree" in Sierra Madre, and another 91 additional trees are slated to be "bulldozed or removed. Of the total 101 trees awaiting the same death 10 are Morton Bay figs, 64 jacaranda trees, 34 Chinese Elm trees, and assorted other varieties . It might be possible to save an additional 64 mature trees, but not all the trees on the list for removal are worth the expense of boxing to replant. However, a complete removal of all these trees to simply please the developer is also not the answer. But how could Coastal Oaks, a protected tree be protected everywhere else in Sierra Madre except at the monastery. How can the town have a Forest Management Plan that especially calls out for the saving of mature trees while

This Mission statement is as follows:

The City of Sierra Madre's Mission to grow and perpetuate the community forest is embodied in the Community Forest Master Plan. This mission is expressed through these overarching goals:

- Conserve and expand tree canopy cover equal to no net loss, with a gradual increase over time.
- Foster increased public awareness and education regarding the environmental value of trees as green infrastructure
- Promote increased shade-tree canopy for energy conservation, storm water capture, and improved air quality
- Encourage species selection appropriate for local environmental conditions and sustainability
- Preserve and enhance community aesthetics and property values through increased canopy cover and diversity
- Apply Best Management Practices for planting, maintaining, and responding to changed environmental conditions in the community forest

Using this mission to create and perpetuate this community forest how in the world can the bulldozing of 101 trees co-exist with the overall mission statement. Although Urban West can mitigate the destruction of 101 trees by planting smaller trees, the destruction of mature trees and those canopies cannot be mitigated.

I68-2

However, this is one area that absolutely does not align with the general plan. We do not kill trees in Sierra Madre.

One of the many concerns is that this housing development is not just a housing development but is a **Specific Plan**. That means it was created in conjunction with the city and the developer. If the planning commission accepts the plan as it currently is presented, none of the current rules and regulations to protect the trees on the property, the width of streets, or the updating of fire codes since the Bobcat Fire apply. Instead what the developer is proposing will be the set of rules the town will have to accept. "The Meadows at Bailey Canyon" should be just a housing development, not the "**Specific Plan**" it currently is. By making this change it would allow the housing development to be part of the rigorous scrutiny that all other projects have to pass in order to move forward. Think about it.

Nancy Beckham

↑ I68-2  
| Cont.

| I68-3

**An Accident Waiting to Happen!**

The Safety Element of the General Plan, that includes the Housing Element, Safety Element and Circulation or HZ 2.12 which states all residential developments in hazard areas shall have at least two emergency evacuations routes ( ie.points of ingress and egress) is specifically important when discussing Carter as an Ingress and an egress.

To enter the Bailey Canyon parking lot to go hiking or to have a picnic .one must travel to West Carter Street between Lima Street and the gate that leads to the Monastery property called Mater Delorosa .The street functions as the entrance to the Bailey Canyon parking lot, or accesses upper Grove, a lane like street that accepts additional parking when the Bailey Canyon parking lot is full. West Carter also allows the Los Angeles Metropolitan Water District to access their debris basin gate just beyond their chain link gate. The Sierra Madre Fire Department can also use the debris basin gate to get their equipment inside the property and up the hill in case of fire. However, Carter is a 25 foot road that is in terrible repair that exists without curbs, no sidewalks, and either side of the paved 20 foot road there is dirt only. The roughly 2 .5 feet per side of dirt totals up to the 25' road width on West Carter. The chain link fence on the north side surrounds Bailey Canyon so the park can be locked up at night. On the south side of the street are wooden fences that were built by the property owners that surround their homes. There is no extra land to widen the street, the county is not interested in cooperating to sell land for this project, and it was never necessary prior because the street existed to just help cars access Bailey Canyon, or the opening the gate to gain access to the debris basin road.

This road is now slated to be both an egress and ingress by Urban West, the developer for The Meadows at Bailey Canyon Housing Development. (The other street slated to function as an egress and an ingress is Sunnyside.)The developer's plan is to build a two lane road for traffic traveling in and out of the housing development, 44-46 feet in width, and simply open the existing gate to the monastery property and just dump anywhere from 300-500 cars daily on this very narrow stretch of road. (total cars trips are thought to be around 800 cars daily.)For a street that was designed for about 100 cars a week, this is an accident waiting to happen. How drivers will negotiate from a road 46 wide at the top of the hill tapering to 44 ' in width as they descend on a            slope, add a left turn and arrive at a now open gate and continue immediately on a road that measures

I68-4

20 feet in width. -- is a magic trick I would like to see. How are you going to mitigate this situation? Please explain in detail! I can just envision the first head on collision when someone ( a teenager, a tired dad, a distracted mom or any driver not paying extreme attention is killed. How can you ask a two lane road to magically shrink to 20 feet in width, but is still to be used for two way traffic? The road was never designed i to function carrying this incresedamount of traffic let alone go from a two lane road to realistically a one lanetwo feet wide road.This raod was never designed to be use in this manner. Why asr youm asking the road to do something It cannot possibly do that it was never designed to do? Carter was never intended to function the way the developer plans it to be used. It is an accident waiting to happen! Think of the law suits!!!  
Nancy Beckham

↑  
I68-4  
Cont.

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## Response to Comment Letter I68

Individual  
Nancy Beckham  
October 4, 2021

- I68-1** The introductory comment notes attachments are included as comment letters. Please see Responses to Comments I68-2 through I68-4, below.
- I68-2** Please see Response to Comment I46-2.
- I68-3** Please see Response to Comment I46-2.
- I68-4** This comment is comprised of Attachment 2 of the Comment Letter I68 titled, “An Accident Waiting to Happen!”. Please refer to Global Response GR-3 regarding compliance with policies within the Draft Safety Element Update (now the adopted Hazard Prevention Element).

The comment further notes Carter Avenue is currently used for access to nearby Bailey Canyon Wilderness Trail and the Bailey Canyon Debris Basin. Additionally, the commenter states the proposed street expansion as part of the project is not feasible to support future traffic conditions of the proposed development. Please refer to Global Response GR-4 and Global Response GR-5 . the project applicant is proposing off-site widening to Carter Avenue, between the southeastern portion of the project site boundary and Lima Street, which would ensure that Carter Avenue would comply with existing code within and outside of the project site (see Final EIR Section 3.3.12 and Global Response GR-5 for details).

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Comment Letter 169

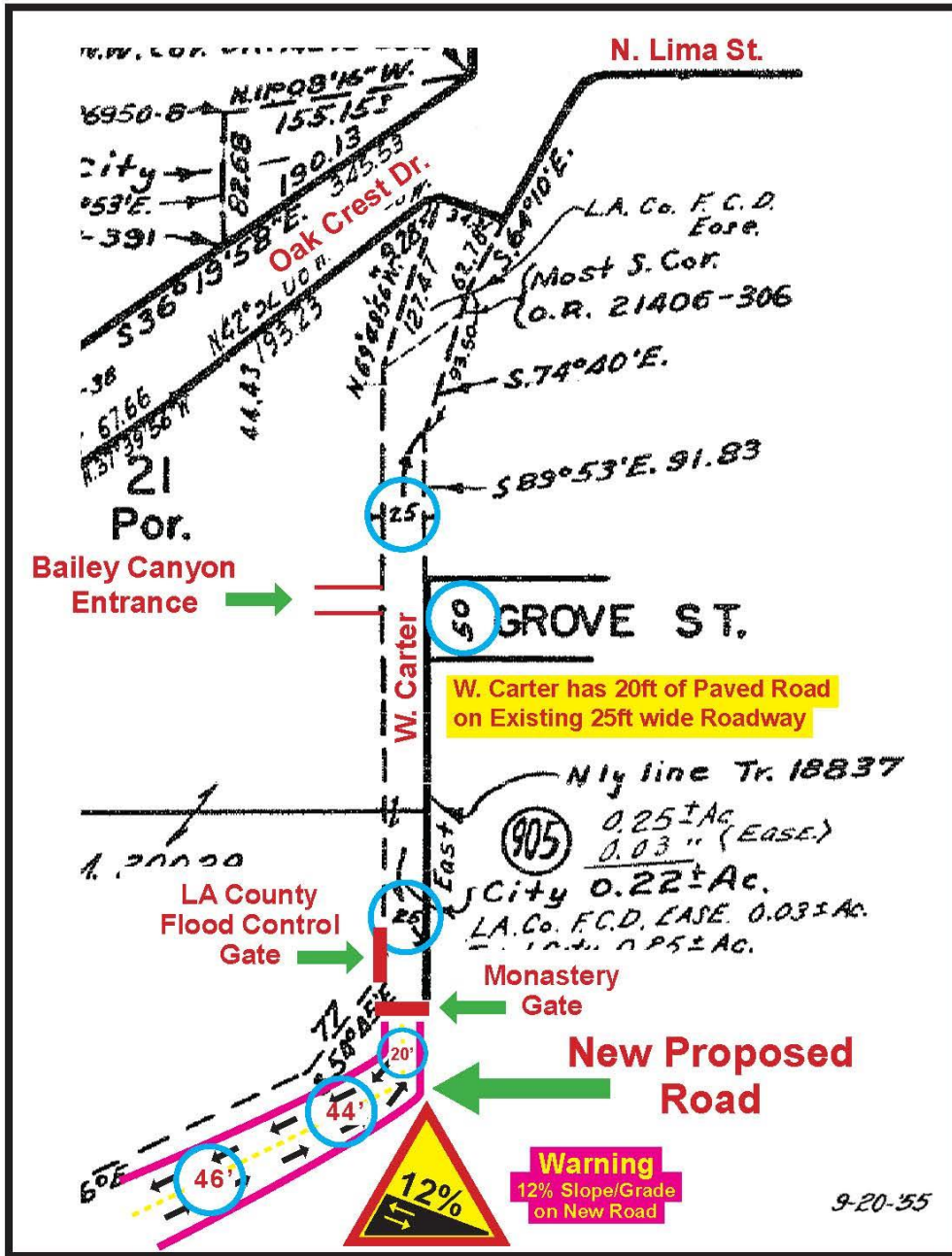
**From:** Nancy Beckham <nbeckham48@gmail.com>  
**Sent:** Monday, October 4, 2021 2:19 PM  
**To:** Jose Reynoso; Vincent Gonzalez  
**Subject:** The upgraded letter regarding Carter and the DEIR, the Urban West map, the Final Plate Map  
**Attachments:** Letter regarding DEIR and Carter.docx; Map streets and pads.jpg; Final Plate Map W. Carter rev 10.01.2021-4 copy.pdf

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Hi Gentlemen,  
I hope the letters are flowing in today. I need to redo my introduction on my 13 page outline addressed to the DEIR so it will apply. It will be submitted shortly.  
But,.....Here you are. Jose, this is the one I promised you I would write with the upgraded plate map explaining Carter further.  
Nancy Beckham

I  
169-1





169-3

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## Response to Comment Letter I69

Individual  
Nancy Beckham  
October 4, 2021

- I69-1** The comment states a future comment letter will be submitted to revise another comment letter previously submitted to the City. However, the comment is unclear which previously submitted letter is intended to be revised. This commenter provided the multiple comment letters included as the following: Comment Letters I4, I46, I47, I68, I70, and I71. Please see the responses to comments, I46, I47, I68, I70, and I71.
- I69-2** This comment provides a map of the project site. Although not specified, this map closely resembles Draft EIR Figure 3-10, Grading Plan. No discussion was included as part of this comment. However, a similar comment letter prepared by the commenter included the same attachment. Please see Response to Comment I47.
- I69-3** This comment provides an unspecified engineering-related map with annotations provided by the commenter. This attachment closely resembles two similar comment letters prepared by the commenter. Please see Response to Comment I4-40.

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Comment Letter 170

**From:** Nancy Beckham <nlbeckham48@gmail.com>  
**Sent:** Monday, October 4, 2021 3:49 PM  
**To:** Jose Reynoso; Vincent Gonzalez  
**Subject:** Updated outline for draft EIR with maps and picture of the Coastal Oak tree the developer is planning to bulldoze.  
**Attachments:** Updated Outline for Zoom 2 DEIR.docx; Coastal Oak Tree.jpg; Final Plate Map W. Carter rev 10.01.2021-4 copy.pdf

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Here is my last article for the draft EIR. The picture of the Coastal Oak and the updated plate map goes with it to make a packet.  
Thank you for all your help. See you at the Thursday night Planning Commission meeting. at 7pm.  
Nancy Beckham

170-1

The Proposal is to create three parcels of land from the entire area purchased by the monastery. This has not yet taken place. WHY???.Could this be because the monastery does not own all of the land but the county and the city owns some of this land as well.? Please explain and clarify? However, .do we need a park adjacent to Bailey Canyon? Bailey Canyon is a wilderness park. Instead could this park be partially a dog park? People have been walking their dogs at the monastery for years. Sierra Madre could use a large dog park. As currently we only have a tiny dog park that is not used because it is not maintained by the city. It just has dirt and chain link fence surrounding the small area and the city does not maintain it. Could this need please be addressed? Thank you.

170-2

The Homes section Page 16 "The Meadows at Bailey Canyon development consists of 42 one and two- story detached single family dwellings on approximately nine acres of the Plan area. Typical floor areas range in size from approximately 2,700 to 4,000 square feet with a minimum lot size of 7,800 square feet"\ Although shown at various gatherings and workshops, homes are to be either one or two stories. The concern is that only two-story homes were shown in specific plan. Does this mean only two-story homes will be built? It does not say anywhere what the maximum size is. Please clarify this information. Also said "The Specific Plan would show how many of each size homes" (it does not) When the Planning Commission asked if they would have to do design reviews of all 42 houses, Vincent Gonzales stated, "there are 4 designs the planning commission would have to review . The developer has shown 4 designs - all 2 story Once again 2 story only???? . Lot sizes have yet to be mentioned as well. Why?? Could a third of the lots be just sold to people so they could build their own home hat would get rid of the development look that many object to as a development is That is definitely not Sierra Madre at all. The CC and R;s would stipulate the zero water, solar panel etc. specified for the homes in this development by New Urban West.

170-3

Actual proposal as it was presented in the draft EIR. Land for the **project is not 20 acres that was negotiated by the city manager in the MOU. Currently the proposed 42 homes will be placed on 13 , not 20 acres.**The lines of the acreage is more irregular than first proposed why is that? I do know the Monastery wanted one additional acre to create a buffer zone between the retreat center and the development maintain the serenity for their retreats .The 1 acre landscaped buffer zone will help with the noise and sounds of the housing development.

170-4

However, could monastery take that one acre from the land they are saving for their retreat center? They are keeping 23 acres for their retreat site. Donating 45 acres of hillside that cannot be used for homesites to the city for additional trails and open space, and 13 acres will now be donated to the project...not 20 acres that Gabe negotiated in good faith for this project. The 7 additional parking places near the newly proposed park are now included in the draft EIR specific plan

**Density I broke it down in steps. Where am I incorrect**

- a. 17 acres minus 1 additional (for the monastery) minus 3 acres for the proposed park equals **13 acres.**
- b. . Density of project changed from 42 homes on 20 acres or 2.47 homes per acre
- c. . Density based on 13 acres of land equals **3.23** homes per acre
- d. This has now translated to a denser housing project because this is a 30.769% increase or 31%
- e. **Are they going to build 31% less homes or 13 less homes to go along with the spirit of the MOU that was negotiated????**

170-4  
Cont.

**3. Water usage**

- a. **Project is net zero in terms of water usage.**
- b. Cost of 50 years of water will be built in the cost of the homes.
- c. The city water will not be impacted by these 42 new homes being built
- D. But there is not 50 years worth of water available now and what would be the cost of that water.? I do not understand how the developer made a big point of this and then found out that amount of water currently can not be purchased. .

170-5

**4. Tree removal**

- a. To build these 42 homes over 101 trees will have to be removed including about 10 California Coastal Oak trees which are a protected species in Sierra Madre. There are 5 protected types of trees in Sierra Madre of which three are Oak trees.

170-6

c. **However by making this housing development a “Specific Plan” NONE OF THE SPECIFIC ORDINANCES GOVERNING THE PROTECTION OF THE TREES IN SIERRA MADRE CAN BE ENFORCED.**

d. Of the 101 trees to be removed 64 are mature jacaranda trees as well as the 10 Coastal Oaks. 34 of the trees are considered to be in good condition. See map of trees to be removed and the chart for the condition the trees are currently.

e. **Why can't the some of the trees be boxed and added back into the landscaping plan once the houses are built.** By allowing this you are violating the mission statement of the town regarding TREES put into effect in 2015 under mayor Nancy Walsh. Those jacarandas would be beautiful being spaced though out the development and are MATURE TREES !

f. **The attached picture with this packet is of the 100 year old Coastal Oak slated to be bulldozed. Instead of bulldozing the tree why not do one less home, take the land and create a green belt around the tree, add some benches, and make it an additional green space for the residents to enjoy. That is a magnificent Oak tree. Please do not let it get destroyed. It should be the signature for the entire housing development.** The same is true of the Morton Fig. Take out two homes and make

parks featuring these trees instead.

g. With the LA County Arboretum approximately 3-4 miles away and with their expert horticulturalists why could those trees not be boxed up and either moved, watered, and maintained while the project continues at the monastery site, or remove the trees to the arboretum to be maintained there during the project. **Or could some of those trees be sold to the city or the**



170-6  
Cont.

**residents rather than be bulldozed. Mature trees are mature trees.**

- 1.. Jim Hendricks is a specialist with the California Oak trees and works at the Arboretum
- 2.. Frank Mc Donough, head horticulturist should be at least approached so these old and established trees are not slaughtered and replaced with tiny saplings which is what the pictures reveal, especially during this time of climate crisis. This would help with the loss of carbon emissions from the heavy equipment to be used to bulldoze and create the new levels of land, lots and streets for the development.
3. James Carlton, Management Analyst and in charge of trees for Sierra Madre. James very nicely explained to me how trees are valued and if someone removes a mature tree, especially a mature Oak because Coastal Oaks are a protected tree in Sierra Madre. The developer must plant a similar tree in place of what was removed.
  - a. Jim Hendricks found me the name of the company that moves large trees for Disney or the Huntington in San Marino James Carlton now has the name of the company in case the need arises.
  - b. I do not think that signature Coastal Oak could be moved successfully as it is too large a tree, so why not just make a park around it as I suggested in 5 f.? It would create a truly beautiful space.
- h. As you drive north on Baldwin and enter the City of Sierra Madre there is a sign posted that indicates Sierra Madre is a town that respects trees. The



170-6  
Cont.

sign reads Tree City USA. I think we need to try and live up to the sign although I do not know if it was an award, or how the town earned that signage. However it is in the ground on a pole as you enter the city of Sierra Madre. We should remember that as well.

i. The developer certainly does not know this but Susan Henderson, editor of the MT View News suggested when I approached her about writing some news articles or letters to the editor regarding some of my concerns regarding this project that this town lost a tremendous amount of trees when we had that 100 year wind storm about 10 years ago. When we discussed the 64 Jacaranda trees that are to be bulldozed she suggested why not carefully box them and let people or the city buy them for their streets. The developer should place them in the development if they can because they are part of the land value of the monastery and by all rights the trees deserve to continue to live at the monastery and be part of the new development. Mature trees are still mature trees.

170-6  
Cont.

**IV. Traffic concerns**

**A. Sunnyside; Ingress and Egress for project.**

1. Sunnyside is the main entrance to the monastery.
2. Sunnyside will be both the ingress and the egress for this proposal.
3. Sunnyside has no sidewalks. above Alegria
4. Sunnyside will be greatly affected as both the ingress and egress.
5. Only one resident is in favor of this project. See signage on the street.

170-7

**B. Carter**

1. Fire Safety concerns for Carter. It is in a fire hazard Area
2. **Fire Department Concerns about Carter becoming one of the ingresses/egresses**
  - a. the chief of the fire department would like as many residents as possible to find out about this project.

170-8

- b. Currently fire chief cannot make comments about the project.
- c. The fire chief will make sure all fire codes are correctly met.
- d. Safety is one of his main concerns
- 3. . Carter adjacent to the monastery gate is very narrow 25'and the road is in terrible condition. **The road itself measure 20'** in width as the additional 5 ' is dirt on either side of the existing road. The fire department already has a difficult time turning the fire trucks around in that location.
- 4. The monastery is going to create a two-lane road that will circle the Monastery property and end at the Monastery gate at Bailey Canyon on West Carter. **That means the road will go from approximately 44--46 feet in width on the Monastery land and then change to a single lane road 20'in width with the dirt on either side of the road way. On that road they now expect two way traffic to travel into and out of the housing development.**
- 5. City street ordinances state that "16.32.035 - Street standards— Modification of same. (Ord. 1229 § 2, 2005)  
  
**Except as otherwise required by Chapter 15.24 of this code, the city's public street standards shall require at least thirty feet of road and a pedestrian walkway**  
Notwithstanding Sections [16.32.020](#) and of this code, the city council may determine, upon approval of a parcel or tentative tract map creating streets, that adjustment of the city's public street standards as to those streets is justified by other benefits to the policies stated in [Section 17.52.010](#) of this code and that such adjustments do not unduly impact circulation and parking.
- 5. Once again this is a Specific Plan and all the normal standard do not apply... **a two lane city street must have 30 feet of road easement to accommodate the two lanes. That 30 feet does not exist on W Carter in this area near Bailey Canyon.**
- 6. The land on either side of Carter(@ 5 feet but split with the north and south side of the road. )The land is owned by the county.



170-8  
Cont.

7. County is not interested in improving the street situation.  
Apparently, Gabe approached the county and they are not interested in improving that area and are not are the interested in adding sidewalks ,widening it, or selling land to the developer. .
8. It appears that the county owns the land north of Carter in the small area near Bailey Canyon. The attached plate map looks like Carter is owned by the city, (See attached plate map)
- 9 There is no parking allowed currently on that part of Carter.
10. There are no sidewalks or curbs in this area on Carter. Currently people park on upper Grove and cross the street into Bailey Canyon Park. to go hiking and enjoy the wilderness .
11. This area is already a concern of the fire chief, especially after last year's Bobcat Fire.
12. WAS THE COUNTY APPROACHED ABOUT WHAT THIS PROJECT WILL DO TO THIS STRETCH OF LAND?
13. Was the municipal water district approached about the impact of this project on this area that leads to the run off basins in Bailey Canyon? A gate exists here but nothing was mentioned in the specific plan. I
14. **How can you expect a street designed to be the entrance to Bailey Canyon and to the entrance of the Municipal Water District Debris Basis (which doubles as the Emergency Fire Access Road for the monastery to now accept 300-400 cars a day from a housing development. Carter is this area is an accident waiting to happen if it is to be used in this manner. The street was never designed to carry that kind of daily traffic**

**SEE ADDITIONAL ARTICLES REGARDING CARTER entitled latter to the DEIR and Carter and carefully review the final copy of the plate map. Attached.**

D. . **Carter** (Carter to Baldwin)

1. Carter now will function as an ingress and an egress, and will have to accept additional traffic throughout the day.
  - a. information written in the March 8 handout by the developer shows 398 trips per 42 homes. They have admitted they did not include Amazon deliveries, gardeners, activities for the retreat center

170-8  
Cont.

170-9



b. trips are more like 780 a day. That means 300-400 cars per day on Carter because carter is the other ingress and egress.

2. Will parking be removed off Carter east of Lima so residents cannot park in front of their home? 2. Plan proposes ingress and egress of Carter to Baldwin with a right turn on Baldwin to get to town., and vice versa.
3. Most cars will not travel to Baldwin but will turn down another neighborhood street to get to town faster. Therefore, the neighborhood will have more cutting through enroute to the downtown area.

170-9  
Cont.

**E. North Grove**

1. North Grove is really a lane at this location(adjacent to Bailey Canyon) and would have a very difficult time absorbing additional traffic.
  - a. There are no sidewalks on North Grove.
  - b. North Grove is an interrupted street as it begins as a lane, is off set twice before reaching Sierra Madre Blvd, and just prior to Sierra Madre becomes an alley in width.
2. if cars are parked on both sides of the street at the top of this street near Bailey canyon, a car traveling south can barely get through to Grandview. That street is also no designed to accept more traffic than just the traffic generated from the residents of the street.
3. The street should be cul-de-saced to protect it. It is just too narrow above Grandview. to be able to absorb additional traffic.

170-10

**F. North Lima**

1. North Lima is the first normal width residential street leaving the Bailey Canyon area and continues to Sierra Madre Blvd and then continues until Orange Grove.
2. North Lima Street has no sidewalks above Grandview.
3. People walk in the street, walk their dogs in the street, and children walk to school in the street and from home to home in the street.
4. Why has North Lima never had sidewalks put in? For that matter why have the streets north of Grandview and including Grandview never had sidewalks?

- a. My home will be 100 years old next year.**
- b. How long does it take the city to put in sidewalks?**
- 5. North Lima has an abundance of Edison poles that are serviced several times a year.
  - a. Edison trucks are very wide
  - b. Residents cannot back their cars out of the driveways when the Edison trucks are on the street
  - c. When Edison comes to service the poles the residents have to park below Grandview and then walk up to their home
- 6 North Lima street is an emergency access route by default that was used effectively during the Bobcat fire by all the firetrucks.
- 7. North Lima will be impacted with additional traffic as a percentage of the 800 plus daily car trips created by 42 new homes will use North Lima to get to the downtown area.
- 8. North Lima has very pronounced steep descent and cars pick up speed traveling down North Lima to the city proper.

See Where are the Sidewalks? article separately submitted

**G. Grandview**

- 1. Grandview is the major east west artery for the residents in the NW quadrant.
- 2. The elementary school of Sierra Madre backs into Grandview and as a result when driving east on Grandview ng about 7:30 -8am or from 2:15 to 3:15 pm cars are stacked on Auburn from Highland to Grandview, and along Grandview past the field on Grandview. That is the drop off and pick up route and parents drop their children off accordingly. Others walk younger children to the school in the streets as once again no sidewalks above Grandview. They walk to pick them up. then walk with them to get them home again.
- 3. I was shocked because Last Tuesday I drove home from the Arboretum and went up Baldwin to Grandview. On Grandview I turned left and continued on W Grandview until N. Lima Street. I was very surprised to see all the cards headed down Auburn but also extending the carpool line past he playground on Grandview. Not having lived in town when my children grew up, I had no idea was the carpool lines were like and how extensive they were. That will be another problem for asking Grandview to absorb additional traffic. IF there is a parked car on each side of the street two cars cannot get

170-10  
Cont.

170-11

past the parked cars, rather one cars works it way carefully in between the parked cars and then continues to their next destination. The size of our streets is not conducive to this housing development.

4. At a minimum The north side of Grandview from Michilinda to Baldwin should have sidewalks installed to help the children get to and from the elementary school. It will also help the older children at the middle school walk from their homes safely.

**V. All streets in North West Corridor**

A. No streets above Grandview have sidewalks including the north side of Grandview. If there is a sidewalk the residents have put the sidewalk in themselves.

B All streets will be expected to absorb additional traffic.

C. Streets that will be impacted are West Alegria, West Fairview, West Grandview, Sunnyside, Carter, North Lima, North Grove, North Baldwin ,just to point out a few.

**D. WHY IS THERE NO DIRECT ACCESS TO MICHILINDA SO TRAFFIC CAN LEAVE THE MONASTERY AND NOT IMPACT THE REST OF THE STREETS IN THIS NW QUADRANT OF THE CITY.?**

**1. When Anokia School sold the land and homes were developed on Baldwin just north of Foothill Blvd in Arcadia about 200 yards away from Sierra Madre, a main road with a manned gate was put into the development at Baldwin. The cars that came with this development of homes did not impact the homes that had been in that part of Arcadia for years. The cars from this development simply came and went on the road that was built on Baldwin. They continue to do so today.**

**2. THERE ARE 2 FIRE ACESS ROADS THAT END ON THE SMALL STREETS ADJACENT TO MICHILINDA**

**3. WHY NOT IMPROVE BOTH OF THEM TO LET THE TRAFFIC OUT ONTO MICHILINDA, A STREET ALREADY DESIGNED FOR A GREAT DEAL OF TRAFFIC.**

**4. Residents on Michilinda reaction to this???? but this would help a number of streets in Sierra Madre that were not designed to carry more traffic without major work to paving, widening, and putting in sidewalks throughout this quadrant.**

170-11  
Cont.

170-12

170-13

**E. The more streets that carry the additional traffic the better for all the residents. We cannot let two streets carry the entire burden of additional traffic.....Sunnyside and Carter. They were designed to be residential streets, or in Carter’s case to just access Bailey Canyon. Neither were designed to be ingresses and egresses for a housing development that will bring up to an additional 800 car trips daily, but @400 on Carter alone.**

**F. A DIFFERENT TRAFFIC PLAN must be considered that includes a DIRECT ROAD TO MICHILINDA why was this not done previously????why was this not addressed in the draft EIR?**

VI. Signage on homes on Sunnyside tells you how the residents feel.

VII. Will this come to a local vote by the residents? If so I think this will be like the completion of the Long Beach freeway that was to be built through South Pasadena. 65 years later the State of California gave up and sold the homes they had purchased and rented for 65 years that were on the freeway route .due to the litigation to stop the freeway from cutting across South Pasadena. During those years Pasadena increased in size and the cars trying to get to the Pasadena freeway were forced to cut through the residential area below west of Oak Grove, South of California to Glenarm, and east of Marengo Traffic consultants were finally hired by the city to try and save the neighborhood. The neighborhood worked with the consultant to work out a plan. The neighborhood was saved which shows if the city and the neighbors can work together things can get done.

VIII. Although this is a small development which is why it has great appeal, what does the city gain? 42 new families to shop in our stores, get gas, enjoy our restaurants and ¼ of a policeman with their pensions paid for? That’s it? Explain this please.....

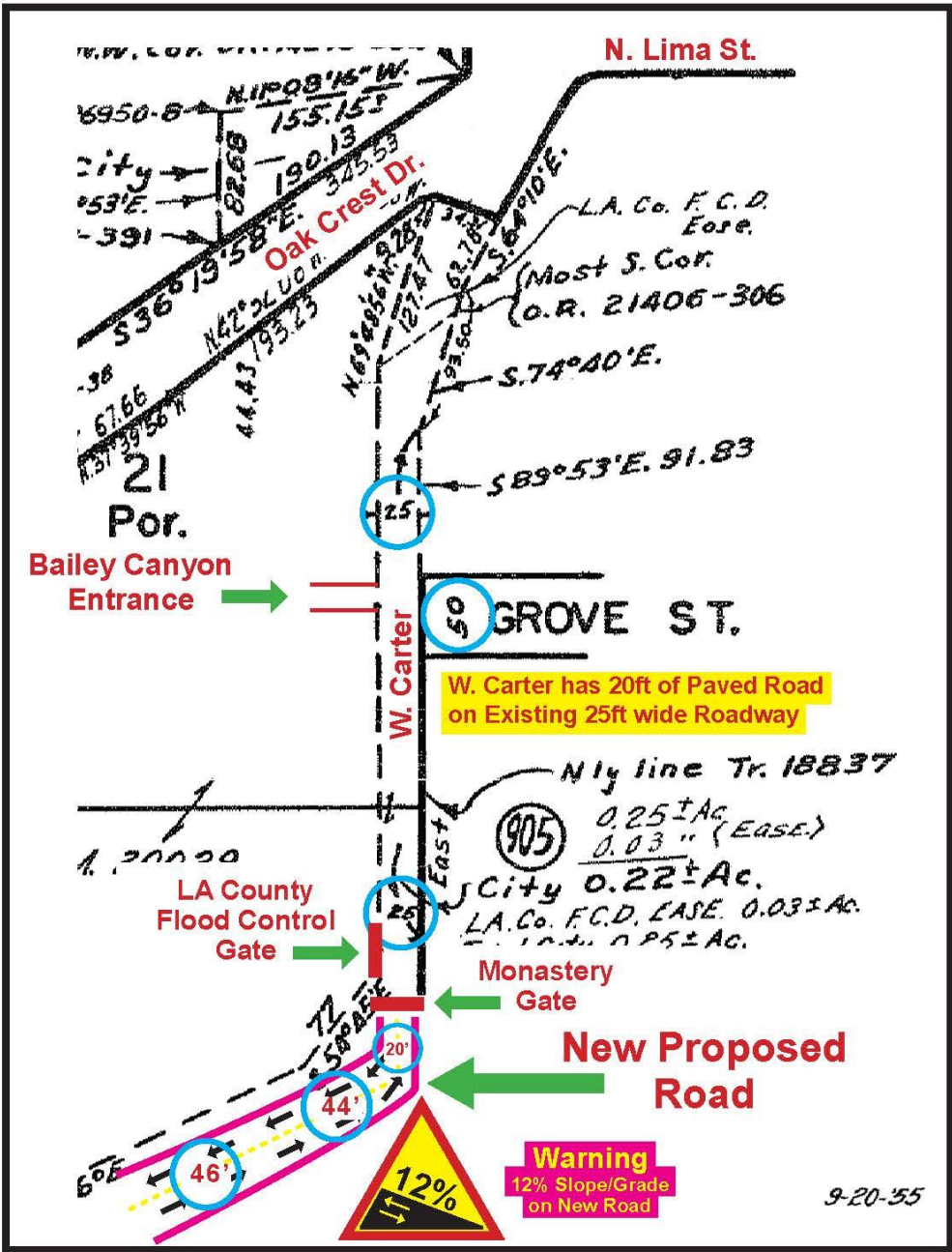
Nancy Beckham  
337 North Lima street,  
Sierra Madre, CA 91024

170-13  
Cont.

170-14



I70-15



170-16

## Response to Comment Letter I70

Individual  
Nancy Beckham  
October 4, 2021

- I70-1** The comment notes this letter is associated with letters previously submitted prepared by the commenter including: Comment Letters I4, I46, I47, I68, I70, and I71. Please see the responses to comments, I46, I47, I68, I70, and I71. No further response is provided.
- I70-2** This comment asks why the project proposes to create three separate parcels and asks whether the City of Sierra Madre and/or the County own part of the project site. The project site as described in Draft EIR Chapter 3, Project Description, consists of one approximately 17.3-acre parcel, identified as Assessor's Parcel Number 5761-002-008. As a result of the project, the site is planned to be subdivided through a future submittal of a tentative tract map which would create a total of 42 residential lots, plus streets, landscape areas, parking, a public park, landscape buffer, and open space. Neither the City nor the County currently own any part of the project site.
- The comment questions whether a new park is needed next to the existing Bailey Canyon Park and suggests that the new park be designated as a dog park. This suggestion will be provided to City decision makers for their review and consideration as part of this Final EIR.
- I70-3** This comment asks whether all the new homes will be two stories and for clarification regarding lot size. Please refer to responses I4-7 through I4-9, above. Finally, the comment asks whether some of the lots can be sold for the purpose of custom homes. Please see Response to Comment I4-11.
- I70-4** The comment asks for clarification regarding perceived changes in the project acreage. Please see Draft EIR Chapter 3, Project Description, for details, including Table 3-1, Land Use Summary. Under Table 3-1, the Specific Plan would designate 9.19 gross acres for Residential Land (RL), 3.39 gross acres for Open Space (OS), 3.68 gross acres for proposed roadways, and 1.04 gross acres for a grading and landscaping buffer. As such, the project site consists of a total of 17.3 acres. These acreages have been refined as the project design has progressed. However, the acreage to be preserved as open space would be 35 acres, and not 13, 23, or 20 acres, as mentioned in this comment. The Applicant has agreed to dedicate 35 acres of open space to the City and the project description remains consistent with this agreement.
- I70-5** The comment questions the cost and feasibility of the project's proposed net-zero water impact. Please refer to Global Response GR-1 for a response addressing concerns on water supplies and the project's net-zero water use.
- I70-6** The comment is concerned that approval of the Specific Plan means that City ordinances, including the City's Tree Preservation Ordinance, will not apply to the project. This is incorrect.
- Draft EIR Section 4.11, Land Use and Planning, states the adoption of The Meadows at Bailey Canyon Specific Plan would establish the zoning and development standards to guide future development on site. When a specific plan is adopted in accordance with the SMMC, the specific plan may effectively supersede portions or all of the current zoning regulations for specified parcels or plan area, and

becomes an independent set of zoning regulations that provide specific direction to the type and intensity of uses permitted, and may define other types of design and permitting criteria. However, the Specific Plan would not supersede the City's Tree Preservation and Protection Ordinance, which requires a permit to remove protected tree species.

Mitigation Measure BIO-3 would require a 1:1 replacement of the protected trees, reducing impacts to protected trees to less than significant. Thus, no further mitigation, including project redesign or the boxing of existing trees to be replanted on site or moved elsewhere, such as to the Los Angeles County Arboretum, is required. Please refer to Global Response GR-2 for information about tree removal, replacement, and requirements.

**I70-7** The comment is concerned with potential traffic impacts to Sunnyside Avenue. However, no adverse impacts to Sunnyside Avenue would occur as a result of the project. The project site is directly accessible by two existing roadways, North Sunnyside Avenue, a north/south road that crosses through the western portion of the site, and Carter Avenue, an east-west road that extends through the eastern portion of the site. Under existing conditions, public access within both roads currently ends at the Mater Dolorosa Retreat Center's gates within the southern portion of the site. Under the proposed project, access to the project site provided via North Sunnyside Avenue would become public. Please refer to Global Response GR-5 and Global Response GR-6.

**I70-8** The comment raises concern for wildfire risk and evacuation planning along Carter Avenue. Draft EIR Section 4.20, Wildfire, analyzes the project's potential impacts related to wildfire, which were determined to be less than significant. Please refer to Global Response GR-4.

The comment also notes concern for the roadway width of Carter Avenue under existing conditions and planned improvements. The comment includes reference to Attachment 3, as shown in Comment I70-16. As addressed in Response to Comment I70-7, the project plans to improve Carter Avenue and the project site with sidewalk infrastructure. Please refer to Global Response GR-5.

Additionally, as addressed in Response to Comment I70-6, the project's proposed Specific Plan does not exempt project consistency and/or compliance with local regulations.

Lastly, the comment asks if the project applicant and the City have discussed the proposed project with the County of Los Angeles. As shown in Draft EIR Section 3.5, Responsible Agencies, the Los Angeles County Department of Public Works (County) has been identified as a responsible agency. The County was notified of the proposed project officially through the publication of the Notice of Preparation in which the City requested agency's views on the scope and content of the environmental information relevant to each agency's statutory responsibilities in connection with the proposed project, in accordance with California Code of Regulations, Title 14, Section 15082(a).

**I70-9** The comment questions the adequacy of the Draft EIR's estimated daily trip generation. Please refer to Global Response GR-6. See also Response to Comment I50-4.

Additionally, the comment questions parking along Carter Avenue east of Lima Street. Please refer to Global Response GR-5.



- I70-10** This comment contains concerns related to existing conditions along North Grove Street and Lima Street. Neither street is located within the project site's boundaries or a part of proposed street improvements. Please see Responses to Comments I46-8, I46-9, and I70-9. Additionally, concerns related to traffic congestion Please refer to Global Response GR-6.
- I70-11** This comment is concerned about existing traffic conditions along Grand View Avenue, specifically noting existing traffic related to school drop-off and pick-up. However, Grand View Avenue is not located within the project site's boundaries, will not be impacted by the proposed project, and is not a part of proposed street improvements.
- I70-12** This comment is concerned about existing traffic and lack of sidewalks above Grandview and in the North West Corridor. However, these roadway segments are not located within the project site, will not be impacted by the proposed project, and are not a part of proposed street improvements.
- I70-13** The comment asks why there is no direct access to the project site from Michillinda Avenue and suggests that such a connection would reduce traffic impacts to streets in the north west quadrant of the City. As shown in Draft EIR Section 4.17, Transportation, no significant traffic impacts will occur as a result of the proposed project, therefore no further mitigation measures, including the addition of a new project access to Michillinda Avenue, is required. See also Response to Comment I70-9, and Global Response GR-6.
- I70-14** The comment asks if the project will be decided by a vote of the City's residents. As outlined in Chapter 3, Project Description, of the Draft EIR, the project's discretionary approvals are not subject to a vote by the City's voting residents; the project would be approved by the City Council. The comment also asks about the ways in which the project benefits to the City. Please see Final EIR Section 3.2, Project Objectives, which identifies the City's objectives for the proposed project.
- I70-15** This comment presents a photograph taken of a tree on site, recorded as Attachment 2 to this comment letter. Comment I70-6 referenced this photograph. Please see Response to Comment I70-6 for more discussion.
- I70-16** This comment presents an unspecified engineering-related map with annotations provided by the commenter. See Responses to Comments I4-40 and I69-3.

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Comment Letter I71

**From:** Nancy Beckham <nlbeckham48@gmail.com>  
**Sent:** Monday, October 4, 2021 10:04 AM  
**To:** Vincent Gonzalez  
**Subject:** Re: Letters directed at the draft EIR

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

You are welcome. When I wrote the letter to the Mt View News I did not know the road was to narrow from 46'in width to 44 ' in width as it came down that 12% grade to the area right outside the gate where the ground flattens out ,and a car has to then make the 90 degree turn into the 20'wide "little Carter street. Little Carter has been doing fine being used as the entrance to Bailey Canyon and has about **100 cars a week**. Now it is going to be asked to accept **400 cars daily** (50% of the 800 daily trips) generated from the 42 homes.It can't do that and the county does not want to sell any land to the city to widen the street. Gabe called and was flatly turned down. Your street statutes say 30' width minimum for a street. You only have **25 ' up there max** which means **20' only** for the paved street. It can not be used as an ingress and an egress. They have to figure something else out. The city requires two ingresses and egresses. Let them build a road to Michilinda.  
However now add the children, dogs ,and adults parking their cars at the new proposed parking lot and walking to Bailey Canyon. The problem then becomes a nightmare.  
I talked this through with the developer and he gets it. If the city really wants this development let them kill the one home necessary using eminent domain and put that road through to Michilinda. But no zoning changes should be discussed until the basic components are in place. This is just housing development that was called a "Specific Plan" so the rules and regulations the city put into place could be circumvented. Since the Bobcat Fle 13 months ago the city said no new development in undeveloped areas that are considered Severe Fire Areas. It should have never gotten considered, but because it is called a "Specific Plan" and it has made it this far. But Thursday night they should drop the "Specific Plan" label and let it make it or get killed based on the city statutes. I dislike the City Council putting pressure on the Planning Commission to change the zoning when the developer hasn't even gotten two decent ingresses and egresses figured out. Talk about putting the cart before the horse. This proposal is not the end all be all. There are other possibilities that could be considered. Putting a land conservancy up there would be the best for everyone...grants are available and should be sought. Jane Tsong will be coming from the Watershed Conservancy Authority and will hopefully be allowed to speak at the next city council. Please don't pressure the Planning Commission to push this thing through and change the zoning laws. The plan has to be improved greatly before they do that. That change should be granted when they make a real attempt to abide by some of the city statutes which they have not done. When they do then the zoning changes should be considered but not before that time occurs. They are not even close as you will find out when all the letters and concerns are read and addressed to the developer.  
Thanks for taking the time to read and digest all of this. See you sometime this week.  
Nancy Beckham

I71-1

I71-2

On Mon, Oct 4, 2021 at 8:13 AM Vincent Gonzalez <[vgonzalez@cityofsierramadre.com](mailto:vgonzalez@cityofsierramadre.com)> wrote:

Nancy,

Thank you for your comment. I forwarded your comment and attachments to the environmental consultant for inclusion in response to comments in the Final EIR for The Meadows project.

I71-3

Vincent Gonzalez

Director of Planning and Community Preservation Department

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**From:** Nancy Beckham [mailto:[nbeckham48@gmail.com](mailto:nbeckham48@gmail.com)]  
**Sent:** Monday, October 4, 2021 7:55 AM  
**To:** Vincent Gonzalez <[vgonzalez@cityofsierramadre.com](mailto:vgonzalez@cityofsierramadre.com)>  
**Subject:** Re: Letters directed at the draft EIR

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Good morning Vincent,

There is the most important one coming in today regarding Carter. I discussed it with Jose on Thursday morning and he was flabbergasted. I am getting the redo on the plate map and will attach it to the letter with both the Urban West map. that shows the problem but there is nothing that spells it out on their map. The Urban West map shows the narrowing of the road going into the left turn but does not spell out the problem created by the road narrowing going down the 12% grade combined with the left turn and then the arrival at the 20'wide road. They expect people to just figure it out by looking at the map. I will come and talk it through with you as I did with Jose once I put the package together but it is a real deal breaker. Here is my write up and the Urban West map but they are just for you. The package will be submitted this afternoon before 5 but will include the updated plate map showing the 12% decline, width of the road at the top versus the bottom going into the turn, the left turn into "little Carter", and then the 20'wide road at Carter at the Carter Gate.

171-4

I will call once I have the upgraded plate map.

Nancy Beckham

On Mon, Oct 4, 2021 at 7:23 AM Vincent Gonzalez <[vgonzalez@cityofsierramadre.com](mailto:vgonzalez@cityofsierramadre.com)> wrote:

Nancy,

Thank you for your comment. I forwarded your comment to the environmental consultant for inclusion in response to comments in the Final EIR for The Meadows project.

171-5

Vincent Gonzalez

Director of Planning and Community Preservation Department

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**From:** Nancy Beckham [mailto:[nlbeckham48@gmail.com](mailto:nlbeckham48@gmail.com)]

**Sent:** Sunday, October 3, 2021 7:04 PM

**To:** Jose Reynoso <[jreynoso@cityofsierramadre.com](mailto:jreynoso@cityofsierramadre.com)>; Vincent Gonzalez <[vgonzalez@cityofsierramadre.com](mailto:vgonzalez@cityofsierramadre.com)>

**Subject:** Letters directed at the draft EIR

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Hi Jose and Vincent

I am attaching and sending several letters I worked on over the weekend regarding the draft EIR.

There will be a few more but I wanted to turn these in as there are some missing pieces that will accompany the last few I will send on Monday. The missing pieces I will have on Monday.

Enjoy.

Nancy Beckham

171-6

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## Response to Comment Letter I71

Individual  
Nancy Beckham  
October 3, 2021

- I71-1** The comment expresses concern for roadway width consistency as well as a change in grade from the project site along Carter Avenue. Please refer to Global Response GR-5.
- I71-2** This comment expresses general opposition to the proposed project. The comment also expresses concern for pedestrian safety on Carter Avenue and suggests the City utilize eminent domain to create another access point to Michillinda Avenue to the project site's west. See Response to Comment I70-13.
- Additionally, the comment expresses concern about the proposed Specific Plan overriding local regulations. Please refer to Global Response GR-7 and Response to Comment I2-6.
- Finally, the comment states the City Council does not support development within fire hazard zones and suggests alternative project sites be considered instead of the proposed change in zoning. Please refer to Draft EIR Chapter 8, Alternatives, for information regarding why the alternative location option was rejected. Please refer to Global Response GR-3.
- I71-3** This comment represents the City's Response to Comment I71-4, noting the comments will be recorded as part of the Final EIR to the proposed project.
- I71-4** This comment represents a reply email to the City and refers to a map which raises concern for roadway width consistency as well as a change in grade. Please refer to Global Response GR-5 and Response to Comment I70-16.
- I71-5** This comment represents the City's Response to Comment I71-6, noting the comments will be recorded as part of the Final EIR to the proposed project.
- I71-6** This comment represents an email to the City from the commenter noting several letters will be provided in response to the Draft EIR. This commenter provided the multiple comment letters included as the following: Comment Letters I4, I46, I47, I68, I70, and I71. Please see the responses to comments on the letters specified for more discussion.

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Comment Letter 172

**From:** Barbara Velturo <barbaravelturo@gmail.com>  
**Sent:** Monday, October 4, 2021 12:38 PM  
**To:** Vincent Gonzalez  
**Subject:** Comment on DEIR  
**Attachments:** DEIR UTILITIES AND PARK.docx

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Vincent Gonzalez  
[Vgonzalez@cityofsierramadre.com](mailto:Vgonzalez@cityofsierramadre.com)

From: Barbara Velturo  
380 West Carter Avenue  
Sierra Madre, CA 91024  
  
[barbaravelturo@gmail.com](mailto:barbaravelturo@gmail.com)  
(802) 558-8864

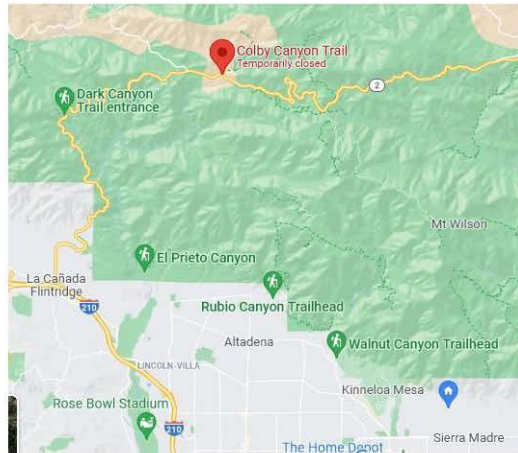
Thank you for the opportunity to comment on the DEIR for the "Meadows at Bailey Canyon"  
Attached is a Word document with my comments. Please retain a copy for the administrative record.  
Please respond to these comments in the Final EIR and please put me on the list of people to notify when the Final EIR is complete

|  
172-1  
|

ERRORS IN THE DEIR

DEIR - PROJECT OBJECTIVES

5. Preserve the hillside open space area by dedicating approximately 30 acres north of the Mater Dolorosa Retreat Center to the City, in order to preserve a portion of Colby Canyon and the Colby Canyon Trail, which would be used by wildlife for movement up and down slope; preserve native vegetation communities and drainages; and preserve land adjacent to the Colby Canyon stream.



172-2

The language adding Colby Canyon and the benefit to wildlife and the stream to the "Project Objectives" came about as a result of a comment made by MIG, the "independent reviewer".

Comment from NUW in response to a previous MIG statement

"The proposed open space dedication is a community benefit but not subject to the SP. Additional details have been included in Section 3.3.3

Response from MIG, the Independent reviewer

“See earlier comment. Its attainment is one of the Project Objectives which makes it part of the project. One of the alternatives evaluated in the ADEIR also indicates that it would not be provided under such alternative which makes its provision clearly conditional on approval of this project. The open space site needs to be defined per our earlier comment. If it will be accessible to or otherwise used by the public it potentially could have, at the least, potential impacts on biological resources, and wildland fire potential. If the actions under this project will not result in access, improvements, or use by the public, than such should be stated and, further that such use or action would be subject to a separate environmental review at a later date if it is made available to the public.

NUW addressed the matter by posting this

Open space has been defined and included as Figure 3-4 of the EIR. In addition, the discussion about the open space dedication has been removed from the alternatives discussion.

Objective 5 has been revised throughout as follows, to indicate the benefits of this dedication:

5. Preserve the hillside open space area by dedicating approximately 30 acres north of the Mater Dolorosa Retreat Center to the City, in order to preserve a portion of Colby Canyon and the Colby Canyon Trail, which would be used by wildlife for movement up and down slope; preserve native vegetation communities and drainages; and preserve land adjacent to the Colby Canyon stream.

So that “BENEFIT” and the project objective BOTH were inaccurate - and somehow no one in the large, well-funded NUW company thought to check how close Colby Canyon was to their development?

172-2  
Cont.

Other Mistakes in the DEIR

From the DEIR - Trails

The City of Sierra Madre is located at the base of the southern foothills of the San Gabriel Mountains, which provides access to over 550 miles of hiking and equestrian trails within the Angeles National Forest (USDA 2010).

The Mount Wilson Trail is the closest active recreation opportunity to the project site, located at the corner of Mountain Trail Avenue and East Mira Monte Avenue and approximately 0.77 miles east of the project site.

(Except for Bailey Canyon Trails which are closer)

Again, did no one in the large development company that plans to raze our Wildland Urban Interface, High Severity Fire Zone, and spend years planning and constructing a multi-million dollar development think to check (maybe the City Website?) for the closest Trail? Or consider the name of their project and think that there could be trails in the Canyon attached to that Park.? Well, they are not "from here".

2. The surrounding area to the north of the Mater Dolorosa Retreat Center and east of the project site is zoned as Hillside Management (H). 4.11-1

That is not accurate (It is Zoned Open Space)

On this map, the Area designated as Hillside Parcel is inaccurate - the parcel on the right above the retreat center is owned by the City of Sierra Madre and is zoned Open Space, as is the parcel they plan to donate.



172-3

172-4

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## Response to Comment Letter I72

Individual  
Barbara Vellturo  
October 4, 2021

- I72-1** This comment requests the following comments (Comments I72-2 through I72-4) be included in the responses to comments of the Final EIR but raises no specific issues relating to the environmental review.
- I72-2** The comment restates one of the proposed project objectives relating to the preservation of hillside open space north of the project site and expresses concern that the project will not actually realize this benefit. See Response to Comment I42-26.
- I72-3** The comment identifies an incorrect statement in Draft EIR Section 4.16, Recreation, that the closest trail to the project site is the Mt Wilson Trail. Please see Response to Comment I42-27. This error has been corrected in the Final EIR.
- I72-4** This comment states the area to the north of the Mater Dolorosa Retreat Center and east of the project site is not zoned “Hillside Management (H)” but instead zoned Open Space. The comment is incorrect. As shown in the latest Zoning Map prepared by the City of Sierra Madre, the area to the north and east of the project site is zoned Hillside Management (H).<sup>6</sup> The City’s General Plan land use map designates the areas to the north and east of the project site as Natural Open Space (NOS).<sup>7</sup>

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<sup>6</sup> City of Sierra Madre. 2021a. Zoning Map. Effective September 14, 2021. <https://www.cityofsierramadre.com/common/pages/DisplayFile.aspx?itemId=18041501>.

<sup>7</sup> City of Sierra Madre. 2021b. Land Use Map. Effective September 14, 2021. <https://www.cityofsierramadre.com/common/pages/DisplayFile.aspx?itemId=18041503>

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Comment Letter 173

**From:** Barbara Velturo <barbaravelturo@gmail.com>  
**Sent:** Monday, October 4, 2021 4:59 PM  
**To:** Vincent Gonzalez  
**Subject:** Typos  
**Attachments:** ALTERNATIVES.docx

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Can you substitute this comment Alternatives for the one just sent, Corrected typos

I 173-1

Alternatives were neither chosen, described or analyzed in accordance with CEQA guidelines

All Alternatives studied in accordance with CEQA guidelines for the project MUST also be fully evaluated as to their level of impact to all environmental conditions

The Alternatives studied MUST, however, be ones chosen according to CEQA guidelines. They must be alternatives that could actually be built under the current Institutional development ordinances and not the ones referenced in the DEIR.

Alternatives must take into account the requirements of the Conditional Use Permit and the Master Plan which would allow the City to significantly lessen the impact of any Institutional development.

**Previous City Councils took valid legal steps to protect the Monastery property from both overdevelopment or a housing development, in keeping with the Vision and goals of Sierra Madre's General plan.**

Previous Sierra Madre City Councils and Planning Commissions have expressed concern over potential future construction on the property owned by the Passionists and have taken actions to protect both the land and the environment, as the law allows. The currently planned residential development, promoted by and supported by the City Staff, is contrary to all protections established by those previous City leaders to ensure the natural beauty of the monastery property is not destroyed, and to stop development contrary to our Water Conservation Policies.

Our General Plan states: "An emphasis on conservation of natural resources, including water conservation will play an important role in the City's land use development regulations in order to preserve the health, safety, welfare, and quality of life of the existing population. The City shall enact and enforce development standards which do not significantly increase the demand for water use and encourage reduction."

In its enactment of the previous Water Moratorium in July 2014, in the midst of a multi-year drought, the City recognized the fact that Water Conservation was critically important to the future of Sierra Madre. In its resolution, the city expressed its intent to make amendments to its zoning and General Plan to address water conservation policies. The wisdom of that intent is unfortunately obvious again today.

173-2

173-3

173-4



One of the many changes to the Land Use Section of the pending General Plan Update, made by the Planning Commission at the direction of the City Council and based on Staff reports, was the removal of a "reuse" provision that would have allowed the Monastery to reuse their land for housing.

If the City were now to remain true to the Goals and Policies expressed by the Citizens and enacted by their elected leaders in the Sierra Madre General Plan, the property would remain zoned Institutional and subject to the regulations for that zone.

Among the most likely Permitted Uses in an Institutional Zone, **with a Conditional Use Permit and a Master Plan** are a School or a Communal Residential Facility. Although the Monastery has publicly expressed its desire for a project that allows for the Serene Meditative nature of its Retreats and causes the least impact on residents, presentations have included photos of oversized monstrosities. The City and the developers have stated to the City Council and the Citizens of Sierra Madre that there would be no way to stop such a plan, if the Monastery chooses it. That is NOT true!

Any Application for an Institutional Use would be subject to all our City reviews and regulations, including the Conditional Use Permit and Master Plan.

Some requirements of the Conditional Use Permit include -

That the site has sufficient access to streets which are adequate, in width and pavement type, to carry the quantity and quality of traffic generated by the proposed use;

That the proposed use is neither detrimental to the public health, safety and general welfare, nor will unreasonably interfere with the use, possession and enjoyment of surrounding and adjacent properties; and

That the proposed use is consistent with the general plan, zoning and other applicable codes

The Master Plan Requires:

buildings keeping to the village theme, high architectural quality, water conservation etc. and a requirement that any institutional be considered with the values of the Hillside zone.

If the requested rezoning and Specific plan is rejected - any institutional building would also be subject to #7 of the Master Plan.

173-4  
Cont.

7. Any development of a site located north of the "Hillside view line" defined in [Section 17.52.080](#) of this title or adjacent to R-H-zoned property shall protect the natural environment from change, preserve and protect views and preserve and maintain the identity, image and environmental quality of the R-H zone;

At the time of the Amendment the adjacent Bailey Canyon Park, was zoned R-H. In acting that regulation, the City made clear its intent that any development must conform to the goals and policies that regulate the sensitive Hillside Parcels. That concern still applies and is reinforced by the present zoning of Bailey Canyon of Open Space.

Our expressed City values in our General Plan and the requirements of the R-H zone would dictate the development permitted.

"Parkland and open space should be preserved and expanded when possible. Hillside areas should be preserved either in their natural state or with very low density residential development designed to be sensitive to the environmental nature of the foothills. This should include water conservation measures to reduce and minimize the impact to the City's water supply and the ability to serve its water customers." and

"The City should continually recognize the connection from the urban area to the mountain wildland by way of hillside land. This connection aligns Sierra Madre with a unique cluster of foothill cities, and preserving this area is vital to protect the fragile watershed, and the urban wildland interface."

If the Planning Commission and City Council uphold the General Plan protections of our land and water by rejecting the Developer's Specific Plan, only a reasonably sized institutional project, that incorporates open spaces and protects views and slopes, as dictated by our Hillside management ordinance, could be built.

Such a development would be much less impactful to Sierra Madre residents, would provide the serenity the monastery wants for it's retreats and would protect our fragile and threatened environment.

In the present case, comprehensive descriptions of Alternatives "studied" were NOT given, nor were any comparative studies of environmental impacts of those alternatives included in the DEIR. We were presented NO evidence to support the conclusions made as to the Alternatives.

I73-4  
Cont.

Alternatives MUST, however, be ones that actually could be built under the current Institutional development ordinances. The DEIR made conclusive and unsubstantiated findings as to the size, lot coverage and Environmental Impacts of Alternatives based on inaccurate information as to what COULD be built under Sierra Madre ordinances.

Those ordinances for Institutional development include REQUIRED Conditional Use Permits and Master Plans, which would significantly limit the size, lot coverage and appearance of a project.

Consideration of an Alternative such as a 150 unit Senior project, with Assisted living and Memory Care facilities would considerably lessen the impact of many environmental concerns. The owners and developers of the "Meadows" were aware of the fact that a developer had been trying to present a proposal for several years but they refused to consider it.

That project would have kept the Western side of the land as open space or a "vineyard" and the Southeastern side as a park. They would have built in a style to complement the Retreat Center. There would be less destruction of trees and sensitive slopes.

That developers EIR traffic studies of other of their similar projects all showed LESS traffic, as even residents who are able to drive tend to use the shuttle services. The City might be able to require even further mitigation by shuttling of incoming and outgoing staff from parking lots.

The "alternatives" in the DEIR were not clearly and adequately described and did NOT meet CEQA requirements of what alternatives must be considered. They MUST be adequately considered in the Final DEIR

The Huge projects referenced (but also not described in detail nor analyzed for their environmental impact) are not the ones required by CEQA to be chosen because of a reduced environmental impact.

The EIR stated that a smaller project had been considered by rejected based on "Economic Infeasibility"

Under CEQA case law, however, a claim of "economic infeasibility" can NOT be claimed unless the costs and income involved are presented for both the proposed project and the Alternatives studied.

And then, economic infeasibility can only be claimed if the difference is so great that "no reasonable person" would choose the alternative. In order to make that claim in the DEIR, the costs of development and income received of both the Meadows project and the Alternatives must be disclosed

173-5

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## Response to Comment Letter I73

Individual  
Barbara Vellturo  
October 3, 2021

**I73-1** This comment requests that non-specified typographical revisions be made to the Final EIR. Although the comment was not specific, the commenter has prepared and the City has received multiple letters, including Comment Letters I2, I32, I72, I74, I75, and I76. No response is required.

**I73-2** This comment represents the start of comments associated with Attachment 1.

This comment generally questions the adequacy of the Draft EIR's alternatives analysis, and requests that alternatives be more thoroughly analyzed. According to State CEQA Guidelines Section 15126.6(d), "[t]he EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed. (*County of Inyo v. City of Los Angeles* (1981) 124 Cal.App.3d 1)". As such, Draft EIR Chapter 8 provides an impact analysis summary comparing each topic area's impact conclusions to the proposed project's impact analysis prepared in Chapter 4 of the Draft EIR.

Additionally, the comment requests the consideration of alternatives that are consistent with the existing land use designation for the project site and that alternatives that are inconsistent with the existing designation be rejected. Pursuant to the CEQA Guidelines, EIRs are required to "describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives" (14 CCR Section 15126.6[a]). The inclusion of an alternative in an EIR does not constitute definitive evidence that the alternative is in fact 'feasible.' The final decision regarding the feasibility of alternatives lies with the decision maker for a given project who must make the necessary findings addressing the potential feasibility of reducing the severity of significant environmental effects (California Public Resources Code, Section 21081; see also 14 CCR Section 15091)." As such, Draft EIR Chapter 8 included the project objectives for the proposed project under Draft EIR Section 8.2. Furthermore, as stated above, the alternatives analysis included a summary of impacts compared to the proposed project. In addition, each alternative summary includes discussion on the alternative's relation to each of the project objectives. This is consistent with the requirements outlined in the State CEQA Guidelines.

**I73-3** The comment provides remarks based on past City leaders' decisions and opinions about the project site and development within the City. The comment states approval of proposed project would be contrary to past efforts. The City notes the commenter's opposition and notes that it does not raise an issue related to the adequacy of the analysis provided in the Draft EIR.

**173-4** The comment quotes excerpts of the City's General Plan and emphasizes concern for water supplies and past policy considerations for water conservation. The comment states the proposed project is inconsistent with the City's General Plan and zoning for the site. See Global Response GR-7.

The comment supports permitted uses under the current zoning for the project site. Draft EIR Chapter 8 analyzed potential alternatives for City decision makers' review and consideration. These alternatives include Alternative 1, No Project/No Build Alternative; Alternative 2, Existing Zoning and Land Use Designation: Communal Residential Facility Alternative; Alternative 3: Existing Zoning and Land Use Designation: Private School Alternative; and Alternative 4: Reduced Development Alternative. Alternatives 2 and 3 align with the commenter's request to develop a project within the existing land use designations and support policies that preserve hillside open space.

The commenter further notes requirements for a Conditional Use Permit and Master Plan development. This discussion is not applicable to the adequacy of the environmental analysis. Additionally, the comment cites zoning requirements under the R-H zone. The project site is not zoned R-H, but instead Institutional (I).

**173-5** The comment incorrectly states that CEQA mandates that only alternatives that are consistent with a project site's existing zoning be considered, and that CEQA does not require consideration of alternatives that include a general plan amendment or zoning code amendment. This is not correct as there is no such requirement in CEQA, the State CEQA Guidelines, or case law. CEQA instead directs lead agencies to consider a reasonable range of alternatives such that the agency can determine whether an environmentally superior alternative is available that is both feasible and would meet most of the project's identified objectives. Alternatives that both do and do not require general plan and zoning code amendments can satisfy CEQA's directives.

The comment also expresses general support for a project alternative that proposes 150 senior housing units, and/or assisted living or memory care facilities and states that such an alternative could reduce the significant impacts associated with the proposed project. The comment implies that the institutional use alternative considered in the alternatives analysis is too large. As stated in Draft EIR Section 8.4.2, a reduced intensity institutional alternative was considered but ultimately rejected. Per CEQA Section 15126.6(f)(1), among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability and economic viability. Due to the decreased intensity associated with this alternative, it is not reasonably foreseeable that a future applicant will develop the project site at this scale, or that development at a reduced intensity would be economically viable for future development of the site. More importantly, however, one of the purposes of an alternatives analysis is to identify alternatives that could avoid or substantially lessen one or more of the significant effects of the project. As discussed in Draft EIR Section 8.4.2, neither Alternative 2 nor Alternative 3 would avoid or substantially lessen the significant impacts of the project, and both would create new and greater impacts in some areas, such as aesthetics, recreation, greenhouse gas emissions, and transportation, as compared to the proposed project. While a reduced intensity alternative would reduce these impacts, there is nothing to indicate that it would avoid or substantially lessen the significant impacts of the proposed project or would be substantially different in terms of impacts as compared to the alternatives already addressed in this section. Therefore, the reduced intensity institutional alternative would not have substantially lessened one or more of the significant effects of the projects as compared to the alternatives that were included and analyzed in detail in Draft EIR Section 8.6, Alternatives Impact Summary. It should be noted that the proposed project would not result in any significant and unavoidable impacts. For additional overview of alternatives analysis under CEQA, please refer to Response to Comment 173-2.

Finally, the comment states that alternatives cannot be rejected on economic infeasibility grounds alone. However, none of the alternatives analyzed in Chapter 8 are rejected solely on economic infeasibility grounds. Alternatives can be rejected on grounds of legal infeasibility (i.e., the project applicant does not have ownership or rights to an alternative project site, or a proposed alternative is inconsistent with state or federal law), failure to meet most of the identified project objectives, or failure to reduce or eliminate one or more significant impacts associated with the proposed project. Notably, the project does not result in any significant impacts after the incorporation of mitigation. Therefore, none of the alternatives reduce a significant impact associated with the proposed project.

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Comment Letter 174

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**From:** Barbara Velturo <barbaravelturo@gmail.com>  
**Sent:** Monday, October 4, 2021 12:38 PM  
**To:** Vincent Gonzalez  
**Subject:** Comment on DEIR  
**Attachments:** DEIR UTILITIES AND PARK.docx

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Vincent Gonzalez  
[Vgonzalez@cityofsierramadre.com](mailto:vgonzalez@cityofsierramadre.com)

From: Barbara Velturo  
380 West Carter Avenue  
Sierra Madre, CA 91024  
  
[barbaravelturo@gmail.com](mailto:barbaravelturo@gmail.com)  
(802) 558-8864

Thank you for the opportunity to comment on the DEIR for the "Meadows at Bailey Canyon"

Attached is a Word document with my comments. Please retain a copy for the administrative record.

Please respond to these comments in the Final EIR and please put me on the list of people to notify when the Final EIR is complete

|  
174-1  
|

The Specific Plan did not provide adequate information about many of its components, and the City did not provide the promised informational public meeting to discuss the DEIR. The City Attorney's single presentation, solely on the timeline of the DEIR was NOT the necessary public discussion on the contents of either the Specific Plan and Deir. As a result, many questions and concerns remain.

174-2

Utilities - Questions and Concerns

The City Website, Water plan and Sewer plan all make it clear that, despite City plans and actions to repair and upgrade underground utility lines, many remain in deteriorated conditions. Leaks are a regular occurrence, resulting in an significant expense to the City and a great loss of precious water.

Though the pipes within the new development and the connections will be in good condition, there is no information in the DEIR as to the condition of all pipes (water, sewer and wastewater) from their connection at the development to their terminus. The 42 home development will result in an influx of water and sewage to those lines.

For each utility the final EIR must provide the size and age of the pipes from their connection at the development to their terminus, when they were last repaired or replaced and whether any have had known leaks.

174-3

The severity and expected length of the current drought (or its permanence) and the critical need to protect dwindling reservoirs and precious groundwater, makes it essential that the planned development not place increased stress on inadequate or deteriorating water or sewer lines.

Sierra Madre must NOT allow a development unless all City water and sewer lines involved have been adequately repaired or replaced. That potential environmental impact MUST be addressed in the Final EIR.

The Park - Questions and Concerns

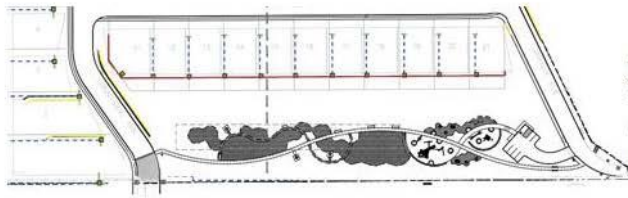
Very few details have been provided in the Specific Plan concerning the Park. Neither the Plan nor the DEIR address the potential nighttime Safety concern in having an open dark area, with many places for concealment, at the base of a development of multi-million dollar homes. They do not address whether the park itself will create the need for additional police officers.

174-4

Some questions that MUST be addressed in the Final EIR are:

What exactly is the benefit of the park to the Community?

How much of the acreage in the park is flat or relatively flat ground? What acreage of the park is included ONLY in the constructed space as shown in this design? What amount of land is used for creation of the "first tier" leading to the first row of houses? Is that land included in the 3 acre park? All space that is unusable to the public should not be included as part of the Park, if the park is considered to be a "Community Benefit". ONLY the acreage of the Park that is NOT required under the Quimby act can be considered a "Concession" (Given in exchange to the City's allowing larger homes and greater setbacks than are required in our Master Plan and Zoning ordinances)



The EIR should explain why this park (also being used for water retention as well as the first tier of their house pads), is a benefit that the City could not have had as a condition of ANY development, and its size and funding, based on its use by the entire community and nearby towns would have been included.

LAND DEDICATED FOR PARKS ETC

- 16.32.080 - Public facilities.
- The city may require that areas of real property within the subdivision be reserved for parks, recreational facilities, fire stations, libraries or other public uses subject to the provisions of Section 66479 of the Subdivision Map Act. (Ord. 1150 § 2 (part), 1999)
- 16.32.090 - Supplemental size of improvements.  
The city may require that improvements installed by the subdivider for the benefit of the subdivision shall contain supplemental size, capacity, or number for the benefit of property not within the subdivision, and that such improvement be dedicated to the public pursuant to Sections 66485 and 66486 of the Subdivision Map Act. (Ord. 1150 § 2 (part), 1999)

174-4  
Cont.

More information must be provided about the construction, location and nature of the planned water retention tank.

174-5

Will there be any above ground equipment involved with the water storage tank? Where will that be located? Is there any noise connected with its operation?

No restrooms are shown on the plans in the Specific Plan, but it is assumed that they will be included. Where would they be located, what would be the size and number and would they be ADA compliant.

174-6

Have the park paths and facilities been designed to be ADA compliant?

How was it determined that 7 parking spaces (1 handicapped accessible) was adequate for a development of 42 homes and public use by both Sierra Madre and Pasadena residents? Bailey Canyon Park has in excess of 25 parking spaces and overflow parking at many times of dozens more.

174-7

The Specific Plan states that the Park will be closed at night - will it be gated and fenced as Bailey Canyon Park is? Will the rest rooms be locked?

If it is not gated, has any study been done as to the safety issue of a dimly lit park at the base of a development of the most expensive homes in Sierra Madre? The Specific Plan indicates that only the paths will be lighted. Dark unsecured areas with trees and vegetation, as well as unlocked restrooms have proved to be an attraction resulting in safety issues in many and will likely require extra police patrols. The Final EIR MUST provide information and an analysis of this issue.

174-8

When the City manager originally spoke to the City Council and the Citizens of the "concessions" to be made, he said that the developer would create the park and "fund it in perpetuity". Now it appears that the town will be responsible for setting up and managing the maintenance, water etc for the park "in perpetuity." Is there a guarantee that only the residents of the development will pay all the costs of the new district, including the Management costs? The Final EIR must provide information and an analysis of this issue.

174-9

Rather than the ONLY "benefit" (or concession) that is not solely meant to meet the needs of the development, the proposed Park as shown may become a problem for the community. And it is clearly insufficient as a "Concession" in exchange for ignoring our General Plan, Ordinances and City Plans.

## Response to Comment Letter I74

Individual  
Barbara Velturo  
October 4, 2021

**I74-1** This comment requests the following comments (Comments I74-2 through I74-9) be included in the responses to comments of the Final EIR. Additionally, the comment notes an attachment for further comments (included as Responses to Comments I74-2 thru I74-9).

**I74-2** The comment is concerned that the Specific Plan does not include enough information about the proposed project; however, the comment does not identify any specific inadequacies to which a response can be made.

The comment is also concerned that an additional public meeting was not held to discuss the Draft EIR; however, the City provided several opportunities for public comment and discussion. First, the City released a Notice of Preparation (NOP), soliciting input from the public during the NOP comment period of July 1, 2020 through August 1, 2020. In addition, as discussed in Chapter 1, Introduction, of the Draft EIR, in August of 2020, the City held three workshops related to the proposed project. At all three of the workshops held in August 2020, the Draft EIR was discussed in detail and participants provided comments to the City, which were memorialized and included in the record. Due to COVID-19 and its related restrictions now easing, and in order to hear from as many residents as possible, the City held an additional in-person informational meeting to discuss the Draft EIR to present the EIR process and to receive written public comments and suggestions regarding the scope and content of the EIR. The meeting has been held on Wednesday July 14, 2021, from 6:00 p.m.–7:30 p.m. at Memorial Park, located at 222 West Sierra Madre Boulevard. During and in regard to this meeting, 47 comment letters were received. The public input provided during the meetings listed above was then used to inform preparation of the Draft EIR. Once the Draft EIR was completed, a Notice of Availability (NOA) of a Draft EIR, was released on July 23, 2021 and revised on August 2, 2021, soliciting input and questions from the public during the Draft EIR public review period of August 2, 2021 to October 4, 2021. This chapter of the Final EIR, Responses to Comments, represents a good-faith, reasoned effort of addressing environmental issues identified by the comments received during the NOA comment period, in accordance with the State CEQA Guidelines sections 15088 and 15024. As such, City decision makers will review and consider the comments received and responses prepared as part of their discretionary review of the proposed project.

The Final EIR provides a good-faith, reasoned effort to address all comments received during the public review period on environmental issues, in accordance with the State CEQA Guidelines sections 15088 and 15024. The public comments, and the responses thereto, are reviewed and considered by City decision makers prior to making any decision on the project entitlements. City decision makers will take public comment at the public hearings at which the project will be considered. These meetings will be noticed on the City's website.

**I74-3** The comment questions the condition of the existing underground water and sewer lines that would serve the proposed project. Refer to response I65-21, above.

The comment is also concerned about the availability of water supplies in drought conditions. See Global Response GR-1.

**174-4** The comment asks whether the proposed park would include nighttime lighting for safety and security purposes or require additional police officer. As discussed in Specific Plan Section 3.8.6, pedestrian-scaled street lighting shall be provided within the proposed park areas within pedestrian routes of travel to enable visibility and safety. Potential impacts to light/glare associated with lighting are addressed in Draft EIR Section 4.1.5, Impacts Analysis, in Section 4.1, Aesthetics.

As addressed in Draft EIR Section 4.15, Public Services, the development of the project site is expected to increase demands of police protection services relative to existing conditions. However, payment of development fees by the project applicant, as required by Chapter 15.52 of the SMMC, would offset the costs of increased personnel or equipment that could be required in order to maintain acceptable service ratios, response times, and other performance objectives.

The comment also questions the community benefit of the proposed park. Draft EIR Section 4.15 states the City has a three acre per 1,000 residents parkland ratio and based on the City's population, the existing park to population ratio is only 2.09 acres per 1,000 residents. Thus, the City currently has a parkland deficiency of approximately 10 acres. The proposed project would result in approximately 134 new residents, and the 3.04 acre proposed park would exceed the parkland ratio required by the project's own residents and help reduce the overall Citywide parkland deficit of 10 acres. Additionally, the proposed park would enhance the project site relative to existing conditions with landscaped mounds, one pond, pedestrian paths, shared open turf/play areas, adventure/natural play equipment, native garden beds, picnic areas, benches, overlook areas, a restroom building, a water fountain, landscaping, water quality facilities, and a small parking lot. Finally, the park's location along the southern boundary of the site would enhance connectivity to the Bailey Canyon Wilderness Park to the east.

The comment also asks about the topography of the proposed park and whether the entire acreage will be usable. Draft EIR Section 3.3.10, Grading Plan describes how the project site would be altered to form four tiers (three tiers for the proposed residential development, and one tier for the proposed park), with a slope between each tier. The proposed project would create a maximum slope of 12% and elevations would range from 1,105 feet to 1,195 feet above mean sea level (AMSL). The proposed 3.03-acre park, which would be located along the southern boundary of the project site, would have an elevation of 1,105 feet AMSL. Per Draft EIR Figure 3-10, Grading Plan, the majority of the park site is flat, while the northern portion of the park site would elevate approximately 15 feet to 1,120 AMSL. Additionally, as further detailed in Section 4.15, the SMCC requires the project to provide 0.5 acres of parkland on site. Thus, the project applicant would provide substantially more than the required amount of parkland in compliance with the SMMC.

**174-5** The comment requests more information related to the proposed water retention tank. Specifically, the comment requests details about construction, location, planned above-ground equipment, and potential impacts related to noise as result of this project component.

As detailed in Draft EIR Chapter 3, Project Description, the proposed storm drain network would flow runoff into an underground retention gallery within the proposed park and would convey surface runoff from two proposed catch basins located on the south end of Carter Avenue. The 63,500-cubic foot

retention storage gallery, proposed within the public park, would consist of approximately 2,400 linear feet of 60-inch diameter perforated pipe surrounded by gravel bed. This retention storage gallery would be located approximately 24 inches below ground and would promote water quality treatment through infiltration. Stormwater not retained in the storage gallery or infiltrated into the ground would be routed to the southeast corner of the proposed park and exit to Crestvale Drive via a 24-inch surface culvert. Please see Draft EIR Figure 3-7, Proposed Drainage Plan, for details on the storm drain network and retention gallery locations. No above ground water tank is proposed.

As described in Draft EIR Section 4.13, Noise, the proposed project would not include any stationary mechanical equipment (such as pumps, motors, fans) associated with the proposed stormwater retention facilities that could generate noise levels with the potential to impact noise-sensitive receptors.

**174-6** The comment requests more information regarding the restrooms proposed at the project's park. Draft EIR Section 4.15 notes that at least one restroom building is planned within the neighborhood park. However, specific details of the restroom (such as location, size, number of stalls) would be developed and presented to the City for review as part of the future tentative tract map. However, restrooms and trails would be required by law to comply with the Americans with Disabilities Act of 1990 (ADA). The processing for the tentative tract map would undergo the City's plan check compliance and ensure regulatory compliance with local, State, and federal laws, including the ADA.

**174-7** The comment asks why only seven public parking spaces are proposed. The seven parking spaces referred to in the comment are proposed for the neighborhood park parking lot, and would serve park visitors, not the 42 residential homes, which, pursuant to the Specific Plan, will each have private parking in the form of parking garages and driveway parking. Draft EIR Chapter 3, subsection 3.3.6.2, Internal Circulation, also describes the on-street parking availability on each of the proposed streets.

**174-8** This comment asks if the proposed park will be closed and gated at night. Similarly, the comment asks if the proposed restroom building will be locked at night. The proposed park would not be gated or closed. As discussed in Draft EIR Section 3.3.2, Neighborhood Park and Open Space, the proposed public park would be maintained by a landscape maintenance district or similar public maintenance entity. The details regarding whether or not the proposed park restrooms would be closed are not available at this time and would be decided under this landscape maintenance district or similar public maintenance entity. The closing of public restrooms proposed would be consistent with other parks within the City.

The comment also expresses concern over whether security lighting will be provided at the park. See Response to Comment 174-4, above.

**174-9** This comment asks whether the developer or the City will be responsible for funding ongoing maintenance of the park in perpetuity and expresses concerns regarding water supply. As stated in Draft EIR Section 3.3, Project Description, the project would establish a dedicated funding source for long-term park maintenance. The details of this funding source would be established via the project's Development Agreement. Regarding water supplies, see Global Response GR-1. In conclusion, the Draft EIR adequately analyzes the potential impacts associated with the proposed park and water supply.

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Comment Letter 175

**From:** Barbara Velturo <barbaravelturo@gmail.com>  
**Sent:** Monday, October 4, 2021 11:32 AM  
**To:** Vincent Gonzalez; Jose Reynoso  
**Subject:** COMMENTS FOR DEIR  
**Attachments:** TRAFFIC CARTER.docx; LAND ABOVE THE RETREAT CENTER.docx

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Vincent Gonzalez  
[Vgonzalez@cityofsierramadre.com](mailto:Vgonzalez@cityofsierramadre.com)

From: Barbara Velturo  
380 West Carter Avenue  
Sierra Madre, CA 91024  
  
[barbaravelturo@gmail.com](mailto:barbaravelturo@gmail.com)  
(802) 558-8864

Thank you for the opportunity to comment on the DEIR for the "Meadows at Bailey Canyon"

Attached are word documents with two of my comments, pertaining to TRAFFIC ON CARTER and THE DONATION OF LAND ABOVE THE MONASTERY

Please retain a copy for the record.

Please respond to these comments in the Final EIR and please put me on the list of people to notify when the Final EIR is complete

175-1

<p>The Specific Plan does not provide two safe and acceptable methods of ingress and egress to the Proposed Development.</p>	<p>175-2</p>
<p>The Specific Plan specifications for Carter Avenue do not comply with Sierra Madre Road Standards</p>	<p>175-3</p>
<p>The DEIR failed to consider or study a serious pedestrian Safety issue that would result from development of this project according to the Specific Plan.</p>	<p>175-4</p>
<p>Among the MANY concerns citizens have with this planned development is the intent to use an inadequate section of Carter Avenue as a second source of ingress and egress for the Parcel. The Specific Plan states that the existing Gate at Carter Avenue will be removed and opened to two way traffic.</p>	<p>175-5</p>
<p>The portion of the road outside the gate is approximately 20 feet wide. The road bed is in poor condition and unaccustomed to any regular traffic (it is used now for an occasional service to the Monastery, for LA County Flood Control access to the debris basin, and for occasional use by rescue vehicles if there is an emergency on the Bailey Canyon trails).</p>	<p>175-6</p>
<p>We have an early traffic study, sent to the developers, that shows that traffic counts, when the housing project is completed and occupied, will be 740 vehicles a day, not counting monastery traffic, traffic from deliveries, gardeners, trash pickup, people using the park, people using the development as a "short cut" to Bailey Canyon Park.....</p>	<p>175-6</p>
<p>(Section of Traffic report attached)</p>	
<p>The developer has stated that it will "improve" that section of road but has not explained what that improvement would be. They have specifically said though that it will not be widened other than what is required for emergency vehicle access.</p>	<p>175-7</p>
<p>That Carter road section is in no condition to handle even a small portion of that much traffic, even if the road bed is improved.</p>	<p>175-7</p>
<p>Parcel map of the section of road attached.</p>	
<p>Photo attached showing the gate to be removed to permit daily two way traffic of hundreds of cars and trucks - and the proximity of LA County Flood Control District access road to the Debris basin to that egress. That County access road is also used by first responders when there is an injured hiker.</p>	<p>175-8</p>

Our fire department has suggested that they could to use the County Access road to fight a wildland fire above the housing development, if it were built. Of course large equipment entering the Access road would make evacuations difficult or impossible

175-9

The DEIR also makes NO mention of the fact that many dozen pedestrians regularly cross the Grove/Bailey Canyon Park/Carter intersection on a daily basis, less than a block from the turn out of the development. It can also be expected that many people planning to use Bailey Canyon Park will park on the west side of Carter inside the development and cross that road to add to the pedestrian traffic exiting the development and adding more pedestrians to the north side of that 24 foot section of the street. Neither Grove nor Carter have sidewalks.

175-10

Cars exiting the development will be coming at a higher rate of speed down the wider, sloped portion of Carter within the development, and intercepting within a (half?) block with pedestrians, unaccustomed to traffic from that direction. Without (at the very least) sidewalks, there WILL be pedestrian accidents.

175-11

The City has known for a long time that the parking on Grove, which barely leaves one lane open on weekends, requires those going to Bailey Canyon Park to walk in the Street. The single lane left with cars parked on both sides would make it difficult for rescue equipment to access those blocked homes if necessary. Yet that already hazardous situation, which would be greatly exacerbated by two way traffic from the potential project, was not at all studied or its impact considered in the DEIR.

175-12

The Developer hopes to evade the protections of our zoning ordinances, on the property they plan to develop, by use of a Specific Plan that makes its own rules within the parcel. However, land OUTSIDE OF THE PARCEL will still be subject to Sierra Madre's General Plan and Ordinances, meant for protection of its Citizens and our City values.

175-13

The pending SEIR for the General Plan update/housing element, at the City's request, included Environmental impacts to both Stonegate and the "Meadows" project (as potential future residential development) to be studied.

175-14

In its traffic analysis of the impacts of development of ALL SITES, that DEIR stated that two evacuation routes must be provided for the adequate safety of all proposed and potential development and further required:

Access to/from each site would be required to meet the City's design standards with respect to location, width, and sight distance. With the above mitigation measures, the General Plan Update residential land uses can be added to the City housing supply without any remaining significant CEQA transportation impacts."

175-15

This is the Sierra Madre Ordinance setting forth the City Subdivision Standards for Streets, that would need to be met to avoid significant CEQA transportation impact.

§ 16.32.035. Street standards—Modification of same.

Except as otherwise required by [Chapter 15.24](#) of this code, the city's public street standards shall require at least thirty feet of road easement to accommodate two travel lanes, one parking lane, and a pedestrian walkway. Notwithstanding [Sections 16.32.020](#) and [16.32.030](#) of this code, the city council may determine, upon approval of a parcel or tentative tract map creating streets, that adjustment of the city's public street standards as to those streets is justified by other benefits to the policies stated in [Section 17.52.010](#) of this code and that such adjustments do not unduly impact circulation and parking. (Ord. 1229 § 2, 2005)

175-16

The public benefit referenced were those included in the Hillside Management Zone. Despite that ordinance, the Developer's Specific Plan for the "Meadows" states:

Site access, including road widths and connectivity, would also comply with all City requirements and would include the following:

- Primary access to the project site would be provided from North Sunnyside Avenue. Carter Avenue would provide secondary egress and ingress access.
- All roads comply with access road standards of not less than 24 feet, unobstructed width

175-17

Sierra Madre's City Street standards REQUIRE "AT LEAST" 30 feet of road easement, including sidewalks for pedestrian safety.

Although the Meadows Specific Plan DEIR includes this statement "Project site access, including road widths and connectivity, would be consistent with the City's roadway standards", they also state: "the existing Carter Avenue access improved to meet fire apparatus access road requirements".

175-18

Fire Apparatus requires 24 feet of road width. City standards for two way traffic require at least 30 feet.

The Specific Plan states that road access will be consistent with the City's standards, and the traffic impacts section of the DEIR for the Updated General Plan says that access to and from each developed site must meet the City's design standards. Those standards require at least 30 feet of width.

175-19

Unless the developer is able to meet Sierra Madre's requirements of 30 feet wide streets to provide safe ingress and egress to traffic, projected to total 740+ vehicles by the time the project is completed, it should not be approved.

The close proximity of that egress from the development should also be examined as to its adequacy as a second evacuation route, in light of firefighter's need to access the development either by Carter Avenue within the development or by the County Access Road, close to the development exit.

175-20

Barbara Velturo  
380 W Carter Avenue  
Sierra Madre, CA 91024

[barbaravelturo@gmail.com](mailto:barbaravelturo@gmail.com)



**TRAFFIC FORECASTS**

The proposed Project was assumed to be built and occupied by 2025. The following traffic scenarios were developed and analyzed as part of this study:

- Existing (2020) Pre-COVID Condition
- Build-out (2025) without Project Condition
- Build-out (2025) with Project Condition

The best tool to determine background growth in the area is the SCAG model. The SCAG model predicts 2040 travel conditions in consideration of land development and transportation changes. It also includes a work-from-home assumption to reflect anticipated changes in how people travel. The results of these assumptions lead to a conclusion that traffic levels will slightly decrease in the study area by 2040. To be conservative, we assumed that the 2025 conditions will not decrease in comparison to existing (pre-COVID) conditions.

We added the Project trips to the study segments and intersections following the trip distribution identified above. The following Table 6-1 and Table 6-2 present the level of change expected on the study roadways as a consequence of the Project. The peak hour intersection traffic of Build-out (2025) with Project condition is shown in Figure 3.

**TABLE 6-1 – Weekday Build-out (2025) with Project Segment ADT**

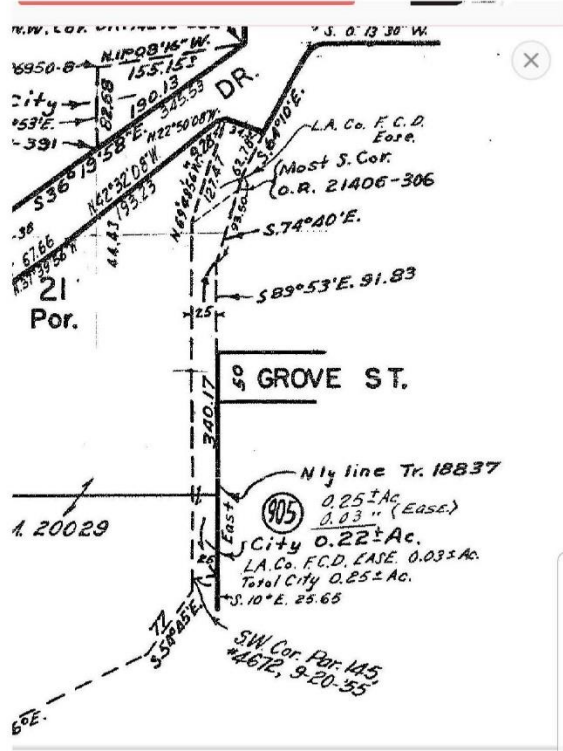
Segment	2025 without Project	2025 with Project	Increase%
Sunnyside Avenue between Project Site and Fairview Avenue	340	740	118%
Sunnyside Avenue between Fairview Avenue and Sierra Madre Boulevard	490	850	73%
Sierra Madre Boulevard between Michillinda Avenue and Sunnyside Avenue	6,970	7,310	5%
Michillinda Avenue between Fairview Avenue and Sierra Madre Boulevard	7,390	7,390	0%
Michillinda Avenue between Sierra Madre Boulevard and Foothill Boulevard	9,550	9,680	1%

175-21



Carter Avenue approaching Monastery Gate  
LA County Access Road to the Right  
Road width approx. 20 ft with vegetation at sides

175-22



Parcel map for Section of Road between Lima and Monastery Gate

AIN: 5761-003-905 8

<p>Situs Address:</p>	<p>Use Type: Other Property Type Parcel Type: Government Owned, Exempt Tax Rate Area: 07516</p>	<p>Parcel Status: <b>ACTIVE</b> Create Date: Delete Date: Tax Status: <b>EXEMPT</b> Year Defaulted: Exemption: None</p>
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175-23



**THE DONATED LAND IN THE SPECIFIC PLAN IS OF NO PUBLIC BENEFIT AND DOES NOT “PRESERVE OR PROTECT” ALREADY PROTECTED LAND**

In the beginning, the City and the Monastery said that the monastery would donate 45 acres of land above the retreat center as a "concession" for being allowed oversized homes. The maps in their presentations originally only showed property directly above the rest of their parcel.

The Specific Plan now shows all property directly above their property as well as a parcel that is NOT within Sierra Madre City Limits.

The parcel above the right side of their property on the Specific plan map is NOT owned by the Monastery but belongs to the City of Sierra Madre and is designated Open Space.  
APN: 5761-001-900 Recorded 1967

The 2 remaining parcels which they are now able to donate include  
APN: 5761-001-001 in Sierra Madre - 20 acres, designated Open Space Zone AND  
APN: 5760-027-013 in Unincorporated LA County - 16.74 acres zoned residential  
Maps are attached showing those parcels as they presently exist – the monastery proposes to donate less land than is currently in APN: 5761-001-001

There is NO benefit to Sierra Madre owning Hillside land in Unincorporated LA County. Land that is in the highest severity level of Fire hazard? Land that is shown as landslide potential on a Seismic hazard map? Land that is directly above several Pasadena housing developments? Has LA County been noticed on the proposal to change or restrict the Zoning on their land? Have they agreed to our changing it?? We can see a lot of negative consequences in our owning 16.74 Hillside acres in Unincorporated LA County - but NO positive ones!!

The Parcel that IS within Sierra Madre is already zoned Open Space which allows NO residential building. It is already Protected and Preserved by that zoning designation. The Retreat Center and its grounds will be gated and protected by an 8 foot concrete wall; the community will have no access to that Parcel and its donation to the city would have NO public benefit.

In addition, the DEIR, in its Executive Summary, states that the Monastery intends to do a lot line adjustment moving its boundaries to the north and changing the size (and the AIN number of that parcel) At this time it is unknown what and how much of the protected land they are proposing to “donate”

The City should refuse to accept donation of land that is not within our City limits and which may be a liability to us.

The Sierra Madre Parcel is already protected by its zoning of Open Space, is not accessible to the public and its eventual size is unknown. It is not a valid concession to permit a developer to disregard our General Plan and Zoning Regulations.

175-24

175-25

175-26

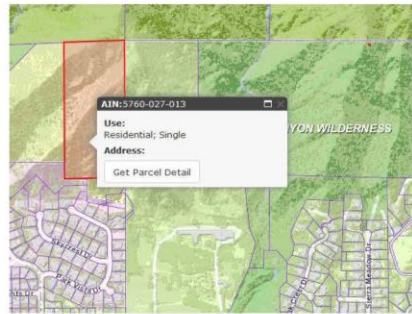
175-27

175-28

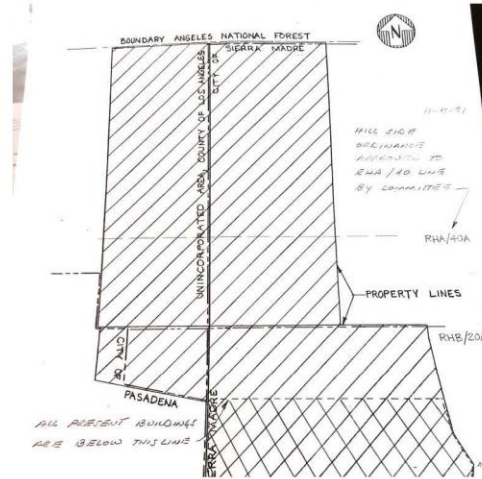
Map from the Specific plan



Parcel in Unincorporated LA County



LAND OWNED BY THE MONASTERY



175-29

Barbara Velturo  
 380 W Carter Avenue  
 Sierra Madre, CA 91024

[barbaravelturo@gmail.com](mailto:barbaravelturo@gmail.com)

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## Response to Comment Letter I75

Individual  
Barbara Vellturo  
October 4, 2021

- I75-1** The comment introduces the comment letter and attachments. The commenter would like to be put on the list of people to notify when the Final EIR is complete. The comment is an introduction to comments that follow. The commenter will be notified when the Final EIR is complete and available to the public.
- I75-2** This comment is part of Attachment 1 of the Comment Letter I75. The comment is concerned about safe egress/ingress at the project site. Please refer to Global Response GR- and Global Response GR-5.
- I75-3** This comment is part of Attachment 1 of the Comment Letter I75. The comment states that Carter Avenue does not comply with City road standards. Please refer to Global Response GR-5 (GR-5), Carter Avenue.
- I75-4** This comment is part of Attachment 1 of the Comment Letter I75. The comment expresses concern relating to pedestrian safety. See Response to Comment I46-8.
- I75-5** This comment is part of Attachment 1 of the Comment Letter I75. The comment states that many citizens are concerned about the use of Carter Avenue as an egress/ingress due to the width and the poor condition of the road. Please refer to Global Response GR-5.
- I75-6** This comment is part of Attachment 1 of the Comment Letter I75. The comment states than an early traffic study for the proposed project indicated that there would be 740 vehicle trips a day that does not include traffic from deliveries, employees, etc. Please refer to Global Response GR-6 .
- I75-7** This comment is part of Attachment 1 of the Comment Letter I75. The comment states that the improvements to Carter Avenue were not explained. Please refer to Global Response GR-5.
- I75-8** This comment is part of Attachment 1 of the Comment Letter I75. The comment references an attached photo of the gate that would have to be removed from Carter Avenue in order to allow for the proposed two-way traffic. Please refer to Global Response GR-5 .
- I75-9** This comment is part of Attachment 1 of the Comment Letter I75. The comment states that the fire department could use the county access road and expresses concerns regarding evacuations. Please refer to Global Response GR-4 and Global Response GR-5 .
- I75-10** This comment is part of Attachment 1 of the Comment Letter I75. The comment states that the Draft EIR does not mention the pedestrian usage at the Grove/Bailey Canyon Park/Carter Avenue intersection. See Response to Comment I75-4. As discussed in Final EIR Section 3.3.12, The proposed project would include off-site improvements to Carter Avenue, between the southeastern portion of the project site boundary and Lima Street, which includes a 6-foot sidewalk on the north side of Carter Avenue. Regarding pedestrian safety along Carter Avenue, please refer to Global Response GR-5.

- I75-11** This comment is part of Attachment 1 of the Comment Letter I75. The comment states that the hazardous design of the Carter Avenue egress would result in issues with pedestrian safety. Please refer to Global Response GR-5 .
- I75-12** This comment is part of Attachment 1 of the Comment Letter I75. The comment states that rescue equipment and vehicles would not be able to reach residents of the proposed project and that this issue was not studied or considered in the Draft EIR. Specific requirements for provision of fire apparatus access roads are provided in Draft EIR Appendix F2. Please refer to Global Response GR-4 .
- I75-13** This comment is part of Attachment 1 of the Comment Letter I75. The comment states that land outside of the proposed project parcels would be subject to City General Plan policies and City ordinances. The comment does not raise new or additional environmental issues concerning the adequacy of the Draft EIR.
- I75-14** This comment is part of Attachment 1 of the Comment Letter I75. The comment states that the SEIR for the City's General Plan Housing Element Update includes the proposed project and the Stonegate Project. The Stonegate project has been accounted for as a cumulative project (see Draft EIR Section 5.3, Cumulative Projects).
- I75-15** This comment is part of Attachment 1 of the Comment Letter I75. The comment states that the proposed project needs to include two evacuation routes for adequate safety and that the project does not comply with City design standards or streets and therefore would result in a significant impact. Please refer to Global Response GR-3 , Global Response GR-4 , and Global Response GR-5 .
- I75-16** This comment is part of Attachment 1 of the Comment Letter I75. The comment states that the proposed project street design does not comply with City design standards regarding width of proposed streets, as outlined in the City's municipal code. Please refer to Global Response GR-5.
- I75-17** This comment is part of Attachment 1 of the Comment Letter I75. The comment states that City streets require at least 30 feet of road easement in order to comply with City street design standards. Please refer to Global Response GR-5 .
- I75-18** This comment is part of Attachment 1 of the Comment Letter I75. The comment summarizes the Draft EIR's statement regarding consistency with City design standards and road improvements to Carter Avenue. The comment does not raise new or additional environmental issues concerning the adequacy of the Draft EIR.
- I75-19** This comment is part of Attachment 1 of the Comment Letter I75. The comment states that the project should not be approved because proposed roads do not meet the fire apparatus minimum of 24 feet, does not meet the required 30 feet in width, ingress/egress requirements, and would result in approximately 740 additional vehicle trips. Please refer to Global Response GR-5 . Regarding additional vehicle trips, please refer to Global Response GR-6.
- I75-20** This comment is part of Attachment 1 of the Comment Letter I75. The comment suggests that the egress should be analyzed to determine its adequacy as a second evacuation route. Please refer to Global Response GR-4 and Global Response GR-5 .

- I75-21** This comment is part of Attachment 1 of the Comment Letter I75. It is a portion of a traffic study done for the proposed project. The comment does not raise new or additional environmental issues concerning the adequacy of the Draft EIR.
- I75-22** This comment is part of Attachment 1 of the Comment Letter I75. The comment is a photo of Carter Avenue to demonstrate its width and current condition. The comment does not raise new or additional environmental issues concerning the adequacy of the Draft EIR. Please refer to Global Response GR-5 regarding discussion of the existing and proposed width of Carter Avenue.
- I75-23** This comment is part of Attachment 1 of the Comment Letter I75. The comment is an image of the parcel map for a section of road between Lima and Monastery Gate. The comment does not raise new or additional environmental issues concerning the adequacy of the Draft EIR.
- I75-24** This comment is part of Attachment 2 of the Comment Letter I75. The comment provides background regarding the history of the proposed open space dedication area. The City notes that the comment provides background information and does not raise an issue related to the adequacy of the Draft EIR.
- I75-25** This comment is part of Attachment 2 of the Comment Letter I75. The comment states that there is no benefit to owning Hillside land due to its fire hazard severity level, and the landslide potential when it's above several existing housing developments in Pasadena. Because no development is proposed in this area, and because the area would be conserved in perpetuity, the proposed open space conservation easement would not result in increases to fire hazards or landslide potential.
- I75-26** This comment is part of Attachment 2 of the Comment Letter I75. The comment states that a parcel donated to the City is zoned as Open Space under the Protected and Preserved zoning designation, and as such the public would have no access to that parcel. Therefore, the parcel donation would provide no benefit to the public. As stated in Draft EIR Section 3.1, Project Location and Project Site, open space areas lie to the north of the Mater Dolorosa Retreat Center. Of this open space area, 35 acres are proposed to be preserved as protected open space; however, these 35 acres are not considered part of the project site, and no development would occur within this area.
- I75-27** This comment is part of Attachment 2 of the Comment Letter I75. The comment states that it is unknown what and how much protected land the Monastery is proposing to donate. According to Draft EIR Section ES.1, Project Location and Project Site, open space areas lie to the north of the Mater Dolorosa Retreat Center. Of this open space area, 35 acres is proposed to be conserved as part of the project to be protected open space; however, these 35 acres are not considered part of the project site.
- I75-28** This comment is part of Attachment 2 of the Comment Letter I75. The comment suggests that the City should not accept the 35-acre conservation easement as it would be a liability to the City. The comment provides the opinions of the commenter and does not raise new or additional environmental issues concerning the adequacy of the Draft EIR.
- I75-29** This comment is part of Attachment 2 of the Comment Letter I75. The comment shows figures of parcel locations. The comment does not raise new or additional environmental issues concerning the adequacy of the Draft EIR.

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Comment Letter 176

**From:** Barbara Velturo <barbaravelturo@gmail.com>  
**Sent:** Monday, October 4, 2021 12:57 PM  
**To:** Vincent Gonzalez  
**Subject:** Comment on DEIR  
**Attachments:** INCONSISTENCY ANALYSIS.docx

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Vincent Gonzalez  
[Vgonzalez@cityofsierramadre.com](mailto:Vgonzalez@cityofsierramadre.com)

From: Barbara Velturo  
380 West Carter Avenue  
Sierra Madre, CA 91024  
  
[barbaravelturo@gmail.com](mailto:barbaravelturo@gmail.com)  
(802) 558-8864

Thank you for the opportunity to comment on the DEIR for the "Meadows at Bailey Canyon"  
Attached are my comments. Please retain a copy for the administrative record.  
Please respond to these comments in the Final EIR and please put me on the list of people to notify when the Final EIR is complete

|  
176-1  
|

Much of the SPECIFIC PLAN for the "Meadows at Bailey Canyon" is INCONSISTENT WITH SIERRA MADRE'S GENERAL PLAN, ZONING ORDINANCES AND PLANS.

From the General Plan Introduction

The City of Sierra Madre General Plan is a long-range policy document which lays out the framework for all future growth and development within the City. The General Plan is the blueprint that sets the basis for future policy decisions, in that it organizes the desires of the Sierra Madre community with respect to the physical, cultural, economic, and environmental character of the City.

Most importantly, the Sierra Madre General Plan is a community-based document that reflects the community values and character as expressed in its goals and policies, while also serving as a technical document which provides information about the City. ***The General Plan shall be used as a guide by the City's decision makers to achieve the community's vision and preserve the history, character and shared values of the community for future generations.***

All those regulations have been carefully crafted and refined over decades, by Sierra Madre's volunteer and elected officials, citizens and hired consultants, to PROTECT the unique character of our VILLAGE OF THE FOOTHILLS. As knowledge has evolved of climate change and the increasing man made dangers of FIRE, DROUGHT and AIR POLLUTION, Sierra Madre has consistently acted to those protections, to keep our vision of our beautiful small town's character.

Because the General Plan is so critically important in guiding all future development decisions in a City, State law requires that a Specific Plan MAY NOT BE ADOPTED Unless it is Consistent with the General Plan. pursuant to §65454

The developers of the Meadows at Bailey Canyon hope to build by use of a SPECIFIC PLAN, which not only evades the VALUES, VISION and POLICIES of our GENERAL PLAN, our ORDINANCES and our CITY PLANS, but which eliminates the oversight of our Planning Commission which is intended to enforce and protect those values.

The following sections will show many critical inconsistencies with several parts of the Sierra Madre General Plan, the Sierra Madre Ordinances and the Sierra Madre Community Forest Plan. Some inconsistencies are readily apparent – some are inconsistent because the Developer failed to do the studies or present the evidence by which the City could ascertain consistency.

Luckily, the law does not allow a developer to so easily replace our City's values with its own. And it is up to Sierra Madre's Planning Commission and City Council to protect those values on behalf of the citizens of this town.

176-2

176-3



The SPECIFIC PLAN for the "Meadows of Bailey Canyon" is INCONSISTENT with the SIERRA MADRE GENERAL PLAN with regard to the Land Use Section of the General Plan

State law requires that Specific Plans must demonstrate consistency with the goals, objectives, policies and programs of a jurisdiction's General Plan. IF THEY DO NOT, THEY CAN NOT BE ADOPTED.

The proposed Meadows development is inconsistent with these GENERAL PLAN LAND USE GOALS, the policies which further define those goals and the Implementation measures to put those policies into effect. Those Goals and Policies establish what is valuable to the Citizens of Sierra Madre. They must be enforced and protected.

City of Sierra Madre 2015 General Plan – Land Use Goals

- 2. Preserve and enhance the diversity in the character of residential neighborhoods ensuring that new development is compatible in its design and scale with older established development in the surrounding neighborhood without attempting to replicate or mass produce a style of Development.
- 3. Ensure that development is done in harmony with its neighborhood, and preserves and protects privacy and mountain views of neighboring properties.
- 4. Ensure that development is done to maximize water conservation practices to reduce and minimize the impact on the City's local water supply and the ability to serve its water customers.
- 5. Institute conservation measures so that the demand for water matches the City's local supply.
- 8. Preserve existing and provide additional constructed and natural open space.
- 9. Preserve the hillside areas in order to protect the environment and mountain views, obtain a balance between developed areas and the hillside wilderness, and establish the role of the hillside as an entry point into wildland areas.

176-4

176-5

THE SPECIFIC PLAN IS NOT CONSISTENT WITH THE LAND USE GOALS AND POLICIES OF THE GENERAL PLAN WITH REGARD TO THE CHARACTER OF NEW DEVELOPMENT.

GOALS OF THE SIERRA MADRE GENERAL PLAN

2. Preserve and enhance the diversity in the character of residential neighborhoods ensuring that new development is compatible in its design and scale with older established development in the surrounding neighborhood without attempting to replicate or mass produce a style of Development.

176-6

3. Ensure that development is done in harmony with its neighborhood, and preserves and protects privacy and mountain views of neighboring properties,

1. Most building projects in Sierra Madre (except for this "Meadows" project which evades all our protective regulations by use of a Specific Plan) would be required by our Planning Application process to SHOW how their planned house or development fits into the neighborhood. A Sierra Madre Planning application requires a: "Neighborhood Analysis - a tabulated list of properties within a 300 foot radius of the project site comparing lot size and building data as presented by the Los Angeles County Assessor" "The analysis should calculate the median and average values for lot size and identify where the proposed project falls within the properties."

176-7

The Meadows Development has not done any such "Neighborhood Analysis" and we do not know if, under the Specific Plan, that analysis will be required, as their Specific Plan negates many of Sierra Madre's planning requirements.

But, unless that analysis IS done, and unless the results show that the project falls close to the median or average values of the surrounding properties, the project can NOT claim to be "consistent" with Sierra Madre General Plan, Ordinances, or our City's Values. The neighborhood surrounding the proposed development has a specific character, lot size and house size. That, and not some oversized house on an oversized lot in another part of town, is what must be compatible in design and scale.

176-8

2. The project's Specific Plan shows larger house sizes than is allowed in single family residential zones. Our General Plan requires adherence to those zoning requirements. The project can NOT claim to be "consistent" with Sierra Madre General Plan, Ordinances, the surrounding neighborhood or our City's Values when it varies from those requirements.

176-9

3. The project's Specific Plan shows greater lot coverage than is allowed in Single family residential zones. Our General Plan requires adherence to those zoning requirements. The project can NOT claim to be "consistent" with Sierra Madre General Plan, Ordinances, the surrounding neighborhood or our City's Values when it varies from those requirements.

176-10

4. The project's Specific Plan shows greater setbacks than is allowed in Single family residential zones. Our General Plan requires adherence to those zoning requirements. The project can NOT claim to be "consistent" with Sierra Madre General Plan, Ordinances, the surrounding neighborhood or our City's Values when it varies from those requirements.

176-11

5. An aerial map of homes adjacent to the Parcel to be developed shows that only 5 homes of 59 in the neighborhoods to the west and south of the project are two story homes and 54 are single story homes. (Map below) We do not know if ANY homes in this proposed development will be one story, and doubt that they will even come close to the prevailing percentage of single story homes in the neighborhood, let alone conforming to the house and lot size that our planning application would require analyzed.

176-12



At the Developer's presentation to the city Council and the residents, in March 2021, a Council Member asked how many of the "Meadows" houses would be one story. The response was that it hadn't been decided, but that information would be in the Specific Plan. It is not! The Specific Plan makes no mention at all about how many houses, IF ANY, will be single story. At a Planning Commission meeting, Planning Director Gonzalez stated that there were only 4 designs to review. ALL designs previously shown were two story houses. And none of those previously presented designs appear in the Specific Plan – the designs of the houses to be built, along with their sizes are not shown.

176-13

The Developer has used a "Stock" response as part of its "Consistency Analysis" – ostensibly intended to cover any Goals and Policies which require the project to be consistent with its surrounding neighborhood.

176-14

Table 1. Consistency with City of Sierra Madre's General Plan Goals and Policies

**Master Responses:**

**Response 1:** The Specific Plan includes development regulations and design guidelines and standards for the project site created to be compatible with the surrounding neighborhood. The development will be designed in a manner that is sensitive to viewpoints through building design, site layout and building heights. The design guidelines and standards in Chapter 5 promote the high-quality standards that the City and the community value. In addition, multiple measures are in place that will provide buffers, additional setbacks for lots west of North Sunnyside Avenue and landscaping, as well as a Grading and Landscape buffer along the northern boundary of the Plan area, to ensure compatibility with existing structures in the adjacent neighborhood and Retreat Center. See Section 3.8.5, Good Neighborhood Plan for additional details. See Section 3.8.5, Good Neighborhood Plan for additional compatibility details in regard to the site's compatibility with surrounding uses.

176-14  
Cont.

Those statements of "fact" unless supported by sufficient evidence are inadequate. In any case where the language merely states that the project would be consistent with itself—not the policy, it fails to establish consistency with the policy. It states the development would be "regulated" by its own design guidelines which are, in fact, inconsistent with this policy. No facts are presented to support the erroneous conclusion of consistency because it can't be done. The developer must address the inconsistency of the project with this policy, with facts.

Unless the developer shows the locations and numbers of ALL one and two story homes, and the lot sizes and house sizes for each of the 42 lots, they can NOT claim that their project is "consistent" with Sierra Madre General Plan, the surrounding neighborhood or our City's Values. The statement that something is so, without evidence, is invalid.

6. The orientation of the homes, as show on previous Site Plans, is NOT CONSISTENT with any other neighborhood in the city. The houses on the west side will all face east and the interior homes will all face north. There will be no homes facing each other. Each row of houses will sit on top of a pad, at the top of a slope. This will eliminate the community/neighborhood aspect of homes looking out onto the same street, that the entire city has and is a configuration not seen in any part of Sierra Madre. The project can NOT claim to be "consistent" with the General Plan, surrounding neighborhood or our City's Values.

176-15

A local architect had these comments that the design of the development did NOT at all fit into our City's standards and character. "It is also separated by making itself a separate enclave, rather than fitting in. This is due to two factors: One is the road layout. It definitely has a message of being separate. For instance, why isn't Carter improved and continued west to Sunnyside as a starting point in the layout?"

Two is that nowhere in Sierra Madre do we have these “Orange County-like” butcher the natural land forms to make these “line 'em-up” flat building pads. Completely un-natural looking, with useless steep slopes that result from doing this. These pads are for the purpose of setting cookie cutter house designs down quickly and cheaply to maximize speed and profit. They have nothing to do with urban form or even trying to fit into our town. This configuration does not exist anywhere in Sierra Madre. It is alien and unnatural.”

176-15  
Cont.

7. The developer has shown no plans, no elevations nor any other studies to support its claim that no views will be impacted by the project. Simply SAYING that it will not is insufficient evidence. Unless they produce evidence to support their unsubstantiated comment, they can NOT claim that the project is "consistent" with Sierra Madre General Plan, the surrounding neighborhood or our City's Values.

176-16

8. The developer has shown no maps or plans that would support their claim that the project is “consistent” with the General Plan requirements attached. They have not shown how many of each lot size and their locations, or the size of the homes on each lot. We can analyze the size of the lots and the homes in the surrounding neighborhoods, but still can't know whether their project is consistent with our General Plan without knowing the developments lot sizes and house sizes.

Simply referring to “Design Standards” in a Specific Plan, which also includes the right to “amend” that plan, does not provide a true representation of what will be built and if it will complement the character of existing development. **Stating** that their development regulations and design standards make the development “compatible with the surrounding neighborhood” and “sensitive to viewpoints” does NOT show to any reasonable person that those things are so, especially when those neighborhood properties were built with more restrictions than will apply under the Specific Plan. The Specific plan sets zoning standards which, if applied, would automatically make the development NOT COMPATIBLE with the neighborhood and inconsistent with our General Plan, which requires that compatibility. Again, their “consistency” statement simply states the development would be “regulated” by its own design guidelines which are, in fact, inconsistent with our policies. No facts are presented to support the erroneous conclusion of consistency because it can't be done. The developer must address the inconsistency of the project with this policy, with facts.

176-17

Below are the Policies in the General Plan pertaining to developments. The Developers Specific Plan MUST demonstrate consistency with our CURRENT General Plan. It may not claim that consistency based on its own regulations or an “Amended” or future General Plan which incorporates those regulations

176-18

The developer has not proven Consistency with any of these policies or implementation measures. The Specific Plan’s stated Home Sizes, Lot Coverage and Setbacks alone make the development inconsistent with the zoning Ordinances that the General Plan policies intended to “maintain” and “protect”.

- Policy L4.1: Ensure that the expansion of existing uses is reflective of and complements the overall pattern of development, without changing the character of existing development.
- Policy L6.2: Ensure that any new or expanded structures in residential neighborhoods do not unreasonably obstruct significant mountain or basin views.
- Policy L7.1: Maintain maximum lot coverage and floor area ratios which allow for adequate buffering from neighboring properties, usable private yard area, air circulation and light.
- Policy L7.3: Limit the height of new buildings to reflect the height patterns on the street and within the Sierra Madre community.
- Policy L7.4: Encourage new residential development to be compatible with existing structures including the following:
  - a. Maintenance of front, side, and rear yard setbacks.
- Policy L10.4: Maintain development standards and minimum lot sizes which result in development with dimensions, quality, and aesthetics consistent with existing developments.
- Policy L15.1: In subdividing larger parcels, determine development density based on a calculation that uses slope as one of the primary factors, which means that the steeper the slope, the larger the minimum lot size.
- Policy L15.2: Ensure that development in the hillside areas be located in those areas resulting in the least environmental impact.
- Policy L15.3: Require that all access into hillside areas be designed for minimum disturbance to the natural features.
- Policy L15.5: Consider the impact of development on wildlife.
- Policy L16.1: Minimize the amount of grading and removal of natural vegetation.
- Policy L17.2: Require that all development be designed to reflect the contours of the existing landform using techniques such as split pads, detached secondary structures (such as garages), and avoiding the use of excessive cantilevers.
- Policy L17.3: Require that all development preserves, to the maximum extent possible, significant features of the natural topography, including swales, canyons, knolls, ridge lines, and rock outcrops.
- Policy L24.1: Require that new residential development be compatible with and complement existing structures on the block:
  - a. Maintain existing front yard setbacks on the block;

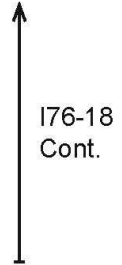
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- Policy L24.5: Encourage the retention of existing mature, specimen trees.

- Policy L37.8: Ensure that all development and new uses are compatible with adjacent uses, and yield no significant negative impacts to noise, air quality, water quality and traffic.

Measure IM-12: The City shall continue to enforce and amend the R-1 (One Family Residential) Zoning Ordinance as necessary to ensure that development is compatible in design and scale with the neighborhood.

Measure IM-59: The City shall continue to enforce the Institutional (I) Zoning Ordinance.



THE SPECIFIC PLAN IS NOT CONSISTENT WITH THE LAND USE GOALS AND POLICIES OF THE GENERAL PLAN WITH REGARD TO THE PRESERVATION OF OPEN SPACE

GOALS OF THE SIERRA MADRE GENERAL PLAN

- 8. Preserve existing and provide additional constructed and natural open space.
- 9. Preserve the hillside areas in order to protect the environment and mountain views, obtain a balance between developed areas and the hillside wilderness, and establish the role of the hillside as an entry point into wildland areas.

Our 2015 General Plan included the following Policies:

- Policy R3.2: Ensure that wildland open space, including the areas of the city designated as High Fire Hazard Severity Zone, is left in its natural state with the exception of brush abatement for public safety in order to aid the City in fighting fires.
- Policy R3.3: Ensure that natural open space within the High Fire Hazard Severity Zones remains undeveloped so as to mitigate the flood cycles that follow wild land fires in the natural open space.

And in the Pending update to our General Plan, the City has added a new policy to its Safety Element to make their intentions clear:

**Objective Hz7: Avoid expanding development into undeveloped areas in Very High Fire Severity Zones.**

The planned project is in the Very High Fire Severity Zone and is part of the Wildland Urban Interface.

The Sierra Madre General Plan identifies and recognizes the value of Constructed and Natural Open Space within our Wildland Urban Interface, but states that NATURAL OPEN SPACE is the most precious because it can not be replaced once lost. The entire parcel to be developed is currently Natural Open Space, the most valuable.

All other parcels which abut the Forest wilderness area recognize the City's goal to "Preserve the hillside areas in order to protect the environment and mountain views, obtain a balance between developed areas and the hillside wilderness, and establish the role of the hillside as an entry point into wildland areas". With the exception of a small part of the Canyon Zone all of those parcels are zoned either Hillside Management Zone or Open Space Zone, for the protection of Open Space and for Fire and Flood Safety. Sierra Madre Zoning Map shows the Open Space Zone in pale green, the Hillside Management Zone in a darker blue/green, and the solid green as City Parks.

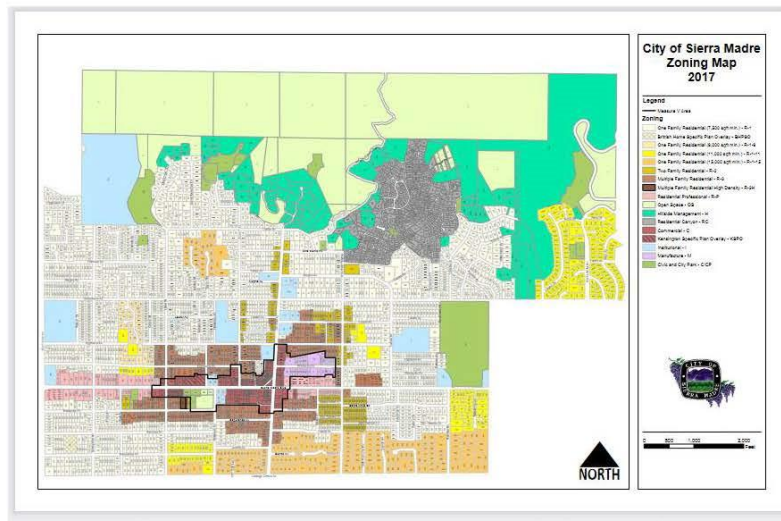
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Cont.

The most important values to our community of that open space are its protections as a buffer against wildfires and landslides as well as an area from which our firefighters and partners can stage their attacks against any fire that threatens our City. It is a safety asset for all of Sierra Madre.

176-23

But there is a further value of that specific area as described to us by a member of a conservation group.

“Watershed Conservation Authority’s mission is to expand the open space and recreational opportunities in the San Gabriel and Lower Los Angeles Rivers Watershed area consistent with the goals of flood protection, water supply, and groundwater recharge. It is in this spirit that I want to share considerations for the Mater Dolorosa land, which is proposed as a site of a residential development.

176-24

This development will be situated on the very last large parcel of land in the Eastern San Gabriel foothills which retains a connection between the canyons and the alluvial fan. Alluvial fans have particularly high rates of infiltration. There, water can sink deep into the ground and recharge aquifers. Keeping remaining recharge areas as undeveloped as much as possible is a critical part of protecting our region’s watersheds. This land was ranked very in high in conservation value in our agency’s Foothills Open Space Acquisition Study due to its watershed value, adjacency to protected lands, potential for habitat restoration, and for public access.

176-25

The opportunity to optimize the recharge potential on any remaining undeveloped alluvial fan land has the potential to benefit all users of the Raymond Basin far into the future. It may also serve as a buffer to absorb flows from the mountains above in an era of climate change uncertainty. If this land is covered by houses and roads, it would be prohibitive to regain all these functions in full. Please give full consideration to an alternative scenario: to acquire the land for regional public benefit and to optimize its capacity to enhance biodiversity, aquifer recharge, as well as provide flood control.”

176-26

The Developer has shown no consistency with any Goals or Policies that seek to Preserve and Protect Open Space, in developing the land.

However, the developer in the DEIR consistency analysis claims that its development is consistent with the General Plan’s goal to Preserve existing and provide additional constructed and natural open space.

They State: “The project would comply with the City’s goal of providing additional constructed open space. The proposed project establishes open spaces zones on the project site, including the incorporation of a neighborhood park at the southern area of the project site and dedication of approximately 35 acres of protected open space to the City, north of the Mater Dolorosa Retreat Center”

176-27

That statement is entirely untrue. The intent of the Goal is to Preserve existing and “add” additional open space. The Developers plan does not “preserve” ANY existing (natural) open space, nor provide any additional open space. It plans to CONVERT less than 5 acres of the 17 from Natural Open Space (the most precious, as stated in our General Plan) to Constructed Open Space, for the Park and for the landscaped buffer to protect the Monastery from the sights and sounds of the development. It has provided NO additional open space of any kind. Their development is inconsistent with the Goal of the General Plan

Though the DEIR states that the proposed “land above the retreat center is NOT part of the project site”, the developer still attempts to claim credit for that land as part of its “consistency” with the City’s goal to “Preserve existing and provide additional constructed and natural open space”. It would not be consistent with that goal, even IF that donation was part of the project.

Only 20 acres of that land is in Sierra Madre and subject to the City’s General Plan goals and policies. Those 20 acres of Sierra Madre land are already Preserved and Protected by the fact that they are zoned “Open Space” and cannot be developed for housing. That proposed donation in no way can serve to evidence any consistency with the General Plan goal –and there is no benefit to the public by the donation of any of the land proposed.

176-28

The developers have neither “**preserved existing**” nor “**provided additional**” open space.

The Developer further claims that the project is consistent with Objective L44: “The preservation of natural open space areas as crucial to the distinctive character of Sierra Madre, and as a key feature of sustainability and public safety” - based on the same referenced donation of land already preserved and protected by its zoning designation, and other land which is not IN Sierra Madre and which poses a significant liability if accepted.

176-29

These are the Goals and Policies in the General Plan pertaining to the preservation and protection of Open Space in Sierra Madre. The developer has NOT proven Consistency with any of these goals, policies or implementation measures.

Goal 8. Preserve existing and provide additional constructed and natural open space.

Goal 9. Preserve the hillside areas in order to protect the environment and mountain views, obtain a balance between developed areas and the hillside wilderness, and establish the role of the hillside as an entry point into wildland areas.

Policy L15.2: Ensure that development in the hillside areas be located in those areas resulting in the least environmental impact.

Policy L15.3: Require that all access into hillside areas be designed for minimum disturbance to the natural features.

Policy L15.5: Consider the impact of development on wildlife.

Policy L16.1: Minimize the amount of grading and removal of natural vegetation.

Policy L24.5: Encourage the retention of existing mature, specimen trees.

Policy L44.3: Establish the role of natural open space as an interface to the wilderness area.

Policy R1.1: Maintain and enforce the Hillside Management Zone Ordinance and other ordinances that seek to protect hillside areas.

Policy R3.2: Ensure that wildland open space, including the areas of the city designated as High Fire Hazard Severity Zone, is left in its natural state with the exception of brush abatement for public safety in order to aid the City in fighting fires.

Policy R3.3: Ensure that natural open space within the High Fire Hazard Severity Zones remains undeveloped so as to mitigate the flood cycles that follow wild land fires in the natural open space.

Policy R3.4: Ensure the protection of natural open space so as to maintain it as a preventative measure against flooding, and as a means of capturing stormwater runoff for groundwater recharge.

Policy R10.8: Continue to monitor construction projects with regard to grading and construction effects on trees, tree removal and replacement.

176-30

Measure IM-1: The City shall continue to enforce the Hillside Zone Ordinance and other ordinances that seek to protect the hillside areas.

Measure IM-5: The City shall amend the Open Space Ordinance to identify wildland open space as areas to remain in their natural state to mitigate flood cycles and capture stormwater runoff, except where brush abatement is necessary for fire safety

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176-30  
Cont.

The Specific Plan does not provide two safe and acceptable methods of ingress and egress to the Proposed Development as required nor two evacuation routes.

The Specific Plan specifications for Carter Avenue do not comply with Sierra Madre Road Standards

The DEIR failed to consider or study a serious pedestrian Safety issue that would result from development of this project according to the Specific Plan.

176-31

A Traffic Study, in an Environmental Impact Analysis to amend our General Plan, done concurrently with this one for the Meadows at Bailey Canyon, also included this project. That analysis showed that the impact of all projects could ONLY meet acceptable standards if, in addition to other mitigations, they adhered to the Sierra Madre bicycle regulations and its Street Standards Ordinance for all access roads, which requires a 30 foot width.

The proposed housing project has admitted that it will not meet the City's bicycle requirements and has shown no intent or ability to widen all of Carter Avenue to the required 30 feet width. Unless it corrects those two issues in the Final EIR, it will remain INCONSISTENT with Sierra Madre's Ordinances and General Plan, and will not meet CEQA requirements to mitigate significant transportation impacts.

The pending Draft SEIR for the General Plan update/housing element, at the City's request, included Environmental impacts to Stonegate and the "Meadows" project (as potential future residential development) to be studied. In its analysis of impacts of ALL SITES, that DEIR made this requirement (among others) for the adequate safety of all proposed and potential development:

Access to/from each site would be required to meet the City's design standards with respect to location, width, and sight distance. With the above mitigation measures, the General Plan Update residential land uses can be added to the City housing supply without any remaining significant CEQA transportation impacts."

This is the Sierra Madre Ordinance setting forth the City Subdivision Standards for Streets that would need to be met:

§ 16.32.035. Street standards—Modification of same.

Except as otherwise required by Chapter 15.24 of this code, the city's public street standards shall require at least thirty feet of road easement to accommodate two travel lanes, one parking lane, and a pedestrian walkway. Notwithstanding Sections 16.32.020 and 16.32.030 of this code, the city council may determine, upon approval of a parcel or tentative tract map creating streets, that adjustment of the city's public street standards as to those streets is justified by other benefits to the policies stated in Section 17.52.010 of this code and that such adjustments do not unduly impact circulation and parking. (Ord. 1229 § 2, 2005)

Despite that ordinance, the Developer's Specific Plan for the "Meadows" states: "Site access, including road widths and connectivity, would also comply with all City requirements and would include the following:

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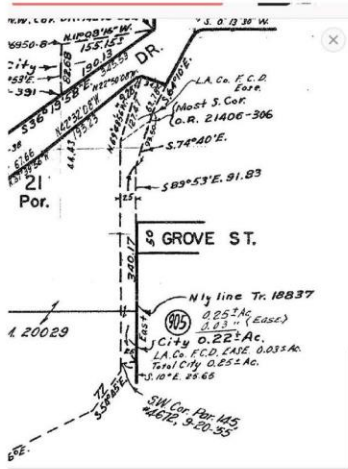
- Primary access to the project site would be provided from North Sunnyside Avenue. Carter Avenue would provide secondary egress and ingress access.  
(They have not explained what is meant by "secondary egress and ingress access", how that would be managed and what, if any results could be obtained by that designation)

- All roads comply with access road standards of not less than 24 feet, unobstructed width."  
(Access road standards of 24 feet are required for fire apparatus, not for two way traffic of hundreds of trips daily)

These findings in the SEIR of what is required for safe traffic must be enforced in any development to satisfy CEQA requirements and should be part of Sierra Madre ordinances as requirements for development. Unless the Project can provide this safe access it must be rejected.

There MUST ALSO be an explanation as to why there is a discrepancy in the findings and required mitigation between the Meadows Environmental Impact Report (paid for by the developer although the City of Sierra Madre is listed on the NOP as lead agency) and the one which considered the same project in the EIR to update the General Plan (paid for by the City of Sierra Madre).

It is unknown who might have the right and ability to correct the deficiencies in this road. Unlike City streets, this section of road has its own parcel number in the LA County assessor's office, and is identified as "Government Owned" We have been unable to ascertain, through public records requests, the title and ownership of this section of land and all easements and rights of way included in it, or whether any entity has the sole right to improve it to comply with our City Street Ordinance. (LA County Assessor's Parcel Map is below"



The Final EIR must also show whether or not the Developer is able to meet the required mitigations to bring its plan to an acceptable level, as well as comply with the City's bicycle regulations. If it is not able to comply, the project is inconsistent with the Sierra Madre Street Standards Ordinance and bicycle requirements and must be rejected.

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176-37

PEDESTRIAN SAFETY

The Meadows DEIR made NO examination of Pedestrian safety in its analysis of Traffic and Circulation.

176-38

Carter Avenue, proposed by the developer to provide ingress and egress for hundreds of vehicles daily, does not meet any reasonable standards for its use for that purpose. Its width and condition and lack of sidewalks for the entire length from Lima Avenue to the current monastery gate are hazardous for pedestrians even with the lesser amount of current traffic.

Because of its location - directly adjacent to Bailey Canyon Park, which regularly results in overflow parking that clogs nearby streets, there is significant pedestrian traffic. Those pedestrians would be crossing the road that the "Meadows" plan proposes to use as and ingress and egress for hundreds of cars daily. Neither Carter Avenue, from the proposed project gate to its intersection with Lima, nor Grove Avenue, directly across from the Park entrance, have sidewalks. All of the many pedestrians walk in the narrow streets

176-39

It can also be expected that many people planning to visit Bailey Canyon Park will park on the west side of Carter (parking side) inside the development and cross 2 way traffic on that road to the developers "pedestrian walkway" (which it says will provide enhanced access to the park), exiting to the north side of that 24 foot section of Carter (with no sidewalks).

176-40

Cars exiting the development will be travelling at a high rate of speed down the wider, sloped portion of Carter within the development(12% slope) threatening those crossing from the west side parking, then making a left turn onto a narrow road and **intercepting** within a short block with pedestrians, unaccustomed to traffic from that direction. Without (at the very least) sidewalks, there WILL be pedestrian accidents.

176-41

Yet the DEIR never considered, nor made mention of any study of that dangerous condition and the danger to pedestrians crossing from the west side parking to the east side "pedestrian walkway" or simply to exit on the east side which is closer to the park.

The City has known for a long time that the parking on Grove Avenue, which barely leaves one lane open on weekends, requires those going to Bailey Canyon Park to walk in the Street. The single lane left on Grove, with cars parked on both sides, would make it difficult for rescue equipment to access those blocked homes if necessary. Yet that already hazardous situation, which would be greatly exacerbated by two way traffic from the potential project, was not at all studied or its impact considered in the DEIR.

176-42

The close proximity of that egress from the development to the County Access road should also be studied as to its adequacy as a second evacuation route, in light of first responders' need to access the development either by Carter Avenue within the development or by the County Access Road, close to the development exit.

176-43

A thorough study of pedestrian safety on and near this road, proposed as a second point of ingress and egress and a second evacuation route in case of fire, earthquake or landslide MUST be done as part of an adequate Traffic and Circulation Analysis.

176-44

The SPECIFIC PLAN for the "Meadows of Bailey Canyon" is INCONSISTENT with the SIERRA MADRE GENERAL PLAN, Ordinances and Community Forest Management Plan with regard to Trees and Tree Canopies.

FROM THE SIERRA MADRE CITY WEBSITE

The Community Forest Master Plan ensures the continuation and enhancement of the tree canopy for the beauty, wellbeing, livability, and long-term environmental health of the community of Sierra Madre.

The City of Sierra Madre's mission to grow and perpetuate the community forest is embodied in the Community Forest Master Plan. This mission is expressed through these overarching goals:

- Conserve and expand tree canopy cover equal to no net loss, with a gradual increase over time.
- Foster increased public awareness and education regarding the environmental value of trees as green infrastructure
- Promote increased shade-tree canopy for energy conservation, storm water capture, and improved air quality.
- Encourage species selection appropriate for local environmental conditions and sustainability
- Preserve and enhance community aesthetics and property values through increased canopy cover and diversity
- Apply Best Management Practices for planting, maintaining, and responding to changed environmental conditions in the community forest

The City of Sierra Madre places a high value on its tree canopy and is committed to the preservation and enhancement of the community forest over the next 50 years. A Tree Preservation and Protection Ordinance also protects the community's trees and the Energy, Environment, and Natural Resource Commission (previously the Tree Advisory Commission) oversees the implementation of the ordinance and makes recommendations to the City Council on management strategies. "

The Developers Specific Plan would entirely ignore the requirements of the City's Forest Management Plan and would replace approximately 90 mature, canopied trees and eliminate their environmental and aesthetic benefits. These mature trees, that have managed to survive droughts with little or no care or watering, would be replaced by an equal number of smaller trees which will require a great amount of water to keep established, if they can survive in the drought. Water we cant afford to use!

Meanwhile, the large "Protected" Oak Trees, if removed, have only a slim chance of surviving the transplant and will be lost.

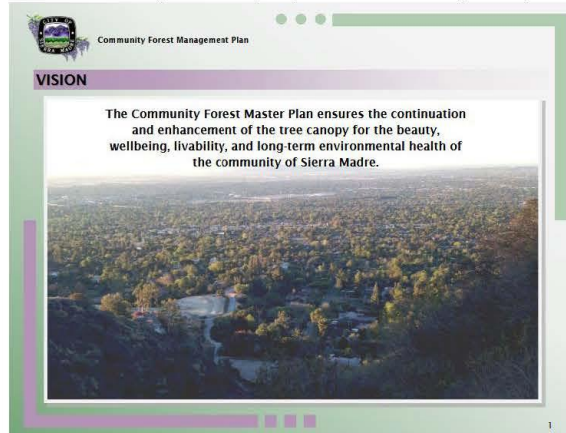
The City has recognized the critical environmental and aesthetic value of its mature trees and their Canopies and has created a plan to protect them.

176-45

176-46



The intent of the Specific Plan to remove all those trees to allow a "MAXIMUM PROFIT" configuration is INCONSISTENT with our Community Forest Plan, despite their claim to be guided by it.



176-47

The following explanation of the critical impact of the Developers Plan shows the immeasurable loss to the Community of these mature trees which will be destroyed to make way for oversized houses on smaller lots than allowed, further depleting the available open land for environmental sustainability by loss of the open land.

COMMENT SUBMITTED BY DANIEL GOLDEN

176-48

"101 mature trees will be removed, including 10 protected Oaks. The Oaks will be replaced with smaller Oaks and other small trees (requiring a great deal of water to become established--water that is not apparently accounted for in the questionable "net zero" pre-purchase arrangement suggested in the Specific Plan). SM has a Forest Management Plan with a mission to preserve "Canopies" for their environmental and aesthetic benefit.

The Specific Plan to swap these mature specimens for 24" boxed trees fails to factor in the massive loss of oxygen production that will be immediately generated. It would take 15 or more years for boxed trees to develop sufficient caliper to emit barely 35% of the oxygen created by the original stand of large mature trees. These large trees each generate over 270 lbs of oxygen per year--so long as they are not summarily uprooted and discarded by the developer. Remove the trees and you lose sufficient oxygen for some 60 families per year. My research, including studies published in the journal of Arboriculture and Urban Forestry, points out the devastating effects on community air quality from such profligate destruction.

176-49

Simply stated, trees grow air, inhibit particulate settling, preserve wildlife, keep ground temperatures in check, absorb storm runoff, help to prevent many human lung disorders, and

176-50

more. The new housing development, if approved, would actually and desperately itself need the offset of the canopy of mature trees on the property to help alleviate massive creation of heat island conditions--hardscape with foundations, driveway pads, sidewalks and paved streets supplanting the current breathable meadow space.

Summary removal of the trees without sufficient atmospheric impact analysis is one of many flaws in the developer's Specific Plan."

The Policy of the City of Sierra Madre is to carry out the objectives and recommendations of the Community Forest Management Plan. Those objectives are to Preserve Canopied Trees for the Benefit of the City and the Citizens of Sierra Madre.

THE SPECIFIC PLAN FOR THE MEADOWS IS NOT CONSISTENT WITH THAT POLICY.

- Policy R10.3: Carry out the objectives and recommendations of the Community Forest Management Plan.
- Policy R10.8: Continue to monitor construction projects with regard to grading and construction effects on trees, tree removal and replacement.



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Cont.

176-51

THE SPECIFIC PLAN for the "Meadows at Bailey Canyon" is INCONSISTENT WITH SIERRA MADRE'S GENERAL PLAN, ZONING ORDINANCES AND PLANS.

Some inconsistencies are readily apparent – some are inconsistent because the Developer failed to do the studies or present the evidence by which the City could ascertain consistency. The Specific Plan for the "Meadows" project is inconsistent with all the following Goals and policies of our General Plan, as explained in each of the previous sections.

City of Sierra Madre 2015 General Plan – Land Use Goals

2. Preserve and enhance the diversity in the character of residential neighborhoods ensuring that new development is compatible in its design and scale with older established development in the surrounding neighborhood without attempting to replicate or mass produce a style of Development.
3. Ensure that development is done in harmony with its neighborhood, and preserves and protects privacy and mountain views of neighboring properties.
4. Ensure that development is done to maximize water conservation practices to reduce and minimize the impact on the City's local water supply and the ability to serve its water customers.
5. Institute conservation measures so that the demand for water matches the City's local supply.
8. Preserve existing and provide additional constructed and natural open space.
9. Preserve the hillside areas in order to protect the environment and mountain views, obtain a balance between developed areas and the hillside wilderness, and establish the role of the hillside as an entry point into wildland areas.

City of Sierra Madre – Policies

- Policy L4.1: Ensure that the expansion of existing uses is reflective of and complements the overall pattern of development, without changing the character of existing development.
- Policy L6.2: Ensure that any new or expanded structures in residential neighborhoods do not unreasonably obstruct significant mountain or basin views.

176-52

- Policy L7.1: Maintain maximum lot coverage and floor area ratios which allow for adequate buffering from neighboring properties, usable private yard area, air circulation and light.
  - Policy L7.3: Limit the height of new buildings to reflect the height patterns on the street and within the Sierra Madre community.
  - Policy L7.4: Encourage new residential development to be compatible with existing structures including the following: a. Maintenance of front, side, and rear yard setbacks.
  - Policy L10.4: Maintain development standards and minimum lot sizes which result in development with dimensions, quality, and aesthetics consistent with existing developments.
  - Policy L15.1: In subdividing larger parcels, determine development density based on a calculation that uses slope as one of the primary factors, which means that the steeper the slope, the larger the minimum lot size.
  - Policy L15.2: Ensure that development in the hillside areas be located in those areas resulting in the least environmental impact.
  - Policy L15.3: Require that all access into hillside areas be designed for minimum disturbance to the natural features.
  - Policy L15.5: Consider the impact of development on wildlife.
  - Policy L16.1: Minimize the amount of grading and removal of natural vegetation.
  - Policy L17.2: Require that all development be designed to reflect the contours of the existing landform using techniques such as split pads, detached secondary structures (such as garages), and avoiding the use of excessive cantilevers.
  - Policy L17.3: Require that all development preserves, to the maximum extent possible, significant features of the natural topography, including swales, canyons, knolls, ridge lines, and rock outcrops.
  - Policy L24.1: Require that new residential development be compatible with and complement existing structures on the block: a. Maintain existing front yard setbacks on the block;
  - Policy L24.5: Encourage the retention of existing mature, specimen trees.
  - Policy L37.8: Ensure that all development and new uses are compatible with adjacent uses, and yield no significant negative impacts to noise, air quality, water quality and traffic.
- Measure IM-12: The City shall continue to enforce and amend the R-1 (One Family Residential) Zoning Ordinance as necessary to ensure that development is compatible in design and scale with the neighborhood.
- Measure IM-59: The City shall continue to enforce the Institutional (I) Zoning Ordinance.



I76-52  
Cont.

Our 2015 General Plan included the following Policies:

- Policy R3.2: Ensure that wildland open space, including the areas of the city designated as High Fire Hazard Severity Zone, is left in its natural state with the exception of brush abatement for public safety in order to aid the City in fighting fires.
- Policy R3.3: Ensure that natural open space within the High Fire Hazard Severity Zones remains undeveloped so as to mitigate the flood cycles that follow wild land fires in the natural open space.

And in the Pending update to our General Plan, the City has added a new policy to its Safety Element to make their intentions clear:

**Objective Hz7: Avoid expanding development into undeveloped areas in Very High Fire Severity Zones**

Policy L15.2: Ensure that development in the hillside areas be located in those areas resulting in the least environmental impact.

Policy L15.3: Require that all access into hillside areas be designed for minimum disturbance to the natural features.

Policy L15.5: Consider the impact of development on wildlife.

Policy L16.1: Minimize the amount of grading and removal of natural vegetation.

Policy L24.5: Encourage the retention of existing mature, specimen trees.

Policy L44.3: Establish the role of natural open space as an interface to the wilderness area.

Policy R1.1: Maintain and enforce the Hillside Management Zone Ordinance and other ordinances that seek to protect hillside areas.

Policy R3.2: Ensure that wildland open space, including the areas of the city designated as High Fire Hazard Severity Zone, is left in its natural state with the exception of brush abatement for public safety in order to aid the City in fighting fires.

Policy R3.3: Ensure that natural open space within the High Fire Hazard Severity Zones remains undeveloped so as to mitigate the flood cycles that follow wild land fires in the natural open space.

Policy R3.4: Ensure the protection of natural open space so as to maintain it as a preventative measure against flooding, and as a means of capturing stormwater runoff for groundwater recharge.

Policy R10.8: Continue to monitor construction projects with regard to grading and construction effects on trees, tree removal and replacement.



176-52  
Cont.

Measure IM-1: The City shall continue to enforce the Hillside Zone Ordinance and other ordinances that seek to protect the hillside areas.

Measure IM-5: The City shall amend the Open Space Ordinance to identify wildland open space as areas to remain in their natural state to mitigate flood cycles and capture stormwater runoff, except where brush abatement is necessary for fire safety

- Policy R10.3: Carry out the objectives and recommendations of the Community Forest Management Plan.
- Policy R10.8: Continue to monitor construction projects with regard to grading and construction effects on trees, tree removal and replacement.

The policies below should be enforced and alone provide a sufficient basis for the project to be rejected by the Planning Commission and City Council.

Measure IM-5: The City shall amend the Open Space Ordinance to identify wildland open space as areas to remain in their natural state to mitigate flood cycles and capture stormwater runoff, except where brush abatement is necessary for fire safety

Policy R3.2: Ensure that wildland open space, including the areas of the city designated as High Fire Hazard Severity Zone, is left in its natural state with the exception of brush abatement for public safety in order to aid the City in fighting fires.

Policy R3.3: Ensure that natural open space within the High Fire Hazard Severity Zones remains undeveloped so as to mitigate the flood cycles that follow wild land fires in the natural open space.

And the proposed Safety Element Objective:

Objective Hz7: Avoid expanding development into undeveloped areas in Very High Fire Severity Zones

We residents of Sierra Madre, who love our very unique and special City because it has enacted and enforces all these Goals and Policies, rely on Sierra Madre's Planning Commission and City Council to continue to protect those values on behalf of the citizens of this town.

Barbara Vellturo  
380 W Carter Ave  
Sierra Madre, CA 91024

176-52  
Cont.

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## Response to Comment Letter I76

Individual  
Barbara Vellturo  
October 4, 2021

- I76-1** The comment introduces the comment letter and attachments. The commenter would like to be put on the list of people to notify when the Final EIR is complete. Draft
- I76-2** The comment states that the Specific Plan is inconsistent with the City's General Plan and Zoning Ordinances. Please refer to response GR-7.
- I76-3** The comment states that the Specific Plan does not comply with the policies and goals of the City's General Plan. Please refer to response GR-7.
- I76-4** The comment states that the Specific Plan does not comply with the policies and goals of the City's General Plan. Please refer to Global Response GR-7.
- I76-5** The comment lists the goals in the City's General Plan – Land Use Element section. The comment does not raise new or additional environmental issues concerning the adequacy of the Draft EIR.
- I76-6** The comment states that the Specific Plan does not comply with the policies and goals of the City's General Plan. Additionally, the comment lists goals 2 and 3 of the City's General Plan. Please refer to Global Response GR-7.
- I76-7** The comment states that building projects such as the proposed project are required to demonstrate how the planned development would fit into the existing neighborhood through a Neighborhood Analysis. There is no mention of a formal neighborhood analysis within the City's General Plan. Please refer to Global Response GR-7..
- I76-8** The comment states that because a neighborhood analysis was not done, the proposed project cannot claim to be consistent with the City's General Plans and ordinances. See Response to Comment I76-7.
- I76-9** The comment states that the proposed project has larger house sizes than allowed under the single-family residential zone designation, and therefore the proposed project is not consistent with the City's General Plan. Please refer to response GR-7, General Plan Consistency. The project site is currently zoned and designated as Institutional (I). As discussed in Draft EIR Section 3.4, Discretionary Actions, under the proposed project, the land designation and zoning of the project site would be changed to Specific Plan (SP), which would then establish Residential Land (RL) and Open Space (OS) sections within the project site. The house sizes are allowable under these designations. Further, the Draft EIR analyzes the potential for environmental impacts resulting from the project as a whole, as the California Public Resources Code and the State CEQA Guidelines require. The project as a whole includes the zone change, and also the general plan amendment, adoption of the specific plan, and approval of the development agreement.
- I76-10** The comment states that the proposed project has a greater lot coverage than allowed under the single-family residential zone designation, and therefore the proposed project is not consistent with the City's General Plan. See Response to Comment I76-9 and Global Response GR-7 .

- I76-11** The comment states that the proposed project has greater setbacks than allowed under the single-family residential zone designation, and therefore the proposed project is not consistent with the City's General Plan. See Response to Comment I76-9 and Global Response GR-7 .
- I76-12** The comment shows and aerial image of the undeveloped project site and surrounding areas. The comment states that the public does not know if the homes in the proposed project will be single-story and if the house and lot sizes would be similar to those of the surrounding neighborhood. Please refer to responses I4-7 through I4-9, above, regarding lot sizes and number of stories. Additionally, according to Draft EIR Section 3.3.1, Residential Development, the proposed residences would be one to two stories.
- I76-13** The comment states that at a developer presentation in March of 2021, it was undecided as to if the houses would be single-story and that the final decision would be in the Specific Plan. The comment states that housing size and design information is not present in the Specific Plan. Please refer to responses I4-7 through I4-9, above, regarding lot sizes and number of stories. Building designs are found within Specific Plan Section 5.5, Architectural Design.
- I76-14** The comment expresses concern relating to the adequacy of the Draft EIR's General Plan consistency analysis. Please refer to response Global Response GR-7. Lastly, please refer to responses I4-7 through I4-9, above, regarding lot sizes and number of stories.
- I76-15** The comment states that the proposed project is not consistent with the neighborhoods of the City because of the house orientation. See response to Global Response GR-7. The comment provides concluding remarks and general opposition to the project that do not raise new or additional environmental issues concerning the adequacy of the Draft EIR.
- I76-16** Viewers at the Bailey Canyon Wilderness Park would consist of recreationists who would be afforded views of the San Gabriel Mountains to the north. The proposed project would not obstruct views of the San Gabriel Mountains from the Bailey Canyon Wilderness Park as the project site is located west of the wilderness park and the San Gabriel Mountains are located to the north. Views of the project site may also be afforded to recreationists within the Bailey Canyon Wilderness Park; however, Bailey Canyon Wilderness Park is concentrated with many existing, mature trees that obstruct significant, widespread views of the project site from this area. In addition, the proposed neighborhood park would be adjacent to the Bailey Canyon Wilderness Park across Carter Avenue, which would include trees and landscaping as shown in Figure 3-3, Proposed Park Conceptual Plan, in Draft EIR Chapter 3, Project Description. Proposed trees and landscaping within the eastern portion of the neighborhood park would help to buffer views of the proposed residential uses from Bailey Canyon Wilderness Park. While new residences may still be partially visible from Bailey Canyon Wilderness Park, neither the project site nor Bailey Canyon Wilderness Park are identified as protected hillside areas or scenic vistas within the City's General Plan. In addition, the design guidelines of the Specific Plan outline site planning and design, architectural design, and landscape design standards that would be implemented as a design of the project in order to ensure that development is consistent with surrounding development and that the proposed project would not significantly degrade views of the project site from Bailey Canyon Wilderness Park. Therefore, views of the project site from Bailey Canyon Wilderness Park would not be considered a substantial change to or from a scenic vista. Implementation of the proposed project would not result in a substantial adverse effect on a scenic vista, including views of and from the San Gabriel Mountains, in compliance with General Plan Policy L6.2. In addition, the conservation of open



space would preserve this hillside area in perpetuity, therefore preserving undeveloped views of the hillside from the City. Therefore, the proposed project would not conflict with General Plan objectives and policies governing scenic quality. Please refer to Global Response GR-7.

- 176-17** The comment states that the proposed project is not consistent with the City’s General Plan and does not provide sufficient evidence to prove that the proposed project is consistent. See Global Response GR-7.
- 176-18** The comment lists goals and policies in the City’s General Plan that have not been proven to be consistent. Please refer to Global Response GR-7.
- 176-19** The comment lists goals and policies in the City’s General Plan. Please refer to Global Response GR-7.
- 176-20** The comment states that the proposed project is in a Very High Fire Hazard Severity Zone as well as part of the Wildland Urban Interface. Please refer to Global Response GR-3 .
- 176-21** The comment states that the proposed project site to be development is currently listed as Natural Open Space, which needs to be preserved. According to Draft EIR Section 4.11.1, Existing Conditions, in Section 4.11, Land Use and Planning, the project site is currently zoned and has a General Plan land use designation of Institutional (I), not as Natural Open Space. The City’s General Plan designate land uses to the north as Natural Open Space (NOS); to the east as NOS, Municipal (M), and Constructed Open Space (COS); and to the south and southwest as Residential Low Density (RL). Development would only occur within the proposed project site.
- 176-22** The comment provides a zoning map of the City and lists the zoning designation of the proposed project site’s surrounding areas. The comment does not raise new or additional environmental issues concerning the adequacy of the Draft EIR.
- 176-23** The comment states that the City values its open space as it provides protections against wildfire and landslides. The comment expresses the opinions of the commenter and does not raise new or additional environmental issues concerning the adequacy of the Draft EIR. Impacts related to wildfire were analyzed in Draft EIR Section 4.20, Wildfire, while impacts related to landslides were analyzed in Draft EIR Section 4.7, Geology and Soils.
- 176-24** The comment further describes the importance of open space to the City, as it relates to flood protection, water supply, and groundwater recharge. Impacts related to flood protection and groundwater recharge were analyzed in Draft EIR Section 4.10, Hydrology and Water Quality, while impacts related to landslides were analyzed in Draft EIR Section 4.7, Geology and Soils. Please see Global Response GR-1, for a discussion of water supply issues and Global Response GR-3, for a discussion related to wildfire issues.
- 176-25** The comment states that the proposed project will negatively affect alluvial fan habitat, which has a high conservation value due to its watershed value, adjacency to protected lands, potential for habitat restoration, and public access. As discussed in Draft EIR Section 4.4.5, Impacts Analysis, in Section 4.4, Biological Resources, the project site consists of ornamental, non-native grassland, and paved roadways. The project site does not support any native vegetation communities and the area appears to be regularly maintained, which limits the potential for many native plant species. No

sensitive communities or riparian habitat occur on the project site (Appendix C1 of the Draft EIR) and the project would not impact these habitats. However, due to the presence of riparian habitat north and east of the project site, associated with Bailey Canyon, impacts to riparian habitat associated with the proposed project could occur if invasive species are placed on site. Therefore, impacts would be potentially significant (Impact BIO-2). Mitigation measure MM-BIO-2, which prohibits the use of invasive species in the project's landscaping plan, would be implemented reduce impacts to nearby riparian habitat to less-than-significant. Lastly, impacts related to flood protection and groundwater recharge were analyzed in Draft EIR Section 4.10 and were found to be less than significant.

**176-26** The comment suggests that optimization of the recharge potential of the undeveloped alluvial fan land would benefit all users of the Raymond Basin. Groundwater recharge was analyzed in Draft EIR Section 4.10, Hydrology and Water Quality, and were found to be less than significant.

**176-27** The comment states that the proposed project does not comply with the City's General Plan goals and policies regarding protection and preservation of open space. See Global Response GR-7. Although the project would occur undeveloped land, this land is not classified as open space as it is not usable for public recreation and it does not possess important natural features (see Draft EIR Section 4.4, Biological Resources). The proposed project would implement various usable open space areas such as the proposed neighborhood park and a 35-acre open space hillside area, to be conserved and undeveloped.

**176-28** The comment states that the proposed dedication of land does not mean the proposed project is consistent with the City's General Plan, because the developers do not preserve existing or provide additional open space.

**176-29** The comment states that the proposed dedication of land does not mean the proposed project is consistent with the City's General Plan because this area would already be preserved, and that the developers do not preserve existing or provide additional open space. See Response to Comment 176-27 and Global Response GR-7.

**176-30** The comment states that the proposed project is not consistent with the City's General Plan and lists goals and policies pertaining open space preservation. See Response to Comment 176-27, Global Response GR-7, and Draft EIR Table 4.11-1, Project's Consistency with City of Sierra Madre's General Plan Goal and Policies.

**176-31** The comment states that the Specific Plan does not provide two safe and acceptable methods of ingress/egress to the proposed project site; does not provide two evacuation routes; the specifications for Carter Avenue do not comply with City road standards; and that the Draft EIR fails to address pedestrian safety. See Global Response GR-4 and Global Response GR-5 .

The Draft EIR addresses pedestrian safety. The project would include sidewalks along the proposed streets to promote pedestrian safety and mobility within the project site and local vicinity as well as a 6-foot sidewalk between the southeastern portion of the project site boundary and Lima Street, which includes a 6-foot sidewalk on the north side of Carter Avenue (see Final EIR Section 3.3.12). Moreover, Draft EIR Section 4.17, Transportation, includes analysis on the project's consistency with pedestrian safety policies. As a result, the analysis determined the project would not result in a hazardous roadway design or unsafe roadway configuration and impacts were found to be less than significant.

- 176-32** The comment states that the proposed project’s traffic study has impacts would be less than significant only if all parts of the proposed project met acceptable standards, which the proposed project does not because all access roads require a 30-foot width. Please refer to Global Response GR-5 and Global Response GR-7.
- 176-33** The comment quotes a section from the General Plan EIR, related to roadway safety and design. The comment does not raise new or additional environmental issues concerning the adequacy of the Draft EIR. The Stonegate project has been accounted for as a cumulative project (see Draft EIR Section 5.3, Cumulative Projects).
- 176-34** The comment quotes a City Ordinance 16.32.035 and questions whether existing roadways, including North Sunnyside Avenue and Carter Avenue meeting current City roadway requirements. Please refer to Global Response GR-5 .
- 176-35** The comment states that an explanation is required as to why there’s a discrepancy in findings and required mitigation in the Draft EIR and the General Plan EIR. It should be noted that the proposed project is a separate project from the General Plan EIR, which is why the findings and mitigation measures differ. The project’s consistency with the City’s General Plan is analyzed in Final EIR Section 4.11. The comment does not raise new or additional environmental issues concerning the adequacy of the Draft EIR.
- 176-36** The comment states that it is unknown as to who would have the right and ability to correct the deficiencies of Carter Avenue. Please refer to Global Response GR-5 . The comment does not raise new or additional environmental issues concerning the adequacy of the Draft EIR.
- 176-37** The comment states that the Final EIR needs to show that the developer would be able to meet the required mitigations and as well comply with the City’s bicycle regulations. Mitigation measures would be enforced through the project’s conditions of approval. Additionally, as discussed in Draft EIR Section 4.17.5, Impacts Analysis, although no bicycle facilities and improvements are proposed under the project, the project would not impact existing bicycle facilities in the vicinity of the project, including the existing bicycle lanes within Sierra Madre Boulevard. See Response to Comment I47-5 for additional discussion.
- 176-38** The comment expresses concern related to pedestrian safety. The Draft EIR addresses pedestrian safety. The project would include sidewalks along the proposed streets to promote pedestrian safety and mobility within the project site and local vicinity. Moreover, Draft EIR Section 4.17 includes analysis on the project’s consistency with pedestrian safety policies. As a result, the analysis determined the project would not result in a hazardous roadway design or unsafe roadway configuration and impacts were found to be less than significant.
- 176-39** The comment states that pedestrians would have to walk in narrow, hazardous streets as a result of the project’s proposed design. See Response to Comment 176-38.
- 176-40** The comment states that pedestrians would have to walk in narrow, hazardous streets resulting from the proposed project design. See Response to Comment 176-38.

- 176-41** The comment expresses safety concern related to steep grades on Carter Avenue. Please refer to Global Response GR-5 .
- 176-42** The comment states that the proposed project would make it difficult for rescue equipment to access homes along Grove Avenue due to two-way traffic. North Grove Street is expected to experience a negligible level of traffic generated by the project, as reflected in the Report (Final EIR Appendix K). Any improvements to Grove Avenue would be the responsibility of the City of Sierra Madre. Please refer to Global Response GR-4.
- 176-43** The comment states that the proximity of the egress from the proposed project to the County access road should be studied. Please refer to Global Response GR-4
- 176-44** The comment states that pedestrian safety, second point of ingress and egress, second evacuation route in the case of a fire, earthquake and landslide hazards must be analyzed in order to have an adequate traffic and circulation analysis. See Response to Comment 176-31.
- As discussed in Draft EIR Section 4.7.1, Existing Conditions, in Section 4.7, Geology and Soils, two major landslides have occurred in the northern hillside areas of the City. However, the City’s General Plan designates the project site as being located outside of any potential landslide zone. Additionally, the project site does not contain slopes susceptible to landslides and is not located within a seismic hazard zone; thus, the potential for earthquake-induced landslides is considered low (Appendix E of the Draft EIR). Additionally, development of the project would adhere to the most current CBC standards. Design and construction of the project in accordance with the CBC would minimize the adverse effects of strong ground shaking to the greatest degree feasible. In addition, as discussed above, the project would be required to implement PDF-GEO-1 through PDF-GEO-15 and MM-GEO-1, which include specific project recommendations from the geotechnical investigation. Therefore, the project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking. Regarding fire impacts, please refer to Global Response GR-3.
- 176-45** The comment states that the Specific Plan is inconsistent with the City’s General Plan with regards to trees and tree canopies. The comment lists the applicable policies and goals related to trees and tree canopies. See Global Response GR-7, and Global Response GR-2 .
- 176-46** The comment states that the Specific Plan ignores the requirements of the City’s Forest Management Plan as it would replace approximately 90 mature, canopied trees. Please refer to Global Response GR-2 .
- 176-47** The comment states that the Specific Plan’s intent is to maximize profit, which would be inconsistent with the Community Forest Plan. Please refer to Global Response GR-2 .
- 176-48** The comment quotes a comment submitted by Daniel Golden regarding the mature trees on the proposed project site, which states that the 101 mature trees, including 10 protected oaks, would be replaced with smaller oaks and trees. The planting of new trees would require a great deal of water, which raises concerns about the viability of the net zero water pre-purchase agreement. Please refer to Global Response GR-1 and Global Response GR-2 .
- 176-49** The comment expresses concern relating to loss of oxygen caused by the removal of the tree canopy on the project site. See Response to Comment I24-1.

- 176-50** The comment expresses concern with the Draft EIR's analysis of tree removal impacts. See Global Response GR-2.
- 176-51** The comment states that the proposed project is not consistent with City's General Plan Policy R10.3 and Policy R10.8. Please refer to Global Response GR-2.
- 176-52** The comment states that the Specific Plan is inconsistent with the City's General Plan, zoning ordinances and plans. The comment lists the City's General Plan's goals and policies that are relevant to the proposed project. Please refer to Global Response GR-7.
- 176-53** The comment suggests that Measure IM-5, Policy R3.2, Policy R3.3, and Objective Hz7 should be enforced. Please refer to Global Response GR-3 for information about Hz7, and Global Response GR- 7. Measure IM-5 is directed at the City as the Applicant does not have authority to amend the City's Open Space Ordinance.
- 176-54** The comment provides concluding remarks and general opposition to the project that do not raise new or additional environmental issues concerning the adequacy of the Draft EIR.

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Comment Letter 177

From: aarrieta1@aol.com
Sent: Monday, October 4, 2021 3:55 PM
To: Vincent Gonzalez
Subject: DEIR Comments for The Meadows at Bailey Canyon

CAUTION: This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Dear Mr. Gonzalez:

Below are my comments/concerns with the DEIR for the proposed housing project known as The Meadows at Bailey Canyon. I ask that you retain a copy for the administrative record and respond to these comments in the final EIR. I would also like to be put on the list of people to notify when the final EIR is complete.

In general, I strongly object to this development project as it is not at all suitable for the City of Sierra Madre, nor for the area in which it is located. The proposed project is also significantly inconsistent with our General Plan and Municipal Code and opposed by the vast majority of residents in Sierra Madre.

My specific comments/concerns are as follows:

1. WATER: Regardless of what the developer promises to do, water is becoming an increasingly scarce resource. Lakes, rivers and reservoirs are drying up all over the Southwestern United States. There is no water source that can ever guarantee the delivery of water in the future under these conditions. Until the drought conditions improve, it would be the height of irresponsibility to bring additional users on line, such as what would occur with the additional of 42 homes. Our General Plan, Goal 4, states that use of local sources of groundwater rather than imported water (such as what is being proposed under the 'Net Zero Water Impact' proposal from NUW) must be used for new developments. The only solution if the drought continues is going to be rationing and higher water rates for existing users. The Meadows project would an already dire water supply situation into a catastrophe. The developer has promised this project will be a "net zero impact" on our water supply. However, our own City Manager, Jose Reynoso, stated in a Planning Commission meeting several weeks ago that purchasing 50 years of water for the 42 homes is not possible, because the water is not available and he's not sure when it will be. Therefore 'net zero impact' is not factual. As a result there will be a huge impact to our existing water supply. Even if the developer offers to retrofit areas in Sierra Madre to offset the water use by the Meadows, that will only be a short-term fix. If the drought gets worse as many experts project will occur, and the developer has already done these retrofits, it means the City has no further options except rationing and higher water rates. This is the height of irresponsibility to approve this project with the significant water issues at play.

2. FIRE: The proposed project site is within 5 miles of where 74 wildfires have burned since the beginning of the historical fire data record. Additionally, the proposed project site is designated as a Local Responsibility Area Very High Fire Hazard Severity Zone by the California Department of Forestry and Fire Protection (CAL FIRE). Our own City Policy H27 of the Safety Element of the General Plan states 'to avoid expanding development into undeveloped areas in Very High Severity Fire Zones. Additionally, City Policy R3.2 states 'to ensure that wildland open space, including the areas of the city designated as High Fire Hazard Severity Zone remains undeveloped so as to mitigate the flood cycles that follow wild land fires in the natural open space. Both of these Sierra Madre policies both emphatically state development must not occur in the very high fire severity zones, such as where the proposed project is. The CALDOR fire in central California started in August 2021 and is still not fully contained. To date it has burned 221,774 acres and burned 782 homes, many of which were built of the same 'fire resistant' materials, the developer is saying these homes would composed of. In 2020, there were 9,639 fires in California with 10,488 homes lost to wild fire, again, many of these homes were also composed of 'fire retardant' materials, and 31 lives lost. Last August, helicopters were using the fields at the Monastery for staging for fire-fighting efforts for the Bobcat fire. It is unconscionable that the City leadership would even consider a housing proposal in such a fire prone area that would endanger lives and property.

177-1

177-2

177-3

3. **TRAFFIC:** The November 10, 2020 Fehr and Peers traffic study indicated there would be a 118% increase in traffic on weekdays and 129% increase in traffic on weekends. With this data, there is no doubt the project will create extremely significant intrusion and increase of thru traffic. The DEIR indicated just from construction alone there would be close to 70,000 trips. The increased traffic from the project will result in a significant decrease in air quality. Also, the additional ingress/egress required for a project of this magnitude located at Carter creates a very dangerous area affecting car and pedestrian traffic, especially where Carter intersects with Grove and Lima. This area is already significantly congested with residents walking and driving. Either a car is going to hit head-on with another car or a pedestrian is going to get hurt or killed. Then if the traffic of another 42 homes is layed on top of this, it could become catastrophic. A critical purpose of having an additional ingress/egress is so that people can evacuate safely in the event of an emergency and so that emergency vehicles can quickly access the property. For the reasons outlined above, it would not be feasible under the conditions I describe now as well as what they would be should this project get approved. The traffic on Sunnyside will destroy the character of that street and the quality of life for the residents. I can remember attending a City Council meeting a few years ago where residents on Sunnyside were concerned about the traffic only coming from the Mater Dolorosa Retreat Center. If you now add to that the traffic coming from 42 additional homes, deliveries, guests, and a public park, Sunnyside will be ruined. Sunnyside also does not have sidewalks and simply cannot support the increase in traffic resulting from a project of this magnitude.

177-4

4. **TREES:** Chapter 2 - Tree Preservation: Goal 1: Continued preservation and enhancing the City's significant tree resources. The proposed project would remove over 100 trees, including protected oak trees. Additionally, every mature tree along the beautiful drive from the entry gates of the Monastery at the top of Sunnyside up to the Retreat Center will be destroyed. These are mature trees that have been there for many years and are irreplaceable.

177-5

5. **SEISMIC IMPACT:** The proposed project is within a few hundred feet of the significant Sierra Madre Earthquake Fault. The DEIR also states the soil on the proposed project site is weak and not currently suitable. A large monastery building was destroyed during a significant earthquake some years ago. It is not safe to build at this site so close to an active earthquake fault.

177-6

6. **AESTHETICS:** Contrary to the precepts in the General Plan and Municipal Code, neighbors immediately adjacent and to the west of the project will have their views, privacy and value of their properties significantly affected by this project. Despite commitments made by Mater Dolorosa over the years about mitigating the impact of their project on the neighbors, that is not the case. Policy L6.2 of the City's General Plan states that any new or expanded structures in residential neighborhoods do not unreasonably obstruct significant mountain or basin views. This project would not achieve that.

177-7

7. **LAST REMAINING OPEN SPACE:** The last large special open space in Sierra Madre will be destroyed with this project. As a result, wildlife such as deer, coyote, bobcats, falcons, bears and other wildlife will be displaced.

177-8

8. **LACT OF VIABLE ALTERNATIVES:** There have no viable alternatives presented to this proposed housing development. The DEIR does not show any environmental or other impacts from any alternative projects. From the beginning, only huge institutional projects have been shared or rather used to 'scare' residents into supporting this project. However, a reasonably sized and well designed institutional development has not been even explored. Many residents would be supportive of such a project because the lot coverage, traffic, water use and overall impact would be significantly less.

177-9

In conclusion, the City of Sierra Madre has no obligation to support, much less approve this poorly conceived and planned project and waive required compliance by the developer to existing zoning and General Plan requirements. For the reasons outlined above, I don't believe any of the outlined concerns and other serious concerns can be effectively mitigated without declining this project and seriously exploring other viable development alternatives.

177-10

Thank you.

Arlene Arrieta



## Response to Comment Letter I77

Individual  
Arlene Arrieta  
October 4, 2021

- I77-1** The comment is introductory in nature and requests a copy of the comment letter and Responses to Comments are provided as part of the Final EIR. The commenter also requests to be put on the list of people to notify when the Final EIR is complete. Finally, the commenter states opposition to the project due to inconsistency with the surrounding area, City's General Plan, and Municipal Code. Please refer to Responses to Comments I77-2 through I77-10 below and Global Response GR-7 in regards to inconsistencies with the City's General Plan
- I77-2** The comment is concerned with project impacts on water availability, usage, and supply. The commenter questions whether 50 years of water supply is available for purchase. See Global Response GR-1.
- I77-3** The commenter raises concerns about the project's location in a designated Local Responsibility Area (LRA) Very High Fire Hazard Severity Zone (VFFHSZ). The commenter quotes Draft Safety Element Update (now the adopted Hazard Prevention Element) Policy Hz7 and Policy R3.2, regarding avoiding development in VFFHSZ areas, and the commenter describes fires in the project vicinity over the last few years. The comment expresses the commenter's opposition to the project specific to its relation to wildfires. Please refer to Global Response GR-3.
- I77-4** The comment states that the Fehr and Peers November 10, 2020 traffic study indicates that a significant traffic impact (and as associated air quality impact) would result from both operation and construction of the proposed project. For information regarding traffic impacts, please refer to Global Response GR-6. Furthermore, North Grove Street is expected to experience a negligible level of traffic generated by the project, as reflected in the traffic conditions analysis. Additionally, as concluded in Draft EIR Section 4.3, Air Quality, impacts to air quality, including air quality impacts from traffic in construction and operation, would be less than significant with implementation of MM-AQ-1.
- The comment also questions whether ingress/egress proposed for the project is adequate, specifically at Carter/Grove and Lima and along Sunnyside. Please refer to Global Response GR-5 . No changes to ingress/egress within Lima Avenue are proposed. In addition, all roadways within the project site, including Sunnyside, have been designed to meet all fire department access requirements.
- I77-5** The comment references the City General Plan Tree Preservation Goal 1, expresses concern of the proposed project's proposed removal of several on-site trees, including protected oak trees. The commenter also expresses concern that every mature tree along the drive from the entry gates of the Monastery at the top of Sunnyside up to the Retreat Center will be destroyed. Please refer to Global Response GR-2.
- I77-6** The comment expresses concern with the project site's distance from a known earthquake fault and soil stability. Draft EIR Section 4.7, Geology and Soils, explains that the project site is not located on a known active, potentially active, or inactive fault as delineated on the Alquist-Priolo Earthquake Fault Zoning Map. The closest earthquake fault to the project site is the Sierra Madre Fault, located approximately 700 feet to the north. As determined in Draft EIR Section 4.7 and Appendix E, the

potential for ground rupture on the project site is considered low. Furthermore, the proposed project would be required to comply with all existing regulations, including the California Building Code and the SMCC in order to ensure seismic safety. In addition, the project would comply with project design features PDF-GEO-1 through PDF-GEO-15, and MM-GEO-1, which includes project specific recommendations from the geotechnical investigation (included as Appendix E). Thus, impacts associated with seismicity were determined to be less than significant.

- I77-7** The comment is concerned with the project's potential to impact views, privacy, and property values near the project site. Private views, privacy, and property values are not protected under CEQA, and impacts to the same are not considered "environmental impacts" for purposes of CEQA. However, the design guidelines of the Specific Plan establish site planning and design, architectural design, and landscape design standards that would address and protect visual character, privacy, and the quality of public and private views. See also Draft EIR Section 4.1, Aesthetics, for a detailed analysis of the project's potential for visual impacts. Lastly, as discussed in Draft EIR Section 4.11.5, Impact Analysis, of Section 4.11, Land Use and Planning, the project would be consistent with Policy L6.2, as the proposed project is designed in a manner that is sensitive to scenic viewpoints and/or viewsheds through building design, site layout, and building heights.
- I77-8** The comment is concerned with the loss of open space and the potential displacement of wildlife. All potential impacts to sensitive wildlife species are analyzed in Draft EIR Section 4.4. Mitigation measures MM-BIO-1 through MM-BIO-3 would reduce impacts to biological resources, including wildlife, to a level that is less than significant. Additional impact analysis is provided in the Biological Resources Report provided as Appendix C1 of the Draft EIR. In addition, as discussed in Final EIR Section 3.3.3, Open Space Conservation Easement, the project would permanently dedicate approximately 35 acres of open space hillside land, located north of the existing Mater Dolorosa Retreat Center. This open space would be preserved and protected from future development by way of a conservation easement.
- I77-9** The comment expresses support for a project alternative that includes a smaller institutional development than what is presented in the Draft EIR's alternatives analysis. See Response to Comment I73-5, above.
- I77-10** The comment expresses general opposition to the project but does not identify any specific concerns with the environmental analysis.

Comment Letter 178

**From:** David Hughes <dthughes123@yahoo.com>  
**Sent:** Monday, October 4, 2021 4:46 PM  
**To:** Vincent Gonzalez  
**Subject:** Mater Dolorosa Housing EIR

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Mr. Gonzalez,

The purpose of this correspondence is to provide my comments on the findings of the Environmental Impact Report for the Meadows at Bailey Canyon Housing Development. I am a nearby resident at 660 Edgeview Drive. My comments are as follows:

178-1

Arborist Report

The arborist report provided by Dudek is not specific to protected tree species that are protected by the City Municipal Code. There are several coast live oaks on the site that are proposed for removal but the assessment of the trees in the report groups the coast live oaks together with other non-native nuisance species. The municipal code identifies these trees as "valuable long term community assets" so that a detailed analysis specific to the oaks is warranted. The detailed analysis should assess the specific age and condition of each oak tree and should analyze ways that these trees, especially the largest ones, can be avoided during construction and protected long-term.

178-2

The arborist report indicates that there are three very large trees on the site, measuring 26, 33, and 54 inches. The Municipal Code indicates that "Trees of an estimated age of one hundred years or more, or trees of high visibility or extraordinary aesthetic quality as determined by the tree advisory commission may be required to be replaced by large sized specimen trees, as deemed appropriate by the tree expert." The trees in question may well be more than 100 years old and given their size are likely of high aesthetic quality. However, the tree report gives them the same weight as the other non-protected trees such as Chinese elm and sugar gum. The oak trees on the site merit a specific analysis of their age, health, and aesthetic quality and a justification by the developer of why they cannot be saved if their removal is proposed. The EIR states that "trees include various trunk and branch maladies and health and structural conditions" and that only 29% are in good health. This is a disingenuous assessment of the trees because it lumps together trees that are poorly adapted to the site with the oak trees that are native to the site and likely pre-date any development in the area. The large oak trees in the area are in good health (per the report). Why are non-protected trees in poor health lumped together with the protected trees that are in good health?

Finally, the mitigation for oak trees, especially such large and impressive ones is inadequate. Adequately mitigating the loss of trees greater than 25 inches in trunk diameter is not possible in our lifetimes. The ecological benefits provided by large oak trees cannot be offset with small oak trees that will be established in a park setting - 1:1 mitigation is especially appalling. The removal of a 54-inch oak tree is not adequately mitigated by establishment of one 24-inch box tree that will likely have a trunk diameter of 1-2 inches. Protection of on-site oak trees should be prioritized. If the developer can justify that there is no other option besides their removal, then mitigation should be based on the size of the tree to be removed and the relative size of the replacement tree. Removal of a 10-inch tree should be offset by 10 trees with a diameter of one inch.

Aesthetics

The EIR states that: " Bailey Canyon Wilderness Park is concentrated with many existing, mature trees that obstruct significant, widespread views of the project site..." and that "proposed trees and landscaping within the eastern portion of the neighborhood park would help to buffer views of the proposed residential uses from Bailey Canyon Wilderness Park." So which is it? Will views from the wilderness park be affected by the development or will the proposed landscaping buffer these views? The EIR should include renderings of the before/after views from the wilderness park to justify their evaluation.

178-3

Biological Resources

The Biological Resources Report (not actually a report, but instead a three-page memorandum), indicates that Braunton's milkvetch - a federally endangered species - is known to occur within 2.7 miles of the project site. This species has the ability to persist in the soil for many years until soil disturbance stimulates its germination. So just because it wasn't seen doesn't mean it isn't there. The report states that there are areas on the site that may be suitable and that the species is associated with carbonate soils. However, no soils testing was performed to determine if suitable soil conditions exist in the grassland before making the judgement that the species isn't present. A mitigation plan should be developed in the event that grading on the site stimulates germination of this plant so that the state and federal government is consulted.

178-4

The biological report mentions mule deer observed on the site, but makes no mention of bears, bobcats, coyotes, and rabbits that utilize the property and the impacts the project will have on these mammals.

The project site is adjacent to areas with native habitat. The developer should be required to provide a list to homeowners of undesirable non-native invasive species that should not be planted on their property, to avoid weed infestations to the native habitat.

Traffic

Unbelievably - the EIR contains NO ANALYSIS regarding the increased traffic on the community that would result from this project. There is a transportation report that indicates "...a VMT-related impact would be considered significant if implementation of the proposed project meets the following two conditions: The baseline project generated VMT per service population or Home-based VMT per capita or Home-based-work VMT per employee exceeds the 15% below the Northwest Region1 baseline VMT, or The cumulative project generated VMT exceeds 15% below the Northwest Region baseline VMT."

178-5

How in the world am I supposed to make sense of those criteria?!? The fact is that Sierra Madre streets, especially Grandview and Michillinda (major arteries that will be primarily impacted by the project) are quite congested especially between 7:30 and 9:00 am when parents are taking their kids to school and people are going to work. Application of some state-wide VMT criteria (an incomprehensible standard) should not be the primary (apparently only!!) criterion for evaluating traffic impacts. Sierra Madre already has narrow streets that impede traffic flow on Grandview, and the nature of these streets and our community do not lend themselves to evaluation according to a one-size-fits-all approach.

Secondly, Sunnyside is a street with a significant gradient and no stop signs until reaching Grandview. Therefore there is no infrastructure to impeded speeding down Sunnyside from these new residents. Currently this is a quiet street (essentially a dead-end street) with little traffic. Adding 84 houses (and likely 168 new drivers or more) will result in more traffic and speeding down this street is a significant concern. Yet there is no analysis on the impacts these new drivers will have on neighboring residents.

Fuel Management/Fire Risk

The recent Bobcat fire and the danger this presented to the community reminds us that fire management is of utmost importance. The Fire Protection Plan states that: "While the eastern side of the project is most susceptible to an approaching wildfire, the adjacent Bailey Canyon Debris Basin is maintained free of vegetation providing an off-site fuel break." It is disingenuous to suggest that the basin provides a sufficient fuel break between lots of flammable vegetation and the new houses and to give the County Public Works Dept the responsibility that maintaining it free of vegetation is necessary for the protection of adjacent homes. The homes are at greater risk of catching fire from embers coming from burning vegetation on the hillsides. Has this been analyzed - how far can embers fly and how is the housing protected from flying embers?

178-6

The Fire Protection Plan indicates that all fuel management can be accomplished on site. Has the City or County Fire Department reviewed this document and agreed with this finding? If the fire department comes back and indicates that off-site vegetation management is needed for fire protection, then the City should require the site plan to be reconfigured rather than allow impacts to off-site vegetation.

Each home should have a specific fire protection plan to prevent flammable vegetation from being planted on each property and that each home is properly maintained to ensure they are adequately fire protected. There should a monitoring program conducted by city personnel and funded by the developer.

Greenhouse Gas Emissions

178-7

The EIR states that there will be an operational increase in greenhouse gas emissions from the new houses. Why are there no mitigation measures provided to reduce this impact? The City should require the developer to install solar panels on each new house to reduce the houses reliance on the electrical grid and reduce carbon emissions.

↑ 178-7  
Cont.

Air Quality

The EIR identifies several potential threats to human health due to reduced air quality. These include issues such as valley fever and increased dust. However, the only mitigation measure is to have the contractor demonstrate to the city that they are using the appropriate equipment. Site watering is the primary proposed method of dust control. How often will the site be watered to reduce dust? Under what criteria will the contractor know that the site must be watered? The developer should fund a full-time city monitor to be onsite to ensure that all air quality standards are being followed.

↑ 178-8

The Phase I Analysis Report indicates that an underground storage tank was previously on the site and acknowledges that several dangerous chemicals (benzene, chloroform, etc) have been detected on site. The table provided in the report identifies levels that have been detected but it is not possible to tell from these tables if the levels these chemicals have been detected present a risk to human health.

There is no analysis to indicate if grading will send any of these dangerous chemicals into the air and if there is potential for valley fever to be spread. The air quality section indicates valley fever may be present, but provides no assessment for potential to be dispersed by project grading. The EIR says that the chances for valley fever to be present is low, and that if its there that it presents only a small danger to adjacent humans. Essentially, the analysis is we don't know if its present and if it is, don't worry about it. That is an inadequate assessment for a grading project that has occupied homes on three sides.

I look forward to seeing responses to these concerns.

↑ 178-9

Sincerely,

David Hughes  
660 Edgeview Drive  
dthughes123@yahoo.com

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## Response to Comment Letter I78

Individual  
David Hughes  
October 4, 2021

**I78-1** The comment provides an introduction to comments that follow and does not raise any concerns with the adequacy of the Draft EIR.

**I78-2** The comment raises concerns regarding the removal of mature trees on-site, the findings of the arborist report, the adequacy of the Draft EIR analysis of the health of the mature trees on-site, and the adequacy of the proposed mitigation. Please refer to Global Response GR-2 .

More specifically, the comment states that the oak trees should have detailed specific analysis which includes the tree age, condition, and determination of which ones can be preserved during construction. Each oak tree was assessed for its health and structure condition, diameter at standard height, height, width, and potential for preservation. The results of the individual tree assessment can be found in Final EIR Appendix C2.

The tree assessment and mitigation requirements recorded in the tree report (Final EIR Appendix C2) are completed to standards established by the City's Municipal Code and satisfy the requirements for this project.

**I78-3** The comment expresses concern regarding the Bailey Canyon Wilderness Park and existing views that would be impacted as a result of the proposed project. Additionally, the comment questions if views from the wilderness park would be affected by the development or if the proposed landscaping would buffer these views. The comment also states that the Draft EIR should include renderings of the before/after views from the wilderness park to justify their evaluation.

Visual simulations are not warranted to adequately analyze visual impacts. For more information, please refer to Draft EIR Section 4.1, Aesthetics. Please refer to Response to Comment I76-16.

**I78-4** This comment states that per the Biological Resources Report, the Braunton's milk-vetch, a federally endangered species, is known to occur within 2.7 miles from the project site, and that the site is potentially suitable for the species as it is associated with carbonate soils. The comment also states that no soils testing was performed to determine if suitable soil conditions exist before making the judgment that the species isn't present, and a mitigation plan should be developed in the event that grading on the site stimulates germination of this plant so that the state and federal government is consulted. Further, the comment states that the biological report mentions multiple other wildlife species that utilize the property that will be impacted by the project, and finally that the project site is adjacent to areas with native habitat and the developer should be required to provide a list to homeowners of undesirable non-native invasive species that should not be planted on their property to avoid weed infestations to native habitat.

The Sensitive Resources Analysis for the Project Located at 700 North Sunnyside Avenue, Sierra Madre Memorandum (Sensitive Resources Analysis) (Draft EIR Appendix C1) and Draft EIR Section 4.4, Biological Resources, analyzed potential impacts to special-status plant and wildlife species

(endangered, rare, or threatened species), as well potential impacts to riparian habitat or other sensitive natural communities. No federal or state-listed plant or wildlife species are expected to occur in the project site. The project site does not support any native vegetation communities and the area appears to be regularly maintained, which limits the potential for many native plant and wildlife species. More specifically, the site undergoes weed abatement on a biannual basis (through a City contract with the County of Los Angeles). Furthermore, Draft EIR Figure 4.4-1, Vegetation and Land Cover Map, illustrates the project site's vegetation and land cover consists of ornamental vegetation lining paved roadways and non-native grassland. The non-native grasslands are mowed and composed of almost entirely non-native grasses and herbaceous annuals, and it was determined that no sensitive communities or riparian habitat occur on the project site. Additionally, soil testing and sampling was completed as part of the Geotechnical Investigation (Appendix E to the Draft EIR), and the findings indicated that artificial fill covered the majority of the project site, and that mitigation measure MM-GEO-1 would be required to remove and recompact artificial soil.

Regarding Braunton's milkvetch, specifically, this species was not identified at the project site during pedestrian surveys conducted during the appropriate blooming period, and as concluded in Appendix B of Appendix C1 of the Draft EIR, Braunton's milk-vetch is not expected to occur due to reason stated previously, and the last California Natural Diversity Database (CNDDDB) occurrence is 2.7 miles from the project site. Therefore, the potential impacts to this species is considered to be less than significant, and further analysis is not warranted.

**178-5** The comment expresses concern that the Draft EIR contains no analysis regarding the increased traffic on the community that would result from the project. The commenter states that there is existing congestion on Sierra Madre streets, especially Grandview and Michillinda, and that application of VMT criteria should not be the primary criterion for evaluating traffic impacts. The commenter also states that there is no infrastructure to impede speeding on Sunnyside and that addition of the new homes and amount of additional drivers on the surrounding roadways is a significant concern and no analysis is provided. Please refer to Global Response GR-6. In addition, concerns about illegal activity, such as speeding is not within the scope of the required environmental analysis under CEQA.

**178-6** The comment expresses concern about the Bailey Canyon Debris Basin being a sufficient fuel break, and the risk of embers catching homes on fire. As stated in Draft EIR Section 4.20, Wildfire, the Bailey Canyon Debris Basin will act as a fuel break in addition to the fuel modification areas that would also create reduced fuel on the site. For a visual representation of the Fuel Modification Area, please see Appendix E of the FPP (Appendix F2). As stated in Draft EIR Section 4.20, buildings would comply with ignition resistant construction standards of the 2019 CBC (Chapter 7A) and Chapter 5 of the UWI code which would address vulnerabilities of the structure such as roofs, eaves, exterior walls, vents, appendages, windows, and doors. These standards would help structures perform at high levels (resist ignition) during the typically short duration of exposure to burning vegetation from wildfires.

The comment also asks if the City or County Fire Department has reviewed this Draft EIR and agreed with the finding. The City of Sierra Madre Fire Department (SMFD) reviewed and agreed with the conclusions of the FPP and Draft EIR Section 4.15, Public Services. The comment also suggest that each home should have a specific FPP and a monitoring program should be conducted to ensure the homes are protected. The FPP would be applicable to all homes within the project site.



**178-7** The comment asks why there are no mitigation measures to address the operational increase in greenhouse gas emissions as a result of the project. The comment also states that the City should require the developer to install solar panels on each proposed house to reduce the demand on the electrical grid and reduce carbon emissions.

An Air Quality and Greenhouse Gas Emissions Analysis Technical Report is included as Appendix B of the Draft EIR. As part of the Air Quality and Greenhouse Gas Emissions Analysis Technical Report, a localized significance threshold (LST) analysis was prepared to determine potential impacts to nearby sensitive receptors during construction of the project. The impacts were analyzed using methods consistent with those in the SCAQMD's Final Localized Significance Threshold Methodology (2009).

This analysis determined that construction activities associated with the project would result in temporary sources of on-site fugitive dust and construction equipment emissions. As shown in Table 4.3-10 of the Draft EIR, with the implementation of Mitigation Measure MM-AQ-1, construction activities would not generate emissions in excess of site-specific LSTs and no impacts to nearby sensitive receptors would occur.

As stated in Table 4.8-6 of Draft EIR Section 4.8, Greenhouse Gas Emissions, the proposed project would include solar roof installations in accordance with the 2019 Title 24 building standards. In addition, as discussed in Section 4.8.5, Impact Analysis, of Section 4.8, estimated annual project-generated greenhouse gas emissions would be approximately 794 MT CO<sub>2e</sub> per year as a result of project operations and amortized construction. This would be less than the significance threshold of 3,000 MT CO<sub>2e</sub> per year as discussed in Section 4.8.3, Thresholds of Significance. Therefore, project impacts to greenhouse gas emissions would be less than significant and no additional mitigation would be required.

**178-8** The comment expresses concern related air quality, specifically dust control and how it will be monitored. Additionally, the comment expresses concern about the chemicals identified in the Phase 1 ESA from an underground storage tank being released into the air as a result of grading. As stated in Draft EIR Section 4.3, Air Quality, the project would implement dust control measures as a project design feature in compliance with SCAQMD Rule 403, including watering the exposed area two times per day (55% reduction in PM<sub>10</sub> and PM<sub>2.5</sub>) and limit vehicle travel on unpaved roads to 15 miles per hour. As concluded in Draft EIR Section 4.9, Hazards and Hazardous Materials, the proposed project would not expose the public to a reasonably foreseeable significant hazard as a result of construction.

**178-9** This is a concluding statement by the commenter that does not raise concerns regarding the adequacy of the Draft EIR.

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Comment Letter 179

10-4-21

Victor Gonzales, Director of Planning  
and Community Preservations.

Oppose the plan to change from  
institutional to R-1 single housing  
because . . .

179-1

1. Traffic would increase to 200-400  
vehicles a day.

179-2

2. We are in an unprecedented  
drought, we don't have enough water  
and borrowing what we need!!

179-3

3. This is in a high fire zone, part  
of Sierra Madre north of Grand View  
were evacuated in the Bobcat  
fire a year ago.

179-4

4. The Sierra Madre earthquake of 1991  
destroyed one of the Monastery's buildings  
22 homes around Sunnyside were  
condemned and there was 12.5 million  
in damages.

Thank You

179-5

Bertha D. Patayas

626 325 3354 BERTHA D. PATAYAS

103 E. Sierra Madre Blvd.

Unit C

Sierra Madre, Ca 91024

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## Response to Comment Letter I79

Individual  
Bertha D. Patsavas  
October 4, 2021

- I79-1** This introductory comment expresses general opposition to the proposed change in zoning and land use designation of the site. Please refer to Global Response GR-7.
- I79-2** The comment states that traffic would increase to 200-400 vehicles a day as a result of the project. Please refer to Global Response GR-6.
- I79-3** The comment expresses concern with drought and availability of water to serve the project. See Global Response GR-1.
- I79-4** The comment states that the project is located in a Very High Fire Hazard Severity Zone, where previous fires or evacuations have occurred. Please refer to Global Response GR-3.
- I79-5** The comment mentions the 1991 earthquake, which destroyed one of the Monetary buildings. See Response to Comment I45-6. The proposed project would be required to comply with all existing regulations, including the California Building Code and the SMCC in order to ensure seismic safety. In addition, the project would comply with project design features PDF-GEO-1 through PDF-GEO-15 and MM-GEO-1, which includes project specific recommendations from the geotechnical investigation (included as Drat EIR Appendix E).

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Comment Letter 180

**From:** Shelby Moser <shelby.moser@gmail.com>  
**Sent:** Monday, October 4, 2021 9:55 AM  
**To:** Vincent Gonzalez  
**Subject:** Comments on the DEIR for the 'Meadows Project'

CAUTION: This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Shelby Moser  
273 E Alegria Ave, Sierra Madre, CA 91024  
[shelby.moser@gmail.com](mailto:shelby.moser@gmail.com)

Dear Vincent Gonzalez,

I am writing to express my concern over the Project moving forward at this time. I hope the City Council and Commission will not allow this project to continue for the following reasons. First, it is not wise to begin such a huge development during our current drought. Although it's been stated repeatedly that the proposed structures would not deplete Sierra Madre water, that overlooks the fact that all water in CA is scarce, including for current residents. We're surrounded by cities who have gone back to stricter watering limitations for citizens, yet Sierra Madre has not.

180-1

More to the point of my concern is the hazardous area in which this project is proposed. I was one of the many families who had to pack and prepare for evacuation during the Bobcat fire, not to mention many before that. Had things gotten worse, the exact area in which these new homes are proposed would require precious resources (water, personnel) that are already spread thin for current residents during our increasingly longer and hazardous fire seasons. I would consider the Housing Project to be in a 'Very High Fire Severity Zone', which should be avoided.

180-2

Finally, I'm not convinced that this project wouldn't create further traffic flow issues, which would contribute to the problems I state just above regarding an already hazardous area.

180-3

I appreciate you taking the time to read and consider my concerns.

Shelby Moser

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## Response to Comment Letter I80

Individual  
Shelby Moser  
October 4, 2021

- I80-1** The comment is concerned with the project's potential impacts on water supplies and availability, in light of current drought conditions. See Global Response GR-1.
- I80-2** The comment expresses concern regarding the hazardous area in which the project site is located, specifically due to prior wildfires in the area, evacuations, and the Very High Fire Hazard Severity Zone designation. Please refer to Global Response GR-3 and Global Response GR-4.
- I80-3** The comment is concerned with potential impacts to traffic flow. Please refer to Global Response GR-6.

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Comment Letter I81

**From:** Maria Karafilis <mariakarafilis@gmail.com>  
**Sent:** Monday, October 4, 2021 10:32 AM  
**To:** Vincent Gonzalez  
**Subject:** questions on DEIR for Meadows at Baily Canyon

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Maria Karafilis  
642 Fairview Ave, Sierra Madre, CA 91024  
[mariakarafilis@gmail.com](mailto:mariakarafilis@gmail.com)

Thank you for the opportunity to comment on the DEIR for the "Meadows at Bailey Canyon"

Below are additional comments and questions in addition to those I already have submitted. Please retain a copy for the administrative record.

Please respond to these comments in the Final EIR and please put me on the list of people to notify when the Final EIR is complete.

I strongly object to the proposed housing development. It is inconsistent with the Policies and Values of our General Plan. In addition to my prior comments, I am especially concerned with:

1) 101 mature trees will be removed, including 10 protected Oaks. The Oaks will be replaced with smaller Oaks and other small trees (requiring a great deal of water to become established) SM has a Forest Management Plan with a mission to preserve "Canopies" for their environmental and aesthetic benefit. 101 large canopied trees will be destroyed. Why are you flouting the SM Forest Management Plan and denuding the area? How will you prevent rock and landslides and impact on wildlife when these mature trees are destroyed?

2) I strongly oppose a change in zoning, a change in our General Plan and a change in the regulations that other residents have to follow.

I  
I81-1  
I  
I81-2  
I  
I81-3

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## Response to Comment Letter I81

Individual  
Maria Karafilis  
October 4, 2021

- I81-1** This introductory comment expresses general opposition to the project but does not raise any issue concerning the adequacy of the Draft EIR. The commenter will be notified when the Final EIR is complete and available to the public.
- I81-2** This comment states that 101 mature trees will be removed including 10 protected Oak trees. The commenter expresses concern regarding project inconsistencies with the City's Forest Management Plan to preserve canopies as well as rock landslides and impacts on wildfire associated with loss of trees. Please refer to Global Response GR-2. As concluded in Draft EIR Section 4.7, Geology and Soils, the project site is located outside of any potential landslide zone and is not located within a seismic hazard zone, therefore, impacts associated with landslides would be less than significant.
- I81-3** The comment expresses general opposition to the proposed change in land use designation of the project site but does not raise any concerns regarding the adequacy of the Draft EIR.

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Comment Letter 182

**From:** Vicki Jennelle <vmeiser@aol.com>  
**Sent:** Monday, October 4, 2021 3:37 PM  
**To:** Vincent Gonzalez  
**Subject:** The Meadows at Bailey Canon

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Dear Mrs. Gonzalez,

I am a resident of 465 N. Sunnyside Avenue and am writing to express my continuing concern with regards to the prospect of developing the 20 acres of land located at the top of Sunnyside Ave.

182-1

I know that the EIR that was funded by the developer has said that there will be minimal impact to our environment, but as a resident I could not disagree more. The increased traffic and taxation of our current infrastructure (roads, sewers, water) will have a significant impact on the quality and safety of the lives of those who reside in close proximity to this development.

182-2

We already have water concerns (as I note by the banner hanging over Baldwin Avenue asking that we conserve water and the "water droplet" scarecrow outside of the city building). I know that the developer is stating that there will be "net zero" water impact on our city, but that cannot be accurate. It's a great catch phrase that makes developing the land with large homes seem like a non-issue. We don't know how long the developer will be in business and cannot project what the water needs/cost will be of those 42 homes over the next 40 years and more.

182-3

Last year was my first year as a resident of Sierra Madre (since February of 2012) that I feared for our safety with the fires coming as close as they did to the city. Homes built up into the hillside pose a greater risk of catching fire & spreading it. I know that they will be built with high fire code standards (as is my home built in 2011) but there will no longer be a staging area for local fire resources if 42 homes are present.

182-4

Traffic will be a nightmare. Residents, cleaning personnel, yard workers, pool workers and the many many daily delivery vehicles are going to turn Sunnyside Ave. into another Michilinda- or worse.

182-5

I think it is proper to provide a greenbelt for the neighbors who would be directly impacted by this project, but installing a public park will just CREATE MORE UNWANTED TRAFFIC. **Please do not add this burden to the already unpalatable project.**

182-6

In short, why can't the city put a measure on the ballot to see if the people of this city will fund buying the land over a number of years? Please do not support this project as it is currently being presented.

182-7

Respectfully,

Vicki Jennelle  
465 N. Sunnyside Ave.  
Sierra Madre, CA 91024  
626-325-3195

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## Response to Comment Letter I82

Individual  
Vicki Jennelle  
October 4, 2021

- I82-1** The comment is an introduction to comments that follow.
- I82-2** The comment expresses general concerns regarding environmental impacts, including impacts to transportation/traffic, roads, sewers, and water. The proposed project's impacts on the environment have been addressed throughout Draft EIR Chapter 4, Environmental Analysis. Impacts to transportation have been addressed in Draft EIR Section 4.17, Transportation, and impacts to utilities have been addressed in Draft EIR Section 4.19, Utilities and Service Systems (with a few clarifying changes made to Final EIR Section 4.19). Lastly, regarding the commenter's concern related to development fees, the development fees from the proposed project would be paid by the Applicant would offset the costs associated with the increased demand for public services and utilities.
- I82-3** The comment expresses concern regarding water supply and the project's net-zero water impact. Please refer to Global Response GR-1.
- I82-4** The comment expresses concern regarding the project's impacts to wildfire. Please refer to Global Response GR-3.
- I82-5** The comment expresses concern regarding the project's impacts to traffic. Please refer to Global Response GR-6.
- I82-6** The comment expresses concern regarding the impacts to traffic related to the proposed park. The project's impacts to transportation have been addressed in Draft EIR Section 4.17. Please refer to Global Response GR-6 .
- I82-7** The comment expresses general opposition to the proposed project and includes suggestion for the City to buy the land associated with the proposed project. The comment does not raise any issue concerning the adequacy of the Draft EIR.

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Comment Letter I83

**Comments re: Draft EIR, Monastery Housing Development  
By  
Bruce H. Jones, D.D.S.**

**Background**

My name is Bruce H. Jones. I am a retired dentist living with my wife at 662 W. Alegria Ave, a location which will be heavily negatively impacted by the Monastery Housing Project should it come to completion.

I83-1

I offer the following as personal and community credentials:  
I have been associated with Sierra Madre since the mid-1950's when immediate family members moved here. I established my first dental practice at 71 W. Sierra Madre in 1976 and moved into an apartment in town shortly thereafter. Since January, 1980 my wife and I have lived at 662 W. Alegria Ave. and raised our two sons, ages 39 and 35, there. Our sons have since married and moved out of the area. From 1977 to about 1984 I was a member of the Sierra Madre Volunteer Fire Department. I had a second career as civilian employee of Pasadena Police Department from 1990-2009. In 2005 I was a member of the Mayor's Ad Hoc Committee on Level of Service which considered and recommended changes to the Fire Department which resulted in the current structure of the Sierra Madre Fire and Paramedic Department. of A few years ago I was invited to meet with then-City Manager Gabe England to go over the 2005 Committee proceedings and give him some oral history on my experiences on the SMVFD. Since 1999 I also serve as a volunteer photographer for the Los Angeles County Fire Department which exposes me to the experience and knowledge of the members of that department.

I83-2

**Please consider the following points:**

**Fire**

In the history of Sierra Madre there have been numerous wildfires which have put the City in danger. I recall two that burned behind the Monastery and retreat house complex and came close to destroying one or both. In 1977 I fought that fire as a member of

I83-3

[1]

SMVFD. I recall a few years later another fire that burned the same area. In 1993 the Altadena (Kinneloa Mesa) Fire came dangerously close to the western border of the City. Sometime around 2000 the Santa Anita Fire burned across the front range behind the City and was stopped at the eastern edge of Bailey Canyon. I do not believe the fuel behind the proposed development area has burned since the late 1970's. This fuel is very dangerous and should it burn it would be very destructive to the surrounding homes including the proposed development. The developer may reassure the City that the proposed homes are fire-safe or even fire resistant but I point out the Northern California wildfires of this past summer 2021 as proof that nothing of that sort exists. Under the current drought and wildfire conditions it will be very difficult, if not impossible, to insure the homes in the new development. Certainly it will be expensive.

183-3  
Cont.

**Water**

The developer claims "water neutrality" for the project. I believe the current drought renders this claim Invalid. We have for several years had to engage in rather severe water conservation measures and I contend the additional need for water for the development will only make the problem worse. I also question the ability of the current City infrastructure to supply and additional 42 homes. Only recently new mains were installed in northwest Sierra Madre and by observation, I question their capacity to do so.

183-4

**Municipal Services**

Our water, sewer and storm drain infrastructure is strained to the limit right now. Does the developer offer to re-construct that infrastructure to handle the additional impact of the 42 homes in the development? This would mean digging up streets to install new piping which will further negatively impact the surrounding neighborhood.

183-5

**Public safety and emergency services**

I question the ability of our Fire and EMS (Emergency Medical Service) departments to adequately serve the additional residents of the new development. I have no numbers but I have seen incidences where Fire and EMS services are brought under pressure, either due to Mutual Aid obligations or

183-6

[2]

disaster-level incidents. I also question the age and condition of our current apparatus. Likewise, will our police department be able to handle the additional calls that will be inevitable with the additional residents? At the moment there is only one way in and out of the proposed development. If Carter is widened there is direct impact on Bailey Canyon Park and the properties across the street.

183-6  
Cont.

**Negative impacts of the construction process itself**

The construction process alone will cause significant negative impact to the residents near the development and will also injure the City infrastructure. During the process there will be passage of many pieces of heavy equipment on streets originally built for automobiles used by the residents. Large grading equipment will have to come first. Then cement batch trucks. As the process goes forward there will be deliveries of materials for all phases of construction such as lumber and roofing materials. The weight alone will damage the pavement and might possibly damage the underground utilities such as our new water mains, sewer and storm drain pipes and gas mains.

183-7

Dust, noise and air pollution from the equipment and the process itself is unavoidable and will be severe.

183-8

Traffic will inevitably be heavy along Michillinda, Sunnyside and related cross streets as trucks seek the most convenient route to the development. Traffic will most certainly be congested along Michillinda as slow and heavy trucks mix with the daily school traffic.

183-9

**Traffic**

While I have no hard numbers I will make a guess that the 42 proposed homes will be occupied by persons who own about two cars apiece. This is 84 cars going in and out of the development about twice a day. This has a definite negative impact on the current residents; air pollution, noise and difficulty of accessing our homes during peak traffic periods. At the moment there is only one way in and out of the development.

183-10

[3]

**Closing thoughts**

In my 42 years of living in Sierra Madre and with my direct involvement in the community I have not once seen or heard of the Passionist Fathers having any direct involvement in Sierra Madre. I view this project as a means for the Passionist Fathers to handle whatever financial problems they might have as quickly and as lucratively as possible with no concern for the surrounding residents or the City itself. Have they considered the historical artifacts near the top of the property – the Stations of the Cross? Has there been any consideration to the possibility of burial sites anywhere in the development area?

183-11

I also point out the failed development at #1 Carter. My sons were at Maranatha High School at the time. I was very close to how this development came about which was very questionable. The political wrangling nearly split the City and friends became enemies. So far, nothing has been done at #1 Carter and all we have is several acres of bare dirt.

183-12

Developers have no conscience. The developer will simply come in, do their business and leave the community with no care of the long term health of the community. To me, the entire process of the Passionist Fathers selling to a developer for a fast project has the bad odor of simply making a “quick buck”.

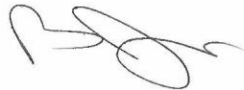
183-13

Sierra Madre is a quiet Foothill Village and should remain so. Please do not allow those involved to sell out our City for money alone.

Has it been considered for the City to purchase or arrange for purchase of the property? I would be willing to donate a significant amount to join with others to do so.

183-14

Thank you for your consideration of my comments.



[4]

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## Response to Comment Letter I83

Individual  
Bruce H. Jones  
October 4, 2021

- I83-1** The comment includes an introductory comment introducing the commenter and comments to follow. The comment does not raise specific issues concerning the adequacy of the Draft EIR.
- I83-2** The comment provides personal background relating to the commenter. The comment does not raise specific issues concerning the adequacy of the Draft EIR.
- I83-3** The comment provides an overview of the history of wildfires in the area and dangers associated with wildfire. Please refer to Global Response GR-3.
- I83-4** The comment expresses concern regarding the project's net-zero water impact and the ability of existing water supply infrastructure to serve the project. Please refer to Global Response GR-1.
- I83-5** The comment expresses concern regarding water, sewer, and storm drain infrastructure, which have been addressed in Draft EIR Section 4.19 (with a few clarifying revisions made in Final EIR Section 4.19). As discussed in this section, the proposed project would result in less than significant impacts to water, sewer, and storm drain infrastructure.
- I83-6** The comment expresses concern regarding the project's impacts on fire protection, emergency medical service (EMS), police protection, and access. These issues have been analyzed in Draft EIR Section 4.15, Public Services. As discussed in this section, SMFD has reviewed the project and has determined that it would not have a significant effect on service demands. Therefore, through payment of appropriate development fees by the project applicant, the proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities. As the SMFD also provides EMS, the project would not result in significant impacts to EMS services. Similarly, regarding police protection, while new development places increased demand on police protection services, due to payment of development fees, participation in mutual-aid agreements, and the project's minimal increase in population, it is not anticipated that the proposed project would result in the need for construction or expansion of police facilities. Please refer to Global Response GR-4 in regard to emergency access concerns.
- I83-7** The comment expresses concern regarding construction of the proposed project, specifically physical impacts to the existing streets and underground utilities. Environmental impacts associated with construction have been addressed throughout Draft EIR Chapter 4, Environmental Analysis. In addition, please refer to comment I65-12 regarding the physical impact of heavy load and equipment.
- I83-8** The comment states that dust, noise pollution, and air pollution from construction would result in significant and unavoidable impacts. Dust, noise pollution, and air pollution have been analyzed in Draft EIR Sections 4.3, Air Quality, and 4.13, Noise. As discussed in these sections, impacts to air quality and noise during construction would be less than significant with mitigation.

- 183-9** The comment expresses concern related to traffic, particularly construction-related traffic on Sunnyside Avenue and Michillinda Avenue. Please refer to Global Response GR-6 . It should be noted that under CEQA, an increase in traffic is no longer used to assess whether a project would have a significant effect on traffic under CEQA, including construction-related traffic. Rather, CEQA now requires that the transportation impacts of a project be assessed solely through the calculation of VMT, and for which, this project was determined to have a less than significant impact. As discussed in Global Response GR-6, Appendix K to this Final EIR includes a Traffic Study, which was prepared strictly for informational purposes and discusses the expected changes in traffic conditions. As discussed in Appendix K, the performance of the study intersections, as measured by LOS, would result in no measurable difference as a result of the project, and all of the intersections will function well-within the City’s standards.
- 183-10** The comment expresses concern regarding air pollution, noise, and ingress/egress impacts associated with traffic as a result of the proposed project. Please refer to Global Response GR-6and Response to Comment 183-9 for discussion related to traffic. Impacts to air pollution and noise have been analyzed in Draft EIR Sections 4.3 and 4.13. As discussed in these sections, impacts to air quality and noise would be less than significant with mitigation.
- 183-11** The comment raises economic, social, or political issues that do not appear to relate to any physical effect on the environment in addition to impacts to historical resources and burial sites. Draft EIR Section 4.5, Cultural Resources, provides an analysis of potential impacts to cultural resources, including historical resources and burial sites. As discussed in this section, the proposed project would not cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5. Impacts would be less than significant. In addition, with implementation of MM-CUL- 1, MM-CUL-2, and MM-CUL-3, potential impacts to previously undiscovered archaeological resources would be less than significant.
- 183-12** The comment raises economic, social, or political issues associated with another project that do not appear to relate to any physical effect on the environment. No further response is required because the comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR.
- 183-13** The comment expresses the general opinions of the commenter that do not appear to relate to any physical effect on the environment. No further response is required because the comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR.
- 183-14** The comment expresses general opposition to the proposed project and includes a suggestion for the City to buy the land associated with the proposed project. The City acknowledges this recommendation and notes that this comment does not raise any issue concerning the adequacy of the Draft EIR.



Comment Letter 184

**From:** johnwiedeman@yahoo.com  
**Sent:** Monday, October 4, 2021 2:36 PM  
**To:** Vincent Gonzalez  
**Subject:** Sierra Madre Quality project fails to develop high quality housing, fails to address traffic issues, and fails to ensure community compatibility with our distinctive small town.

CAUTION: This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

It ain't right!  
Go! Gonzolez and cohorts.  
We bad!

184-1

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## Response to Comment Letter I84

Individual  
John Wiedeman  
October 4, 2021

- I84-1** The comment expresses general opposition to the project and general traffic concerns. Please refer to Global Response GR-6 for discussion related to traffic.

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Comment Letter 185

**From:** Tricia Searcy <tricia\_searcy@yahoo.com>  
**Sent:** Monday, October 4, 2021 1:22 PM  
**To:** Vincent Gonzalez  
**Cc:** Barbara Velturo; Alexander Arrieta  
**Subject:** Comments on DEIR for the Meadows at Bailey Canyon Specific Plan Project  
**Attachments:** MeadowsSPEIR\_Dr\_Peer\_4\_2\_21\_MIG2\_full6-22\_DudekResponses6.25.21 (005)-1.pdf; Traffic Study - LOS Memo\_Final -1.pdf; Lot Line Adjustment Letter 1.pdf; Lot Line Adjustment Letter 2.pdf

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

October 4, 2021

To: Vincent Gonzalez, Planning Director  
 232 W. Sierra Madre Boulevard  
 Sierra Madre, CA 91024  
[vgonzalez@cityofsierramadre.com](mailto:vgonzalez@cityofsierramadre.com)

From: Tricia Searcy  
 734 Fairview Avenue  
 Sierra Made, CA 91024  
[tricia\\_searcy@yahoo.com](mailto:tricia_searcy@yahoo.com)

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) for the Meadows at Bailey Canyon Specific Plan Project.

It is evident to even the most casual observer that this EIR is filled with misstatements of fact, omissions of material fact, and obfuscation of the project's noncompliance with applicable laws, city policies, and our General Plan.

Below are my detailed comments. Please retain a copy for the administrative record.

Please respond to these comments in the Final EIR and please put me on the list of people to notify when the Final EIR is complete.

Comments to the Draft Environmental Impact Report (EIR) for the Meadows at Bailey Canyon Specific Plan Project.

I. ES. 1 Project Location, Project Site at p. ES-1

This section fails to address the problems articulated on page 3 of MIG's June 22, 2021 third-party peer review of the project ("the MIG Review") submitted as an attachment to this comment.

In this section, the DEIR revises the proposed open space down from 45 to 35 acres and continues to say the "open space dedication area is not considered part of the project site." As pointed out by MIG, "if this is not part of the project then it should not be referenced as one of the objectives...nor described as a community benefit. If it is part of the project then it should be further described in the project description, including a location map, how it will be provided, how it will be protected, and what it will be used for. If it will be accessible to or otherwise used by the public, it needs to be included in the project description and the environmental setting and analyzed as part of the project." P.3 MIG Review.



MIG twice made clear that the open space needs to be defined and that "[i]f it will be accessible to or otherwise used by the public it potentially could have, at the least, potential impacts on biological resources, and wildland fire potential. If the actions under this project will not result in access, improvements, or use by the public, then such should be stated and, further that such use or action would be subject to a separate environmental review at a later date if it is made available to the public." P. 3 MIG Review. This still hasn't been done.

185-2  
Cont.

Is the open space part of the project or not? If not, it must be taken out of the project description and not presented as a community benefit. If it is, it must be clearly described, including how it will be provided, protected, what its use will be, and a separate comprehensive environmental review should be conducted, including, but not limited to, biological resources and wildfire potential, and made available to the public.

185-3

II. E.S. 2 Project Description at p. ES-2.

185-4

There are three standards that a project description must meet: it must be clear, stable, and finite. The project does not meet this standard because it is unclear, unstable, and not finite as set forth below.

The project description states that it would include "approximately 3.39 acres of open space (including 3.04-acre dedicated neighborhood park) and identifies "open space dedication as a community benefit."

185-5

If 3.04 acres of the 3.39 acres is the park, then that leaves .35 acres of open space. Under Project Location above, the area is identified as 35 acres. In project objective number 5, 30 acres is referenced and the area is clearly misidentified as being near Colby Canyon and Colby Canyon Trail. (see Objective 5. Preserve the hillside open space area by dedicating approximately 30 acres north of the Mater Dolorosa Retreat Center to the City, in order to preserve a portion of Colby Canyon and the Colby Canyon Trail, which would be used by wildlife for movement up and down slope; preserve native vegetation communities and drainages; and preserve land adjacent to the Colby Canyon stream). Colby Canyon is above the city of La Canada nowhere near this project. See map below. Thus, the location, boundaries, and acreage of the "open space" are not clear.

Please clearly describe and accurately map the proposed "open space" along with identifying how it will be provided, protected, what its use would be and provide a separate comprehensive environmental review as recommended by MIG. See MIG Review p.3.

185-6

Please remove all references to preservation of Colby Canyon, Colby Canyon trail and stream as a project objective and/or community benefit and specifically describe what "community benefit" will be provided by any proposed "open space."

185-7

In addition, the project description is unclear, unstable and not complete or finite because the boundaries have yet to be determined. As stated at p. ES-1, "The Mater Dolorosa Retreat Center currently is on the same legal parcel as the project site, which is currently split within three different lot [sic]; however, a lot line adjustment would be processed to adjust the boundaries of the three existing lots that make up the Mater Dolorosa Retreat Center and the project site. The lot line adjustment would consolidate the two lots that make up on [sic] legal lot for the project site into one and adjust the site's northern boundary farther to the north."

185-8

The developer applied for a lot line adjustment in April 2021 and it was rejected for several reasons. Among other things, the "proposed lot line adjustment will result in the creation of two parcels from one existing parcel, which is in violation of the Subdivision Map Act, as it relates to the Lot Adjustments." See Memo from Clare Lin to Jonathan Frankel dated May 3, 2021 including the comments from Kevork Tcharkhoutian to Chris Cimino (attached). Please clarify the boundaries of the project site and address the eight (8) specific problems raised in the attached document.

185-9

With regard to the vague and unattainable term "net zero water impact," MIG has confirmed, "[n]et zero water use is not a community benefit: it is no different than the amount of water currently being used and its only benefit is to provide service to the project similar to utilities, street improvements etc: **remove it from the sentence.**" P.3 MIG Review (emphasis mine).

185-10

All references to "net zero water" as a community benefit should therefore be removed as per MIG's recommendation.

The project description is also fatally unclear and unenforceably vague in its statement that, "[c]ommunity benefits would include...establishing a dedicated funding source for long-term park maintenance." What exactly does "dedicated funding

185-11

source for long-term park maintenance” mean? How much money is being committed, if any, and for how long? Where is it coming from? How much is long term park maintenance expected to cost? What sort of maintenance will be required? Elsewhere it is indicated that the city will need to establish a public maintenance district for the park. Establishing a new public department and staffing it will cost money—how much is it expected to cost? How many staff will be involved? Where will this new department be located in the city? Please provide these pertinent facts and an analysis to answer these questions

185-11  
Cont.

The project description is also unclear, unstable, and subject to change with regard to the description of the proposed residences such that it is impossible to determine if the project is consistent with the city’s General Plan and ordinances.

The residential development is described as consisting of “42 detached single-family dwellings ranging from 2,700 to 3,800 square feet with a minimum lot size of 8,500 square feet. The gross density of the project is approximately 2.5 dwelling units per acre. The proposed residences would be one to two stories.” At p.3-3.

185-12

How many of the residences will be two story? The neighboring houses are primarily one story. How many of the lots will be the “minimum lot size of 8,500?” Please state what size *all* the lots are, how many stories each house will be, along with what the designs of the houses will be. None of these significant details are included here or in the SP. Thus, the project description is unclear, unstable, and not finite.

III. E.S.2.1 Project Objectives at p. ES-2

Objective number 5 should be removed (see text below and see comments above). All references to Colby Canyon should be removed as it is nowhere near the project.

185-13

5. Preserve the hillside open space area by dedicating approximately 30 acres north of the Mater Dolorosa Retreat Center to the City, in order to preserve a portion of Colby Canyon and the Colby Canyon Trail, which would be used by wildlife for movement up and down slope; preserve native vegetation communities and drainages; and preserve land adjacent to the Colby Canyon stream.

Please remove Objective number 6 or describe in detail what street improvements are provided for that would “facilitate safe and efficient access.” There are no sidewalks on North Sunnyside which is a narrow, old residential road ending at the monastery gate. Nowhere in this report is there any factual support for achieving this objective—no sidewalks and no street improvements are planned for the street leading up to the project—references are only to the streets inside the project. As it stands, the project will greatly increase danger to pedestrians and create traffic jams on a tiny street unsuitable as a primary ingress and egress.

185-14

It is asserted under “Project Location” that “Carter would be improved to provide secondary egress and ingress access to the site,” but no specific improvements are identified and LA county has stated that it will not widen the street. Thus, it is unclear how Carter, which also has no sidewalks and is used by many pedestrians on a daily basis visiting Bailey Canyon Park, could be improved to make it safe.

185-15

Please describe in detail what improvements will be made to the section of Carter leading up to the project that will provide safe ingress and egress and how it will be accomplished. If this cannot be done, the sentence should be removed.

185-16

With regard to Objective 7, a development agreement is not a public benefit nor is there “enhanced connectivity to the Bailey Canyon Wilderness Park and trail system. The public already has open and easy access to these things and the development agreement is strictly a benefit to the developer.

185-17

These sentences should be removed.

IV. ES.5 Project Alternatives at pp. ES 4-5.

This section must describe a reasonable range of alternatives **sufficient to foster informed decisionmaking and public participation**. This section, however, provides only one paragraph summary descriptions of alternatives made up of conclusory statements that fail to adequately describe and evaluate the comparative merits of each alternative. What

185-18

projects, if any, were actually considered? There is zero analysis of the environmental impact of any factual alternative. Due to the lack of qualitative and quantitative analysis, this section provides insufficient information to meet the requirements for Alternatives Analysis or for any possibility of informed, rational decisionmaking.

185-18  
Cont.

Please provide factual information (e.g bids) on what *specific projects were actually considered, if any*, and provide analysis of the environmental impact of each specific project alternative sufficient to allow for informed, rational decisionmaking.

V. Aesthetics—Lighting at pp. ES 6-7

This section asks if the project creates a new source of substantial light or glare which would adversely affect day or nighttime views in the area. In determining less than significant impact, the analysis here improperly relies on PDFs (Project Design Features) instead of applicable regulations and requirements.

185-19

The PDFs are circular in nature in that they refer back to the Specific Plan (SP) for validation instead of applicable regulations and requirements. See MIG Review p. 4.

Further, as stated by MIG, “PDFs need to address the specific provisions that are being referenced in the SP so the reader doesn’t have to guess at what is being referred to. In addition, merely saying that the project will comply with the SP is still circular: the SP can be changed and may no longer address issues of concern to the EIR.” MIG Review p. 4.

**Saying the project meets its own “guidelines” or “development standards” is meaningless. Please do as MIG suggested and “reference back to the regulations /requirements and specify what they are in the narrative of the relevant EIR topical section.”** MIG Review p.4.

185-20

**This comment/suggestion applies to all PDFs in the EIR and elsewhere in the document, particularly with regard to the Consistency Analysis.** Circular statements that the project meets its own guidelines are used to erroneously support conclusions of consistency with the terms of applicable laws and policies.

In addition, regarding PDF AES-2, specifying that “[s]olar panels shall be oriented to the south to maximize efficiency and establish visual consistency across buildings” **exacerbates rather than mitigates** the problem of substantial light and glare as the neighboring communities are to the south and west.

185-21

VI. ES-1 Air Quality at p. ES-9-10

This section asks if the project would result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard as well as if it would expose sensitive receptors to substantial pollutant concentrations.

185-22

In determining less than significant impact, the analysis improperly rejects the recommendations spelled out by the independent reviewer, MIG.

The whole point of retaining an independent reviewer is to ensure that environmental impacts are fairly evaluated. Allowing the developer to reject MIG’s recommendations and do what it wants without regard to the health and well being of the surrounding community eviscerates the value of hiring an independent reviewer and puts the community at significant risk.

The project should be held to all the standards outlined in MIG’s review for the reasons set forth therein. Please see the MIG review (attached) at pp. 7-8 for their comments, analysis and reasoning.

185-23

In summary, MIG twice recommends that “MM-AQ-1 be revised to use the SCAQMD thresholds of significance as the performance standard for the mitigation measure, because 1) the standard is the same as that utilized as a threshold in the EIR, and 2) it provides specificity beyond that currently captured in the EIR (i.e. the performance standard for

185-24



'functionally equivalent diesel PM emissions totals' is not clearly identified in the mitigation measure)." (MIG Review p. 8 emphasis theirs)

↑ 185-24  
Cont.

MIG further recommends that for diesel PM, "MM-AQ-1 be clarified to require functionally equivalent **diesel PM emissions reductions for the purposes of the EIRs LST analysis** and a corresponding update to the construction health risk assessment for the **purposes of the EIR's diesel PM analysis.**" (MIG Review p. 8 emphasis theirs).

185-25

MIG's review at p. 6, indicates that several GP policies have been removed. Dudek's response to MIG's comment questioning why they have been removed states that, "These specific ones have been removed(sic) as they are directed to the City and not the responsibility of the project. Please specify what has been removed and what the implications are. What exactly is the responsibility of the City and not the project.

185-26

VII. ES-1 Utilities and Service Systems at p. ES-46: Water

This section asks if there will be sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years and concludes that there will be less than significant impact because "the project applicant will provide funds to the City to purchase supplemental water from the San Gabriel Valley Municipal Water District (SGVMWD) in an amount equal to the anticipated total indoor and outdoor water demand of each residential unit over a 50-year period. This purchase would be in addition to the City's existing agreement with SGVMWD providing for the purchase of supplemental imported water. "

185-27

Please address the facts that the proposed mitigation is not possible because:

- 1) **As admitted by Interim City Manager, Jose Reynoso, water is currently unavailable for purchase and there is no guarantee of future availability;**
- 2) **the agreement calls for the purchase price to be at 2021 rates for the next 50 years when, in fact, price of water will most certainly increase; and**
- 3) **the agreement would need to be in perpetuity to be less than significant impact.**

VII. Zoning General Plan and Policy Conflicts 4.1-8

The project site is currently zoned Institutional, and the existing General Plan land use designation is also Institutional. The proposed project is **in direct conflict with the zoning code and General Plan** because, among other things, it would change the land use designation to Specific Plan. To say that it is consistent because the Specific Plan would *change* the zoning code and General Plan is oxymoronic. If it were consistent, zoning code and General Plan amendments would obviously not be necessary. Failure to admit this basic inconsistency highlights the problem throughout this report of claiming consistency even where the project is in direct conflict with the city's General Plan and policies.

185-28

In an attempt to show consistency with city policies and the General Plan, this report improperly uses language that fails to establish consistency with the policy at issue by stating that the project would be consistent with itself—not the policy. In several instances, it states the development would be "regulated" by its own design guidelines which are, in fact, inconsistent with the policy. No facts are presented to support erroneous conclusions of consistency when it can't be done. Please address the inconsistency of the project with city policies and the General Plan with facts instead of circular reasoning.

185-29

Moreover, because the project location and description are so unclear, unstable, and not finite (subject to change) as stated above at pp.1-5, it is impossible to determine whether the project is consistent with the city's General Plan and ordinances.

185-30

VIII. 4.15.5 Impacts Analysis: Fire Protection

This section asks if the project would result in substantial adverse physical impacts associated with the provision of fire protection services and concludes that "SMFD has reviewed the project and has determined that it would not have a significant effect on service demands....Therefore, through payment of appropriate development fees by the project applicant, the proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities. Impacts would therefore be less than significant." P. 4.15-9

185-31

The conclusion is not supported by the facts given that the city is already short staffed. A fully staffed fire department consists of 15 firefighters and the City has only 10 and "SMFD does not have any signed mutual aid agreements for fire protection." p.4.15-1.

Please explain *how* payment of development fees would be used to mitigate the adverse impact of overburdening an already overburdened fire department and explain the grounds for SMFD's determination that the project would not have a significant impact on services demands.

IX. Wildfire

This section describes the existing wildfire conditions within the vicinity, regulations, and a Fire Protection Plan (FPP).

185-32

As indicated in the MIG review, the Fire Protection Plan "is not really a clear-cut plan for fire protection...it is an amalgam of often generic narrative reference already existing fire safety regulations, and information not specific to the project: it is difficult to sort what is being provided for the site in terms of fire protection that is not already required." p. 5 MIG Review.

Please implement MIG's recommendation "that the FPP be modified to be more project specific **including an exhibit showing the FPP.**" (emphasis theirs). As it stands, the FPP is, according to MIG, "an artifice of a plan that really is just compliance with existing regulations." p. 5 MIG Review.

185-33

The Fire Plan is exceptionally important given Sierra Madre's history of fire and it is a source of great anxiety in the community that this be properly addressed. Right now the plan appears to place responsibility on individuals stating that "each property owner would be individually responsible to adopt, practice, and implement a "Ready, Set, Go!" approach to site evacuation." p.4.20-10. It's hard to imagine how this could be a sufficient fire plan.

185-34

With regard to access and evacuation, the section on roads at 4.20-13 fails to address the significant problem that there is not adequate ingress and egress due to the condition and width of both Sunnyside and Carter leading into the project.

It states only that, "[t]he project would include reconfiguration of North Sunnyside Avenue, located *within the western portion of the site*, which would be moved farther to the west. In addition, the project would result in improvements to Carter Avenue to provide secondary egress and ingress access to the site." p. 4.20-13 (emphasis mine). Further it is incorrectly asserted that, "All roads comply with access road standards of not less than 24 feet, unobstructed width and are capable of supporting an imposed load of at least 75,000 pounds." P. 4.20-13. This is not so—Carter is 20 feet in width.

185-35

How will Carter be improved to provide adequate ingress and egress when the County will not allow it to be widened? No improvements are mentioned for the portion of Sunnyside leading up to the project that would make it a viable access road either.

185-36

Please address the conflict with City policy Hz7 "to avoid expanding development into undeveloped areas in Very High Severity Fire Zones" in the update to the City's Safety Element.

185-37

Please address the conflict with City Policy R3.2 to "ensure that wildland open space, including the areas of the city designated as High Fire Hazard Severity Zone remains undeveloped so as to mitigate the flood cycles that follow wild land fires in the natural open space."

185-38

X. 4.17 Transportation at p. 4.17-1 at pp. 4.17-3-4

This section describes the existing transportation conditions, evaluates potential impacts and mitigation measures.

This section fails to adequately address conflicts with the following city policies:

*Policy L51.2:* Limit the development of new roadways or the expansion of existing roadways.

The project conflicts directly with this policy by developing new roadways (3 new streets) and expanding existing roadways (Carter and Sunnyside, although it's unclear what the project will do, if anything, to the existing roadways.

No facts have been presented to support the conclusion that the project is consistent with this policy. Please provide factual support for this conclusion.

*Policy L51.5:* Encourage and support the use of non-automotive travel throughout the City.

The project conflicts directly with this policy by failing to provide bicycle facilities and creating safety hazards for pedestrians on surrounding streets.

*Objective L52:* Improving streets to maintain levels of service, vehicular, cyclist and pedestrian safety.

The project conflicts with this policy by *greatly increasing safety hazards* for pedestrians and cyclists on the surrounding streets. Neither north Sunnyside nor Carter has sidewalks, the roads are narrow, and both streets are used by many pedestrians walking the neighborhood and visiting Bailey Canyon Park. Families park on nearby Grove Street and walk in the street up to Bailey Canyon because there are no sidewalks and will be put at increased danger by the significant increase in cross traffic.

No facts have been presented that the project will improve streets. On the contrary, it will create hazards for pedestrians and cyclists. Please provide facts in support of the conclusion that the project is consistent with this objective.

*Policy L52.9:* Explore the possibility of sidewalk continuity where feasible.

There is no provision for sidewalks to accommodate pedestrians on either Carter or Sunnyside leading up to the project. As such, the project conflicts directly with this policy.

No facts have been presented to support the conclusion that the project is consistent. Please provide facts to support this conclusion.

*Policy L52.8:* Require the incorporation of bicycle facilities into the design of land use plans and capital improvements, including bicycle parking within new multi-family and non-residential sites or publicly accessible bicycle parking.

It is acknowledged that the project directly conflicts with this policy, but there is no good reason nor mitigation provided.

*Objective L53:* Protecting residential neighborhoods from the intrusion of through traffic.

The November 10, 2020 Fehr and Peers traffic study (attached) establishes that by project completion there will a 118% increase in traffic on weekdays and 129% increase in traffic on weekends. Given these facts, it is indisputable that the project will create significant intrusion of thru traffic, conflicting directly with this objective.

There is nothing to support the conclusion that the project is consistent with this objective. Please provide any factual support that the project is consistent with this objective.

*Housing Policy 5.4:* Incorporate transit and other transportation alternatives such as walking and bicycling into the design of new development.

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185-46

The project conflicts with this policy in that it does not provide bicycle facilities and creates significant safety hazards to pedestrians on the small surrounding streets leading up to the site.

185-46  
Cont.

There are no facts to support the conclusion that the project is consistent with this policy. If there any such facts, please provide them.

*Circulation Goal 1.* A balanced transportation system which accommodates all modes of travel including automobiles, pedestrians, bicycles, and transit users.

185-47

The project conflicts with this policy in that it does not provide bicycle facilities and creates significant safety hazards to pedestrians on the small surrounding streets leading up to the site which have no sidewalks, are narrow and in disrepair.

*Circulation Goal 2.* Safe and well-maintained streets.

The project conflicts with this policy by *greatly increasing safety hazards* for pedestrians and cyclists on the surrounding streets. Neither north Sunnyside nor Carter has sidewalks, the roads are narrow, and both streets are used by many pedestrians walking the neighborhood and visiting Bailey Canyon Park. Families park on nearby Grove Street and walk in the street up to Bailey Canyon because there are no sidewalks and will be put at increased danger by the significant increase in cross traffic.

185-48

There are no facts to support this conclusion that the project is consistent with the goal of safe and well-maintained streets.

If there are any facts, particularly with regard to the surrounding streets that lead up to the project that support the conclusion that the project is consistent with this goal, please provide them. Has any study been done/will any study be done to determine the impact on safety for pedestrians? Is there any plan to improve the poor condition of Carter? What is the plan?

*Circulation Goal 3.* Preservation of quiet neighborhoods with limited thru traffic.

The November 10, 2020 Fehr and Peers traffic study (attached) establishes that by project completion there will a 118% increase in traffic on weekdays and 129% increase in traffic on weekends. Given these facts, it is indisputable that the project will create significant intrusion of thru traffic, disturbing the surrounding quiet neighborhood and conflicting directly with this policy.

185-49

There are no facts in this section that support the conclusion that the project would preserve quiet neighborhoods with limited thru traffic. If there are any facts that support for the conclusion that the project is consistent with this policy, please provide them.

*Objective C30:* Improving traffic safety.

The project conflicts with this policy by *greatly increasing safety hazards* for pedestrians and cyclists on the surrounding streets. Neither north Sunnyside nor Carter has sidewalks, the roads are narrow, and both streets are used by many pedestrians walking the neighborhood and visiting Bailey Canyon Park. Families park on nearby Grove Street and walk in the street up to Bailey Canyon because there are no sidewalks and will be put at increased danger by the significant increase in cross traffic.

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There is nothing in this section to indicate how the project could improve traffic safety in any way. If there are any facts that support for the conclusion that the project is consistent with this objective, please provide them. Please indicate if any safety study has been done and, if not, why not?

*Policy C30.3:* Maintain safety and efficient circulation without impacting the village atmosphere.

See above response to Objective C30. There is nothing in this section to indicate how the project could maintain safety and efficient traffic circulation. If there are any facts to support the conclusion that the project is consistent with this policy, please provide them. Please indicate if any safety study has been done and, if not, why not?

185-51

Overall, this section completely ignores the significant safety concerns and traffic impacts on the surrounding community by focusing on the streets inside the development to the exclusion of the impact on the neighboring streets. How exactly is the project going to deal with these problems?

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I



1650 SPRUCE STREET, STE 106  
RIVERSIDE, CA92507  
951-787-9222  
WWW.MIGCOM.COM

To: Vincent Gonzalez, Director, Planning & Community Preservation  
*City of Sierra Madre*  
232 W. Sierra Madre Blvd.  
Sierra Madre, CA 91024

From: Bob Prasse, Director of Environmental Services, MIG

Date: June 22, 2021

**Subject: Peer Review of The Meadows at Bailey Canyon Specific Plan, Second Administrative Draft Environmental Impact Report (June 2021)  
FULL REVIEW**

At your direction attached is our Full, third-party peer review of the Meadows at Bailey Canyon Specific Plan second Administrative Draft EIR (ADEIR) which was prepared for the applicant by Dudek and Associates. Our first review was submitted on April 2<sup>nd</sup> 2021, and the current review is for the 2<sup>nd</sup> draft of the EIR.

We previously provide a partial review of the 2<sup>nd</sup> draft on June 17<sup>th</sup>, 2021. For simplicity we have include our comments in colored fonts in the same column that the applicant has provided their comments. The comments in the blue colored font are those that were made in the June 17<sup>th</sup> partial review, and the balance of our comments included in today's submittal are shown in a red colored font. Both sets of comments are included in this document and none of the blue (June 17<sup>th</sup>) comments have been modified since the June 17<sup>th</sup> submittal.

Please also note that our review was focused on the Dudek revisions made directly in response to our comments on the original draft of the EIR: although we looked through the numerous other revisions made in the current draft, and in a few cases made additional comment, we did not "line read" the numerous changes that were made that were not related to our original comments, largely due to time and scope constraints.

Let us know if you have any questions.

185-53

PLANNING | DESIGN | COMMUNICATIONS | MANAGEMENT | SCIENCE | TECHNOLOGY  
1650 Spruce Street, Suite 102 • Riverside, CA 92507 • USA • 951-787-9222 • www.migcom.com  
Offices in: California • Colorado • Oregon • Texas • Washington

Meadows SP EIR Draft Peer Review Comments, Interim Progress Draft Comments 2nd Draft, June 17

Comment Location	MIG Comment	Dudak Response	Dudak Response (2nd Round)
<b>DEIR Executive Summary</b>			
P. ES 2, 4th, Para 2nd Sentence	Modify to read as follows: Public access <del>for</del> <del>within</del> both of these roads: ...	Revised here and in PD OK. Also chapter will need to be modified track with other comments/exchanges in other parts of the EIR.	Complete
<b>DEIR CHAPTER 1.0: INTRODUCTION</b>			
P. 1.1, 1st Para, last sentence	The creation of a separate lot for the 45 acres of open space needs to be included in the project description, if indeed it is part of the project. In addition, an exhibit needs to be provided showing the location of the 45-acre open space area.	Additional details have been included in Section 3.3.3 of the PD and Figure 3-4. An exhibit still needs to be provided per our earlier comment.	See Figure 3-4, which has been incorporated and included in the 2nd submittal to MIG
Subsection 1.3.2, Notice of Preparation and Scoping	<ul style="list-style-type: none"> <li>The applicant needs to obtain and reference the comment letters received in response to the NOP. Appendix A only includes 5 of the 7 letters that were apparently received and does not include the standard acknowledgement letter sent by the State Clearinghouse. What entity commented, the date of the letter and sentence or two on issues raised should be included in a summary table in this section. The NOP, all the correspondence received, and the mailing/distribution list for the NOP needs to be included in the appendices as it is part of the administrative record.</li> <li>The subsection also needs to indicate when the NOP scoping meeting was held and a summary of what issues or comments were raised by the public needs to be included. If there was a sign-in sheet (electronic or otherwise) that should also be included in the Appendix as part of the record.</li> <li>It also appears that written comments received during the review period have not been addressed, in particular the 11-page letter from California Department of Fish and Wildlife. This letter includes comments specific to the project that have not been addressed in the ADEIR, among other items: potential impacts to the Crotch Burrtle Bee, loss of trees (including those not protected by the City's Tree Preservation Ordinance) and potential resulting impacts on raptor foraging for sensitive species, and potential project edge condition effect on adjacent riparian/wetlands areas. These and other issues raised need to be addressed in the CDFW letter need to be directly addressed in the Biological Resource Chapter of the ADEIR.</li> </ul>	<p>SCH do longer send the standard acknowledgement letter since converting to the online portal. There should only be 6 comment letters (one of the NAHC ones was included by accident and the SCH one is not needed). Necessary revisions have been made</p> <p>OK</p> <p>Table has been added</p> <p>OK</p> <p>No scoping meeting was held for the project. See response under bio regarding the CDFW comment letter, which has been incorporated. This item needs to be discussed further.</p>	It is unclear what needs to be discussed here. MIG agreed okay with the bio response. We will go ahead and leave discussion as is and discuss with City so they concur on our approach.
	<ul style="list-style-type: none"> <li>Include Cultural Tribal Resources in the list of issue areas addressed in the EIR</li> </ul>	Added OK	Addressed
<b>DEIR CHAPTER 2.0: ENVIRONMENTAL SETTING</b>			
	Existing conditions needs to include a description of site vegetation including a description of the 101 (mostly mature) trees on the project site. The setting also needs to describe the potential riparian/wetlands areas to the east.	Added OK	Addressed
<b>DEIR CHAPTER 3.0: PROJECT DESCRIPTION</b>			
P. 3.1, 2nd Para, 3rd Sentence	Typo: add the word "acres" after the number 3.75	Added OK	Addressed



185-53  
Cont.

City of Sierra Madre

Comment Location	MIG Comment	Dudak Response	Dudak Response (2nd Round)
P. 3-1, 2nd Para, Last Sentence	With respect to the park, specify whether the project includes the dedication and developer construction of the 3.03-acre public park. Elsewhere in the EIR text it is implied that it will be dedicated but it is not clear whether it will be improved or constructed, please clarify.	Revised OK – Based on the revised language the park will be improved as part of the project – correct?	Per open space on the project site will be constructed, open space would be dedicated to the north of the site, clarified in text.
P. 3-1, 3rd Para, 4th Sentence	Add the following to the end of the sentence: "between Carter Avenue and North Sunnyside Avenue".	This sentence talks about existing access roads which are Carter and North Sunnyside, not between Carter and North Sunnyside. Minor revisions made for clarifications OK.	Addressed
P. 3-1, 3rd Para, last Sentence	This sentence references the 45-acre protected open space area that will be dedicated but further indicates that it is not part of the project site. This is not part of the project then it should not be referenced as one of the objectives on page 3-2 nor described as a community benefit. If it is part of the project then it should be further described in the project description, including a location map, how it will be provided, how it will be protected, and what it will be used for. If it will be accessible to or otherwise used by the public, it needs to be included in the project description and the environmental setting and analyzed as part of the project.	The proposed open space dedication is a community benefit but not subject to the SP. Additional details have been included in Section 3.3.3 (see response below). Acreage of open space has been removed to show this more generally and a new figure has been added. See earlier comment. Its attainment is one of the Project Objectives which makes it part of the project. One of the alternatives evaluated in the ADEIR also indicates that it would not be provided under such alternative which makes its provision clearly conditional on approval of this project. The open space site needs to be defined per our earlier comment. It will be accessible to or otherwise used by the public it potentially could have, at the least, potential impacts on biological resources, and wildland fire potential. If the actions under this project will not result in access, improvements, or use by the public, then such should be stated and, further that such use or action would be subject to a separate environmental review at a later date if it is made available to the public.	Open space has been defined and included as Figure 3-4 of the EIR. In addition, the discussion about the open space dedication has been removed from the alternatives discussion.  Objective 5 has been revised throughout as follows, to indicate the benefits of this dedication:  1. Preserve the hillside open space area by dedicating approximately 20 acres north of the Mater Dolores Retreat Center to the City, in order to preserve a portion of Dolby Canyon and the Dolby Canyon Trail, which would be used by wildlife for movement up and down slope; preserve native vegetation communities and drainages; and preserve land adjacent to the Dolby Canyon stream.
P. 3-3, First Sentence	This sentence asserts that there are several features of the project that are community benefits. Except for the public park, these are not community benefits, unless street or other improvements extend beyond the boundaries of the project site, these features are merely items that are needed to support the project, and if there is no project there would be no need for these features. Please note that CEQA allows but does not require a project to describe community or other benefits.	Removed mention of street improvements and underground utilities in relation to community benefits, and added the open space dedication as a benefit of the project. Although not required under CEQA, we believe it is important to show the non-required benefits the project would be providing. Net zero water use is not a community benefit. It is no different than the amount of water currently being used and its only benefit is to provide a service to the project similar to utilities, street improvements etc. remove it from the sentence.  - COMMENT ON NEW REVISIONS TO OBJECTIVES – See comment above on 45-acre open space dedication.	Open space has been defined and included as Figure 3-4 of the EIR. EIR has been revised based on discussions with the applicant and the city related to net zero water, and additional details have been added.
P. 3-3, Sec. 3.3.1, 4th Sentence	This sentence reads: The overall density of the project is approximately 2.5 dwelling units per acre. More specificity is needed. 2.5 dwellings per acre equals 17,424 SF average lot size. If this is the gross density for the site, accounting for and including the buffer and open space areas, it must be identified as such.	It is gross density. Revised OK.	Addressed
P. 3-4, First Sentence	This sentence uses a future tense. Is not it included in the SP and, if so, the conceptual landscape should be included in the EIR project description.	Figure has been created. The tense is still wrong in this sentence  "The Specific Plan would incorporate a Conceptual Landscape Plan (see Figure 3-5, Conceptual Landscape Plan), which would utilize fire-resistant and drought-tolerant tree and plant species to create a natural and safe environment." – Correct to say.	Revised. Although please note that the original language was consistent with the tense used throughout the EIR ("The Specific Plan would..."). This is typical CEQA language that does not provide

185-53  
Cont.



Meadows SP EIR Draft Peer Review Comments, April 2, 2021

Comment Location	MIC Comment	Dudek Response	Dudek Response (2 <sup>nd</sup> Round)
		"The Specific Plan incorporates..."	confirmation to the public know that the project/Specific Plan would be approved
P. 3-4, Subsections 3.3.5.1 and 3.3.5.2	The numbering on these subsections is off - please correct.	Fixed OK	Addressed
P. 3-4, Subsections 3.3.5.2	There appear to be some words missing (after the word "portion") in the 7 <sup>th</sup> sentence, and in the last sentence "discussed" should be changed to discussion.	Fixed "discussion". Read section and wasn't sure what the first portion of this is referring to but made sure no words are missing. This wording in the current draft is awkward "to the site, as well as" would provide internal circulation throughout the project site" (as well as provide?). Please clarify.	Revised to "as well as provide"
P. 3-6, 2 <sup>nd</sup> paragraph	This sentence reads: "In addition, to achieve a net-zero impact on local water supplies, the project Applicant shall work with the City to pay an off-site retrofit program in order to offset water use by reducing demand in the other areas of the City."  This narrative needs to be more detailed as it is too vague. See additional discussion under General Comments.	Revised. The provided revision is confusing because the initial language references a retrofit program while the revised language references the pre-purchase of water rights directly from MWD. Please clarify: is the retrofit program no longer being considered?	Correct. Retrofit program no longer considered and instead the applicant will purchase water rights directly from MWD.
P. 3-7 Sect 3.3.11 - Project Design Features	In general, the project design features (PDF) need to also be included in their respective topical sections; otherwise, it is too hard for the reader to follow.	A PDF section has been included throughout each section OK - will verify in individual sections.	Addressed
P. PDFs AES-1 & 2	Both of these PDFs are somewhat circular in nature in that they refer back to content in the Specific Plan. Instead of identifying them as PDFs please reference back to the regulations/requirements and specify what they are in the narrative of the relevant EIR topical section. In addition, AES-1 is inappropriate as a PDF because it refers to "guidelines" in the context of using PDFs as requirements vs. something actually built into a project's design (i.e. something you can see on a site plan or elevation) PDF "need to be similar to project conditions of approval. Permissive terms like "guidelines" or "should" or "work with" are generally not appropriate because they are not specific, subject to interpretation and often not enforceable.	These PDFs have been incorporated as PDFs per the applicant's legal counsel. Revised PDF-AES-1 to state "development standards" instead of guidelines, and have been incorporated in the aesthetics section - Notwithstanding the advice of the applicant's legal counsel these revisions provided do not address the concerns raised in our original comment. The PDF's need to address the specific provisions that are being referenced in the SP so the reader doesn't have to guess at what is being referred to. In addition, merely saying that the project will comply with the SP is still circular: the SP can be changed and may no longer address issues of concern to the EIR.	"Guidelines" has been removed from PDFs and the PDFs match what is in the SP. Revised both aesthetics PDFs throughout (in PD, AES section, and area summary) to be more precise and to include the associated section numbers in the Specific Plan
P. 3-8, PDF UTIL 1	If this PDF is necessary to provide potable water to the project, this needs to be a mitigation measure. It also needs to be in perpetuity and needs to have a trigger (prior to grading, or building, etc.) trigger. In its present form it is too vague to be a PDF or a mitigation measure. Additional analysis and detail are needed in the DEIR if this approach is necessary to assure that the project will have a reliable potable water supply.	This will be done as a part of the project. Added timing component - Appreciate the timing component but additional background into would be useful. We were unable to find the mitigation measure (we recommended that the PDF be converted to a mitigation measure). There does not appear to be anything in the DEIR in the way of background/supplemental information about how water rights can be pre-purchased from MWD, and whether it is feasible or if MWD is willing to sell such right.  Additional information about this unusual approach to obtaining water for a residential project would be helpful to the reader the mechanics and implication of such an approach.	Revised this and the utilities section per Jonathan's discussions with the City

185-53  
Cont.

City of Sierra Madre

Comment Location	MIS Comment	Dudak Response	Dudak Response (2 <sup>nd</sup> Round)
p. 3-8, Wildfire PDF's (and Fire protection plan).	<p>While much of the narrative in the PDF's refers back to the Fire Protection Plan (FPP) the FPP is not really a clear-cut plan for fire protection -- the only place the word "plan" shows up in the FPP Table of Contents is the "conceptual site plan". While the FPP contains lots of valuable information about risk analysis, anticipated fire behavior and other fire safety issues, it is an amalgam of often generic narrative -- reference already existing fire safety regulations, and information not specific to the project; it is difficult to sort what is being provided for the site in terms of fire protection that is not already required.</p> <p>We recommended that the FPP be modified to be more project specific, including an exhibit showing the FPP. The more focused FPP, using the FTP's in the EIR as the foundation, should also be incorporated into the Specific; this approach, with a single mitigation measure in the EIR requiring compliance with the FPP will be less unwieldy and more accessible compared to stacking mitigation measures in the EIR.</p>	<p>The FPP is general and points out what is required by code because that is what its purpose is and the regulations included are what is applicable to the project, hence their inclusion in the plan. Based on the analysis of the fire environment (which is provided in the FPP), it is determined that the planned approach, with fuel mod zones, ignition resistant structures, access providing primary and secondary alternatives, water and fire flow to the code, etc. ... the project can be considered to include necessary protections such that risk is reduced to acceptable levels. This is evidenced by the fire marshal agreeing with the plan's conclusions and accepting the document. The regulations included are what is applicable to the project, hence their inclusion in the plan. We have revised the PDFs to include just one PDF stating compliance with FPP.</p> <p>If the FPP basically identifies existing provisions that are required by code anyway is a separate plan really needed? It may be easier to just identify and briefly describe (much of this information appear to be in the plan anyway) what are the applicable regulations and requirements are that would be applied to the project instead creating the artifice of a plan that really is just compliance with existing requirements.</p> <p>A large part of what is incorporated in the plan relates to fire risk analysis and the wildfire environment, and this information is good and necessary to have, but it doesn't need to be included in a "plan" per se.</p> <p>We are also recommending that additional detail be provided about project water service/efflow; below is the excerpt from the FPP that addresses this issue:</p> <p>"Water service for the project site would be provided by the City of Sierra Madre as the project site is within the City's service area. The internal waterlines will supply sufficient fire flows and pressure to meet the demands for required on site fire hydrants and interior fire sprinkler systems for all structures".</p> <p>This passage is generic and somewhat conclusory and provides no substantiation as a minimum it needs to identify fireflow and duration standards for the project.</p> <p>In addition, per our original comment, an exhibit highlighting the features of the FPP is important to include in the EIR and the FPP is important to provide, especially as we understand that this is likely an issue that is important to Sierra Madre residents, and such an exhibit will make the FPP more understandable....</p>	<p>FPP will be significant to have and it highlights wildfire requirements and highlights what the project is doing in terms of addressing wildfire risks. We will leave the FPP in place. However, we are have revised the FPP language per suggestions regarding water service. Lastly, most if not all of the summary items are included in the FPP and are not amenable to being graphically depicted. Note that App. E does depict the Fuel Mod Plan and App. D gives specific details for construction features.</p>
P. 3-7, Sec. 3.3.9	<p>Grading Plan. Additional detail needs to be provided. What are the slopes on the tiers (greater than 2:1)? What is the average slope and where is the 12% slope located? Also, the word "tiered" is misspelled in the second sentence.</p>	<p>Added OK:</p>	<p>Addressed</p>

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P. 3-9, Sec. 3.4 - Discretionary Actions	One of the bullet points under this section reads: "Approval of the Development Agreement between the Applicant and the City."  A Development Agreement has not been mentioned up to this point and must be described in more detail in the project description, including the basic content and purpose of the DA. Also, if the DA addresses the dedication of the 45-acre open space area then it needs to be included as part of the project description.	Additional details on the DA have been added OK.	Addressed
P. 3-10, Sec. 3.5	This section identifies responsible agencies but only lists Los Angeles Regional Water Quality Control Board. This is too short. Please identify other agencies. WWD? California Fish and Wildlife? The EIR consultant and/or applicant should be able to provide this.	LA public works (including flood control) for new easements within Sunnyside has been added. Also, Caltrans has been added per NOP comment letter OK.	Addressed
<b>DEIR CHAPTER 4.0: Environmental Analysis</b>			
4.0.1 Mineral Resources to the list of environmental issues addressed		Done OK.	Addressed
<b>DEIR CHAPTER 4.3: AESTHETICS</b>			
P. 4.1 - 5, 2 <sup>nd</sup> Para, 3 <sup>rd</sup> Sentence	This sentence is inconsistent with the second paragraph on Page 4.1-1 under the "Project Site" subsection which indicates that the site has a "high of 1,210 feet above sea level (AMSL) at the northwestern portion of the site, to a low of 1,107". Please revise to reconcile these two passages.	Revised - If public benefits to achieve project objectives is to be through a DA then the basic "deal points" of the DA need to be better identified in the DEIR. These numbers are still inconsistent. Please revise.	Revised. This number was supposed to indicate the proposed elevations (rather than existing) so that is why the numbers still differ.
P. 4.1-8, 1st Para, 2nd Full Sentence	This sentence references the City's Dark Sky Program. The Dark Sky Program needs to be referenced and described in Section 4.1.2 - Relevant Plans, Policies, and Ordinances.	It is included under the General Plan. Added some clarification OK.	Addressed
<b>DEIR CHAPTER 4.2: AGRICULTURE AND FORESTRY RESOURCES</b>			
<b>DEIR CHAPTER 4.3: AIR QUALITY</b>			
General Comment	There are inconsistencies between the way information is presented in the EIR Air Quality Section and the air quality / greenhouse gas technical report contained as EIR Appendix B. For example, whereas the Appendix B indicates that the utilization of Tier IV construction equipment would be a project design feature, the EIR incorporates this provision as a mitigation measure. To this end, the EIR incorporates emissions values in its tables that differ from corresponding tables in Appendix B (e.g., emissions identified in Table 4.3-6 in the EIR differ from those shown in Table B of Appendix B). MIG recommends updating the EIR / Appendix B, so that project design features / mitigation measures are identified in a consistent manner and that emissions values between the two documents are consistent between corresponding tables.	The Appendix B and EIR Air Quality Section will be updated to be completely consistent. This may have been a version issue as the most recent Appendix B reflected this as mitigation. OK. Please provide this information when completed.  NEW COMMENT ON GP Policies - Page 4.3-17 - Several from the last draft have been removed: why were they removed?	We revised some of the policies throughout the sections to make sure they are consistent with Table 4.11-1 in the land use and planning section. These specific ones have been removed as they are directed to the City and not the responsibility of the project.
Page 4.3-20, Section 4.3.3.1.1	The first paragraph states, "The project would implement dust control strategies as a project design feature." The proposed project would be required to comply with SCAQMD Rule 403, which provides requirements for the control of fugitive dust during construction activities. MIG recommends revising the text to indicate the project would comply with the requirements of SCAQMD Rule 403 and that the dust control measures noted in the bullet's following this text reflect the assumptions accounted for in the CalEEMod runs.	Text was revised as commenter suggested OK.	Addressed
Page 4.3-28, "Health Effects of Other Criteria Air	The text indicates that construction of the project would not exceed thresholds for PM <sub>10</sub> and PM <sub>2.5</sub> ; however, the emissions estimates contained in Table 4.3-8 (compared against LSTs) indicates particulate matter emissions would be	The text was revised to reflect the exceedance of the LST thresholds OK.	Addressed

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<p>Pollutants, Fourth Paragraph Page 4.3-29, Section 4.35, MM-AQ-1</p>	<p>potentially significant. MIG recommends revising this text to reflect localized particulate matter emissions could be potentially significant.</p> <p>MM-AQ-1 generally requires the project applicant utilize CARB-certified Tier 4 Interim engines or equipment outfitted with CARB verified diesel particulate filters, but also provides an exemption pathway, should it be determined that the aforementioned equipment standards are not readily available in the South Coast Air Basin. The exemption pathway sets forth various requirements before this option can be taken into consideration, one of which is that "functionally equivalent diesel PM emission totals ... be achieved for the project from other combinations of construction equipment." MIG disagrees with using a mass-based standard as the performance metric for the project, because receptor exposure to diesel PM concentrations has a different health risk effect, depending on the age of the receptor at time of exposure. Reduction in mass-based emissions would have a different benefit in year 1 of construction than it would in year 2. In addition, a reduction in total mass does not necessarily result in reductions at the receptor. MIG recommends MM-AQ-1 be revised to use the SCAQMD thresholds of significance as the performance standard for the mitigation measure, because 1) the standard is the same as that utilized as a threshold in the EIR, and 2) it provides specificity beyond that currently captured in the EIR (i.e. the performance standard for "functionally equivalent diesel PM emission totals" is not clearly identified in the mitigation measure).</p>	<p>The mitigation measure is in place to reduce emissions PM<sub>10</sub>, PM<sub>2.5</sub>, and DPM emissions from project construction. The mitigation measure is not solely in place to reduce DPM emissions and health risk impacts. As such, the functional equivalent must reduce the same mass emissions to ensure the PM<sub>10</sub> and PM<sub>2.5</sub> mass thresholds for LSTs are not exceeded. While the comment may be valid for DPM, the mitigation measure is not solely for DPM and thus no changes are necessary.</p> <p>The additional context and explanation is helpful, however, MIG disagrees that the plain language of MM-AQ-1 achieves the stated intent for the following reasons:</p> <ol style="list-style-type: none"> <li>MM-AQ-1 requires replacement equipment be evaluated using standard methods that document "necessary project-generated functional equivalencies in the diesel PM emissions level are achieved." The MM does not explicitly state on a mass, mass percentage, or other basis what this equivalency is. There are more than 400 pages of CalEEMod output to review to identify that the EIR is requiring a 91.1% reduction in PM<sub>10</sub> exhaust emissions and a 90.4% reduction PM<sub>2.5</sub> exhaust emissions. At a minimum, the EIR needs to clearly state what the PM reduction standard is, even if the MM is not specifically required for diesel PM and health risk impacts.</li> <li>Both on-site fugitive and exhaust emissions sources contribute to LST PM<sub>10</sub> and PM<sub>2.5</sub> emissions estimates. While MM-AQ-1 refers to diesel PM reductions, language should be added that explicitly prohibits additional fugitive dust controls in lieu of higher equipment exhaust emissions. This will ensure any subsequent remodeling does not solely apply enhanced fugitive dust controls (e.g., 3x watering) as a means of LST and diesel PM compliance.</li> <li>MM-AQ-1 requires all equipment 50 horsepower or greater to meet Tier 4 Interim engine standards; however, the MM provides an exemption if this equipment is not available. The EIR should generally document the options that are available to provide necessary diesel emissions reductions if Tier 4 interim equipment is not available (e.g., reductions in small off-road equipment engines included in the modeling, if any), use of retrofit devices on older equipment, use of alternative-fueled equipment, etc.).</li> <li>The EIR evaluates LST significance based on the construction phase with the highest on-site PM<sub>10</sub> and PM<sub>2.5</sub> emissions (2024 Remedial and Mass Excavation Phase). Whereas the LST analysis is based on a single phase, MIG assumes the emissions modeling is based on the use of Tier IV interim equipment during all phases of construction (the CalEEMod output indicates Tier IV mitigation was applied to certain equipment, but it is not possible to know which equipment or for what phase without the input file). The measure as written appears to allow diesel PM reductions to occur anywhere in the construction site.</li> </ol>	<ol style="list-style-type: none"> <li>This request is not necessary to facilitate the emission reductions needed by the mitigation measure. The engine tier level specified in the MM-AQ-1 reduces emissions of PM<sub>10</sub>, PM<sub>2.5</sub>, and DPM to below levels of significance. There is no importance as to what % this is reducing and does not provide value for the mitigation.</li> <li>MM-AQ-1 reduces engine exhaust PM emissions solely. It does not specify or refer to reducing fugitive emissions of PM. While MM-AQ-1 reduces exhaust PM<sub>10</sub> and PM<sub>2.5</sub>, it also reduces total PM<sub>10</sub> and PM<sub>2.5</sub> (which includes fugitive dust PM<sub>10</sub> and PM<sub>2.5</sub>). As additional measures to reduce fugitive dust PM<sub>10</sub> and PM<sub>2.5</sub> are not needed for the project, this addition is not necessary. Furthermore, adding this to a mitigation measure that is focused solely on off-road equipment engines would cause confusion for the reader.</li> <li>MM-AQ-1 has been updated to include specific pathways for which an exemption can be granted and example engine technologies that can be used that are functional equivalents to Tier 4 Interim for reducing engine PM<sub>10</sub> and PM<sub>2.5</sub>.</li> <li>The health risk assessment was prepared evaluating emissions of DPM statewide where construction activity is likely to occur. At this stage in project development, information is not refined enough to parse out the equipment over different regions of the project. As such, if a change in equipment proposed compared to what was evaluated in the EIR the analyses would be revised consistent with the EIR to evaluate the DPM emissions statewide, not within specific regions of the site. Therefore, as long as total DPM emissions of the project are the same or less than what was evaluated in the EIR, HRA impacts would be the same or less as what was evaluated in the EIR.</li> </ol>

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		<p>however, the health risk assessment is based on specific equipment with specific emission rates operating in specific areas. Emissions reductions occurring in different areas or during different phases may not achieve the same reduction in modeled PM concentrations and corresponding health risks.</p> <p>For the reasons above, it is MIC's opinion our comment is valid for diesel PM. MIG recommends MM-AQ-1 be clarified to require functionally equivalent diesel PM emissions reductions for the purposes of the EIR's LST analysis and a corresponding update to the construction health risk assessment for the purposes of the EIR's diesel PM analysis.</p>	
Appendix B, Section 1.3	The Project Description in Appendix B contains different land use values than the EIR. For example, whereas Appendix B identifies approximately 14 acres for the residential land use, the EIR Project Description identifies 9.11 acres. The input value for the single-family residential land use in CalEEMod is neither of those values, and instead is shown at 11.12 acres. MIG recommends reconciling these discrepancies and updating the CalEEMod project file to confirm all emissions estimates reflect project conditions.	<p>The CalEEMod modeling is updated to reflect the land use sizes as shown in the project description.</p> <p>The numbers for the residential is now consistent with Table 3-1 of the Project Description (9.11 acres). The number for parks - 4.49 acres - is higher than in the PD-3.39 acres. However, Table 3-1 also includes a category titled "Grading and Landscape Buffer" which includes 1.04. please clarify whether this acreage is part of the 4.49 acres reference in Appendix B.</p>	Yes, the parks acreage in CalEEMod includes the acreage for the landscape buffer to conservatively account for any water use during operation. As CalEEMod default assumptions were not relied upon during construction, any small change in acreage would not affect the construction modeling or emissions from what is presented in the EIR. Furthermore, the final acreage of 2.04 acres park and 1.04 acre landscape buffer are less than the 4.49 acres modeled and thus what is modeled is conservative.
Appendix B, Section 1.3, Page 3	The first paragraph on page 3 of Appendix B indicates the project would involve the construction and operation of a detention basin at the park that would have a footprint of approximately 77 by 60 feet, or approximately 4,620 square feet. In contrast, the EIR Project Description describes this project element as a "63,500-cubic foot retention storage gallery." With the footprint identified in Appendix B and the capacity identified in the EIR Project Description, the retention/detention basin would have an approximate depth of 13.7 feet. MIG recommends: <ol style="list-style-type: none"> <li>1) The EIR and Appendix B provide additional clarification / details on this project element;</li> <li>2) Confirm the grading (i.e., net cut / fill) estimates reflect the spoils that would be generated by this activity; and</li> </ol> Confirm the equipment operating assumptions currently accounted for in CalEEMod capture the likely / necessary equipment required to excavate and install this project element. Table 6 (page 26) of Appendix B currently identifies (2) Crawler Tractors, (1) Dozer, and (8) Scrapers, but no dedicated excavating equipment.	<p>The project description in Appendix B was updated to be consistent with the EIR project description. The grading and equipment needed for grading were provided by the applicant and do not need updating.</p> <p>OK</p>	Addressed
Appendix B, Section 2.4.2.3	MIG recommends adding additional information to this section to fully disclose the use of different variables (e.g., daily breathing rate, age sensitivity factor, fraction of time at home (FAH), etc.) accounted for in the health risk assessment, based on OEHHA guidance. The preparer should also confirm no school is within the 1 in one million cancer risk isopleth, requiring the FAH to be set to 1 for the 3 <sup>rd</sup> trimester and ages 0-2 and 2-16 age bins per OEHHA guidance.	<p>Clarification was added to Appendix B to reflect the FAH.</p> <p>OK</p>	Addressed
Appendix B, Page 24, Table 5	The table indicates the CO LST at a distance of 25 meters for SPA 9 is 535 pounds per day; however, based on the LST lookup tables provided by the SCAQMD, the CO LST is 623 pounds per day (635 pounds per day is for SPA	<p>The LST was revised to 535 in Appendix B and the EIR.</p> <p>OK</p>	Addressed

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	<p>8. MIG notes that despite this inconsistency, the utilization of 535 pounds per day for the CO LST assessment provides a conservative assessment of potential impacts.</p>		
Appendix B, Page 30, Section 2.5, "Consistency Criterion No. 2"	<p>The analysis indicates that, despite the project involving a land use / zoning change, the approximately 42 new residences allowed for under the proposed Specific Plan would be within the SCAQMD 2016 RTP/SCS assumptions. The analysis does not, however, provide any history or context with regard to prior development in the City that supports this statement. The addition of 42 new residences comprises more than 20% of the residences accounted for by the 2016 RTP/SCS in Sierra Madre. The EIR should be revised to provide a history of prior development in the City since the adoption of the 2016 RTP/SCS before concluding that the growth allowed by the project would be consistency with the growth projections accounted for in the 2016 RTP/SCS.</p>	<p>Additional clarification was added to the EIR and Appendix B to address the history of development in the City.</p> <p>OK.</p>	Addressed
Appendix B, Page 33, Table 8	<p>A footnote in this table indicates that adjustments have been made to the CalEEMod file to reflect compliance with SCAQMD Rule 1113; however, based on MIG's review of the CalEEMod output files (which also indicate such adjustments were made), it does not appear any alterations to CalEEMod default values have been made. Please provide clarification if adjustments have been made to the model with regard to residential / non-residential / parking architectural coating rates and what the adjusted application rates (in terms of grams VOC per liter coating) were assumed.</p>	<p>The footnote was removed as no changes to CalEEMod were made for architectural coatings.</p> <p>OK.</p>	Addressed
Appendix B, Page 37, "Construction Health Risk"	<p>Appendix B discusses the maximum individual cancer risk but does not disclose where the MEIR is. MIG recommends the EIR be revised to disclose where the MEIR is located.</p>	<p>Appendix B and the EIR were updated to include the location of the MEIR.</p> <p>OK.</p>	Addressed
Appendix B, AERMOD Modeling	<p>MIG has reviewed the AERMOD input file, and has the following concerns regarding the dispersion modeling conducted for the proposed project:</p> <ul style="list-style-type: none"> <li>Source Release Characteristics: MIG has reviewed the references provided at the end of Table B, and cannot confirm that the various parameters used in the modeling (e.g., release height of 2.5 meters) are appropriate. MIG recommends adding additional information to Section 2.4.2.3 of Appendix B and/or revising AERMOD to reflect updated parameters.</li> <li>On-site Source Representation / Location: The project's on-site emissions were modeled as a line source that spirals from the project boundary to the center. In doing so, the project roughly averages emissions across the site. This approach is not necessarily reflective of the project, which MIG anticipates would require a relatively large amount of equipment operating in the southeastern portion of the site (i.e., closer to receptor locations) during excavation and installation of the stormwater retention basin. MIG recommends the preparer consider modeling the on-site activities in a different manner, if it is anticipated development activities would be congregated in certain areas of the site for a prolonged amount of time.</li> <li>Off-site Emissions: The AERMOD file does not include mobile source emissions from haul trips or vendor deliveries. MIG recommends incorporating off-site emissions into the AERMOD run and HRA.</li> <li>Meteorological Data: While it appears the Azusa meteorological data was imported into the model, the dispersion plot file does not show a strong prevailing wind from the west/southwest as indicated by the met file's wind</li> </ul>	<p>The source release parameters for the construction HRA are provided in Table 7 of Appendix B of the HRA. This is further confirmed starting on page 47 of Appendix B to Appendix B, the AERMOD_ADO output file.</p> <p>The HRA reflects the anticipated construction activity of the project. While construction activity may at times be concentrated in one or more areas of the site, when evaluating construction impacts over the entire project, construction activity will occur in accordance to the site plan where building occurs. No changes are necessary.</p> <p>On-site haul truck trips and vendor truck trips were previously included in the HRA. Offsite truck trips were added to the HRA and the EIR and Appendix B were revised.</p> <p>The meteorological data as identified in Table 7 of Appendix B is also verified on page 68 of Appendix B of Appendix B in the AERMOD_ADO output file.</p> <p>The HRA models on-site construction equipment as 400 surface-based the volume sources. This approach is generally consistent with the referenced SCAQMD Final LST methodology document; however, the SCAQMD's methodology uses elevated volume surfaces with dimensions of 10 meters x 10 meters, resulting in 36 sources per acre (as opposed to 27 sources per acre) and an initial vertical dimension of 1.4 meters.</p>	<p>The Final LST methodology was used as the basis for the plume height of 5 meters. In accordance with the EPA guidance, the Plume Width is the vehicle width plus 6 meters and the release height is 1/2 the plume height. So the 10 x 10 meter methodology does not apply as it doesn't follow the more updated and relevant source parameters for volume sources. These source parameters better model the actual source compared to what is recommended in the LST document.</p>

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	<p>rose. Rather, pollutants seem to be congregated in proximity of the site, with the highest point of emissions occurring in the middle / top portion of the site. Appendix B does not include any sort of graphical output from Lakes AERMOD. Therefore, MIG cannot confirm whether or not an error occurred while importing the data for review. MIG recommends a graphic be provided with the next iteration of Appendix B that provides a visual reference for sources, dispersion pattern, etc.</p> <p>Based on the above remarks, MIG has limited its review to the CalEEMod outputs and AERMOD files and has not evaluated the HARP file in a detailed manner.</p>	<p>MIG acknowledges there are multiple, acceptable ways to model construction emissions; however, at a minimum, we recommend the EIR include text discussing why the surface-based volume source type was used for this modeling and why even partitioning of emission rates was employed given potential differences in residential / park construction areas.</p>	
<b>DEIR CHAPTER 4.4: BIOLOGICAL RESOURCES</b>			
<p><b>General Comment</b></p>	<p>Please note that this section will require substantial revisions because it does not address the issues raised by the 11-page letter from California Department of Fish and Wildlife, including numerous project specific issues raised (See prior comment on Section one). These comments will need to be addressed.</p>	<p>CEFW concerns have been incorporated. Here is an overview of where issues are addressed:</p> <p><b>Specific Comments</b></p> <ol style="list-style-type: none"> <li>1. Nesting Birds – Surveys and Buffers             <ol style="list-style-type: none"> <li>a. MM-BIO-1 provided in Section 4.4.5 of the DEIR meets the suggested survey and buffers.</li> </ol> </li> <li>2. Crotch Burds Bee             <ol style="list-style-type: none"> <li>a. This species did not come up in the CNDDB search for the Bio Analysis included as Appendix C-1 of the DEIR.</li> <li>b. Based upon the classroom training a few of us, Dudak biologists got, Brock's CDFW-approved survey methodology, and my experience in using that classroom training and approved methodology at Strauss, the species would not be expected to have burrows or refugia on the project site. Additionally, the plant species used for food sources are not present.</li> <li>c. There was a recent court ruling that threw out the proposed listing for Crotch since CESA does not cover insects.</li> </ol> </li> <li>3. California Endangered Species Act – Least Bell's Vireo             <ol style="list-style-type: none"> <li>a. This species did come up in the CNDDB search for the Bio Analysis included as Appendix C-1 of the DEIR                     <ol style="list-style-type: none"> <li>i. "Not expected to occur. The project site lacks the dense riparian habitat suitable for this species to occur."                             <ol style="list-style-type: none"> <li>1. There is no potential habitat in the vicinity of the project.</li> </ol> </li> <li>ii. No impacts and no CESA ITP.</li> </ol> </li> </ol> </li> <li>4. Bat Species             <ol style="list-style-type: none"> <li>a. Eleven bat came up from the CNDDB search for the Bio Analysis included as Appendix C-1 of the DEIR.                     <ol style="list-style-type: none"> <li>i. It includes the three species CDFW mentions</li> </ol> </li> <li>b. None of the species have a moderate or high potential to occur during roosting due to the lack of associated suitable habitat.                     <ol style="list-style-type: none"> <li>i. Only one had a low potential to occur because it roosts in trees, but only individuals, and not maternity</li> </ol> </li> </ol> </li> </ol>	<p>Addressed</p>

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		<p>(nursery) or wintering, and those individuals would be expected to leave if the tree is disturbed.</p> <p>5. Landscaping – No Invasive</p> <ul style="list-style-type: none"> <li>a. This would need to be addressed in the Project Description for the development</li> <li>b. I agree that no invasive species should be used, ever or anywhere, but especially that close to natural open space.</li> </ul> <p>6. Tree Removal</p> <ul style="list-style-type: none"> <li>a. This is discussed and mitigated (MM-BIO-2) in Section 4.4.5 of the DEIR.</li> </ul> <p>7. Fuel Modification – Impacts to resources in areas adjacent or mitigation lands</p> <ul style="list-style-type: none"> <li>a. Figure 3-9 of the DEIR indicates the fuel modification would not impact any adjacent natural habitats.</li> </ul> <p>8. Human-Wildlife Interface</p> <ul style="list-style-type: none"> <li>a. Bear safe garbage containers                             <ul style="list-style-type: none"> <li>i. Needs to be addressed in the Specific Plan, HOA, or other management entities for the development.</li> </ul> </li> <li>b. Mountain Lion interactions now that the species is a candidate for listing under State ESA                             <ul style="list-style-type: none"> <li>i. Not analyzed in the DEIR, but since the project vicinity is not expected to support natural areas (nonrma's don't like human activity) and is not part of wildlife corridor, direct and indirect impacts are not expected.</li> <li>ii. Taking away the mule deer grazing area will actually decrease the likelihood of human-lion interactions.</li> </ul> </li> </ul> <p>9. Biological Baseline Assessment Need</p> <ul style="list-style-type: none"> <li>a. Provided as Appendix C-1 of the DEIR</li> <li>b. The species mentioned were analyzed.</li> </ul> <p>10. Biological Direct, Indirect, and Cumulative Impacts Need</p> <ul style="list-style-type: none"> <li>a. Analyzed in Section 4.4 of the DEIR</li> </ul> <p>11. Wetland Resources</p> <ul style="list-style-type: none"> <li>a. CDFW mentions indirect impacts to the basins to the east.                             <ul style="list-style-type: none"> <li>i. It is expected that since the Project involves more than 1 acre of disturbance that during construction, erosion-control measures would be implemented as part of the Storm Water Pollution Prevention Plan (SWPPP) for the Project. Prior to the start of construction activities, the Contractor is required to file a Permit Registration Document (PRD) with the State Water Resources Control Board (SWRCB) in order to obtain coverage under the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with the Construction and Land Disturbance Activities (Order No 2009-009-DWG, NPDES No. CAS000002) or the latest approved general permit.</li> </ul> </li> </ul>	

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		<p>b. CDFW notes, based upon aerial imagery, a potential depression in the southeast corner of the site that could be a vernal pool.</p> <p>i. This area was noted in the desktop analysis and the survey did include an investigation that was negative on it being a vernal pool or depression.</p> <p><b>General Comments</b></p> <ol style="list-style-type: none"> <li>Jurisdictional Waters                     <ol style="list-style-type: none"> <li>As stated in Section 4.4.1 of the DEIR, no wetlands or other jurisdictional waters are observed on the project site. Additionally, no wetland or riparian features have been previously identified.</li> </ol> </li> <li>Project Description and Alternatives                     <ol style="list-style-type: none"> <li>See Chapter 8 of the DEIR</li> </ol> </li> <li>Compensatory Mitigation for Impacted Sensitive Habitats                     <ol style="list-style-type: none"> <li>As stated in Section 4.4.1 of the DEIR, the project site's vegetation and land cover consists of ornamental vegetation lining paved roadways and non-native grassland. No sensitive communities or riparian habitat occur on the project site.</li> </ol> </li> <li>Long-term Management of Mitigation Lands                     <ol style="list-style-type: none"> <li>None needed since no sensitive or riparian habitats are being impacted.</li> </ol> </li> <li>Translocation/Savage of Plants and Animal Species                     <ol style="list-style-type: none"> <li>As stated in Section 4.4.1 of the DEIR, no special-status species are expected.</li> </ol> </li> <li>Moving out of Harm's Way – Wildlife                     <ol style="list-style-type: none"> <li>As stated in Section 4.4.1 of the DEIR, the site supports low quality habitat for most wildlife and no listed species are expected. <b>OK</b></li> </ol> </li> </ol>	
P. 4.4.1, Sec. 4.4.1, Existing Conditions	Potential Riparian and/or wetlands feature to the east of the project site, as well as any other natural features must be addressed in this section.	Added: The project site is adjacent to wetlands and riparian features across the roadway which separates the project site from Bailey Canyon Wilderness Park (USFWS 2020).	Addressed
P. 4.4.1, Description of Project Site	The 100+ trees on the project site need to be described and referenced in the existing conditions subsection.	Added: "Locally Protected Trees One hundred and one trees were inventoried within the biological study area including ten coast live oak ( <i>Quercus agrifolia</i> ) trees. All 10 of the oak trees meet the City's criteria for a protected oak tree. Appendix B presents the location of the individual trees mapped and assessed for the proposed project. Overall, the trees exhibit growth and structural conditions that are typical of their location in an undeveloped urban landscape. The trees include various trunk and branch malades and health and structural conditions. As presented in Appendix A, 29% of the individually mapped trees (29 trees) exhibit good health, 49% (49 trees) are in fair health, and 24% (24 trees) are in poor health. Structurally, 6% (6 trees) of the individually mapped trees are considered to exhibit good structure, and 77% (77 trees) exhibit fair structure, and 18% (18 trees) have poor structure. The trees in good condition exhibit acceptable vigor, healthy foliage, and adequate structure, and lack any major malades. Trees in fair condition are typical, with few malades but declining vigor. Trees in poor condition exhibit declining vigor, unhealthy	Added policy RT0.2 back in the bio and land use section. Added text regarding tree replacement ratio, required under MM-BIO-3.

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		<p>foliage, poor branch structure, and excessive lean. No pests or pathogens were observed on site.</p> <p>Trees within the biological study area vary in size and stature according to species and available growing space. The site's trees are composed of single- and multi-stemmed trees, with single-stemmed trunk diameters that range from 2 to 44 inches, and multi-stemmed trunk diameters that range from 4 to 76 inches. Tree heights vary from 8 to 55 feet. Tree canopy extents range from 5 feet to approximately 70 feet.* OK</p> <p>COMMENT ON NEW TEXT ADDED, PAGE 4.4-8 – Policy R10.2 was deleted in the current draft. Add this policy back into the text as it relates to the project.</p> <p>COMMENT ON NEW TEXT ADDED, PAGE 4.4-13 - Consider including an estimate of the number of trees that will be provided as part of the project, including trees in the new park and street trees. Recommended that a minimum of 1:1 replacement be provided for existing trees that are removed; alternatively, payment to the City's tree mitigation fee can be made.</p>	
P. 4.4-9, Impact Analysis	Under Impact 1 or elsewhere in this section there needs to be a discussion of the impacts related to the loss of the 101 trees on the project site regarding potential loss of raptor foraging area. This issue also needs to be addressed in the cumulative impact section. Also see California DFW NOP letter comment on 1:1 replacement of the trees to be removed.	<p>Added: "One hundred and one trees were inventoried within the biological study area that could provide nesting habitat for birds. These trees could also be used by raptors for foraging in the area, however, common prey for raptors, including California ground squirrel (<i>Dipodomontus beecheyi</i>) and desert cottontail (<i>Sylvilagus auduboni</i>) were not observed or not abundant enough to provide a unique resource for raptors." OK</p> <p>California Fish and Game Code does not require replacement for trees. Only trees protected by the City Ordinance will be compensated for per the City's requirements. Yes, we know still they nonetheless made the comment and other commenters may pick up on this comment – easier to acknowledge now than to have to deal with it in RTC later.</p>	Comment regarding the replacement of trees at a 1:1 ratio has already been addressed in MM-BIO-3
P. 4.4-12, 1 <sup>st</sup> Para, Last two sentences	These two sentences need to specify that MM-BIO-1 would reduce potential impacts to less than significant.	Added "...and it would reduce potential impacts to less than significant" to last sentence. OK	Addressed
P. 4.4-12, Last Para, Last sentence	Indicate that with MM-BIO-3 that impacts would be less than significant.	Added "...and it would reduce potential impacts to less than significant" to last sentence. OK	Addressed
<b>DEIR CHAPTER 4.5: CULTURAL RESOURCES</b>			
P. 4.5-22, MM-CUL-1	Change the last sentence to read as follows so the MM is not permissive/optional:  The WEAP training <del>could</del> shall include a discussion of the types of archaeological resources that may potentially be uncovered during project excavations, save protecting these resources, and appropriate actions to be taken when these resources are discovered.	<p>Revised OK</p> <p>COMMENT ON NEW TEXT ADDED, PAGE 4.5-1, 2<sup>nd</sup> Para – Among other changes to this paragraph was the addition of the following sentence which is a fragment, "Because of its proximity and because the project site is being acquired from the Water Obsolete Retreat Center". Please correct this sentence.</p>	Revised

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<b>DEIR CHAPTER 4.6: ENERGY</b>			
Page 4.6-9, Section 4.6.4, Second Paragraph	MIG recommends indicating that the project would be required to utilize equipment meeting EPA/CARB Tier IV emission standards, consistent with MM-AQ-1, instead of stating that the project is committed to it.	The text was revised to include the reference to mitigation measure MM-AQ-1. <b>OK</b>	Addressed
Page 4.6-11, "Summary", First Paragraph	MIG recommends providing additional context with regard to how the Pavley regulations have reduced OHG emissions. For example, "reduced OHG emissions from California passenger vehicles by about 22% in 2012, compared to XYZ."	Additional context was added to this section. <b>OK</b>	Addressed
Page 4.6-11, "Summary", Third Paragraph	The EIR provides, "[t]he proposed project would create additional electricity and natural gas demand by adding recreational and commercial facilities;" however, the CalEEMod emissions modeling contains neither energy consumption nor emissions estimates for any recreational or commercial facilities. If energy demand is anticipated from structures such as this, they should be accounted for in CalEEMod.	The text was revised to reflect the residential only component of the project. <b>OK</b>  <i>NOTE: additional revisions to the Energy section that were made will be reviewed/verified. OK - verified</i>	Addressed
<b>DEIR CHAPTER 4.7: GEOLOGY AND SOILS</b>			
P. 4.7-1, 1 <sup>st</sup> Para.	Please also reference the Paleo study in this paragraph.	Info on paleo has been added to this section. <i>This comment is not addressed; please reference the Paleo Study.</i>	Added reference the paleo records search
P. 4.7-1, 4 <sup>th</sup> Para, 3 <sup>rd</sup> Sentence	This sentence indicates that the site has been altered with the placement of artificial fill in the upper 7 feet. However, the Geologic report indicates that artificial fill can be located as much as 18 feet BGS. Revise this sentence to be consistent with the Geologic report.	Revised discussion. <i>This revision was not made; please include this revision.</i>	Revised
P. 4.7-1, 4 <sup>th</sup> Para, 3 <sup>rd</sup> sentence	Change the word "extent" to "extend".	Revised. <b>OK</b>	Addressed
P. 4.7-2, 3 <sup>rd</sup> Para, 3 <sup>rd</sup> sentence	The reference that the fault is 700 feet from the site is not consistent with a reference that the fault is approximately 0.3 mile from the site on page 4.7-7.	Revised. <b>OK</b>	Addressed
P. 4.7-4, 1 <sup>st</sup> Para, 2 <sup>nd</sup> and 3 <sup>rd</sup> sentences.	The sentences read: "This report satisfies project requirements in accordance with CEQA and California Public Resources Code Section 5097.5. This analysis also complies with guidelines and significance criteria specified by the Society of Vertebrate Paleontology (SVP 2010)."  These sentences appear to have been directly copied from Paleo report. Please revise them to place in context with the EIR section.	Revised. <b>OK</b>	Addressed
P. 4.7-5, 1 <sup>st</sup> Para, 1 <sup>st</sup> sentence.	This sentence reads: "The City is in the process of preparing a Local Hazard Mitigation Plan (LHMP) and a draft was released for public review in February 2020".  Please provide an update on the status of the LHMP. Assuming it has now been approved since it has been over a year since its release, please reference any relevant components of the plan as they pertain to the project.	Per info at the link below, this is still in review. However, this plan outlines issues that were already addressed in the EIR and no further analysis is needed.  <a href="https://www.cityofserramadre.com/residents/emergency_management/vrhp">https://www.cityofserramadre.com/residents/emergency_management/vrhp</a> <b>OK</b>	Addressed

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<p>P. 4.7-7, 3<sup>rd</sup> Para., sentences 4 thru 6.</p>	<p>Discussion in these sentences indicate that the upper 7 feet of terrace deposits are subject to hydroconsolidation and need to be removed. However, while this discussion only references the top 7 feet, the Geologic study indicates the following:</p> <p><u>Artificial Fill (af):</u> The artificial fill consisted of brown, silty, very fine sands and fine to coarse sands that were dry to damp, and loose to medium dense. The thickness of the fill ranged from 5 to 18 feet. The artificial fill is uncemented and unsuitable for structural support, therefore, it should be removed and recompact in areas of proposed Grading.</p> <p>Consistent with the recommendation of Leighton Associates peer review (see page 5) removal of all artificial fill, which may be as deep as 18 feet needs to occur.</p> <p>Please revise the narrative to more accurately reflect the geologic study.</p>	<p>Revised: Note that per the Geotech only the top 7 feet were needed to be mitigated</p> <p>The geotechnical analysis provided by GeoSoils Consultants for this project discusses artificial fill on page 4.</p> <p><u>Artificial Fill (af):</u> The artificial fill consisted of brown, silty, very fine sands and fine to coarse sands that were dry to damp, and loose to medium dense. The thickness of the fill ranged from 5 to 18 feet. The artificial fill is uncemented and unsuitable for structural support, therefore, it should be removed and recompact in areas of proposed Grading.</p> <p>On page 10 the analysis also indicates the following:</p> <p><u>Artificial Fill</u> Previously placed artificial fill on the site is not suitable for structural support and support of structural fill.</p> <p><u>Mitigation:</u> Removing and recompact the artificial fill within the limits of proposed grading.</p> <p>The peer review memo that was prepared by Leighton Associates (Dated February 17, 2021) includes the following on page 5:</p> <p><u>Seismically Induced Settlement</u></p> <p>Based on GeoSoils report, the site is underlain by 5 to 18 feet of artificial fill underlain by native soil (consisting mostly of silty, fine sands). GeoSoils indicated that the upper 5 to 7 feet of soil onsite is potentially susceptible to seismically induced settlement. GeoSoils presented a mitigation measure to remove and recompact the upper 7 feet of existing soil in proposed grading areas. Without documentation of geotechnical observation and testing of existing artificial fill onsite, we would further suggest to remove all artificial onsite (as deep as 18 feet below the surface according to GeoSoils) as well as remedial removals of 7 feet below the existing surface, whichever is deeper. Considering these removal measures, we anticipate that the potential total settlement resulting from seismic loading to be within typical tolerable limits, and seismically induced differential settlement is not considered to be a major constraint. As such, the risk associated with seismically induced settlement is considered to be less than significant with mitigation.</p> <p>Finally in the Conclusion and Recommendations section of Leighton's memo on page 9:</p>	<p>Revised section and title</p>

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		<ul style="list-style-type: none"> <li>Remedial removals and overexcavation of the site prior to compacted fill placement should include removing all artificial crossties (as deep as 18 feet bgs according to GeoSoils) as well as remedial removals of 7 feet below the existing surface, whichever is deeper. Actual removal depths may vary based on the project geotechnical consultant's observations of subsurface conditions during grading.</li> </ul> <p>Based on Loughton's review and the above referenced narrative included in the GeoSoils study, we continue to recommend that the narrative in the EIR and associated mitigation measures/PDF's acknowledge and address removal and re-compaction of artificial fill up to a depth of 18 feet bgs.</p>	
P. 4.7-9, 1 <sup>st</sup> Para, 1 <sup>st</sup> sentence	The references to Impacts (GEO-4 & 5) appear to be incorrect. Please revise as appropriate.	Impact numbering has been updated throughout. We will also check for these types of issues in the publications phase before public review OK.	Addressed
P. 4.7-9, 2 <sup>nd</sup> Para.	See previous comment (page 4.7-7) about the depth of artificial fill and need for removal, as referenced in the Geologic study.	Revised throughout - Does not address artificial fill below 7 feet and does not address issues with fill below 7 feet - see discussion above.	Revised throughout to indicate up to 18 feet would be removed.
P. 4.7-9, 2 <sup>nd</sup> Para, 3 <sup>rd</sup> sentence	This is an incorrect reference as Impact GEO-6 relates to Paleo Resources.	Revised numbering OK.	Addressed
P. 4.7-9, last Para, last sentence.	Reference to impact GEO-7 is incorrect as it does not exist.	Revised numbering OK.	Addressed
P. 4.7-10 - Mitigation Measures MM GEO-1 thru 16	<p>It is unclear what the source is of these mitigation measures. They appear at least in part to be taken from guidelines included in the applicant's geotechnical study. Consequently, much of the language is not suitable for mitigation measures as it is often permissive and sometimes vague. In addition, the full set of 16 mitigation measures are very hard to follow for the lay reader, include technical terms and jargon, reference other sources and requirements are sometimes repetitive to one another. In general, they are not that suitable as mitigation measures.</p> <p>It is recommended that what are now shown as mitigation measures be repackaged and incorporated into a revised Geotechnical report as explicit recommendations from the Geologist, and that a single mitigation measure indicating that the project will comply with the recommendations of the Geo report is used to replace the 16 current mitigation measures. That way it is clear that the Geologist has signed off on the recommendations.</p> <p>Please also note that where the issue of the removal of artificial fill (indicated by the Geo report to occur as deep as 18 feet), the recommendation will need track with our earlier comment on page 4.7-7.</p>	<p>These measures have been taken from the recommendations provided in the Geotech and added as PDF's per comments from the applicant's legal counsel and then revised from PDF's to MMs per City comments. They were originally packaged/included in the Geosols consultant's Geotech report. Therefore, we made them PDF's where they are not mitigating an impact. The only mitigation that was directly tied to geo impacts was the one related to artificial fill. Therefore, we left this as mitigation and revised the rest as PDF's as to not make it look like we have impacts when we do not.</p> <p>While these PDF/MM's may have been based on the GeoSoils study - "Taken from the recommendations provided in the Geotech..." there appear to be differences. For example, the mitigation referenced in the GeoSoils report regarding artificial fill does not appear to be included in the PDF's and we could not find any reference to artificial fill in the PDF's. Nor did we see reference to the mitigation (immediately prior to the Artificial Fill mitigation) for 7 feet of removal/recompaction related to hydro-consolidation and seismic settlement.</p> <p>In order to assure consistency, we continue to recommend that either the EIR provide a mitigation measure requiring compliance with the Geo Study recommendations or, if PDF's are desirable, have your Geologist review and provide their document their documented sign-off "seal of approval".</p>	<p>Artificial fill is a mitigation measure as it directly addresses impacts. PDF's are standard recommendations that would be implemented and thus have not been included in the MMs. MM would be expanded to address the concerns above and we will check PDF's to make sure they are consistent.</p> <p>Geo PDF's came directly from the Geotech. PDF's have already been incorporated to ensure compliance with geo study, which has already been reviewed by MIS consultant. We will leave discussion as is.</p>

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<b>DEIR CHAPTER 4: APPENDIX B: GREENHOUSE GAS EMISSIONS</b>			
Appendix B, Section 3.4.2.1, Page 62/63	Appendix B employs the use of a 3,500 MTCO <sub>2</sub> e annualized threshold on the basis that the project consists of residential development, however, the project also involves the development of a public park. Given that the SCAQMD-interim GHG emission threshold for mixed-use projects is lower than the residential threshold at 3,000 MTCO <sub>2</sub> e, MIG recommends employing that threshold instead as it is more conservative.	The EIR and Appendix B were updated to reflect the 3,000 MT CO <sub>2</sub> e threshold. OK.	
Appendix B, Section 3.5.1	The SCAQMD interim GHG emission thresholds were intended to address GHG emissions through the year 2020, consistent with the goals set forth in AB 32. The proposed project is anticipated to become operational in 2029, six years after 2020. For this reason, the SCAQMD interim GHG emission thresholds are not directly applicable to the project, as they do not capture the additional GHG emission reductions required to keep the state on track for meeting its future goals (e.g., 2030 GHG emission reduction goals outlined in SB 32). MIG recommends providing additional context and support for why the SCAQMD-interim threshold are appropriate for use and why the project's mass emissions are not significant and/or utilize a multi-threshold justification approach for why the project would not result in a significant impact with regard to GHG emissions.	Additional context was added to the EIR and Appendix B to justify the use of the threshold.  The additional context and explanation provides factual substantiation for the 3,000 MTCO <sub>2</sub> e threshold, however, MIG continues to recommend providing additional context for the project's GHG emissions, such as comparison to per capita metrics contained in the latest Scoping Plan.	The project has an established GHG significant threshold of 3,000 MTCO <sub>2</sub> e per year based on the SCAQMD interim thresholds. No additional comparison is needed to the Scoping Plan's statewide emissions targets. A consistency analysis of the Scoping Plan is provided in threshold (b) of the EIR's GHG section.
Appendix B, Section 3.2.3	MIG recommends cross-referencing the discussion of the SCAG RTP/SCS shown in Section 2.2.3.2 in Section 3.2.3.	The EIR and Appendix B were updated to cross-reference the discussion for SCAG's RTP/SCS. OK.	Addressed
Appendix B, Table 15	MIG recommends the consistency analysis presented in this table be updated, based on the most current regulations, plans, etc. provided in Section 3.2. For example, under the "Vehicle/Mobile Sources" line on page 72, the analysis indicates the project is compliant with and subject to the RTP/SCS targets for 2015; however, the SCAG recently adopted Connect SoCal the 2020-2045 RTP/SCS. The row directly below that also does not reflect the latest LCFS requirements.	The EIR and Appendix B were updated to reflect these changes. OK.	Addressed
<b>DEIR CHAPTER 4: HAZARDS AND HAZARDOUS MATERIALS</b>			
NA	MIG has no comments on Chapter 4.9. With respect to Wildfire issues, please cross reference comments on related PDF's and the Fire Protection Plan under the Project Description and the Wildfire Chapter (4.20).	Revised FPP discussion - See cross comments on FPP	Addressed
<b>DEIR CHAPTER 4: HYDROLOGY AND WATER QUALITY</b>			
P. 4.10-8, 3 <sup>rd</sup> Para.	This paragraph and the preceding paragraph do not explain why the proposed improvements will result in less than significant impact; please include an explanation.  Also, this subsection needs to briefly describe how upstream flows from the retreat are handled.	See revised discussion.  Since significant revisions were made to this threshold, I added discussion on upstream flows under threshold c, where it was more appropriate. OK.	Addressed
P. 4.10-9, 2 <sup>nd</sup> Para, 3 <sup>rd</sup> sentence	This sentence is conclusory in indicating that the estimated potable water demand is "minimal" and demand needs to be compared existing supply; although the demand may be small it is not zero and may be substantial when compared to	See revisions. The project wouldn't contribute to the City's water demand since it would purchase water directly from MWD. Added recharge discussion as well. OK.	Addressed

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	existing supply. The discussion under this impact statement should also discuss the potential for recharge for the infiltration facility under the park.		
P. 4.10-9, 2 <sup>nd</sup> Para, 7 <sup>th</sup> sentence	Absent further explanation and detail this implicit reference to the water supply PCDF is too vague to be used as a mitigation or a PCDF. See discussion of PCDF under Project Description.	Revised PDF to add timing (see PD) See other comments on water supply.	Addressed
P. 4.10-9, 2 <sup>nd</sup> Para, 9 <sup>th</sup> sentence	This sentence reads: "As such, because the project would be adequately supplied potable water from Sierra Madre Water District, the project would not substantially decrease groundwater supplies or interfere with groundwater recharge. Therefore, impacts associated with groundwater supplies and recharge would be <b>less than significant.</b> "  This assertion has not been substantiated in the preceding narrative nor has it been substantiated elsewhere in the EIR.	See revisions See other comments on water supply.	Addressed
P. 4.10-12, Impact Statement 5.	There is no discussion under this impact statement about a sustainable groundwater management plan (or even if there is one). Please include this discussion including the disposition/status of such a plan.	Revised OK	Addressed
P. 4.10-12, 2 <sup>nd</sup> para, 2 <sup>nd</sup> to last sentence	See comment on P. 4.10-9, 2 <sup>nd</sup> Para, 7 <sup>th</sup> sentence.	Revised OK	Addressed
P. 4.10-13, 1 <sup>st</sup> para, last sentence	It is difficult to understand the purpose of this general statement as there is not discussion about how This Project is consistent with the plan and why.	See additions OK	Addressed
<b>DEIR CHAPTER 4.11: LAND USE AND PLANNING</b>			
P. 4.11-1, Last Para, 1 <sup>st</sup> sentence	This sentence reads: "The surrounding area to the north and east of the project site is zoned as Hillside Management (H)".  This is confusing: is the retreat which is directly north of the project zoned Institutional or Hillside Management? Elsewhere in the EIR the zoning is indicated as Institutional. Please clarify.	Clarified  OK	Addressed
P. 4.11-2, 4 <sup>th</sup> Para.	Reference is made and most of this paragraph refers to state housing law. Please include a discussion of relevant state housing law under the relevant State Policies.  Also, it should be noted that the SCAO RHNA allocation was finalized in early February. (The allocation of 204 units was not changed.) Please revise this paragraph accordingly.	Added  Revised to 6 <sup>th</sup> cycle  OK	Addressed
P. 4.11-3, Reference to Community Forest Management Plan	This plan is not discussed at all in the analysis and needs to be addressed under Impact 2 of this chapter. include a discussion of how the project is consistent with this plan. This discussion is particularly important to demonstrate no net loss of tree canopy given that the project proposes the removal of 101 mostly mature trees. This plan also must be referenced in the Biological Resources Chapter.	Consistency with this plan is included on page 4.11-28. Additional info has been added here and in the bio section  OK	Addressed
Table 4.11-1 (Consistency) Objective L51	Similar to Goal 1 above this does not describe how the project is consistent with	Added info here and under Goal 1  OK	Addressed

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Table 4.11-1 (Consistency) Policy L51.5	Please describe other travel modes (beyond pedestrian).	Added OK	Addressed
Table 4.11-1 (Consistency) Objective L52	This response needs to indicate how the project will maintain levels of service.	Added. Cited LOS study. OK	Addressed
Table 4.11-1 (Consistency) Policy L52.9	This sentence needs to address the specific issue raised by this Policy (sidewalk continuity), instead of repeating the same narrative used to respond to many of the circulation policies.	Revised OK	Addressed
Table 4.11-1 (Consistency) Objective L53	Again, this objective appears to repeat a response from another goal/policy and does not actually address intrusion of through traffic. Please revise to address this issue.	Revised OK	Addressed
Table 4.11-1 (Consistency) Policy RA.3	This analysis does not directly address issues raised – does the SP have requirements that limit lighting height below the house eave or have a restriction on residential lighting pole height?	These are all the details known at this time and included in the specific plan. However, this gets at light spillover which has been addressed in the response.  This doesn't really answer the question about specific restrictions in the SP – if it is unknown if lighting will be attached to home above an eave or allow light trespass on to adjacent properties or high skies, then it must be considered inconsistent.  This seems like a pretty easy fix that could be made in the SP.	Added clarification under this policy. The eave is the edge wrap around part of a roof so it would not make sense to put any lights above there.
Table 4.11-1 (Consistency) Tree Preservation, Goal 1	This response does not directly address this goal and only addresses protected trees; and the goal covers trees not subject to the Tree Preservation Ordinance. Explain how the loss of the other 91 trees is consistent (or not) with this goal.	See added discussion. OK	Addressed
Table 4.11-1 (Consistency) Tree Preservation, Goal 2	Please include an estimate of the number and size of the new trees that will be planted as part of the project in order to demonstrate consistency with this goal.	Additional details were added but the exact number of trees is not known at this time.  See previous comment in Biology Section. Provide a rough estimate or ranges to show that the trees will be replaced.	Revised
Table 4.11-1 (Consistency) Policy R10.2	See comment under tree preservation Goal 1 above	See added discussion  This policy has now been deleted (with no explanation), but needs to be re-included since it directly relates to tree loss on the site.	We removed this as it seemed to be addressed to the City, not the applicant/project. However, we added back in per this comment.
Table 4.11-1 (Consistency) Policy R12.3	This response needs to include a reference to the water retention facility that will be built underneath the park.	Added OK	Addressed
Table 4.11-1 (Consistency)	Instead of providing this very generic response identify the specific City requirement is for smoke detection systems in new homes.	Revised	Addressed

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<b>Policy H2.1</b>		OK	
Table 4.11-1 (Consistency) <b>Policy H2.3</b>	The review indicated presumably does not include the review of building plans. Please revise this response to better demonstrate consistency with this policy.	Revised	Addressed
Table 4.11-1 (Consistency) <b>Policy C.4.3</b>	This response does not address the issue raised in Policy C.4.3 (i.e., maximize passive prevention measures). Please revise to directly address this policy.	OK: Added some details but exact passive prevention measures are not known at this time	Addressed
Table 4.11-1 (Consistency) <b>Policy C.3.5</b>	This response needs to include a description of the water retention facility that will be built under the park.	Added	Addressed
Pages 4.11-27 & 28	All of this text is confusing and appears to belong in another section – possibly Recreation or Public Services? Please revise accordingly.	OK Removed discussion of the parkland dedication ordinance as it is not a plan. Left the rest and clarified discussion	Addressed
<b>DEIR CHAPTER 4.12: MINERAL RESOURCES</b>			
NO COMMENTS ON THIS SECTION			
<b>DEIR CHAPTER 4.13: NOISE</b>			
Page 4.13.2, Section 4.13.1.2	Please update the EIR's general description of noise-sensitive land uses to specifically include open space / recreation areas (such as Bailey Canyon Wilderness Park). This will provide consistency with the City's General Plan definition of noise-sensitive land uses (General Plan pg. 6-21).	Open space/recreation areas added, as suggested.	Addressed
Page 4.13.2, Section 4.13.1.2	The EIR states "noise measurements were conducted on and near the project site . . . to characterize the existing ambient noise environment" and that monitoring locations were selected to "represent sample existing noise-sensitive receivers on and near the project site." The EIR's discussion of ambient noise levels does not include any discussion on the effect State and regional public health orders limiting gatherings, school openings, non-essential travel, and other activities intended to control the spread of COVID-19 may have had on the ambient noise monitoring results. These orders have generally been acknowledged to lower vehicle traffic volumes and associated traffic noise levels. A discussion on the effect of public health orders on the ambient noise monitoring results is warranted given the EIR states that the primary noise sources at the site consisted of "light traffic along adjacent roadways" and "distant traffic."	Language added regarding noise measurements during the COVID pandemic and public health orders, as suggested. OK	Addressed
Page 4.13.3, Section 4.13.2, "Federal Transit Administration"	The EIR indicates guidance and methodology from the FTA's Transit Noise and Vibration Impact Assessment Guidance Manual is used in the EIR's vibration analysis, but no information on the FTA's methodology or standards is presented in the EIR's regulatory setting section. We note the construction vibration threshold discussed on EIR page 4.13-7 is based on Caltrans' guidance. The EIR needs to be clarified how FTA guidance and methodologies were used in the noise and vibration analysis, if at all.	Analysis of construction noise and vibration is based upon both FTA and Caltrans guidance and methodologies, and the FTA impacts assessment manual is referenced numerous times in the impacts section. Clarification added. OK	Addressed
Page 4.13.4, Section 4.13.2, "California"	MIG understands OPR updated its General Plan guidelines in 2017, however, the information presented in the EIR is not consistent with the City's General Plan Land Use Compatibility for Community Noise Exposure (General Plan Table 6-8). The	As suggested, a copy of Table 6-8 is provided in the revised noise section. OK – the file we have includes a comment to add this table.	Yes—this will be added

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Department of Health Services Guidelines*	City's General Plan noise guidelines constitute the local standards that apply to the project. These standards need to be presented in the EIR's regulatory setting section.		
Page 4.13-4, Section 4.13-2, "California Department of Transportation"	The EIR presents information and vibration standards contained in Caltrans' 2013 Transportation and Construction Vibration Guidance Manual; however, Caltrans released an updated version of this document in 2020. The EIR should be updated with this latest information.	Caltrans' vibration manual references have been updated. OK	Addressed
Page 4.13-4, Section 4.13-2, "City of Pasadena General Plan" and "City of Pasadena Municipal Code"	The EIR provides more information on the City of Pasadena's General Plan and Municipal Code standards than the City of Sierra Madre's standards; however, the project is not located in the City of Pasadena. The EIR states Pasadena General Plan policies are "applicable" to the project and implies the Pasadena code standards are, too; however, the EIR is not clear if the requirements of Pasadena Municipal Code Section 9.36.70 pertaining to allowable construction hours are, in fact, applicable to the project. MIG notes Pasadena's allowable construction hours are more stringent than Sierra Madre's. The EIR must take a clear position on whether each of the presented Pasadena standards are "applicable" to the project or presented solely for information and contextual purposes only.	Discussion of Pasadena's noise standards has been revised to explain that Pasadena standards are provided for information only. The impacts analysis has been revised so as to assess the proposed project in the context of City of Sierra Madre standards, not Pasadena standards.  OK	Addressed
Page 4.13-6, Footnote 1	This note states the City of Sierra Madre has a prohibition on construction equipment or any other noise source emitting a noise level in excess of 80 dBA at 25 feet. MIG interprets the City's Code to apply an 80 dBA L <sub>max</sub> standard to existing residential, commercial, and public property land uses that have the potential to generate noise above ambient levels per Code Section 9.32.030, 9.32.040, and 9.32.050. In contrast, MIG interprets the City's Code to apply an 85 dBA L <sub>max</sub> standard to construction equipment (as measured at 25 feet). Footnote 1 needs to be updated to reflect City code requirements; however, this change does not affect the main purpose of the note (compliance with Sierra Madre construction equipment noise levels).  MIG notes discussion with the city may be necessary to determine whether the construction equipment standards are energy-averaged (L <sub>eq</sub> ) or maximum noise levels (L <sub>max</sub> ). Section 9.32.050 uses the term noise level, which is defined in Section 9.32.020 as "the maximum continuous sound level of repetitive peak level". In addition, Section 9.32.060 A refers to 80 dBA under its "most noise condition". Finally, General Plan Table 6-9 refers to "maximum permissible" noise levels and limits.	Based upon our reading of the City's Municipal Code we don't believe that the intent was to use L <sub>max</sub> as the base metric for this standard.  Please see the City's definition of "noise level", here: <a href="https://libran.municipalcode.com/city-of-sierra-madre/codes/code-of-ordinances?code=TI19PUPEMOWE_CH9-32-ND_9.32.020C">https://libran.municipalcode.com/city-of-sierra-madre/codes/code-of-ordinances?code=TI19PUPEMOWE_CH9-32-ND_9.32.020C</a>  Please see the FHWA's definitions, here: <a href="https://www.fhwa.dot.gov/Environment/noise/resources/twahep17053.pdf">https://www.fhwa.dot.gov/Environment/noise/resources/twahep17053.pdf</a>  While the City's definition of "sound level" does include the word "maximum", it also includes "continuous" and "repetitive", which is not descriptive of the L <sub>max</sub> noise metric. The use of the L <sub>eq</sub> noise metric to characterize typical noise during construction as opposed to the absolute maximum is consistent with normal standards of the practice, as well as standards promulgated by such agencies as the Federal Transit Administration (which uses 1-hour, 8-hour, and 30-day averages depending upon the level of analysis), and numerous cities and counties.  Based on the Code definition of "noise level" it is probable that the L <sub>eq</sub> metric is Code standard. While L <sub>max</sub> is more conservative, L <sub>eq</sub> would be more consistent with typical construction noise evaluations. MIG recommends the City review planning or enforcement records to ascertain whether this standard has historically been interpreted one way or the other.	Jonathan—This is asking the that the City checks and confirms whether the L <sub>eq</sub> or the L <sub>max</sub> noise metric is their chosen basis for the standard. Please discuss with Vincent.

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<p>Page 4.13.7, Section 4.13.3</p>	<p>The EIR states construction noise would be significant if it exceeds either: 1) 80 dBA <math>L_{eq}(1-hr)</math> at a distance of 25 feet for any allowable construction hour, or 2) 85 dBA <math>L_{eq}</math> at or beyond a noise sensitive receiver's property boundary.</p> <p>Regarding the first threshold, as stated in MIO's comment on Page 4.13-6, Footnote 1, MIO does not interpret the City's code to apply an 80 dBA <math>L_{eq}(1-hr)</math> standard for construction noise. Rather MIO interprets the City's code to only apply an 85 dBA <math>L_{max}</math> standard that is applied at any point outside the property plane. In addition, as stated in MIO's comment on Page 4.13-4, Section 4.13-2, the EIR is not clear what is meant by "any allowable construction hour" (i.e., whether City of Sierra Madre or City of Pasadena allowable hours prevail). Given the above, the EIR needs to be clarified regarding: 1) which numeric standard for construction equipment noise levels is correct, and 2) what are the allowable construction hours applicable to the project.</p>	<p>Please see previous response. Ok. Applicable standard (<math>L_{eq}</math> or <math>L_{max}</math>) pending City confirmation.</p>	<p>Jonathan—same as above. Please discuss with Vincent.</p>
<p>Page 4.13.8, Section 4.13.4, Impact 1.</p>	<p>The EIR's construction noise analysis indicates worst case noise levels were predicted at distances of 25 feet from existing residences and 75 feet from the retail center. The basis for this difference is not clear—is it due to the grading and landscaping buffer on the northern portion of the site? In addition, since the City of Sierra Madre and Pasadena regulates construction noise levels at the property plane, the EIR needs to be very clear whether modeled construction noise distances are measured to the property line or the existing residential structures. MIO notes the EIR appears to use the property line but states (emphasis added) "construction activity phases near the southern and western project site boundaries would take place within approximately 25 feet of existing residences . . ."</p>	<p>Correct, the difference is due to the grading and landscape buffer. Language has been clarified that construction noise levels are assessed at the property line. OK.</p>	<p>Addressed</p>
<p>Page 4.13.9 and 4.13-10, Section 4.13.4, Impact 1 and Table 4.13-3</p>	<p>The EIR's construction noise analysis uses the <math>L_{eq}</math> metric to evaluate construction noise levels. As noted in our comment on EIR Page 4.13-6, the use of the <math>L_{eq}</math> metric does not appear to be consistent with the City Code, which MIO interprets to apply an <math>L_{max}</math> standard. If the <math>L_{max}</math> standard is applicable this section of the EIR will require revision to present <math>L_{max}</math> and <math>L_{eq}</math> noise levels.</p>	<p>Please see response above regarding MIO's interpretation of the City's construction noise standard. OK Applicable standard (<math>L_{eq}</math> or <math>L_{max}</math>) pending City confirmation.</p>	<p>Jonathan— same as above. Please discuss with Vincent.</p>
<p>Page 4.13.9 and 4.13-10, Section 4.13.4, Impact 1 and Table 4.13-3</p>	<p>EIR Table 4.13-3 presents estimated construction noise levels on a dBA <math>L_{eq}</math> (8-hr) basis. As noted in our comment on EIR Page 4.13-6, the use of the <math>L_{eq}</math> metric does not appear to be consistent with the City Code, which MIO interprets to apply an <math>L_{max}</math> standard. If the <math>L_{max}</math> standard is applicable Table 4.13-3 will require revision to present <math>L_{max}</math> and <math>L_{eq}</math> noise levels. If the <math>L_{eq}</math> metric is consistent with Code requirements, a footnote explaining the <math>L_{eq}</math> 8-hr noise level is assumed to be the same as the 1-hour noise exposure level would provide clarity and consistency with the current EIR significance threshold for construction noise levels (<math>L_{eq}</math> 1-hr).</p>	<p>Please see prior response. Footnote added. OK.</p>	<p>Addressed</p>
<p>Page 4.13.10, Section 4.13.4, Table 4.13-3</p>	<p>For the Balance Site (Grading phase), the predicted noise level at 75 feet is 72 dBA while the predicted noise level at 500 feet is 70 dBA. Please double check the 500-foot 70 dBA estimate, as this does not appear to be correct.</p>	<p>We have revised accordingly, thanks. OK.</p>	<p>Addressed</p>
<p>Page 4.13.10, Section 4.13.4, Table 4.13-3</p>	<p>Table 4.13-3 lists the distance from construction activities to noise receptors. The table presents a single distance (e.g., 25 feet) when in actuality construction equipment was set at variable distances from the modeled receptor (i.e., equipment for receptors west and south of the site was modeled at 25, 50, and 75 feet away). Since modeled noise levels are energy-averaged for all equipment, the distances in Table 4.13-3 needs to be clarified, or additional information presented on modeled equipment distances. For example, some Building Construction equipment was modeled 300 feet away from receptors locations, not 25 feet as listed in the table.</p>	<p>Because construction equipment cannot physically occupy the same point, and because construction equipment working on a site are in motion, the equipment "consist" was spread around the site at varying distances in a manner that, in our professional opinions, would represent a conservative but reasonable working scenario. OK.</p>	<p>Addressed</p>

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<p>Page 4.13-11, Section 4.13-4, Impact 1, Off-site Traffic Noise</p>	<p>MIG notes that listing a single distance in Table 4.13-3 would be appropriate if an <math>L_{Aeq}</math> value is used to evaluate construction noise levels (since the RCNM model uses the single knock value for <math>L_{Aeq}</math> reporting purposes).</p> <p>The EIR uses the City of Sierra Madre Code (45 dBA) and City of Pasadena Code (+5 dBA) to evaluate the significance of potential increase in off-site traffic noise levels. It is MIG's opinion these thresholds are not appropriate for the following reasons:</p> <ul style="list-style-type: none"> <li>Each City's respective code requirement governs non-transportation noise is applied at the noise generating/ noise receiving land use property line.</li> <li>Page 4.13-1 states, "Changes in a community noise level of less than 3 dB are not typically noticed by the human ear (Caltrans 2013a). Changes from 3 to 5 dB may be noticed by some individuals who are extremely sensitive to changes in noise. A 5 dB increase is readily noticeable." Therefore, the EIR's 6 dB allowable traffic noise increase would be readily noticeable because it would permit up to a quadrupling of traffic volumes.</li> <li>Modeled noise receptors appear to be placed between 70 to 120 feet from the roadway center, not at the edge of the roadway/property where the code standard would apply.</li> </ul> <p>MIG recommends the EIR use the more common threshold approach of a +1 (where noise levels would transition to or remain unacceptable), +3 (where noise levels would transition from acceptable to conditionally acceptable), and +5 dBA increase (where noise levels would remain acceptable) that considers increases in traffic noise levels in the context of noise and land use compatibility guidelines. Alternatively, if a revised threshold is not applied, the EIR needs to provide a more robust discussion of potential traffic noise level thresholds and additional justification for why the code standard is a suitable and appropriate threshold for use.</p>	<p>Agreed. Revised accordingly.</p> <p>OK</p>	<p>Addressed</p>
<p>Page 4.13-12, Section 4.13-4, Impact 1, Interior Noise Impact</p>	<p>The EIR states, "While current CEQA noise-related guidelines do not require an assessment of exterior-to-interior noise intrusion or noise exposure to occupants of newly created residences or non-residential uses attributed to the development of the project, the State requires that interior noise levels not exceed a CNEL of 45 dB within residences." MIG concurs an assessment of noise exposure to occupants of new residents is not required by CEQA pursuant to CBIA v. BAAQMD, however, we note CEQA does not preclude such an analysis of residential noise exposure. In addition, an evaluation of how project-related traffic noise levels may exacerbate interior noise levels at existing residences is warranted and needs to be topically addressed in the EIR.</p> <p>Finally, MIG is not aware of any provision in CEQA that specifically excludes consideration of interior noise levels in non-residential development. The EIR should be clarified to indicate whether the project could exacerbate interior noise levels at existing commercial land uses.</p>	<p>Comment noted. Discussion of potential for interior noise level increases added.</p> <p>OK</p>	<p>Addressed</p>
<p>Page 4.13-13, Section 4.13-4, Impact 1,</p>	<p>The EIR's discussion of neighborhood park noise is not consistent. The EIR indicates park usage would be passive in nature, not include sound amplification, and open between 6 AM and 10 PM. The EIR then states that sound amplifying equipment could be permitted by City permit provide noise does not exceed 60 dBA.</p>	<p>Discussion of park use and associated potential for noise impact revised.</p> <p>OK</p>	<p>Addressed</p>

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Neighborhood Park	<p>at 50 feet, but that the noise levels produced by a special event would be speculative. Finally, the EIR presents noise levels for a park land use both with and without a public address system in use for sports activities.</p> <p>MIO recommends the discussion of neighborhood park noise levels be revised to provide a clearer description of planned park uses and activities. It is not clear why the EIR states potential event noise levels are speculative since the municipal code appears to set a general decibel limit for sound-amplifying equipment associated with such an event. In addition, the EIR should not present noise levels from a park land use with a public address system if such a system is not proposed as part of the project. Finally, additional details on the discussion of noise levels from the City of Chula Vista (e.g., time of day, noise monitoring duration, etc.) would provide additional context and evidence for the EIR's conclusions regarding noise levels.</p> <p>MIO also recommends the discussion of the neighborhood park be clarified to indicate if there are any stationary sources associated with the proposed stormwater retention facilities (e.g., pumps) that could generate noise levels that have the potential to impact noise-sensitive receptors.</p>		
Page 4.13-13, Section 4.13-4, Impact 2	<p>MIO notes Caltrans' Transportation and Construction Vibration Guidance Manual (2020) does not explicitly set a vibration standard, although the 0.2 inches per second annoyance criteria reference in the</p> <p>The 0.12 inches per second estimate in the EIR is identified by Caltrans as "strongly perceptible" and the level at which vibration may "begin to annoy" (Caltrans 2020, Tables 4 and 5), although these responses are for steady-state vibration levels. MIO recommends additional information be provided in the EIR on Caltrans' range of human response and annoyance criteria (either in the regulatory setting or impact analysis) and that the total duration of vibration-generating activities be considered a factor in evaluating vibration.</p>	<p>Comment noted. The statement is correct - 0.2 inches is a common threshold applied for CEQA purposes.</p> <p>As noted, the referenced tables refer to steady-state operations, not transient.</p> <p>OK.</p>	Addressed
Pages 4.13-14 to 4.13-15, Section 4.13-5, MM-NOI-1	<p>The EIR indicates the temporary noise barrier will provide 9 dB of noise reduction. MIO notes this level of noise reduction is effective due to the EIR's use of the <math>L_{eq}</math> metric to evaluate construction noise, however, if the <math>L_{max}</math> standard is applicable the effectiveness of this mitigation measure may need to be confirmed/modified (see comment on Page 4.13-6)</p>	<p>Please see previous response regarding <math>L_{eq}</math> vs. <math>L_{max}</math>. Regarding noise barrier performance, to our knowledge <math>L_{max}</math> would, if anything, be more effective than a theoretical <math>L_{eq}</math> situation in which ambient <math>L_{eq}</math> levels were within 10 dB of the construction noise levels. In this case however, ambient <math>L_{eq}</math> levels are substantially lower than the predicted construction noise levels. Thus, we would anticipate that barrier performance would be the same, whether in terms of <math>L_{max}</math> or <math>L_{eq}</math>.</p> <p>OK. Applicable standard (<math>L_{eq}</math> or <math>L_{max}</math>) pending City confirmation.</p>	Justification—same as above.
Appendix X-2	<p>The RCNM model outputs indicate a combination of spec and actual max noise levels were used to model construction noise levels. The model outputs also indicate varying equipment distances were used to predict noise levels at receptor locations. While it is MIO's opinion the construction noise modeling is likely conservative in nature (i.e., likely to overpredict noise levels), the EIR needs to explain the basis/rationale for these varying assumptions.</p>	<p>Spec and actual <math>L_{max}</math> used as RCNM inputs were the defaults.</p> <p>Regarding varying equipment distances, please see previous response regarding this issue.</p> <p>OK.</p>	Addressed
Appendix X-3	<p>The TNM modeling output appear to include a barrier analysis. The EIR needs to be clarified if a barrier is included in the traffic noise modeling conducted for the project.</p>	<p>The TNM model includes several barrier model elements to represent the many existing residential structures separating the various roadways in the greater project area—not for the project site. This is done merely to better represent the general conditions along the arterial roadways in the greater project area. All of the traffic noise modeling scenarios have the exact</p>	Addressed

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		same structure barriers, with no alterations in the "with project" versus "without project" cases. No noise barrier analysis is included.	
		OK	
<b>DEIR CHAPTER 4.14: POPULATION AND HOUSING</b>			
P. 4.14-1, Para. 6, 1 <sup>st</sup> sentence	Please clarify that the 2020-2045 RTP/SCS has not yet been adopted.	The 2020-2045 RTP/SCS was adopted on September 3, 2020. The date of adopted has been added.	Addressed
		OK	
P. 4.14-7, Para. 3, 0 <sup>th</sup> sentence	This sentence indicates that population would grow by 95 persons as the result of the project, but the discussion of population on page 4.14-6 indicates that it would increase population by 134 persons; please correct/reconcile these two estimates.	Revised: 134 is correct OK	Addressed
P. 4.14-8, last citation	Please update this reference.	This is the latest citation, unsure of what updates are needed here	Addressed
<b>DEIR CHAPTER 4.15: PUBLIC SERVICES</b>			
P. 4.15-1, Fire Protection Services	Please identify whether or not the City has mutual aid agreement with other public agencies (besides the state) for fire protection and/or emergency services	Added OK	Addressed
P. 4.15-3, 1 <sup>st</sup> Para., 2 <sup>nd</sup> sentence	Include a reference to the City park acreage standard (either in this sentence or another sentence) so that the reader can know what the standard is.	Added OK	Addressed
P. 4.15-7, 1 <sup>st</sup> Para., 1 <sup>st</sup> full sentence	The discussion of the state Quimby act on page 4.15-4 indicates the standard is 3.5 acres per one thousand persons while this sentence shows it as 3 acres/1,000. Please reconcile/clarify this standard.	This is referring to the City's existing park to population ratio not the Quimby Act. Added text to clarify OK	Addressed
P. 4.15-7, 1 <sup>st</sup> Other Public Services	Please specify what other services and facilities are covered by this fee.	Done. OK	Addressed
P. 4.15-8, last Para. 2 <sup>nd</sup> sentence	There is nothing that shows that the project impacts are "nominal" which implies that there will be little or no increase in calls; this conclusion cannot be reached unless there is information about existing calls and an estimate of the increased number of calls resulting from project implementation. In addition, on page 4.15-1 it is indicated that the fire station has 10 sworn personnel and a fully staffed station requires 15 sworn personnel – so it is reasonable to assume that the project will further exacerbate this deficiency.	Unsure of what text this is referring to. But I removed sentence regarding a nominal increase in calls on page 4.15-9, which seemed like the text that was the most relevant to this comment. OK for removal of sentence. Please respond to the 2 <sup>nd</sup> part of the comment relating to potential staffing deficiency and the potential of the project to make that deficiency worse.	Added further discussion on page 4.15-9
P. 4.15-8, 3 <sup>rd</sup> Para. last sentence	Do not include this sentence – see parallel discussion under the fire protection section.	See response above. Removed text. OK	Addressed

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P. 4.15-11, 1 <sup>st</sup> Para, 2 <sup>nd</sup> sentence	This sentence reads: "Additionally, as described above, the proposed project is not expected to have a material change in the current officer-to-population ratio in the City."  This is not correct as the SMPD indicates on the previous page that ratios will be affected, and the material change can be easily calculated. Please delete this sentence or include analysis to support that is not conclusory.	Removed sentence OK	Addressed
P. 4.15-12, last Para, 4 <sup>th</sup> sentence	Remove the word negligible.	Done OK	Addressed
<b>DEIR CHAPTER 4.16: RECREATION</b>			
P. 4.16-3, Quinby Act	Please clarify and provide the correct standard: elsewhere it is shown as 3 acres per 1,000 persons instead of 3.5 acres.	The Quinby Act varies slightly from the San Marcos Municipal Code. The Municipal Code was chosen for the analysis as it more directly applies to the project. OK	Addressed
P. 4.16-5, 1 <sup>st</sup> Para.	This paragraph merely repeats what is provided in the existing conditions section a few pages prior. Please delete this paragraph as it is redundant.	Done OK	Addressed
P. 4.16-5, 4 <sup>th</sup> Para, last two sentences	These sentences appear to be taken from another document and do not directly apply to this project. Please revise to better fit this project.	This just references existing requirements. How these requirements apply to the project has been discussed below. OK	Addressed
<b>DEIR CHAPTER 4.17: TRANSPORTATION</b>			
P. 4.17-2, Senate Bill 743	In this section, please include a reference to the requirement for Cities to adopt VMT thresholds by July 2020, and also reference that the City has adopted thresholds and when they were adopted.	Added OK	Addressed
P. 4.17-3 – Policies and Objectives	Policies L51.2, L51.5, L52.8 and Objective L52. These policies and objectives were not addressed in the land use and planning section of the EIR – please revise as appropriate to address them.	Added OK	Addressed
P. 4.17-8 <sup>a</sup> Para, 3 <sup>rd</sup> sentence	This description of roadways is not consistent with Figure 3-4 – please revise/reconcile.	Removed discussion OK	Addressed
<b>DEIR CHAPTER 4.18: UTILITIES AND SERVICES</b>			
P. 4.18-2, 3 <sup>rd</sup> Para, 2 <sup>nd</sup> sentence	Strike the word "recently". Also, the phrase "water supply from the treated Colorado River" is confusing. Should it read "treated water supply from the Colorado River" since the river itself is not treated?	Done OK	Addressed
P. 4.18-8 – Urban Water Management Plans	Please indicate when the 2020 update of the UWMF is expected to be completed.	Per info from the City, this is the latest plan. The City is in the process of updating the 2020 UWMF and should have it completed in a few months. OK – thanks for the check (leave as is)	Addressed

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P. 4.19-12, 1 <sup>st</sup> Para., 4 <sup>th</sup> sentence	Please specify whether the 8.64 MOY water demand estimate includes water use for the park.	Done OK	Addressed
P. 4.19-12, 1 <sup>st</sup> Para., 1 <sup>st</sup> sentence	This sentence is problematic and is unsubstantiated. First this is not a redevelopment project as the site is now undeveloped, and 8.64 MOY is not minimal and there is no substantiation that water saving through the Green Building Code would make water use minimal.	Removed sentence OK	Addressed
P. 4.19-14 – General Comment	General comment – since most of this language is identical or very similar to the language in Impact 1 with respect to water, make the corresponding changes to the language in this impact statement.	Condensed text OK	Addressed
P. 4.19-14 – 2 <sup>nd</sup> full para., last sentence.	This reference is more than 5 years old and needs to be updated in conjunction with the 2020 update of the UWMP.	See response to the 2 <sup>nd</sup> comment, above OK	Addressed
P. 4.19-14 – last para., 2 <sup>nd</sup> sentence.	The assertion in this sentence about water supply sufficiency is conjecture and is not based on any substantiated information. Please provide substantiation or delete the sentence. It is also based on information that is more than 5 years old and should be updated in conjunction with the 2020 UWMP.	Revised OK	Addressed
<b>DEIR CHAPTER 4.18: TRIBAL CULTURAL RESOURCES</b>			
NO COMMENTS ON THIS CHAPTER			
<b>DEIR CHAPTER 4.20: WILDFIRE</b>			
1			
<b>DEIR CHAPTER 5: CUMULATIVE EFFECTS</b>			
P. 5-4, 1 <sup>st</sup> sentence.	Make the following changes to this sentence:  As discussed in Section 4.3.1.4.1, South Coast Air Basin Attainment Designation, the SCAB has been designated as a national nonattainment area for ozone (O <sub>3</sub> ) and particulate matter (PM <sub>10</sub> and PM <sub>2.5</sub> ) and particles less than 10 microns in diameter (PM <sub>10</sub> ) and a California nonattainment area for ozone (O <sub>3</sub> ), PM <sub>10</sub> , and particles less than 2.5 microns in diameter (PM <sub>2.5</sub> ).	Done OK	Addressed
P. 5-10, 5 <sup>th</sup> para., 1 <sup>st</sup> sentence	The part of this sentence in parentheses seems irrelevant to the rest of the sentence: please clarify or delete.	Deleted OK	Addressed
<b>DEIR CHAPTER 6: GROWTH INDUCEMENT</b>			
P. 6-2, last para., 2 <sup>nd</sup> sentence	The RHNA has now been approved: please update this sentence.	Done OK	Addressed
<b>DEIR CHAPTER 7: SIGNIFICANT IRREVERSIBLE CHANGES</b>			
NO COMMENTS ON THIS CHAPTER			
<b>DEIR CHAPTER 8: ALTERNATIVES</b>			
P. 8-1, 1 <sup>st</sup> para., 2 <sup>nd</sup> sentence	Remove the reference to land use and planning as there are no mitigation measures applicable to this issue area.	Bio mitigation is applicable to LU. Left as is for consistency.  Disagree as this creates confusion and the bio does not create a conflict with a land use plan, policy etc. We continue to recommend this deletion.	For discussions with the applicant's legal counsel, we left this as is. This is because, as discussed in comments above, trees would need to be replaced to

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			Ensure consistency with the Community Forest Management Plan.
P. 8-5, last para, 2 <sup>nd</sup> sentence.	Revise this sentence as follows: "There are no known or locally important mineral resources existing on the project site and the proposed project would result in less than <u>significant</u> impacts to mineral resources".	Revised OK	Addressed
P. 8-7, 2 <sup>nd</sup> para, 3 <sup>rd</sup> sentence	Please clarify: does the zoning code allow up to 35% coverage or require it?	Maximum of 35% when developed near residential buildings (see section 17.38.040 of the Municipal Code). Added clarification OK	Addressed
P. 8-8, last para, last sentence.	Removal of the 45-acre open space area from the project is not specified in the description of this alternative. It is recommended that such removal not be included in the alternative as it needlessly complicates analysis and there is no basis for differentiation (why would it be included in this alternative?). In addition, discussing the 45 acres in the context of biological resources is problematic as the biological benefits of the 45 acres is not discussed elsewhere in the EIR and it is not clear that there are benefits.	Removed discussion OK	Addressed
P. 8-14 2 <sup>nd</sup> para, 2 <sup>nd</sup> sentence	Jurisdictional and riparian areas to the north and east of the site were not identified in the elsewhere in the EIR, please revise/reconcile as necessary.	Discussion is included under thresholds 2 and 3 in the biological resources section  I thought it was now said in the bio section that the project did not affect these areas; please verify/clarify.	Correct. Removed from discussion in alt.
P. 8-14 2 <sup>nd</sup> para, 4 <sup>th</sup> sentence	See comment on Alternative 2 which also applies here: there is no basis for not including the 45-acre open space area in these alternatives.	Removed throughout. OK	Addressed
P. 8-18, last para, 3 <sup>rd</sup> sentence	The project description did not previously indicate that an HOA would be used to maintain the park, which is a public park and there is little information to support that 42 homes on smaller lots would be able to support park maintenance and 34 larger lot homes would not. Please revise to be consistent with the project description and substantiate the assertion that 34 homes are not feasible with respect to the park: at a minimum, the land could be dedicated to the City under this alternative.	Added maintenance entities to the PD and removed reference to the HOA here to avoid confusion  Please provide additional clarification about what kinds of fees are anticipated to differentiate between DIF fees and monthly maintenance fees.	Added



185-53  
Cont.



**MEMORANDUM**

**Date:** 11.10.2020  
**To:** Jonathan Frankel  
**From:** Billing Liu & Steven J Brown, PE  
**Subject:** Traffic Conditions with the Proposed Sierra Madre Residential Project

OC20-0744

The following documents the expected changes in traffic conditions with the proposed 42-unit residential project (Project) in Sierra Madre, California. The Project is located on the north of Sunnyside Avenue and Fairview Avenue intersection and adjacent to the Mater Dolorosa Retreat Center in the City of Sierra Madre. The Project proposes 42 single-family units on a vacant land and is proposed to be built out and occupied in 2025.

**EXISTING CONDITIONS**

The following intersections and roadway segments would provide access to the site and are most likely to experience direct traffic effects, if any, from the Project:

Intersections:

1. Sunnyside Avenue & Fairview Avenue
2. Sunnyside Avenue & Sierra Madre Boulevard
3. Michillinda Avenue & Sierra Madre Boulevard
4. Michillinda Avenue & Foothill Boulevard

Roadway Segments:

1. Sunnyside Avenue between project site & Fairview Avenue
2. Sunnyside Avenue between Fairview Ave & Sierra Madre Boulevard
3. Sierra Madre Boulevard between Michillinda Avenue & Sunnyside Avenue
4. Michillinda Avenue between Fairview Avenue & Sierra Madre Boulevard
5. Michillinda Avenue between Sierra Madre Boulevard & Foothill Boulevard

Traffic counts were collected for the above intersections and segments in October 2020. Due to the COVID-19 pandemic in 2020, travel activity and traffic volumes were potentially atypical throughout the study area and Southern California. Thus, we reviewed multiple data sources in order to select a growth factor applying to existing counts to represent 2020 condition in a non-COVID environment. The findings from different data sources are listed below:

185-54



1. LADOT Data

LADOT analyzed the loop detector data for 12 intersections from March 10<sup>th</sup> to April 30<sup>th</sup> in 2020 and summarized the weekday volume for stages of “stay-at-home” conditions. Based on this study, the daily vehicle volume was reduced by 37% to 58% compared on non-COVID condition. However, data from other sources suggest that traffic conditions in Spring 2020 were different than October 2020, as many businesses and some schools have returned to at least partial on-site operating conditions.

2. Caltrans Performance Measurement System (PeMS) Data

PeMS collects real-time data from over 39,000 individual detectors on the freeway system across all major metropolitan areas in California. Based on the Project location, we reviewed the nearest I-210 freeway data, which is at Michillinda Avenue. **Table 1** presents the weekday Average Daily Traffic (ADT) values in February and October 2020. The October ADT were reduced by 6% to 14% compared to February pre COVID-19 conditions.

**Table 1: PeMS ADT Data at I-210 and Michillinda Avenue**

Location	Fed ADT	Oct ADT	Change
I-210 E Before On Ramp	102,812	88,722	-14%
I-210 E After On Ramp	108,810	96,592	-11%
I-210 W Before On Ramp	113,636	107,188	-6%
I-210 W After On Ramp	108,459	101,337	-7%

Source: Caltrans PeMS Website, 2020

3. Streetlight Data

Streetlight uses smartphones as sensors to measure travel activities on all streets. In this analysis, ADT data was collected from February to September 2020 at the 5 project study roadway segments to track the traffic changes after COVID-19. As shown below, the traffic decreased by approximately 45% in April and then gradually came back to approximately “normal” conditions in September. **Table 2-A** shows weekday conditions, while **Table 2-B** shows weekend conditions.

185-54  
Cont.



Table 2-A: Weekday ADT

Segment	Pre-COVID	Post-COVID						
	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep
Sunnyside Avenue between Project Site and Fairview Avenue	369	297	195	294	308	400	413	523
Sunnyside Avenue between Fairview Avenue and Sierra Madre Boulevard	1,947	1,669	1,221	1,605	1,960	2,108	2,211	2,098
Sierra Madre Boulevard between Michillinda Avenue and Sunnyside Avenue	7,045	5,905	4,211	5,603	6,506	6,987	7,289	7,178
Michillinda Avenue between Fairview Avenue and Sierra Madre Boulevard	8,611	6,984	4,320	6,301	7,985	8,392	8,895	8,678
Michillinda Avenue between Sierra Madre Boulevard and Foothill Boulevard	11,801	9,416	6,325	8,581	10,366	10,928	11,435	11,154
<i>Total</i>	<b>29,773</b>	<b>24,271</b>	<b>16,272</b>	<b>22,384</b>	<b>27,225</b>	<b>28,815</b>	<b>30,243</b>	<b>29,631</b>
<b>Change compared to Pre-COVID</b>		<b>-18%</b>	<b>-45%</b>	<b>-25%</b>	<b>-9%</b>	<b>-3%</b>	<b>2%</b>	<b>0%</b>

Source: Streetlight, 2020

185-54  
Cont.



Table 2-B: Weekend ADT

Segment	Pre-COVID	Post-COVID						
	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep
Sunnyside Avenue between Project Site and Fairview Avenue	401	304	155	334	327	433	371	809
Sunnyside Avenue between Fairview Avenue and Sierra Madre Boulevard	2,046	1,833	1,228	1,764	1,956	2,111	2,268	2,553
Sierra Madre Boulevard between Michillinda Avenue and Sunnyside Avenue	7,013	6,106	4,025	5,436	6,537	7,244	7,662	7,928
Michillinda Avenue between Fairview Avenue and Sierra Madre Boulevard	9,037	7,685	4,212	6,011	7,926	8,933	8,993	9,199
Michillinda Avenue between Sierra Madre Boulevard and Foothill Boulevard	12,160	10,374	6,461	8,609	10,195	11,769	12,019	11,951
<b>Total</b>	<b>30,657</b>	<b>26,302</b>	<b>16,081</b>	<b>22,154</b>	<b>26,941</b>	<b>30,490</b>	<b>31,313</b>	<b>32,440</b>
<b>Change compared to Pre-COVID</b>		<b>-12%</b>	<b>-46%</b>	<b>-26%</b>	<b>-10%</b>	<b>2%</b>	<b>5%</b>	<b>9%</b>

Source: Streetlight, 2020

I85-54  
Cont.



As the COVID-19 pandemic is still affecting regional travel, we applied an upward adjustment of 10% to the October 2020 counts to represent a worst-case condition prior to COVID-19.

MATER DOLOROSA RETREAT CENTER EVENT TRIPS

Mater Dolorosa Retreat Center is adjacent to the Project site in the north and held many weekly and special events before the COVID-19 pandemic. We were provided with 2019 data for the center, which included the date, duration, arrival window, departure window and estimated round trips for each event. We analyzed this information to estimate the average weekday and weekend trips associated with the center. The retreat center generated approximately 69 trips per weekday and 35 trips per weekend day in 2019. There were 13 AM peak hour trips (12 inbound/1 outbound) and 3 PM peak hour trips (1 inbound/2 outbound) per weekday.

TABLE 3 - Mater Dolorosa Historical External Event Trips in 2019

	Daily	AM Peak Hour			PM Peak Hour		
		In	Out	Total	In	Out	Total
Weekday	69	12	1	13	1	2	3
Weekend	35						

Source: Fehr & Peers, 2020

EXISTING (2020) PRE-COVID CONDITION

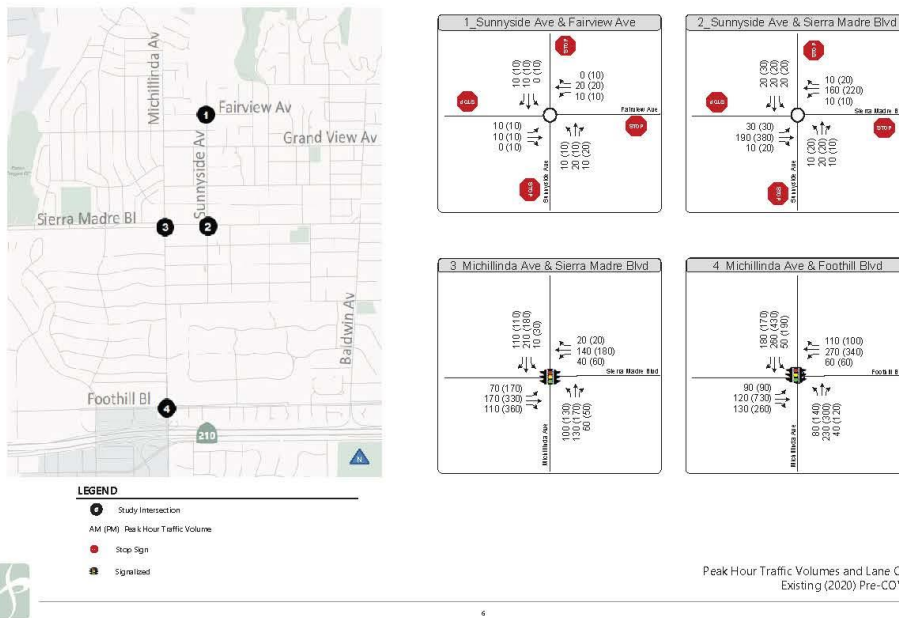
We estimated the existing (2020) pre-COVID condition by applying the 10% growth factor and adding the retreat center trips to represent a full non-COVID traffic condition. Table 4 and Figure 1 present the segment ADT and peak hour intersection traffic.

TABLE 4 - Existing (2020) Pre-COVID Segment ADT

Segment	Weekday	Weekend
Sunnyside Avenue between Project Site and Fairview Avenue	340	310
Sunnyside Avenue between Fairview Avenue and Sierra Madre Boulevard	490	400
Sierra Madre Boulevard between Michillinda Avenue and Sunnyside Avenue	6,970	6,290
Michillinda Avenue between Fairview Avenue and Sierra Madre Boulevard	7,390	6,930
Michillinda Avenue between Sierra Madre Boulevard and Foothill Boulevard	9,550	8,200

Source: Fehr & Peers, 2020

185-54  
Cont.





**TRIP GENERATION**

As shown in **Table 5-1**, the Project is expected to generate approximately 396 weekday daily trips, including approximately 31 trips (8 inbound/23 outbound) during the AM peak hour, and 42 trips (26 inbound/16 outbound) during the PM peak hour. On a typical weekend day, the Project will generate approximately 401 daily trips, including 39 trips (10 inbound/29 outbound) in AM peak hour, and 39 trips (25 inbound/14 outbound) in PM peak hour (**Table 5-2**).

**TABLE 5-1 - Weekday Trip Generation Estimates**

Land Use	Units	ITE Code	Quantity	Daily	AM Peak Hour			PM Peak Hour		
					In	Out	Total	In	Out	Total
Single-Family	DU	210	42	396	8	23	31	26	16	42
<b>Net New Trips</b>				<b>396</b>	<b>8</b>	<b>23</b>	<b>31</b>	<b>26</b>	<b>16</b>	<b>42</b>

**TABLE 5-2 - Weekend Trip Generation Estimates**

Land Use	Units	ITE Code	Quantity	Daily	AM Peak Hour			PM Peak Hour		
					In	Out	Total	In	Out	Total
Single-Family	DU	210	42	401	10	29	39	25	14	39
<b>Net New Trips</b>				<b>401</b>	<b>10</b>	<b>29</b>	<b>39</b>	<b>25</b>	<b>14</b>	<b>39</b>

**Notes:**

1. DUs = Dwelling Units

Source: Fehr & Peers, 2020

**TRIP DISTRIBUTION**

The Project trip distribution reflects the spatial distribution of trips traveling to and from the Project site. To determine where Project trips will travel, we applied a "select zone analysis" using the Southern California Association of Governments (SCAG) travel demand model. This method predicts where trips travel to/from for the area immediately surrounding the Project. The estimated trip distribution of the Project trips is shown on **Figure 2**.

185-54  
Cont.



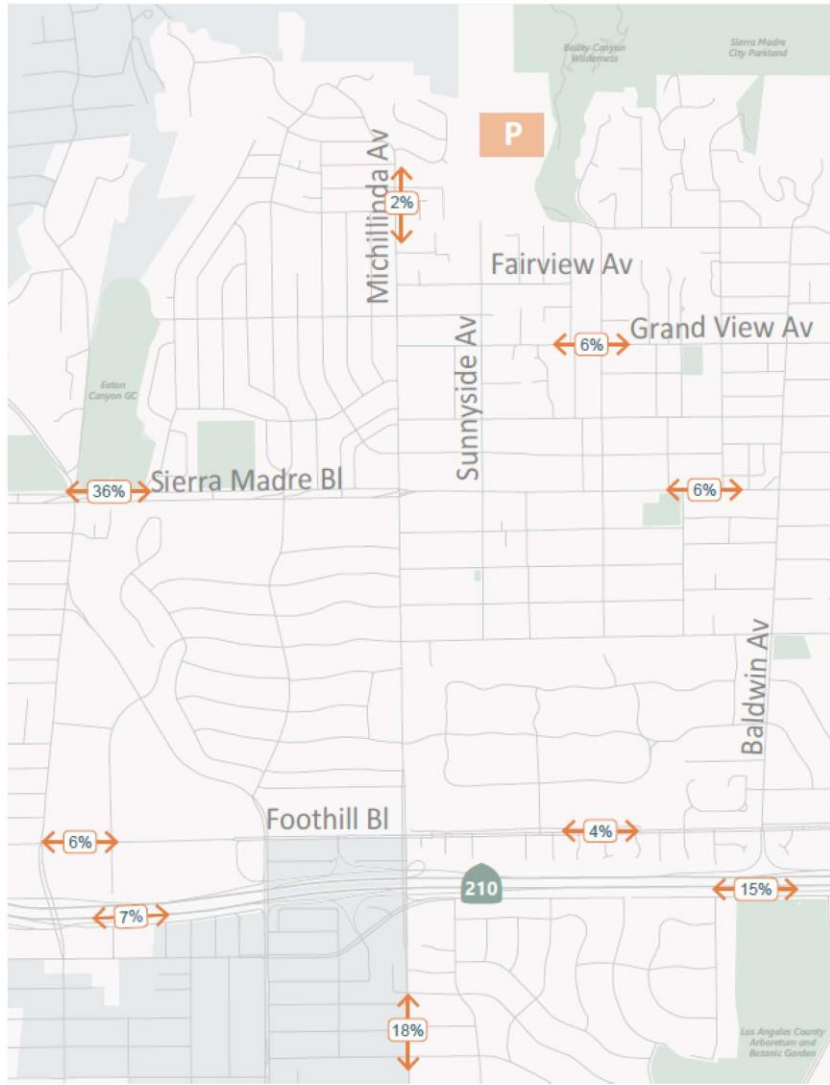


Figure 2  
Trip Distribution

185-54  
Cont.



**TRAFFIC FORECASTS**

The proposed Project was assumed to be built and occupied by 2025. The following traffic scenarios were developed and analyzed as part of this study:

- Existing (2020) Pre-COVID Condition
- Build-out (2025) without Project Condition
- Build-out (2025) with Project Condition

The best tool to determine background growth in the area is the SCAG model. The SCAG model predicts 2040 travel conditions in consideration of land development and transportation changes. It also includes a work-from-home assumption to reflect anticipated changes in how people travel. The results of these assumptions lead to a conclusion that traffic levels will slightly decrease in the study area by 2040. To be conservative, we assumed that the 2025 conditions will not decrease in comparison to existing (pre-COVID) conditions.

We added the Project trips to the study segments and intersections following the trip distribution identified above. The following **Table 6-1** and **Table 6-2** present the level of change expected on the study roadways as a consequence of the Project. The peak hour intersection traffic of Build-out (2025) with Project condition is shown in **Figure 3**.

**TABLE 6-1 – Weekday Build-out (2025) with Project Segment ADT**

Segment	2025 without Project	2025 with Project	Increase%
Sunnyside Avenue between Project Site and Fairview Avenue	340	740	118%
Sunnyside Avenue between Fairview Avenue and Sierra Madre Boulevard	490	850	73%
Sierra Madre Boulevard between Michillinda Avenue and Sunnyside Avenue	6,970	7,310	5%
Michillinda Avenue between Fairview Avenue and Sierra Madre Boulevard	7,390	7,390	0%
Michillinda Avenue between Sierra Madre Boulevard and Foothill Boulevard	9,550	9,680	1%

185-54  
Cont.



**TABLE 6-2 – Weekend Build-out (2025) with Project Segment ADT**

Segment	2025 without Project	2025 with Project	Increase%
Sunnyside Avenue between Project Site and Fairview Avenue	310	710	129%
Sunnyside Avenue between Fairview Avenue and Sierra Madre Boulevard	400	760	90%
Sierra Madre Boulevard between Michillinda Avenue and Sunnyside Avenue	6,290	6,640	6%
Michillinda Avenue between Fairview Avenue and Sierra Madre Boulevard	6,930	6,930	0%
Michillinda Avenue between Sierra Madre Boulevard and Foothill Boulevard	8,200	8,330	2%

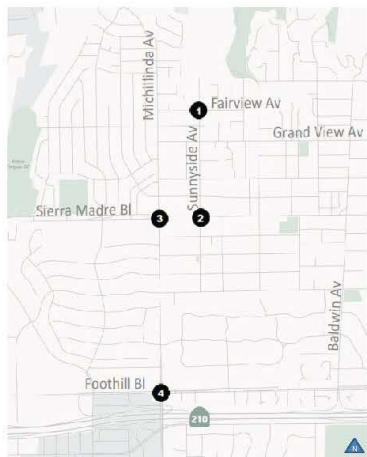
Source: Fehr & Peers, 2020

185-54  
Cont.

**INTERSECTION LOS ANALYSIS**

LOS is a measure of traffic operating conditions, which varies from LOS A (indicating free-flow traffic conditions with little or no delay) to LOS F (representing over-saturated conditions where traffic flows exceed design capacity resulting in long queues and delays). These ratings represent the perspective of drivers and indicate the comfort and convenience associated with driving. The analysis determines the intersection volume-to-capacity (V/C) ratio and corresponding LOS for the turning movements and intersection characteristics at signalized intersections. "Capacity" represents the maximum volume of vehicles in the critical lanes that have a reasonable expectation of passing through an intersection in one hour under prevailing roadway and traffic conditions. Traffic conditions for signalized intersections were evaluated using the Vistro Version 7.0 software - also reference as stop method<sup>1</sup>. The all-way stop intersections were evaluated using a standard method that predicts the delay for drivers. **Table 7** shows the LOS results for the study intersections:

<sup>1</sup> Intersection Capacity Utilization (ICU) method was applied in Vistro to estimate the roadway intersection capacity and LOS for signalized intersections.



- LEGEND**
- Study Intersection
  - AM (PM) Peak Hour Traffic Volume
  - Stop Sign
  - Signalized

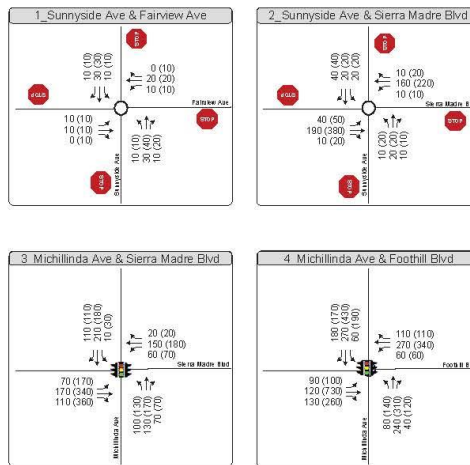


Figure 3  
Peak Hour Traffic Volumes and Lane Configurations  
Build-out (2025) With Project Condition

185-54  
Cont.



**TABLE 7 - Intersection LOS Analysis**

Intersection	Analysis Method	Existing (2020) Pre-COVID / Build-out (2025) without Project				Build-out (2025) with Project			
		AM V/C	AM LOS	PM V/C	PM LOS	AM V/C	AM LOS	PM V/C	PM LOS
1 - Sunnyside Ave & Fairview Ave	HCM 6th Edition		A		A		A		A
2 - Sunnyside Ave & Sierra Madre Blvd	HCM 6th Edition		A		B		A		B
3 - Michillinda Ave & Sierra Madre	ICU	0.36	A	0.53	A	0.36	A	0.54	A
4 - Michillinda Ave & Foothill Blvd	ICU	0.40	A	0.59	A	0.40	A	0.59	A

Source: Fehr & Peers, 2020

185-54  
Cont.

**CONCLUSION**

Development of the proposed Project would result in 396 trips being generated on a typical weekday and 401 trips on a typical weekend. As a result, the traffic volume changes on the study roadways of approximately 0 to 120 percent according to the location. The performance of the study intersections, as measured by LOS, would result in no measurable difference as a result of the Project.

**From:** Clare Lin  
**Sent:** Monday, May 3, 2021 8:31 AM  
**To:** 'Jonathan Frankel'  
**Subject:** FW: 700 N Sunnyside Monastery  
**Attachments:** SAMPLE LLA.pdf; APN MAPS AND MUNI CODE.pdf; LOT LINE ADJUSTMENT NEW FORM.docx

Hi Jonathan,  
Please see the comments below.

Thanks,

**Clare Lin**  
Senior Planner  
Planning & Community Preservation  
[www.CityofSierraMadre.com](http://www.CityofSierraMadre.com)  
(626) 355-1536 | [clin@cityofsierramadre.com](mailto:clin@cityofsierramadre.com)

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**From:** KEVORK TCHARKHOUTIAN [mailto:hyecity@live.com]  
**Sent:** Sunday, May 2, 2021 9:47 PM  
**To:** Chris Cimino <CCimino@cityofsierramadre.com>; Vincent Gonzalez <vgonzalez@cityofsierramadre.com>; Clare Lin <clin@cityofsierramadre.com>  
**Subject:** FW: 700 N Sunnyside Monastery

Hi Chris/Vince/Clare

After reviewing the applicant's submittals please see below my response . I wanted to discuss this before I forward it to the applicant's engineer.

Thanks

Kev

***700 N Sunnyside Monastery***

*The following is a review of documents submitted by the applicant for a lot line adjustment at 700 N. Sunnyside Ave. Congregation of the Passion-Mater Dolorosa Community Lot line adjustment documents were received by the City on April 22, 2021 The applicant is tentatively requesting approval of a lot line adjustment between three parcels owned by the applicant*

- 1. Currently the three parcels in question are tied together as one as evidenced by assessor parcel number(APN) 5761 -002 -008 .The applicant is starting with one legal parcel namely 5761-002-008 and the proposed lot line adjustment will result in the creation of*

185-55

APPLICATION  
PENDING REVIEW

*two parcels from one existing parcel, which is in violation of the Subdivision Map Act, as it relates to Lot Line Adjustments..*

2. *The applicant must research the title of the three parcels prior to their tie as one parcel namely APN number 5761- 002 - 008*
3. *Applicant must provide the City with the lot tie covenant and recorded documents which tied the 3 parcels, portion of lot 20, portion of lot 19, and portion of section 17. One option would be to untie or undo the lot tie covenant, thus reverting to 3 parcels , and as a result of the Lot Line Adjustment the existing 3 parcels would have 2 resulting parcels, in compliance with the SMA.*
4. *Applicant to submit a corporate resolution from the nonprofit corporation owning the property. The corporate resolution must state that the applicant authorizes Mr. Adam Browning and an authorized agent of NUWI, Sierra Madre LLC, (that agent shall be named ) are authorized by the congregation to submit, coordinate the approval of the lot line adjustment, and authorized to sign the official certificate of compliance document.*
5. *Applicant’s surveyor must submit traverse sheets with closure calculations*
6. *The certificate of compliance submitted by the applicant is incomplete and does not conform to the City’s official lot line adjustment form. Please see attached certificate of compliance form, in MS Word to be filled out notarized and executed by the authorized parties. The certificate of compliance must be recorded with the LA County recorder’s office upon approval by the City of Sierra Madre. Please see attached a sample of the format to follow in order to record the signed certificate of compliance document.*
7. *Applicant or applicant’s engineer or land surveyor must prepare a brief executive summary to address the requirements of the Sierra Madre municipal code sections 16 - 20-020 Subsections A1, A3 ,A4 and A7 .Please see attached sections of the code.*
8. *The Title report by Chicago Title Company attached to the submittal is for parcel APN 5761-001-001, which is not the parcel subject to the Lot Line Adjustment. The parcel to be considered and shown on the applicant’s submittal is 5761-002-008.*

185-56

Attachments:

Kev Tcharkhoutian P.E.

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## Response to Comment Letter I85

Individual  
Tricia Searcy  
October 4, 2021

- I85-1** The comment expresses general opposition to the proposed project and provides as an introduction to comments that follow.
- I85-2** The comment expresses concern regarding the discussion of the proposed open space conservation area. As discussed in Final EIR Section 3.2, Project Objectives, one of the objectives of the proposed project is to preserve the hillside open space area by conserving approximately 35 acres north of the Mater Dolorosa Retreat Center to the City in order to preserve a portion of Bailey Canyon and the Bailey Canyon Trail, which would be used by wildlife movement up and down slope; preserve native vegetation communities and drainages; and preserve land adjacent to the Bailey Canyon stream. It should be noted that no development is proposed within this 35-acre open space hillside conservation area that would potentially result in environmental impacts, nor is the City proposing any land use action for the 35-acre hillside open space area. Therefore, an analysis of environmental impacts associated with the proposed 35-acre hillside open space area is not required. It should be noted that A few minor changes were made to Final EIR Section 3.3.3 to clarify the conditions of the open space conservation easement. Lastly, Draft EIR Figure 3-4 shows the approximately 35 acres of open space hillside land to be conserved, located north of the existing Mater Dolorosa Retreat Center.
- I85-3** The comment expresses concern regarding the discussion of the proposed open space conservation area and whether or not it is a part of the proposed project. Please refer to Response to Comment I85-2.
- I85-4** The comment expresses the commenter's opinions regarding the project description of the Draft EIR. In addition, the comment is an introduction to other comments regarding the project description that follow.
- I85-5** The comment raises concerns regarding the amount of acreage that would be dedicated to open space. As discussed in Chapter 3, Project Description, of the Final EIR, approximately 35 acres would be preserved as open space off-site and will not be developed. Within the project site, 3.39 acres would be developed as open space, which includes a 3.04 acre proposed neighborhood park. Final EIR Chapter 3 includes a few additional clarifications related to the project description, including a few errors correcting the open space deduction from 30 acres to 35 acres. These revisions do not raise new or additional environmental issues concerning the adequacy of the Draft EIR.
- I85-6** The comment requests that the proposed open space and details associated with its protection are identified. The commenter also requests a separate comprehensive environmental review associated with the proposed open space. As discussed in Chapter 3, Project Description, of the Final EIR, in addition to the development of an approximately 3.04-acre dedicated neighborhood public park at the southernmost portion of the project site, the proposed project would include development of approximately 0.35 acres of passive open space located to the east of North Sunnyside Avenue and west of Carter Avenue, adjacent to Streets A and B (see Figure 3-2, Conceptual Site Plan see Figure 3-3, Proposed Park Conceptual Plan). In addition to the 3.39 acres of open space and neighborhood park, to be developed on the project site, to be developed on the project site, the proposed project also proposes conservation of approximately 35 acres of open space hillside land,

located north of the existing Mater Dolorosa Retreat Center (see Figure 3-4, Open Space Conservation Easement Area). No development would occur within this 35-acre open space hillside area. Conveyance of this open space hillside land to the City would be effectuated through execution of a development agreement between the City and project applicant/landowner. The Applicant/landowner would be subject to record of conservation easements in favor of the City, which would prevent development of the open space conservation easement area. Therefore, because no development is proposed in this area, and because the area would be conserved in perpetuity, comprehensive environmental review of the open space conservation is not required.

- 185-7** The comment requests that references associated with Colby Canyon and Colby Canyon trail and stream are removed and requests clarification regarding the community benefits associated with the proposed open space. Please refer to Response to Comment 142-26 regarding Colby Canyon and Colby Canyon trail. The community benefit associated with the proposed open space conservation includes conservation of this open space hillside area. As described in Objective 5 in Final EIR Section 3.2, Project Objectives, advantages associated with this preservation include preservation of a portion of Bailey Canyon and the Bailey Canyon Trail, which would be used by wildlife for movement up and down slope; preserve native vegetation communities and drainages; and preserve land adjacent to the Bailey Canyon stream.
- 185-8** The comment expresses states that the project description is unclear, unstable, and not complete because the project site boundaries have not yet been determined and accurately describes the discussion regarding the proposed lot line adjustment. As discussed in Chapter 3, Project Description, of the Draft EIR, the proposed project site is 17.30 acres and does not include the area already developed as the Mater Dolorosa Retreat Center (see Draft EIR Figure 3-1, Project Location).
- 185-9** The comment references a prior lot line adjustment application that was submitted to the City and returned to the project application for corrections. The comment then references Attachment 4 to the comment letter, which lists six directives the commenter believes the are relevant to any future lot line adjustment related to the project. The attachment also describes the prior lot line adjustment application and makes a statement about the relevancy of a title report attached to the prior lot line adjustment application. None of these comments raise any environmental issues relevant to the Draft EIR or its adequacy. No response is required.
- 185-10** The comment expresses concerns relating to the net-zero water impact associated with the project. Please refer to Global Response GR-1.
- 185-11** The comment asks for clarification about the dedicated funding source for the long-term park maintenance. As stated in Draft EIR Section 3.3.2, Neighborhood Park and Open Space, the proposed project would be maintained by a landscape maintenance district or similar public maintenance entity. The proposed project would be located at the southernmost portion of the project site (see Figure 3-3, Proposed Park Conceptual Plan). Maintenance activities associated with the proposed park would include trash removal, landscape maintenance, and maintenance of park facilities such as play structures and picnic areas. Estimated number of employees are not known at this time but it is anticipated that the park would be maintained by existing City staff. The comment also raises economic issues that do not appear to relate to any physical effect on the environment. No further response is required because the comment does not raise an issue related to the adequacy of the Draft EIR.

- 185-12** The comment states that the project description is unclear, unstable, and subject to change because there is a range of sizes in homes, and whether or not they would be one or two stories, and because the architectural design are not stated. Please refer to responses I4-7 through I4-9, above, regarding lot sizes and number of stories. As discussed in Specific Plan Section 3.3, the proposed project would implement a cohesive set of diverse, architectural styles that are intended to complement the architectural diversity of the existing structures of the City. Regarding the commenter’s concern that these details make it impossible to determine if the project is consistent with the City’s General Plan and Ordinances, please refer to Draft EIR Section 4.11, Land Use and Planning, as well as GR-7, General Plan Consistency, for an overview of the project’s consistency with the City’s General Plan policies and applicable plans and ordinances.
- 185-13** The comment states that Objective 5 should be removed. Please refer to Response to Comment I42-26.
- 185-14** The comment expresses concern that there are no details provided to substantiate Objective 6 and that the project would increase safety concerns on this roadway. Draft EIR Section 3.3.6, Access and Circulation Network, provides details regarding improvements proposed within North Sunnyside Avenue. This would include reconfiguration of North Sunnyside Avenue, located within the western portion of the site, which would be moved farther to the west. North Sunnyside Avenue would transition from a width of 40 feet at its existing terminus to a varying 54- to 56.5-foot right-of-way within the project site, with curbs and gutters, parking and planting areas on both sides, a landscaped parkway and sidewalk on the west side, and tree plantings on the east side of the street. The commenter also stated that no improvements to North Sunnyside Avenue outside the boundaries of the proposed project site would occur. However, in order to address commenters’ concerns related to safety issues along Carter Avenue and outside of the boundaries of the proposed project site, the project applicant is proposing off-site widening to Carter Avenue, between the southeastern portion of the project site boundary and Lima Street, which would ensure that Carter Avenue would comply with existing code within and outside of the project site (see Final EIR Section 3.3.12 and Global Response GR-5 for details).
- Regarding the commenter’s safety concerns, please refer to Final EIR Section 4.17.5, Impacts Analysis, in Section 4.17, Transportation. As discussed in this section, the project does not include any project elements that could potentially create a traffic hazard for motor vehicles, bicycles, or pedestrians due to a proposed, non-standard design feature. The proposed project’s circulation system is designed to interconnect with the existing adjacent public street system and discourage cut-through automobile traffic. Access points would not create a hazard for vehicles or people entering or exiting the site. Additionally, the project would not result in a hazardous roadway design or unsafe roadway configuration; place incompatible uses on existing roadways; or create or place curves, slopes, or walls that impede adequate sight distance on a roadway.
- 185-15** The comment states that the details of improvements of Carter Avenue are not clearly explained and expresses safety concerns associated with those improvements. Please refer to Global Response GR-5.
- 185-16** The comment requests an explanation of improvements proposed along Carter Avenue, leading up to the project site. Please refer to Global Response GR-5 .
- 185-17** The comment expresses the opinions of the commenter that the development agreement and enhanced connectivity to Bailey Canyon Wilderness Park would not be public benefits. Although the development agreement is not in itself a public benefit, the public benefits associated with the project

would be effectuated through execution of a development agreement between the City and project applicant/landowner. In addition, although access to Bailey Canyon Wilderness Park already exists, pedestrian access to the Bailey Canyon Wilderness Park and trail would be enhanced through a pedestrian path in the southeast corner of the project site as well as a sidewalk along the northern side of Carter Avenue just outside of the proposed project site, which would provide pedestrian access to the entrance/parking lot of the Bailey Canyon Wilderness Park, off of Carter Avenue (see Final EIR Section 3.3.12 for details).

**185-18** The comment expresses concern that the alternatives section is insufficient. Please refer to Response to Comment I26-10.

**185-19** The comment says that the PDFs outlined in the Draft EIR need to specify what applicable provisions, which was suggested by MIG in the third-party review process. It should be noted that Admin Draft of the Draft EIR that MIG peer reviewed is not the same version as the Draft EIR that went out for public review. This comment, provided by MIG on the Admin Draft EIR, was addressed in the Draft EIR and can be found in Draft EIR Section 3.3.13, Project Design Features, Table 3-2.

**185-20** The comment says that the PDFs outlined in the Draft EIR need to specify what applicable provisions, which was suggested by MIG in the third-party review process. See Response to Comment I85-19, above.

**185-21** The comment states that PDF-AES-2 exacerbates impacts associated with substantial light and glare to the existing neighborhoods to the south and west.

A discussion has been added to Final EIR Section 4.1.5, Impact Analysis, in Section 4.1, Aesthetics, to address this concern. As disclosed in this section, if installed, solar panels on residential rooftops would be fully integrated into roof designs and would be oriented to the south to maximize exposure to the sun. Modern solar panels are designed to be highly absorbing of incoming light to both maximum energy generation potential and to minimize potential for reflective light (i.e., glare). Typically, the potential for glare associated with solar panels is reduced by the use of anti-reflective coatings (a standard component of modern panel technology) and by the mounting angle of installed panels. Under most circumstances, rooftops panels are installed at a pre-specified and specific tilt/angle in order to maximize exposure to the sun. With typical mounting angles/tilt, the angle of reflective light is similar to the angle of inbound light and as such, any reflective light associated with the panel surface is reflected at an angle and height that is located "higher" in elevation than surrounding land uses. At the project site, the potential installation of solar panels atop detached single-family residences is not anticipated to generate substantial glare that would be received by single-family residences to the south and west due to mounting heights and angles, the greater elevation of the project site (and future single-family residences) in relation to existing residential development to the south, and due to screening associated with the installation of landscaping along the southern and western boundaries of the project site as depicted in the Conceptual Landscape Plan (see Draft EIR Figure 3-5). As discussed above, additional discussion has been added to Draft EIR Section 4.1.5, Impacts Analysis, in Section 4.1, Aesthetics, to further substantiate why impacts relating to solar panel glare would be less than significant.

**185-22** The comment asks whether the project would result in a cumulatively considerable net increase in of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard. The comment also asks whether the project would expose sensitive receptors to substantial pollutant concentrations and expresses concern that the project rejects the recommendations made by MIG regarding health and well-being to the community.

As discussed in Draft EIR Section 4.3.5, Impacts Analysis, in Section 4.3, Air Quality, based on the project-generated construction emissions, the project would not result in a cumulatively considerable increase in emissions of nonattainment pollutants. Impacts would be less than significant. In addition, regarding sensitive receptors, construction activities would generate emissions in excess of site-specific LSTs for PM<sub>10</sub> and PM<sub>2.5</sub>; therefore, localized construction impacts during construction of the project would be potentially significant (Impact AQ-1) and mitigation is required. However, mitigation measure MM-AQ-1 would be implemented to reduce localized construction impacts during construction of the project (Impact AQ-1) to less than significant with mitigation. The comments provided by MIG in the third-party review process, including comments related to air quality and health risks associated with air quality impacts were previously addressed in the Public Review version of the Draft EIR.

**185-23** The comment states that the project should be held to the standards outlined in MIG's review. It should be noted that Admin Draft of the Draft EIR that MIG peer reviewed is not the same version as the Draft EIR that went out for public review. These comments, provided by MIG on the Admin Draft EIR, have been considered and addressed in the Draft EIR.

**185-24** The comment states that the project should use the SCAQMD thresholds of significance as the performance standard for MM-AQ-1 as suggested by MIG as part of the third-party independent review process. Dudek and MIG coordinated in the approach of what threshold to use and ultimately decided to mass based standards. The mitigation measure is in place to reduce emissions PM<sub>10</sub>, PM<sub>2.5</sub>, and Diesel Particulate Matter (DPM) emissions from project construction. The mitigation measure is not solely in place to reduce DPM emissions and health risk impacts. As such, the functional equivalent must reduce the same mass emissions to ensure the PM<sub>10</sub> and PM<sub>2.5</sub> mass thresholds for LSTs are not exceeded.

**185-25** The comment states MIG's recommendation associated with MM-AQ-1 and diesel PM.

As discussed in Draft EIR Section 4.3, impacts to air quality would be less than significant with implementation of MM-AQ-1. The request made by MIG on the Admin Draft EIR is not necessary to facilitate the emission reductions needed by the mitigation measure. The engine tier level specified in the MM-AQ-1 reduces emissions of PM<sub>10</sub>, PM<sub>2.5</sub>, and DPM to below levels of significance. In addition, MM-AQ-1 reduces engine exhaust PM emissions solely. It does not specify or refer to reducing fugitive emissions of PM. While MM-AQ-1 reduces exhaust PM<sub>10</sub> and PM<sub>2.5</sub>, it also reduces total PM<sub>10</sub> and PM<sub>2.5</sub> (which includes fugitive dust PM<sub>10</sub> and PM<sub>2.5</sub>). As additional measures to reduce fugitive dust PM<sub>10</sub> and PM<sub>2.5</sub> are not needed for the project, this addition is not necessary. Furthermore, adding the suggested language by MIG to a mitigation measure that is focused solely on off-road equipment engines would cause confusion for the reader. Nonetheless, MM-AQ-1 has been updated, per MIG's requests, to include specific pathways for which an exemption can be granted an example engine technologies that can be used that are functional equivalents to Tier 4 Interim for reducing engine PM<sub>10</sub> and PM<sub>2.5</sub>. The health risk assessment (HRA) was prepared evaluating emissions of DPM site-wide where construction activity is likely to occur. At this stage in project development, information is not refined enough to parse out the equipment over different regions of the project. As such, if a change in equipment proposed compared to what was evaluated in the Draft EIR, the analysis would be revised consistent with the Draft EIR to evaluate the DPM emissions sitewide, not within specific regions of the site. Therefore, as long as total DPM emissions of the project are the same or less than what was evaluated in the Draft EIR, HRA impacts would be the same or less as what was evaluated in the Draft EIR.

- I85-26** The comment asks what General Plan policies have been removed from the Admin Draft EIR because they are not the responsibility of the project to implement and what is the responsibility of the City and not the project. The policies that apply to the project are listed in Draft EIR Section 4.11, Land Use and Planning, in Table 4.11-1. All other goals and policies listed in the City’s General Plan are not applicable to the project. More specifically, goals and policies not listed in Table 4.11-1 would not apply to the project because they do not geographically cover the project site or because they fall under the responsibility of the City and would not be under the purview and responsibility of the project or project applicant. For example, Goal 7 of Chapter One: Land Use of the General Plan is to “Preserve and enhance the pattern of development in the downtown area to facilitate commerce.” The project is not located in the downtown area of the City and therefore would not apply. For another example, Policy L7.5 calls for “Review and update the R1 Zoning Ordinance and other implementing ordinances every two years…” and Policy L7.6 calls to “Consider implementing a design review process.” Given the nature of these policies, they would be under the responsibility of the City to implement and therefore would not apply to the project.
- I85-27** The comment expresses concern regarding the net-zero water impact. Please refer to Global Response GR-1.
- I85-28** The comment expresses concern regarding the project’s inconsistency with the existing zoning and land use designation of the project site. The commenter is correct that the project is inconsistent with various goals and polices the General Plan but as stated in Draft EIR Section 4.11.5, Impacts Analysis, the conflicts do not result in a significant environmental impact. In addition, as described in Draft EIR Section 3.4, Discretionary Actions, the proposed project would include amendments to the Zoning Code and the City’s General Plan to change the land use designation for the project site from Institutional to Specific Plan. Please refer to Global Response GR-7.
- I85-29** The comment expresses concern with the language used in the consistency analysis of the Draft EIR. Please refer to Global Response GR-7. It should be noted that this comment was provided by MIG on the Admin Draft EIR, which is not the same version as the Draft EIR that went out for public review. These comments, provided by MIG on the Admin Draft EIR, have been considered and addressed in the Draft EIR.
- I85-30** The comment expresses general concerns regarding the adequacy of the project description and consistency analysis presented in the Draft EIR. See Response to Comment I85-12 and I85-29, above.
- I85-31** The comment states that fire analysis is not substantiated by facts as the Sierra Madre Fire Department (SMFD) is understaffed and does not have signed mutual aid agreements for fire protection. The comment also asks for an explanation as to how development fees would mitigate adverse impacts. A comprehensive analysis of the project’s impacts to fire protection services is presented in Draft EIR Section 4.15, Public Services. As stated in Draft EIR Section 4.15.5, Impact Analysis, the current staffing level at the City’s station is at 10 sworn personnel. In response to a request for information, the SMFD noted a fully staffed station would be at 15 sworn personnel with a goal to increase staffing to 21 sworn personnel. However, the SMFD also indicated that existing facilities are sufficient to accommodate the proposed. Payment of development fees by the project applicant, as required by Chapter 15.52 of the SMMC, would be used to offset the costs of increased personnel or equipment that could be required in order to maintain acceptable service ratios, response times, and other performance objectives and impacts would be less than significant.

- I85-32** The comment states that, per comments provided by MIG, the FPP is not specific enough to the project. The purpose of the FPP is to point out what is required by code and the regulations included are what is applicable to the project. Based on the analysis of the fire environment (which is provided in the FPP), it is determined that the project would include necessary protections such that risk is reduced to acceptable levels. This is evidenced by the fire marshal agreeing with the FPP's conclusions and accepting the document.
- I85-33** The comment requests that, per comments provided by MIG, the FPP is modified to be more specific to the project and include an exhibit showing the FPP. See Response to Comment I85-32, above.
- I85-34** The comment states that the "Ready, Set, Go!" approach outlined in the FPP is not a sufficient fire plan. Per the FPP and as discussed in Draft EIR Section 4.20, Wildfire, various additional features will be implemented into the project to address wildfire issues. These include compliance with the enhanced ignition-resistant construction standards of the 2019 CBC (Chapter 7A) and Chapter 5 of the UWI code; incorporation of fire prevention and landscaping standards, per Chapter 17.52 of the SMMC; vegetation management; project site access, including road widths and connectivity, which would be consistent with the City's roadway standards and the 2019 CFC Section 503; and drainage and water quality improvements. In addition, the project would provide for at least 100 feet of FMA around all buildings; 200 feet of FMA on the southern side of the project; 62 to 100 feet of FMA on the eastern side; and over 100 feet of FMA on the northern side. Installation and maintenance of project roads, service utilities, fuel modification, drainage and water quality improvements, and other associated infrastructure would not exacerbate wildfire risks provided that the appropriate fire prevention and vegetation management activities are implemented as required by the FPP and SMMC. Impacts to wildfire would be less than significant.
- I85-35** The comment expresses concern regarding access and evacuation impacts associated with the existing width of both Sunnyside and Carter Avenue leading up to the project. As discussed in Draft EIR Section 4.20, the proposed driveways and roadways (proposed and existing) providing access to the project site would comply with the City's roadway standards and the 2019 CFC Section 503. Additionally, all access roads would meet SMMC standards, requiring roadways to have a minimum 20-foot unobstructed width (30- and 36-foot-wide roadway surfaces are proposed) and a minimum 26-foot width within 25 feet of hydrants. Therefore, the project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant. Please also refer to Global Response GR-4 and Global Response GR-5.
- I85-36** The comment expresses concern regarding access issues the portions of Sunnyside and Carter Avenue that are outside of the project site and will not be widened. Please refer to Global Response GR-5 and Response to Comment I85-35.
- I85-37** The comment expresses concern regarding the project's consistency with General Plan Policy Hz7. Please refer to Global Response GR-3.
- I85-38** The comment expresses concern regarding the project's consistency with General Plan Policy R3.2. Please refer to Global Response GR-3.
- I85-39** The comment describes Draft EIR Section 4.17. The comment is an introduction to comments that follow, related to the transportation analysis.

- 185-40** The comment expresses concern regarding the project's consistency with General Plan Policy L51.2. Please refer to Global Response GR-7.
- 185-41** The comment expresses concern regarding the project's consistency with General Plan Policy L51.5 as the project would fail to provide bicycle facilities and create safety hazards. As discussed in Draft EIR Section 4.11.5, the proposed project would provide for a circulation system using non-vehicular modes of transportation in a system of pedestrian pathways within the project site. In addition, the proposed project's residents would have access to existing transit facilities, including transit connection for Routes 78 and 268 and stops for the Gateway Coach located at the intersection of North Sunnyside Avenue and West Grand View Avenue and at the intersection of Michillinda Avenue and West Grand View Avenue. Therefore, although the proposed project would not provide new bicycle facilities, the project would be consistent with Policy L51.5. Please refer to Global Response GR-7. Regarding safety concerns, please refer to Response to Comment 185-42, below.
- 185-42** The comment states that the project conflicts with General Plan Objective L52 as the project would increase safety hazards to pedestrians and bicyclists. Please refer to Global Response GR-7. The Specific Plan includes a Mobility Plan, including a Pedestrian Plan, which will improve both North Sunnyside Avenue and Carter Avenue and develop new Streets A, B, and C to provide adequate circulation within the project site. In addition, as described in Draft EIR Section 4.17.5, although no bicycle facilities and improvements are proposed under the project, the project would not impact existing bicycle facilities in the vicinity of the project, including the existing bicycle lanes within Sierra Madre Boulevard. See Response to Comment 147-5 for additional discussion.
- 185-43** The comment states that the project conflicts with General Plan Policy L52.9 as the project would increase safety hazards to pedestrians and bicyclists. Please refer to Response to Comment 185-42, above. As discussed in Draft EIR Section 4.11.5, the proposed project would provide sidewalks throughout the project site and includes a pedestrian path, which would extend from the east side of Carter Avenue and pedestrian access to Bailey Canyon Wilderness Park to the east of the site as well as an additional 6-foot sidewalk on the north side of Carter Avenue, between the southeastern portion of the project site boundary and Lima Street (See Final EIR Section 3.3.12 and Figure 3-11, Proposed Off-Site Improvements and Figure 3-12, Carter Avenue Offsite Improvement Plan). Please refer to Global Response GR-7 .
- 185-44** The comment states that there is no good reason or mitigation provided associated with conflicts with General Plan Policy L52.8. Please refer to Global Response GR-7.
- 185-45** The comment states that the project conflicts with General Plan Objective L53 and cites a study prepared by Fehr and Peers. As discussed in Draft EIR Section 4.11.5, the proposed project would extend public access into the project site along North Sunnyside Avenue. Adequate circulation would be provided throughout the project site through development of A, B, and C, and through internal public access along Carter Avenue. Carter Avenue would become an egress and ingress lane and would still allow access to the Mater Dolorosa Retreat Center. Because no existing residential uses would use Carter Avenue or North Sunnyside Avenue for access, the proposed project would not result in intrusive through traffic. These proposed circulation improvements would be used to serve the proposed project residents and would also allow access to the Mater Dolorosa Retreat Center. Due to their location, these proposed improvements would not result in through traffic in adjacent neighborhoods and the project would be consistent with this policy. Please refer to Global Response GR-7 .



Regarding the study cited prepared by Fehr and Peers, the study states that the project would result in a 118% increase in weekday build-out (2025) at the segment of Sunnyside Avenue between the Project site and Fairview Avenue and a 129% increase at the segment of Sunnyside Avenue between the project site and Fairview Avenue, the intent of Objective L53 is to protect residential areas from significant increases in traffic volume created by non-residential sources and/or use of residential streets as a short-cut due to congestion on a major roadway. It is not meant to apply to an extension of a residential area, as this would imply that no residential area could ever be expanded beyond the initial phase. The residential nature of the project is consistent with the adjacent area, such that the site and the surrounding area will become one “neighborhood” with respect to traffic conditions. Please also refer to Global Response 6 (GR-6), Traffic.

**185-46** The comment states that the project conflicts with Housing Policy 5.4 as it does not provide bicycle facilities and creates safety hazards to pedestrians. As discussed in Draft EIR Section 4.11.5, the proposed project includes a Mobility Plan, which provides for a circulation system using private vehicular and non-vehicular modes of transportation in a system of public roadways and pedestrian pathways within the project site. Therefore, the proposed project would be consistent with this policy. Please also refer to Global Response GR-7.

**185-47** The comment states that the project conflicts with Circulation Goal 2 as it as it does not provide bicycle facilities and creates safety hazards to pedestrians and bicyclists. As discussed in Draft EIR Section 4.11.5, the proposed project would be consistent with this policy and would provide for a circulation system using private vehicular and non-vehicular modes of transportation in a system of public roadways and pedestrian pathways within the project site. These transportation improvements include reconfiguration of North Sunnyside Avenue, located within the western portion of the site; improvements of Carter Avenue; and construction of Streets A, B, and C, which would run east to west within the project site. In addition, a pedestrian path extending from the east side of Carter Avenue would provide pedestrian access to Bailey Canyon Wilderness Park to the east of the site. Sidewalks would also be provided throughout the project site. Lastly, the project applicant is proposing off-site widening to Carter Avenue, between the southeastern portion of the project site boundary and Lima Street, and would include a 6-foot sidewalk within the northern portion of Carter Avenue at this location (see Final EIR Section 3.3.12 and Global Response GR-5 for details). Please refer to Global Response GR-7.

**185-48** The comment states that the project conflicts with Circulation Goal 2 as it creates safety hazards to pedestrians and bicyclists. As discussed in Draft EIR Section 4.11.5, the proposed project would extend public access along North Sunnyside Avenue and include new Streets A, B, and C to provide circulation throughout the project site. Carter Avenue would also be improved and would be publicly accessible from within the project site and would become an ingress and egress secondary access road at the southeastern portion of the site. Lastly, the project applicant is proposing off-site widening to Carter Avenue, between the southeastern portion of the project site boundary and Lima Street, and would include a 6-foot sidewalk within the northern portion of Carter Avenue at this location (see Final EIR Section 3.3.12 and Global Response GR-5 for details). The project would implement street sections that slow traffic and create a safe and pleasant small neighborhood environment. Therefore, the project would create safe and well-maintained streets and be consistent with this policy. Please refer to Global Response GR-5 and Global Response GR-7.

- I85-49** The comment states that the project conflicts with Circulation Goal 3, per a study prepared by Fehr and Peers in 2020. As discussed in Draft EIR Section 4.11.5, the proposed project would extend public access along North Sunnyside Avenue and include new Streets A, B, and C to provide circulation throughout the project site. Carter Avenue would also be improved and would be publicly accessible from within the project site and would become an egress and ingress secondary access road at the southeastern portion of the site. Lastly, the project applicant is proposing off-site widening to Carter Avenue, between the southeastern portion of the project site boundary and Lima Street, and would include a 6-foot sidewalk within the northern portion of Carter Avenue at this location (see Final EIR Section 3.3.12 and Global Response GR-5 for details). Thus, the proposed project would be consistent with Circulation Goal 3. Regarding the study cited prepared by Fehr and Peers, see Response to Comment I85-45.
- I85-50** The comment states that the project conflicts with Objective C30 as it increases safety hazards. The proposed project would extend public access along North Sunnyside Avenue and include new Streets A, B, and C to provide circulation throughout the project site. Carter Avenue would also be improved and would provide secondary egress and ingress access to the site, as well as internal circulation. Lastly, the project applicant is proposing off-site widening to Carter Avenue, between the southeastern portion of the project site boundary and Lima Street, and would include a 6-foot sidewalk within the northern portion of Carter Avenue at this location (see Final EIR Section 3.3.12 and Global Response GR-5 for details). As discussed in Draft EIR Section 4.17, the proposed project would not result in new traffic hazards, including due to a geometric design feature, the proposed project would extend public access along North Sunnyside Avenue and include new Streets A, B, and C to provide circulation throughout the project site. Please refer to Global Response GR-5 and Global Response GR-7.
- I85-51** The comment states that the project conflicts with Objective C30.3 as it does not maintain safety. Please refer to response I85-50.
- I85-52** The comment states that the transportation section ignores safety concerns and traffic impacts. Draft EIR Section 4.17.5 addresses whether or not the project would substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). Draft EIR Section 4.17 details consistency with existing General Plan policies and objectives highlighting the need for safety. Moreover, the project would include sidewalks along the proposed streets to promote pedestrian safety and mobility within the project site and local vicinity and would not result in a hazardous roadway design or unsafe roadway configuration. Please refer to Global Response GR-6, for information about traffic impacts and Global Response GR-5, related to safety along Carter Avenue.
- I85-53** The comment is an attachment to the comment letter and includes MIG's third party peer review of the Draft EIR, dated June 22, 2021, as well as Dudek's responses during MIG's first and second review of the Draft EIR. It should be noted that this comment was provided by MIG on the Admin Draft EIR, which is not the same version as the Draft EIR that went out for public review. These comments, provided by MIG on the Admin Draft EIR, have been considered and addressed in the Draft EIR. The comments provided by MIG in their third-party review are referenced and addressed in responses I85-19, I85-20, I85-22, I85-23, I85-24, I85-25, I8532, and I85-33, above. No further response is required.

- 185-54** The comment is an attachment to the comment letter and includes a Traffic Conditions with the Proposed Sierra Madre Residential Project Memorandum prepared by Fehr & Peers on November 10, 2020. The City notes that the comment provides background information and does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. The information stated in this memo is referenced and addressed in responses 185-45 and 185-49, above. No further response is required.
- 185-55** The comment includes an email chain between Clare Lin, a Senior Planner at the City, Jonathan Frankel, the project Applicant, Kevork Tcharkhoutian, and Chris Cimino, dated May 3, 2021. The City notes that the comment provides background information and does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. The information stated in this email correspondence are referenced and addressed in response 185-9. No further response is required.
- 185-56** The comment provides continued email response from Kevork regarding Attachment 3 (see Response to Comment 185-55, above). The City notes that the comment provides background information and does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. The information stated in this email correspondence are referenced and addressed in Response to Comment 185-9. No further response is required.

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Comment Letter 186

**From:** Wendy Thermos <wendythermos@yahoo.com>  
**Sent:** Monday, October 4, 2021 4:55 PM  
**To:** Vincent Gonzalez  
**Subject:** Draft EIR for The Meadows project

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

After reading the Draft EIR for The Meadows project, I urge you to reject this project.

Several important issues are glossed over or simply not addressed in the Draft EIR, making the proposed project at odds with the city's General Plan and incompatible with the surrounding community.

186-1

One of the most glaring issues is traffic. It's simply unrealistic to claim that 42 homes will have no traffic impacts. The Draft EIR focuses entirely on traffic circulation within the project and fails to address impacts on surrounding neighborhoods. There's no analysis of environmental impacts at all, just an unsupported conclusion that there are no traffic impacts. Where are the traffic studies we were promised? This is a stunning omission.

186-2

Water supply is also given inexcusably short shrift. The developer's claim that the project will have "net zero" water-use relies on fuzzy logic. California, as you surely know, is in a severe, persistent drought. Water rights can't be "guaranteed" into the future, given the increasingly pessimistic projections being made by the state of California and our local water agencies, and no amount of money for purchase of so-called "rights" is going to change that. Granting permission for projects to stick more straws in a diminishing supply not only flies in the face of common sense, it is an insult to those of us who are increasingly being asked to cut our water use. Simply put, we are being asked to cut our water use so that a single property owner and a developer can make a boatload of money.

186-3

Allowing 42 homes to be built in an officially designated extreme-high-fire-danger zone is also inadequately addressed in the Draft EIR, to the point where I'm wondering, Why have an EIR at all? The bottom line is that such construction is completely at odds with Sierra Madre's General Plan. Yet somehow, again, the authors of the Draft EIR see no significant impacts. As with the other flawed statements made in the Draft EIR, granting approval to this claim would be governmental foolishness at its worst.

186-4

Sincerely,  
Wendy Thermos  
Homeowner on the 400 block of Grove Street for 28 years

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## Response to Comment Letter I86

Individual  
Wendy Thermos  
October 4, 2021

- I86-1** The comment expresses general opposition to the project but does not raise any specific issues concerning the adequacy of the Draft EIR.
- I86-2** The comment is concerned with the potential for traffic impacts in the neighborhoods surrounding the proposed project site. Please refer to Global Response GR-6.
- I86-3** The comment is concerned with potential impacts to water supply and the feasibility of the net zero water-use approach. See Global Response GR-1.
- I86-4** The comment expresses general opposition to the project, and concern with the project site's location in a Very High Fire Hazard Severity Zone, and perceived inconsistencies between the project and the City's General Plan. Please refer to Global Response GR-3 and Global Response GR-7.

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Comment Letter I87

**From:** Laura Kalayjian <drilaurak@hotmail.com>  
**Sent:** Monday, October 4, 2021 3:01 PM  
**To:** Vincent Gonzalez  
**Subject:** Comment regarding draft EIR for Meadows project

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Dear Mr. Gonzalez, My name is Laura Kalayjian and I live at 660 Edgeview Dr. Sierra Madre. My phone number is 626-836-9539.

I am commenting on the Draft EIR for the Meadows.

#1 The draft proposes to cut down 10 protected Coast Live Oak trees. A 1:1 replacement is not nearly enough restitution for mature Oak trees. Why didn't the developers incorporate these trees in their plot design. Saving protected oak trees is more in line with the character of Sierra Madre.

#2 Why are there no solar panels on any of these new units? The California solar mandate is a building code that requires new construction homes to have a solar photovoltaic (PV) system as an electricity source. This code, which went into effect on January 1, 2020, applies to both single-family homes and multi-family homes that are up to three stories high.

#3 Who will do the monitoring of the air quality on the construction site and how will that be available to neighboring community? As a parent to children, also known as "sensitive receptors", I want to be able to hold the developer accountable to mitigate the impact of toxic and carcinogenic pollutants as described in the appendix.

Thank you, Laura Kalayjian

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## Response to Comment Letter I87

Individual  
Laura Kalayjian  
October 4, 2021

- I87-1** This is an introductory comment introducing the commenter and comments to follow.
- I87-2** The comment expresses concern over the removal of 10 protected Coast Live Oak trees and states the proposed 1:1 replacement is not enough restitution for mature Oak trees. The commenter asks why the developers didn't incorporate these trees into their design, which would be more in line with the character of Sierra Madre. Please refer to Global Response GR-2 .
- I87-3** The comment asks for clarification on whether solar panels will be required. As stated in Table 4.8-6 of Draft EIR Section 4.8, Greenhouse Gas Emissions, the proposed project would include solar roof installations in accordance with the 2019 Title 24 building standards. Draft EIR Chapter 3, Project Description, and Section 4.1, Aesthetics, describe Project Design Feature PDF-AES-2, which would ensure solar panels would comply with requirements outlined in the Specific Plan, which includes the following, to reduce potential for glare:
- Solar panels shall include materials and elements that are consistent with the selected architectural style and shall be fully integrated into the roof design.
  - Solar panels shall be oriented to the south to maximize efficiency and establish visual consistency across buildings.
  - Flashing, sheet metal, and framing should be colored to match the roof material

As the project includes solar roof installations, it would not conflict with the City's General Plan Housing Element Policy 5.3, or the California solar mandate. The future submittal of the TTM will include additional detail regarding solar on the proposed homes.

- I87-4** The comment asks for additional details regarding air quality monitoring during project construction, and requests mitigation for any impacts of toxic and carcinogenic pollutants on sensitive receptors.

An Air Quality and Greenhouse Gas Emissions Analysis Technical Report is included as Appendix B of the Draft EIR. As part of the Air Quality and Greenhouse Gas Emissions Analysis Technical Report, a localized significance threshold (LST) analysis was prepared to determine potential impacts to nearby sensitive receptors during construction of the project. The impacts were analyzed using methods consistent with those in the SCAQMD's Final Localized Significance Threshold Methodology (2009).

This analysis determined that construction activities associated with the project would result in temporary sources of on-site fugitive dust and construction equipment emissions. As shown in Table 4.3-10 of the Draft EIR, with the implementation of Mitigation Measure MM-AQ-1, construction activities would not generate emissions in excess of site-specific LSTs and no impacts to nearby sensitive receptors would occur. MM-AQ-1 would ensure that, "prior to the City's issuance of the demolition and grading permits for the Project, the Applicant shall demonstrate to the satisfaction of the Planning Division that its construction contractor will use a construction fleet wherein all 50-horsepower or greater diesel-powered equipment is powered with California Air Resources Board

(CARB)-certified Tier 4 Interim engines or equipment outfitted with CARB verified diesel particulate filters.” The City of Sierra Madre Planning Division will be responsible for overseeing the implementation of MM-AQ-1. The project contractor is required to abide by the South Coast Air Quality Management District (SCAQMD) rules. The SCAQMD has the discretion to perform random inspections, but the City of Sierra Madre would ultimately be responsible for compliance with mitigation measures.

Comment Letter 188

**From:** Colleen Allen <angelorum@webtv.net>  
**Sent:** Monday, October 4, 2021 3:22 PM  
**To:** Vincent Gonzalez  
**Subject:** DEIR comments / concerns for the Meadows at Bailey Canyon

CAUTION: This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Dear Mr. Gonzalez,

Thank you for the opportunity to comment on the DEIR for the "Meadows at Bailey Canyon".

Below are my comments. Please retain a copy for the administrative record.

Please respond to these comments in the Final EIR. Thank you.

I am opposed to changing the zoning and building new homes on the Monastery property. Having lived on Grove Street for over 48 years, I am especially concerned about the following issues and how they will impact my neighborhood.

My first concern is fire. Living in a high fire hazard zone, I am concerned that there will not be enough exits for the families exiting the Meadows area. In our past mountain fires, the traffic was so congested on Grove Street, it was bumper to bumper traffic. It was chaotic. The air was filled with smoke, ash and embers. It was difficult to breathe. This caused a sense of panic. In the 1993 Kinneloa Fire, it was most difficult to exit south on Grove Street to Grandview. (Fairview was closed off.) Some of my neighbors had a difficult time exiting their driveways to go south on Grove because the cars coming down our street would not let them merge. In the event of a future disaster, residents of the Meadows exiting on Grove would only worsen the impact on traffic. Currently, Grove Street suffers with added traffic from hikers, especially weekend hikers. They park their vehicles on both the east and west sides of Grove. In the event of an emergency, can a fire truck safely drive past so many parked vehicles?

Earthquakes are another concern. I understand that there are two faults on the building site. Why wasn't this information included in the DEIR? I was here when the main monastery building was demolished due to the 1991 earthquake. Sierra Madre was designated as the epicenter, and it registered a 5.8 on the Richter scale. Grove Street was hit hard! If the main monastery building was so severely damaged as to raze it, why hasn't there been more investigation into the potential seismic hazards of this property? Both future buyers and current residents deserve to know the risks. I would like to see an in depth, independent study done to determine both the seismic safety and potential risks of this building site.

This proposed project requires massive soil excavations. If we experience heavy rains in the future, I can easily foresee mud coming down Grove Street and possibly impacting my property. Back In 1994, there was a flash flood in Bailey Canyon. I recall the day very well. I was hiking through the Monastery when it happened. I could feel the rumble of the earth below me. I think it was the force of the water cascading down the mountains into the basin. A sense of fear overcame me. Immediately, I knew I needed to get home. By the time I arrived, it was raining intensely. Later that day, I learned that two residents lost their lives in the flash flood. Mr. Henderson and his son were hiking in Bailey Canyon when the flash flood swept them up and quickly took their lives. If the proposed project is approved, could this tragedy happen again?

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My last concern is the pedestrian traffic on Carter. I hike up Grove Street to Bailey Canyon on a daily basis. There is a tremendous amount of foot traffic. I would like to see a more in depth study on the pedestrian safety for Carter and Grove Streets.

I 188-8

Thank you for hearing my comments on the DEIR for the Meadows at Bailey Canyon.

I 188-9

Sincerely,

Colleen Allen  
431 Grove Street  
Sierra Madre, Ca 91024  
angelorum@webtv.net

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## Response to Comment Letter I88

Individual  
Colleen Allen  
October 4, 2021

- I88-1** The comment is introductory in nature and requests that their comments be responded to in the Final EIR. The City acknowledges this comment, and it is not related to the adequacy of the Draft EIR.
- I88-2** The comment expresses general opposition to the project but does not raise any specific issues related to the adequacy of the Draft EIR.
- I88-3** The comment expresses concern about evacuation during a fire being impacted due to the increase in residents. Please refer to Global Response GR-4.
- I88-4** The comment expresses concern regarding two faults on the project site and that information about the 1991 earthquake was not included. Please refer to response I42-19.
- I88-5** The comment expresses concern related to seismic hazards and previous seismic events that occurred near the project site. The comment requests an independent study investigating seismic hazards. Please refer to response I42-20.
- I88-6** The comment expresses concern about the soil excavations causing mud to flow onto nearby properties in the case of a rainfall event. As stated in Draft EIR Section 4.7, Geology and Soils, the project would have the potential to increase soil erosion on the project site. Impacts are determined to be less than significant with the implementation of PDF-GEO-1 through PDF-GEO-15 as well as Best Management Practices required by the implementation of the project's Stormwater Pollution Prevention Plan.
- I88-7** The comment expresses concern about hazardous flooding that could occur in the area. As stated in Draft EIR Section 4.10, Hydrology and Water Quality, the project does reduce the number of impervious surfaces on the site but does include a new on-site drainage system that would help collect off-site flows and the underground storage would help reduce runoff flow velocity. Impacts related to an increase in flooding would be less than significant.
- I88-8** The comment expresses concern about pedestrian safety on Carter Avenue and Grove Street and would like to see a more in-depth study on pedestrian safety. Please refer to Global Response GR-5. More specifically, in order to address commenters' concerns related to safety issues along Carter Avenue and outside of the boundaries of the proposed project site, the project applicant is proposing off-site widening to Carter Avenue, between the southeastern portion of the project site boundary and Lima Street, which would ensure that Carter Avenue would comply with existing code within and outside of the project site (see Final EIR Section 3.3.12 and Global Response GR-5 for details). These proposed improvements would also assist in further reducing safety impacts on Grove Street.
- I88-9** The comment provides concluding remarks that do not raise new or additional environmental issues concerning the adequacy of the Draft EIR.

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Comment Letter I89

**From:** Alexander Arrieta <alexanderarrieta23@gmail.com>  
**Sent:** Monday, October 4, 2021 2:57 PM  
**To:** Vincent Gonzalez  
**Cc:** Rachelle Arizmendi; Gene Goss; Robert Parkhurst; Kelly Kriebs; Edward Garcia; Jose Reynoso; Barbara Vellturo; Tricia Searcy; MATTHEW BRYANT  
**Subject:** Fwd: DEIR COMMENTS  
**Attachments:** Alex Arrieta DEIR FINAL Comments 10-4-21.docx

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

October 4, 2021

To: Vincent Gonzalez, Planning Director  
 232 W. Sierra Madre Boulevard, Sierra Madre, CA 91024  
[vgonzalez@cityofsierramadre.com](mailto:vgonzalez@cityofsierramadre.com).

From: Alex Arrieta  
 645 Edgeview Drive  
 Sierra Madre, CA 91024  
[alexanderarrieta23@gmail.com](mailto:alexanderarrieta23@gmail.com)

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) for the Meadows at Bailey Canyon Specific Plan Project.

Attached are my detailed comments. Please retain a copy for the administrative record.

Please respond to these comments in the Final EIR and please put me on the list of people to notify when the Final EIR is complete.

Overall, I strongly object to this project as it is not at all appropriate or suitable for the City of Sierra Madre and the designated area in which it is located. The proposed project is also significantly inconsistent with our General Plan and Municipal Code. As indicated in my attached comments, there have been no viable alternatives presented for evaluation to compare to this project, which is unacceptable, considering the

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significant size, scope and impact of this project. Lastly, the project is opposed by the vast majority of the residents of Sierra Madre.

I 189-5

My specific concerns and comments are listed below in the attached document.

I 189-6

Alex Arrieta

I80-Attachment 1

October 4, 2021

To: Vincent Gonzalez, Planning Director  
232 W. Sierra Madre Boulevard, Sierra Madre, CA 91024  
[vgonzalez@cityofsierramadre.com](mailto:vgonzalez@cityofsierramadre.com)

From: Alex Arrieta  
645 Edgeview Drive  
Sierra Madre, CA 91024  
[alexanderarrieta23@gmail.com](mailto:alexanderarrieta23@gmail.com)

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) for the Meadows at Bailey Canyon Specific Plan Project.

Below are my detailed comments. Please retain a copy for the administrative record.

Please respond to these comments in the Final EIR and please put me on the list of people to notify when the Final EIR is complete.

Overall, I strongly object to this project as it is not at all appropriate or suitable for the City of Sierra Madre and the designated area in which it is located. The proposed project is also significantly inconsistent with our General Plan and Municipal Code. Lastly, the project is opposed by the vast majority of the residents of Sierra Madre. My specific concerns and comments are listed below.

Comments to the Draft Environmental Impact Report (EIR) for the Meadows at Bailey Canyon Specific Plan Project

WILDFIRE RISK

- I. Page 52 Question and Page 282 #7: Would the project expose people or structures either directly or indirectly to a significant risk of loss, injury or death involving wildfires? The DEIR states there are no guarantees that a given structure will not burn during extreme fire conditions, or cause harm to persons. The proposed project site is within 5 miles of where 74 wildfires have burned since the beginning of the historical fire data record. Additionally, the proposed project site is designated as a Local Responsibility Area Very High Fire Hazard Severity Zone by Cal Dept of Forestry and Fire Protection (Cal Fire) **Please state why the impact is less than significant and**

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**why no mitigation measures would be required in building 42 homes in this zone.**

The 2020 Bobcat Fire burned 116,000 acres and many parts of Sierra Madre needed to be evacuated. The CALDOR Fire, started in August, 2021 and is still not contained. To date it has burnt 221,774 acres and destroyed 782 homes, many of which were constructed of the same fire-retardant materials these homes would be built with. The DEIR states that based on its analysis there would be a fire within 5 miles of the project site on a regular basis. Additionally, the proximity of the project to large expanse of open space to the North (Angeles National Forest) and northeast, and the terrain within the San Gabriel Mountains, has the potential to funnel Santa Ana winds, thereby increasing local wind speeds and increasing wildfire hazard in the vicinity of the project. **Please address the conflict with City policy Hz7 "to avoid expanding development into undeveloped areas in Very High Severity Fire Zones" in the update to the City's Safety Element.**

**Please address the conflict of this proposed project with City Policy R3.2 to "ensure that wildland open space, including the areas of the city designated as High Fire Hazard Severity Zone remains undeveloped so as to mitigate the flood cycles that follow wild land fires in the natural open space."**

**Please state why with the sobering statistics on hundreds of thousands of acres and homes burned in areas just like the proposed project site, built with the same fire-retardant materials but likely with more significant fire department resources, the project insists on building homes in a fire-prone zone. Please state how the project intends to safeguard existing homes and residents.**

WATER SUPPLY

1. Page 52: Would the project decrease groundwater supplies? Stating 'NO' is not factual. Interim City Manager, Jose Reynoso, stated in the Planning Commission meeting where the city's water supply was discussed that the developer's 'Net Zero Water Impact' from the project is predicated on the city being able purchase 50 years of water for the 42 homes. However, he indicated that the water is not available for purchase and does not know when the water would be available for purchase. Therefore, this is not a viable option. The city's existing water supply would need to be tapped into for this project, during an extreme drought. Consequently, this not only not a viable option, but will severely impact the city's existing, limited water supply. **Please state that if the water to be purchased under the 'Net Zero Water Impact' is not available as is the case according to the City Manager, how the proposed project would meet the need for 42 homes while not tapping into the existing limited water supply.**

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Cont.

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2. Page 62: Would project have sufficient water resources? **Please state that if the water to be purchased under the 'Net Zero Water Impact' is not available as is the case according to the City Manager, how the proposed project would meet the need for 42 homes while not tapping into the existing limited water supply.**

189-18  
Cont.

3. Goal 4 of General Plan - Use of local sources of groundwater rather than imported water for new development projects. The project is inconsistent with this policy because it needs to purchase 50 years' worth of water for the 42 homes. As addressed before, the City Manager has stated this is not an option as the water is not available. **Please state how the project intends to address so that it is not inconsistent with this critical policy, especially in light of the water not being available for purchase.**

189-19

4. Policy Hz2.4 - Consider water availability in terms of quantity. The project is inconsistent with this critical policy of the General Plan because it would need to purchase the water from San Gabriel Water District to achieve Net Zero Impact. As stated previously, the city is not able to purchase this water. **Please state how the project intends to secure sufficient water for this project if the proposed net zero water impact solution is not viable, as we've been told by the City Manager.**

189-20

3. Page 294: Hydrology and Water Quality

Objective R14: Ensuring adequate water availability for future growth in the city. **Please state that if the water to be purchased under the 'Net Zero Water Impact' is not available as is the case according to the City Manager, how the proposed project would meet the need for 42 homes while not tapping into the existing limited water supply.**

189-21

Objective R15L: Conserving water during times of drought. The State of California is in the midst of the most severe drought in many years and it's anticipated to get more severe. **Please state how the City plans to conserve water during this time with the addition of 42 homes.** As referenced above, the Net Zero Water Impact 'solution' is not factual and therefore not viable since the City Manager indicated the water is not available for purchase. As a result, Sierra Madre residents will be asked to conserve more water. **Please state why existing Sierra Madre residents must be forced to conserve more water so that an additional 42 homes can be built.**

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PUBLIC SERVICES

1. Fire Services would be insufficient for additional 42 homes. SM Fire Department current staffing level is 10 staff, but indicates it should be 15 staff with ultimate goal to be at 21 staff. The SM Fire department does not have agreements with other city

189-25

fire departments. **Please indicate how the increased demand for SM Fire Department needs from servicing 42 homes would be met.**

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Cont.

Page 275 Policy Hz2.5 - Assess the impacts of incremental increases in development density and related traffic congestion on fire hazards and emergency response time, and ensure through the development review process that new development will not re-sult in a redirection of fire protection services below acceptable levels. **Please state how the addition of 42 homes on a new development with limited space for fire-trucks will be serviced effectively. Also, please state how a Sierra Madre Fire De-partment staffed with ten employees that is supposed to be staffed with 15 and ultimately 21 employees will be able to effectively and safely handle the increased demand of 42 homes in a Very High Fire Risk Zone.**

189-26

189-27

AESTHETICS, VIEWS: POLICY L6.2 - Ensure that any new or expanded structures in residential neighborhoods do not unreasonably obstruct significant mountain or basin views.

189-28

Objective L17 - Protecting views to and from hillside areas in order to maintain the im-age and identity of the city as a village of the foothills. P.115 - 4.1.3 Thresholds of sig-nificance. According to Appendix G of the CEQA Guidelines, a significant impact re-lated to aesthetics would occur if the project would have a substantial adverse effect on a scenic vista. 42 homes, most of which are two-story homes, would create a substan-tial adverse effect on a scenic vista.

189-29

Page 116 - 4.1.5 Impacts Analysis: Would the project have a substantial adverse effect on a scenic vista: **Please indicate how scenic vistas of the hills and Monastery meadows which current residents on the West and South Side currently have will be preserved with two story homes being built.**

189-30

ZONING

Page 119 - The land on which the proposed project is based is currently zoned institu-tional and a direct violation of the Sierra Madre General Plan. Therefore the currently proposed project is in direct conflict with the current zoning and inconsistent with the General Plan. The developer uses circular, and frankly moronic reasoning when it states 'if approved, the proposed project would not conflict with the applicable zoning and land use designation, as amendments to the General Plan and Zoning Code would be approved concurrently with the proposed project.' Any proposed development pro-ject must comply with the existing and relevant zoning and General Plan. **Please state how the currently proposed project is in compliance with the current zoning for the land, which is Institutional?**

189-31

Page 146 Further circular and faulty reasoning: "The approval of the Specific Plan would provide zoning and development standards that allow for greater gross floor area,

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lot coverage...for the new residential development parcels. **Please state why the project applicant should not be held to the same requirement all other Sierra Madre residents are held to, with the relevant General Plan and Zoning requirements be-ing institutional.**

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189-32  
Cont.

TAC HEALTH RISKS

The project construction TAC health risk impacts would be potentially significant (Impact AQ-2) and mitigation is required. **Please state what mitigation measures will be im-plemented.**

189-33

Page 153 'Because construction of the proposed project would exceed the SCAQMD localized significance thresholds for PM10 and PM2.5, the potential health effects asso-ciated with criteria air pollutants are considered potentially significant (Impact Aq-1) and mitigation is required. The proposed mitigation is to use CA Air Resource Board (CARB) certified Tier 4 engines. However, exemptions can be granted. **Please state how this extremely serious health concern can be effectively mitigated when the primary mitigation option can be given an exemption.**

189-34

LOCALIZED SIGNIFICANCE THRESHOLD ANALYSIS

P. 154 **Please state why off-site emissions from vendor trucks, haul trucks and worker vehicle trips are not included in the LST Analysis. As a result, this is not a comprehensive analysis and must be re-done.**

189-35

TREE PROTECTION

Chapter 1 Land Use of the Sierra Madre General Plan Goal 8: Preserve existing and provide additional open space. Objective L4: Mitigating the impacts of new develop-ment on the City's open space, trees...**Please state how this objective is achieved with the building of 42 homes on the last remaining open space in Sierra Madre and with 100 trees being removed.**

189-36

Chapter 2 - Tree Preservation. Goal 1: Continued preservation and enhancing the City's significant tree resources. **Please state how this goal is achieved with the planned removal of 100 trees. Replacing very mature trees, some that are can-opy, and removal of 10 oak trees that are protected and that would constitute a significant impact if removed, with 24 inch box trees is far from an equitable miti-gation. This is unacceptable and does not meet this critical goal.**

Objective R10: Maintaining and enhancing the City's significant tree resources.

Sierra Madre Municipal Code: Chapter 12.20 (Tree Preservation). It is unlawful to remove any protected tree on any undeveloped property. **Please state how removing 10 protected oak trees is not a direct violation of this code.**

Community Forest Management Plan: Goals: Conserve and expand tree canopy cover equal to no net loss with a gradual increase over time. **Please state how removal of multiple trees that serve as tree canopy on the main Sunnyside Drive is not a direct violation of this goal.**

Page 167: There are 41 special status plant species with four species listed under the Federal and/or California Endangered Species Act on the proposed project land. Additionally, there are 43 special status species with recorded occurrences on the project site. 37 species are listed under the Federal and/or California endangered Species Act. **Please state how building on this land with the aforementioned protected species is not a direct violation of the relevant Federal and/or California Endangered Species Act.**

CONSISTENCY ANALYSIS WITH EXISTING NEIGHBOR HOMES

Table 4.11-1 Projects Consistency with City of Sierra Madre General Plan and Policies

Objective L6: Development that is done in harmony with its neighborhood and preserves and protects the privacy, mountain and basin views of neighboring properties.

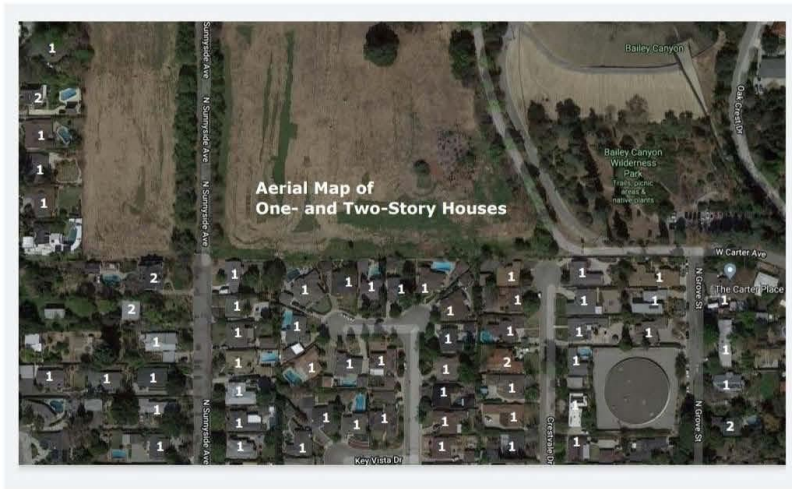
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Cont.

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**Please state how this project of 42 homes will protect the privacy and views of existing residents on the South and West side when two story homes will be there blocking visibility.**



189-38  
Cont.

Policy L20.1 requires that new residential development be compatible with and complement existing structures on the block. The picture above reflects existing homes in the immediate, surrounding blocks being almost entirely single-story homes. However, the proposed project of 42 homes, is planned to be mostly two-story homes with average square footage much larger than existing homes. **Please state how the proposed development is consistent with this critical General Plan policy**

NON-VEHICULAR IMPROVEMENTS

Policy L51-8 - Prioritize improvements for non-vehicular improvements for non-vehicular modes like bicycles, pedestrians and transit to eliminate the need for new or expanded roadways and intersection improvements like traffic signals. The DEIR states the project is inconsistent on this critical policy because the project would not implement this. **Please state how the project intends to address this critical policy.**

189-39

EARTHQUAKE/SEISMIC ASSESSMENT

Policy Hz10.2 General Plan: Conduct a comprehensive geologic investigation to show where active faults pose a hazard to structures. The study that was completed is far from being comprehensive. **Please conduct an exhaustive geologic assessment on seismic risks associated with building within several hundred feet of the Sierra Madre Earthquake Fault.**

189-40

CONSTRUCTION

Construction of the project will result in 68,440 trips by workers during construction. **Please state how this exceedingly high number of additional trips into this small area will not create significant traffic congestion, unhealthy air quality, excessive noise and disruption to existing residents.**

189-41

TRIBAL CULTURAL RESOURCES - 4.18

Seven tribes have not responded to the initial letter sent March 30 about the proposed development potentially having adverse impact on them. During a global pandemic its anticipated response may require secondary communications. **Please state how these seven tribes will be informed of their rights and please issue a second communication to ensure they are informed and have an opportunity to respond.**

189-42

PROJECT ALTERNATIVES

This section must describe a reasonable range of alternatives **sufficient to foster informed decision-making and public participation**. This section, however, provides only one paragraph summary descriptions of alternatives made up of conclusory statements that fail to adequately describe and evaluate the comparative merits of each alternative. There is zero analysis of the environmental impact of the alternatives. Due to the lack of qualitative and quantitative analysis, this section provides insufficient information to meet the requirements for Alternatives Analysis or for any possibility of informed, rational decision-making.

189-43

Please provide factual information and analysis regarding the environmental impact of each alternative sufficient to allow for informed, rational decision-making.

II. ES. 1 Project Location, Project Site at p. ES-1

This section fails to address the problems articulated on page 3 of MIG's June 22, 2021 third-party peer review of the project ("the MIG Review") submitted as an attachment to this comment.

189-44

In this section, the DEIR revises the proposed open space down from 45 to 35 acres and continues to say the “open space dedication area is not considered part of the project site.” As pointed out by MIG, “if this is not part of the project then it should not be referenced as one of the objectives...nor described as a community benefit. If it is part of the project then it should be further described in the project description, including a location map, how it will be provided, how it will be protected, and what it will be used for. If it will be accessible to or otherwise used by the public, it needs to be included in the project description and the environmental setting and analyzed as part of the project.” P.3 MIG Review.

MIG twice made clear that the open space needs to be defined and that “[i]f it will be accessible to or otherwise used by the public it potentially could have, at the least, potential impacts on biological resources, and wildland fire potential. If the actions under this project will not result in access, improvements, or use by the public, then such should be stated and, further that such use or action would be subject to a separate environmental review at a later date if it is made available to the public.” P. 3 MIG Review. This still hasn’t been done.

Is the open space part of the project or not? If not, it must be taken out of the project description and not presented as a community benefit. If it is, it must be clearly described, including how it will be provided, protected, what its use will be, and a separate comprehensive environmental review should be conducted, including, but not limited to, biological resources and wildfire potential, and made available to the public.

II. E.S. 2 Project Description at p. ES-2.

There are three standards that a project description must meet: it must be clear, stable, and finite. The project does not meet this standard because it is unclear, unstable, and not finite as set forth below.

The project description states that it would include “approximately 3.39 acres of open space (including 3.04-acre dedicated neighborhood park) and identifies “open space dedication as a community benefit.”

If 3.04 acres of the 3.39 acres is the park, then that leaves .35 acres of open space. Under Project Location above, the area is identified as 35 acres. In project objective number 5, 30 acres is referenced and the area is clearly misidentified as being near Colby Canyon and Colby Canyon Trail. (see Objective 5. Preserve the hillside open space area by dedicating approximately 30 acres north of the Mater Dolorosa Retreat Center to the City, in order to preserve a portion of Colby Canyon and the Colby Canyon Trail, which would be used by wildlife for movement up and down slope; preserve native vegetation communities and drainages; and preserve land adjacent to the Colby Canyon stream). Colby Canyon is above the city of La Canada nowhere near this project. See map below. Thus, the location, boundaries, and acreage of the “open space” are not clear.

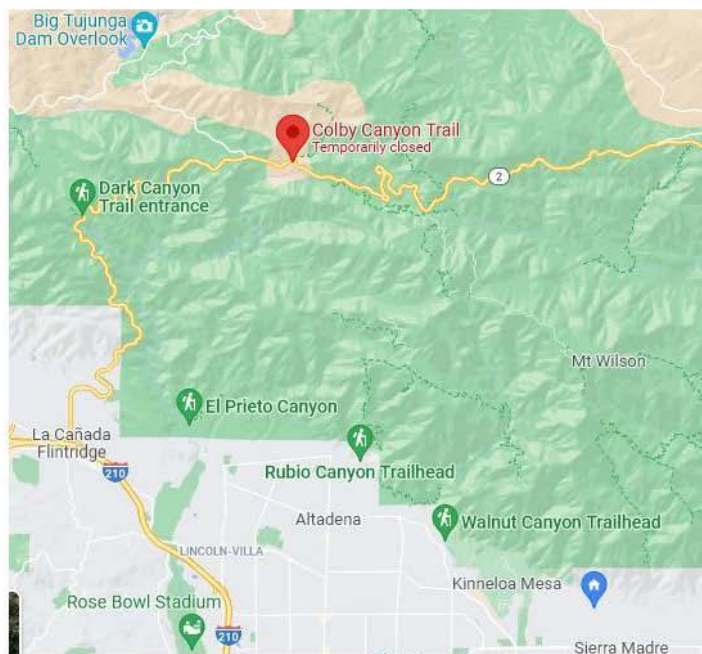
189-44  
Cont.

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Please clearly describe and accurately map the proposed "open space" along with identifying how it will be provided, protected, what its use would be and provide a separate comprehensive environmental review as recommended by MIG. See MIG Review p.3.

Please remove all references to preservation of Colby Canyon, Colby Canyon trail and stream as a project objective and/or community benefit and specifically describe what "community benefit" will be provided by any proposed "open space."

189-45  
Cont.



189-46

The project description states that, "[c]ommunity benefits would include the new public park, net-zero water impact, establishing a dedicated funding source for long-term park maintenance, and the open space dedication."

It's fatally unclear what this description means. What are the details of the "dedicated funding source for long-term park maintenance?" How much money is being committed, if any, and for how long? Where is it coming from? How much is long term park maintenance expected to cost? What sort of maintenance will be required? Elsewhere it is indicated that the city will need to establish a public maintenance district for the park. Es-

189-47

establishing a new public department and staffing it will cost money—how much is it expected to cost? How many staff will be involved? Where will this new department be located in the city?

↑ 189-47  
Cont.

As MIG has confirmed, “[n]et zero water use is not a community benefit: it is no different than the amount of water currently being used and its only benefit is to provide a service to the project similar to utilities, street improvements etc: **remove it from the sentence.**” P.3 MIG Review (emphasis mine).

189-48

All references to “net zero water” as a community benefit should be removed.

The project description is also unclear, unstable, and subject to change with regard to the description of the proposed residences such that it is impossible to determine if the project is consistent with the city’s General Plan and ordinances.

The residential development is described as consisting of “42 detached single-family dwellings ranging from 2,700 to 3,800 square feet with a minimum lot size of 8,500 square feet. The gross density of the project is approximately 2.5 dwelling units per acre. The proposed residences would be one to two stories.” At p.3-3.

189-49

How many of the residences will be two story? The neighboring houses are primarily one story. How many of the lots will be the “minimum lot size of 8,500?” Please state what size *all* the lots are, how many stories each house will be, along with what the designs of the houses will be. None of these significant details are included here or in the SP. Thus, the project description is unclear, unstable, and not finite.

III. E.S.2.1 Project Objectives at p. ES-2

Objective number 5 should be removed (see text below and see comments above). All references to Colby Canyon should be removed as it is nowhere near the project.

189-50

5. Preserve the hillside open space area by dedicating approximately 30 acres north of the Mater Dolorosa Retreat Center to the City, in order to preserve a portion of Colby Canyon and the Colby Canyon Trail, which would be used by wildlife for movement up and down slope; preserve native vegetation communities and drainages; and preserve land adjacent to the Colby Canyon stream.

Please remove Objective number 6 or describe in detail what street improvements are provided for that would “facilitate safe and efficient access.” There are no sidewalks on North Sunnyside which is a narrow, old residential road ending at the monastery gate. Nowhere in this report is there any factual support for achieving this objective—no sidewalks and no street improvements are planned for the street leading up to the project—references are only to the streets inside the project. As it stands, the project will greatly

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increase danger to pedestrians and create traffic jams on a tiny street unsuitable as a primary ingress and egress.

6. Provide street improvements to facilitate safe and efficient access to the site from North Sunnyside Avenue.

It is asserted under "Project Location" that "Carter would be improved to provide secondary egress and ingress access to the site," but no specific improvements are identified and LA county has stated that it will not widen the street. Thus, it is unclear how Carter, which also has no sidewalks and is used by many pedestrians on a daily basis visiting Bailey Canyon Park, could be improved to make it safe.

Please describe in detail what improvements will be made to the section of Carter leading up to the project that will provide safe ingress and egress and how it will be accomplished. If this cannot be done, the sentence should be removed.

With regard to Objective 7, a development agreement is not a public benefit nor is there "enhanced connectivity to the Bailey Canyon Wilderness Park and trail system. The public already has open and easy access to these things and the development agreement is strictly a benefit to the developer.

These sentences should be removed.

IV. Aesthetics—Lighting at pp. ES 6-7

This section asks if the project creates a new source of substantial light or glare which would adversely affect day or nighttime views in the area. In determining less than significant impact, the analysis here improperly relies on PDFs (Project Design Features) instead of applicable regulations and requirements.

The PDFs are circular in nature in that they refer back to the Specific Plan (SP) for validation instead of applicable regulations and requirements. See MIG Review p. 4.

Further, as stated by MIG, "PDFs need to address the specific provisions that are being referenced in the SP so the reader doesn't have to guess at what is being referred to. In addition, merely saying that the project will comply with the SP is still circular: the SP can be changed and may no longer address issues of concern to the EIR." MIG Review p. 4.

Saying the project meets its own "guidelines" or "development standards" is meaningless. Please do as MIG suggested and "reference back to the regulations /requirements and specify what they are in the narrative of the relevant EIR topical section." MIG Review p.4.

**This comment/suggestion applies to all PDFs in the EIR.**

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In addition, regarding PDF AES-2, specifying that “[s]olar panels shall be oriented to the south to maximize efficiency and establish visual consistency across buildings” **exacerbates rather than mitigates** the problem of substantial light and glare as the neighboring communities are to the south and west.

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V. ES-1 Air Quality at p. ES-9-10

This section asks if the project would result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard as well as if it would expose sensitive receptors to substantial pollutant concentrations.  
In determining less than significant impact, the analysis improperly rejects the recommendations spelled out by the independent reviewer, MIG.

The whole point of retaining an independent reviewer is to ensure that environmental impacts are fairly evaluated. Allowing the developer to reject MIG’s recommendations and do what it wants without regard to the health and well-being of the surrounding community eviscerates the value of hiring an independent reviewer and puts the community at significant risk.

The project should be held to all the standards outlined in MIG’s review for the reasons set forth therein. Please see the MIG review at pp. 7-8 for their comments, analysis and reasoning.

189-54

In summary, MIG twice recommends that “MM-AQ-1 be revised to use the SCAQMD thresholds of significance as the performance standard for the mitigation measure, because 1) the standard is the same as that utilized as a threshold in the EIR, and 2) it provides specificity beyond that currently captured **in the EIR (i.e. the performance standard for ‘functionally equivalent diesel PM emissions totals’ is not clearly identified in the mitigation measure).**” (MIG Review p. 8 emphasis theirs)

MIG further recommends that for diesel PM, “MM-AQ-1 be clarified to require functionally equivalent **diesel PM emissions reductions for the purposes of the EIRs LST analysis** and a corresponding update to the construction health risk assessment for the **purposes of the EIR’s diesel PM analysis.**”(MIG Review p. 8 emphasis theirs).

MIG’s review at p. 6, indicates that several GP policies have been removed. Dudek’s response to MIG’s comment questioning why they have been removed states that, “These specific ones have been removed(sic) as they are directed to the City and not the responsibility of the project. Please specify what has been removed and what the implications are. What exactly is the responsibility of the City and not the project?”

189-55

VI. ES-1 Utilities and Service Systems at p. ES-46: Water

This section asks if there will be sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years and concludes that there will be less than significant impact because “the project applicant will provide funds to the City to purchase supplemental water from the San Gabriel Valley Municipal Water District (SGVMWD) in an amount equal to the anticipated total indoor and outdoor water demand of each residential unit over a 50-year period. This purchase would be in addition to the City’s existing agreement with SGVMWD providing for the purchase of supplemental imported water.”

Please address the facts that the proposed mitigation is not possible because:

- 1) **As admitted by Interim City Manager, Jose Reynoso, water is currently unavailable for purchase and there is no guarantee of future availability;**
- 2) **the agreement calls for the purchase price to be at 2021 rates for the next 50 years when, in fact, price of water will most certainly increase; and**
- 3) **the agreement would need to be in perpetuity to be less than significant impact.**

189-56

VII. Zoning and General Plan Conflicts 4.1-8

The project site is currently zoned Institutional, and the existing General Plan land use designation is also Institutional. The proposed project **is in direct conflict with the zoning code and General Plan** because, among other things, it would change the land use designation to Specific Plan. To say that it is consistent because the Specific Plan would *change* the zoning code and General Plan is oxymoronic. If it were consistent, zoning code and General Plan amendments would obviously not be necessary.

In addition, because the project location and description are so unclear, unstable, and not finite (subject to change) as stated above at pp.1-5, it is impossible to determine whether the project is consistent with the city’s General Plan and ordinances.

189-57

VIII. 4.15.5 Impacts Analysis: Fire Protection

This section asks if the project would result in substantial adverse physical impacts associated with the provision of fire protection services and concludes that “SMFD has reviewed the project and has determined that it would not have a significant effect on service demands....Therefore, through payment of appropriate development fees by the project applicant, the proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities. Impacts would therefore be less than significant.” P. 4.15-9

189-58



The conclusion is not supported by the facts given that the city is already short staffed. A fully staffed fire department consists of 15 firefighters and the City has only 10 and "SMFD does not have any signed mutual aid agreements for fire protection." p.4.15-1. Please explain *how* payment of development fees would be used to mitigate the adverse impact of overburdening an already overburdened fire department and explain the grounds for SMFD's determination that the project would not have a significant impact on services demands.

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IX. Wildfire

This section describes the existing wildfire conditions within the vicinity, regulations, and a Fire Protection Plan (FPP).

As indicated in the MIG review, the Fire Protection Plan "is not really a clear-cut plan for fire protection... it is an amalgam of often generic narrative reference already existing fire safety regulations, and information not specific to the project: it is difficult to sort what is being provided for the site in terms of fire protection that is not already required." p. 5 MIG Review.

Please implement MIG's recommendation "that the FPP be modified to be more project specific **including an exhibit showing the FPP.**" (emphasis theirs). As it stands, the FPP is, according to MIG, "an artifice of a plan that really is just compliance with existing regulations." p. 5 MIG Review.

189-59

The Fire Plan is exceptionally important given Sierra Madre's history of fire and it is a source of great anxiety in the community that this be properly addressed. Right now the plan appears to place responsibility on individuals stating that "each property owner would be individually responsible to adopt, practice, and implement a "Ready, Set, Go!" approach to site evacuation." p.4.20-10. It's hard to imagine how this could be a sufficient fire plan.

With regard to access and evacuation, the section on roads at 4.20-13 fails to address the significant problem that there is not adequate ingress and egress due to the condition and width of both Sunnyside and Carter leading into the project.

It states that, "[t]he project would include reconfiguration of North Sunnyside Avenue, located *within the western portion of the site*, which would be moved farther to the west. In addition, the project would result in improvements to Carter Avenue to provide secondary egress and ingress access to the site." p. 4.20-13 (emphasis mine). Further it is incorrectly asserted that, "All roads comply with access road standards of not less than 24 feet, unobstructed width and are capable of supporting an imposed load of at least 75,000 pounds." P. 4.20-13. This is not accurate —Carter is 20 feet in width.

189-60

How will Carter be improved to provide adequate ingress and egress when the County will not allow it to be widened? No improvements are mentioned for the portion of Sunnyside leading up to the project that would make it a viable access road either.

Please address the conflict with City policy Hz7 “to avoid expanding development into undeveloped areas in Very High Severity Fire Zones” in the update to the City’s Safety Element.

189-61

Please address the conflict with City Policy R3.2 to “ensure that wildland open space, including the areas of the city designated as High Fire Hazard Severity Zone remains undeveloped so as to mitigate the flood cycles that follow wild land fires in the natural open space.”

X.    4.17 Transportation at p. 4.17-1 at pp. 4.17-3-4

This section describes the existing transportation conditions, evaluates potential impacts and mitigation measures.

This section fails to adequately address conflicts with the following city policies:

Policy L51.2: Limit the development of new roadways or the expansion of existing roadways.

The project conflicts directly with this policy by developing new roadways (3 new streets) and expanding existing roadways (Carter and Sunnyside, although it’s unclear what the project will do, if anything, to existing roadways.

No facts have been presented to support the conclusion that the project is consistent with this policy. Please provide factual support for this conclusion.

Policy L51.5: Encourage and support the use of non-automotive travel throughout the City.

The project conflicts directly with this policy by failing to provide bicycle facilities and creating safety hazards for pedestrians on surrounding streets.

Objective L52: Improving streets to maintain levels of service, vehicular, cyclist and pedestrian safety.

The project conflicts with this policy by *greatly increasing safety hazards* for pedestrians and cyclists on the surrounding streets. Neither north Sunnyside nor Carter has sidewalks, the roads are narrow, and both streets are used by many pedestrians walking the neighborhood and visiting Bailey Canyon Park. Families park on nearby Grove Street and walk in the street up to Bailey Canyon because there are no sidewalks and will be put at increased danger by the significant increase in cross traffic.

No facts have been presented that the project will improve streets. On the contrary, it will create hazards for pedestrians and cyclists. Please provide facts in support of the conclusion that the project is consistent with this objective.

Policy L52.9: Explore the possibility of sidewalk continuity where feasible.

189-62

There is no provision for sidewalks to accommodate pedestrians on either Carter or Sunnyside leading up to the project. As such, the project conflicts directly with this policy.

No facts have been presented to support the conclusion that the project is consistent. Please provide facts to support this conclusion.

Policy L52.8: Require the incorporation of bicycle facilities into the design of land use plans and capital improvements, including bicycle parking within new multi-family and non-residential sites or publicly accessible bicycle parking.

It is acknowledged that the project directly conflicts with this policy, but there is no good reason nor mitigation provided.

Objective L53: Protecting residential neighborhoods from the intrusion of through traffic.

The November 10, 2020 Fehr and Peers traffic study (attached) establishes that by project completion there will be a 118% increase in traffic on weekdays and 129% increase in traffic on weekends. Given these facts, it is indisputable that the project will create significant intrusion of thru traffic, conflicting directly with this objective.

There is nothing to support the conclusion that the project is consistent with this objective. Please provide any factual support that the project is consistent with this objective.

Housing Policy 5.4: Incorporate transit and other transportation alternatives such as walking and bicycling into the design of new development.

The project conflicts with this policy in that it does not provide bicycle facilities and creates significant safety hazards to pedestrians on the small surrounding streets leading up to the site.

There are no facts to support the conclusion that the project is consistent with this policy. If there are any such facts, please provide them.

Circulation Goal 1. A balanced transportation system which accommodates all modes of travel including automobiles, pedestrians, bicycles, and transit users.

The project conflicts with this policy in that it does not provide bicycle facilities and creates significant safety hazards to pedestrians on the small surrounding streets leading up to the site.

Circulation Goal 2. Safe and well-maintained streets.

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189-64

The project conflicts with this policy by *greatly increasing safety hazards* for pedestrians and cyclists on the surrounding streets. Neither north Sunnyside nor Carter has sidewalks, the roads are narrow, and both streets are used by many pedestrians walking the neighborhood and visiting Bailey Canyon Park. Families park on nearby Grove Street and walk in the street up to Bailey Canyon because there are no sidewalks and will be put at increased danger by the significant increase in cross traffic.

There are no facts to support this conclusion that the project is consistent with the goal of safe and well-maintained streets.

If there are any facts, particularly with regard to the surrounding streets that lead up to the project that support the conclusion that the project is consistent with this goal, please provide them. Has any study been done/will any study be done to determine the impact on safety for pedestrians? Is there any plan to improve the poor condition of Carter? What is the plan?

Circulation Goal 3. Preservation of quiet neighborhoods with limited thru traffic.

The November 10, 2020 Fehr and Peers traffic study (attached) establishes that by project completion there will a 118% increase in traffic on weekdays and 129% increase in traffic on weekends. Given these facts, it is indisputable that the project will create significant intrusion of thru traffic, disturbing the surrounding quiet neighborhood and conflicting directly with this policy.

There are no facts in this section that support the conclusion that the project would preserve quiet neighborhoods with limited thru traffic. If there are any facts that support for the conclusion that the project is consistent with this policy, please provide them.

Objective C30: Improving traffic safety.

The project conflicts with this policy by *greatly increasing safety hazards* for pedestrians and cyclists on the surrounding streets. Neither north Sunnyside nor Carter has sidewalks, the roads are narrow, and both streets are used by many pedestrians walking the neighborhood and visiting Bailey Canyon Park. Families park on nearby Grove Street and walk in the street up to Bailey Canyon because there are no sidewalks and will be put at increased danger by the significant increase in cross traffic.

There is nothing in this section to indicate how the project could improve traffic safety in any way. If there are any facts that support for the conclusion that the project is consistent with this objective, please provide them. Please indicate if any safety study has been done and, if not, why not?

Policy C30.3: Maintain safety and efficient circulation without impacting the village atmosphere.

189-64  
Cont.

See above response to Objective C30. There is nothing in this section to indicate how the project could maintain safety and efficient traffic circulation. If there are any facts to support the conclusion that the project is consistent with this policy, please provide them. Please indicate if any safety study has been done and, if not, why not?

Overall, this section completely ignores the significant safety concerns and traffic impacts on the surrounding community by focusing on the streets inside the development to the exclusion of the impact on the neighboring streets. How exactly is the project going to deal with these problems?

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## Response to Comment Letter I89

Individual  
Alexander Arrieta  
October 4, 2021

- I89-1** This comment requests the following comments (Comments I89-2 through I89-66) be included in the responses to comments of the Final EIR. As shown, the commenter's request has been recorded as part of this Final EIR.
- I89-2** The comment expresses general opposition for the project. The comment does not raise any specific issue concerning the adequacy of the EIR; therefore, no further response is required or provided.
- I89-3** The comment states that the proposed project is inconsistent with the City of Sierra Madre General Plan as well as the Municipal Code. Please refer to Global Response GR-7.
- I89-4** The comment is concerned with the range of reasonable alternatives considered in the Draft EIR. Please refer to Response to Comment I26-10.
- I89-5** The comment expresses general opposition for the project. The comment does not raise any specific issue concerning the adequacy of the Draft EIR; therefore, no further response is required or provided.
- I89-6** The comment references an attachment to the comment letter. This comment is an introduction to the ones that follow and does not relate to the adequacy of the Draft EIR.
- I89-7** This comment is introductory in nature and does not raise any specific issue concerning the adequacy of the Draft EIR. Please refer to Response to Comment I89-1.
- I89-8** The comment and expresses general opposition to the project. The comment does not raise any issue concerning the adequacy of the Draft EIR; therefore, no further response is required or provided.
- I89-9** The comment is concerned with the project's consistency with the City of Sierra Madre General Plan as well as the Municipal Code. Please refer to Global Response GR-7.
- I89- 10** The comment is an introduction to comments that follow and is not related to the adequacy of the Draft EIR.
- I89- 11** The comment reiterates information about existing wildfire risk conditions. This information can be found in Draft EIR Section 4.9, Hazards and Hazardous Materials. The comment does not raise any specific issue related to the adequacy of any specific section or analysis of the Draft EIR. Therefore, no further response is required or provided.
- I89-12** The comment asks why the impact is less than significant and why no mitigation would be required for project implementation. Please refer to Global Response GR-3. As stated in Draft EIR Section 4.9 and Section 4.20, Wildfire, the project would be required to adhere to the design measures provided in the FPP (see Draft EIR Appendix F2). The purpose of the FPP is to assess potential impacts and identify ways to mitigate those impacts for the specific project area. The FPP includes measures such as using ignition resistant construction materials and fuel modification around homes. There is no mitigation required as impacts would be less than significant.

- 189-13** The comment discusses general fire history in the City and California as a whole and notes that many of the homes destroyed in the fires were constructed with the same fire-retardant materials that are suggested for the proposed project. As discussed in the FPP (Appendix F2), there are no guarantees that a given structure will not burn during extreme fire conditions.
- 189-14** This comment restates information about fire being expected within 5 miles of the project site on a regular basis as well as an increased wildfire hazards near the project. The City notes this information on fire history. The comment is not related to the adequacy of the Draft EIR.
- 189-15** The comment is concerned with potential conflicts between the project and City Policy Hz7 from the Draft Safety Element Update (now the adopted Hazard Prevention Element). Please refer to Global Response GR-3.
- 189-16** The comment is concerned with potential conflicts between the project and Policy R3.2 from the Draft Safety Element Update (now the adopted Hazard Prevention Element). Please refer to Global Response GR-3.
- 189-17** The comment expresses concern about homes being built in a fire prone area and asks how the project intends to protect existing homes and residents. Please refer to Global Response GR-3.
- 189-18** The comment expresses concern related to decrease in groundwater supplies, availability of water to be purchased under the project's net-zero water impact and impacts to the City's water supply under extreme drought. It should be noted that the SMWD has determined that there would be adequate water supply and water is available for purchase. Please refer to Global Response GR-1. In addition, the project's impact to groundwater was addressed in Draft EIR Section 4.10.5, Impacts Analysis, in Section 4.10, Hydrology and Water Quality. As discussed in this section, the project would not substantially decrease groundwater supplies or interfere with groundwater recharge. Therefore, impacts associated with groundwater supplies and recharge would be less than significant.
- 189-19** The comment is concerned with the project's inconsistency with Goal 4 of the General Plan. Please refer to Global Response GR-7. Regarding inconsistency with Goal 4, use of local sources groundwater rather than imported water, the project would not result in a significant environmental impact on water supplies (see Global Response GR-1). Therefore, this inconsistency would not result in a significant environmental impact (see Final EIR Section 4.11, Land Use and Planning). Regarding the availability of water to be purchased under the project's net-zero water impact, please refer to Global Response GR-1.
- 189-20** The comment is concerned with the project's consistency with Policy Hz2.4 of the General Plan. The commenter also asks how water would be secured if water is not available for purchase under the project's net-zero water impact. Please refer to Global Response GR-1. As discussed in Final EIR Section 4.19.5, supplemental water is not available for purchase, the applicant would provide funds to the City to support the creation of a lawn retrofit program or improvements to existing water infrastructure, which achieve a commensurate level of water reduction. In addition, it should be noted that in Final EIR Section 4.11.5, Impacts Analysis, in Section 4.11, Land Use and Planning, in Table 4.11-1 it was determined that the project is consistent with this policy as the proposed project would achieve a net-zero impact on local water supplies through the purchase of supplemental water in order to offset the demand placed on existing supplies and provide supplemental water to the City, available to serve the public; creation of a lawn retrofit program; or improvements to existing water



infrastructure, such as pipe leakage fixes (see PDF-UTL-1 in Final EIR Section 4.19.4, Project Design Features). As determined in Draft EIR Section 4.19 (with clarifying revisions made in the Final EIR Section 4.19), there would be adequate water availability to meet the demand of the proposed project. Additionally, the proposed project would include a new water system within the planned roadways consisting of a network of mainlines for potable water delivery to the site.

- 189-21** The comment refers to Objective R14 of the General Plan and asks how water would be secured if water is not available for purchase under the project's net-zero water impact. Please refer to Global Response GR-1, and Response to Comment 189-20.
- 189-22** The comment refers to Objective R15L of the General Plan asks how the City plans to conserve water in time of drought with the addition of 42 homes. Please refer to Global Response GR-1 . In addition, as concluded in Table 4.11-1, in Final EIR Section 4.11.5, the project would be consistent with this policy through the purchase of supplemental water to offset additional demand.
- 189-23** The comment is concerned with the viability of the project's net-zero water impact solution. Please refer to response to Global Response GR-1 and Response to Comment 189-20.
- 189-24** The comment is concerned with the potential for Sierra Madre residents to have to conserve more water as a result of the project. However, residents will not be forced to conserve more water as a result of this project. The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. Therefore, no further response is required or provided.
- 189-25** The comment is concerned with the sufficiency of fire service. As stated in Draft EIR Section 4.15.5, Impacts Analysis, in Section 4.15, Public Services, payment of development fees by the project applicant would be used to offset the cost of increased personnel or equipment that could be required to maintain service levels. SMFD reviewed the Draft EIR and determined that impacts would be less than significant.
- 189-26** The comment refers to Policy Hz2.5 and asks how new homes in a new development with limited space for firetrucks would be serviced effectively. As concluded in Table 4.11-1, in Draft EIR Section 4.11.5, the project would be consistent with this policy. In addition, SMFD has reviewed the project and has determined that it would not have a significant effect on service demands. Through payment of appropriate development fees by the project applicant, the proposed project would ensure adequate service levels of fire protection. Please refer to Global Response GR-4 .
- 189-27** The comment asks how the SMFD would be able to effectively and safely handle the increased demand of the 42 homes in a VHFHSZ. Please refer to Global Response GR-3 and Draft EIR Section 4.15, Public Services.
- 189-28** The comment refers to Policy L6.2 of the General Plan. Please refer to Global Response GR-7. In addition, as discussed in Draft EIR Section 4.11.5, Impact Analysis, of Section 4.11, Land Use and Planning, the project would be consistent with Policy L6.2, as the proposed project is designed in a manner that is sensitive to scenic viewpoints and/or viewsheds through building design, site layout, and building heights.

- 189-29** The comment refers to Objective L17 from the General Plan and is concerned with potential impacts to scenic vistas. Please refer to Response to Comment I76-16.
- 189-30** The comment is concerned with potential impacts to private views of hills and meadows as well as scenic vistas. Please refer to Response to Comment I76-16 and I77-7.
- 189-31** The comment is concerned with the project's inconsistency with the site's existing zoning designation. The commenter is correct that the project would require a zoning designation change. Please refer to Global Response GR-7.
- 189-32** The comment is concerned with the project's need for zoning designation change. Please refer to Global Response GR-7.
- 189-33** The comment asks what mitigation measures would be implemented to mitigate Impact AQ-2, related to TAC health risks. As stated in Draft EIR Section 4.3, Air Quality, MM-AQ-1, which includes requirement of Tier 4 construction equipment, would reduce Impact AQ-2 to less than significant levels.
- 189-34** The comment expresses concern about the exemption within mitigation measure MM-AQ-1. MM- AQ-1 states:

An exemption from this requirement may be granted if: (1) the Applicant documents equipment with Tier 4 Interim engines are not reasonably available, and (2) functionally equivalent diesel PM emission totals can be achieved for the project from other combinations of construction equipment (Tier 3 with level 3 diesel particulate filter, electric, compressed natural gas, hydrogen, etc.). For example, if a Tier 4 Interim piece of equipment is not reasonably available at the time of construction and a lower tier equipment is used instead (e.g., Tier 3), another piece of equipment could be upgraded to a Tier 4 Final or replaced with an alternative-fueled (not diesel-fueled) equipment to offset the emissions associated with using a piece of equipment that does not meet Tier 4 Interim standards. Before an exemption may be granted, the Applicant's construction contractor shall: (1) demonstrate that at least two construction fleet owners/operators in Los Angeles County were contacted and that those owners/operators confirmed Tier 4 Interim equipment could not be located within Los Angeles County during the desired construction schedule; and (2) the proposed replacement equipment has been evaluated using the California Emissions Estimator Model (CalEEMod) or other industry standard emission estimation method, and documentation provided to the Planning Division confirms that necessary project-generated functional equivalencies in the diesel PM emissions level are achieved.

The exemption would not be granted if the contractor only demonstrates that one of these conditions are met. If the exemption was granted, diesel PM emission levels would need to be reduced below the same threshold as the emissions produced if Tier 4 Interim engines were available. Therefore, given that diesel PM levels would be functionally equivalent with implementation of this exemption, impacts would remain less than significant with the implementation of this mitigation measure.

- 189-35** The comment asks why off-site emissions from vendor trucks, haul trucks, and worker vehicle trips are not included in the LST analysis. As stated in Draft EIR Section 4.3.5, Impacts Analysis, according to the SCAQMD’s Final Localized Significance Threshold Methodology “off-site mobile emissions from the project should not be included in the emissions compared to the LSTs.”<sup>8</sup> As SCAQMD is the regional agency responsible for regulation and enforcement of air quality policy and regulations, SCAQMD methodology was used.
- 189-36** The comment is concerned with the project’s consistency with the City’s tree protection policies and regulations of the General Plan, Municipal Code, and Forest Management Plan. Please refer to Global Response GR-2.
- 189-37** The comment expresses concern over how the project would impact special status species protected under the Federal/California Endangered Species Act. As concluded in Draft EIR Section 4.4.5, Impacts Analysis, of Section 4.4, Biological Resources, impacts to special status species would be less than significant.
- 189-38** The comment is concerned with the project’s consistency with General Plan policies regarding neighborhood compatibility. As concluded in Draft EIR Section 4.11, the project is consistent with Objective L6 and Policy L20.1 of the General Plan through development regulations and design guidelines to be compatible with the surrounding development and natural landscape. The project would be designed to be sensitive to scenic viewpoints with site layout and building heights. It should be noted that impacts to private views are not considered environmental impacts pursuant to CEQA. Nonetheless, design guidelines for the proposed project specifically are designed to protect the privacy of adjacent neighbors and would avoid balconies with overlooking views into adjacent properties.
- 189-39** The comment expresses concern regarding inconsistency with Policy L51.8, as the project would not implement bicycle facilities. Policy L51.8 prioritizes alternative forms of transportation to eliminate need for expansion of roadways, the project would not impact existing bicycle facilities, but would ultimately expand roadways and not provide bicycle facilities. Not constructing bicycle facilities, as required to be consistent with Policy L51.8, would not result in significant environmental impacts. Explanations as to why the project is consistent or inconsistent with certain polies can be found in Final EIR Table 4.11-1. Please refer to Global Response GR-7.
- 189-40** The comment asks for a comprehensive geologic assessment to be conducted for the project site. A geologic assessment was performed for this project site and can be found in Appendix E. As stated in Draft EIR Section 4.7, Geology and Soils, with the implementation of PDF-GEO-1 through PDF-GEO-15 and MM-GEO-1, seismic risks would be reduced to less than significant level.
- 189-41** The comment expresses concern about the trips generated by construction vehicles and how the increase in trips would impact traffic, air quality and noise. The construction emissions associated with the proposed project, including vehicle trips related to construction, have been addressed in Draft EIR Section 4.3.5. Similarly, noise impacts associated with construction, including vehicle trips related to construction, have been addressed in Draft EIR Section 4.13.5, Impacts Analysis, in Section 4.3, Noise. As discussed in both sections, air quality and noise impacts associated with the project would be less than significant. Regarding traffic, please refer to Global Response GR-6.

<sup>8</sup> SCAQMD. 2009. Final Localized Significance Threshold Methodology. Revised July 2009.

- 189-42** The comment asks that tribes that have not yet responded to the notification of the project to be sent additional communication for them to have an opportunity to respond. The time frames for invitations to consult, responses to invitations to consult, and the closing of the formal consultation process is set by state statute. As stated in Draft EIR Section 4.18, Tribal Cultural Resources, the NAHC provided the City with a list of eight Native Americans who should be contacted pursuant to SB 18 and AB 52 because of their cultural affiliation to the project site and surrounding area. In compliance with AB 52, the City contacted all tribal representatives that have requested formal project notification on March 30, 2021. In compliance with SB 18, the City contacted all NAHC-listed traditionally geographically affiliated tribal representatives on March 30, 2021. One Native American Contact, Gabrieleño Band of Mission Indians-Kizh Nation, responded to the City's notification letter on April 5, 2021, and indicated that the project site is within the Gabrieleño Band of Mission Indians-Kizh Nation ancestral territory and requested to engage in formal consultation. The City has engaged in consultation with the tribe, the details of which are provided in Draft EIR Section 4.18.
- 189-43** The comment is concerned with the level of environmental analysis performed for the project alternatives. Please refer to Response to Comment I26-10 and Chapter 8, Alternatives, of the Draft EIR for detailed analysis of each alternative.
- 189-44** The comment states that the open space has not been defined, asks what the benefit is to the community, and asks if open space would be available to the public. The open space has been defined in Figure 3-4 of the Draft EIR. Project Objective 5 describes the benefits of the open space easement, which include in preservation of a portion of Bailey Canyon and the Bailey Canyon Trail, which would be used by wildlife for movement up and down slope; preservation of native vegetation communities and drainages; and preservation of land adjacent to the Bailey Canyon stream (see Final EIR Section 3.2, Project Objectives). This open space area would not be open to the public. Also, please refer to response I85-6 which discusses that, because no development is proposed in this area, and because the area would be conserved in perpetuity, comprehensive environmental review of the open space conservation easement is not required.
- 189-45** This comment requests clarification on the open space areas within the project. Specifically, the commenter asks where the remaining 0.35 acres of open space would be located on the project site. As discussed in Draft EIR Section 3.3.2, Neighborhood Park and Open Space, the development of an approximately 3.04-acre neighborhood public park at the southernmost portion of the project site as well as development of approximately 0.35 acres of passive open space located to the east of North Sunnyside Avenue and west of Carter Avenue, adjacent to Streets A and B (Please refer to Figure 3-2, Conceptual Site Plan). This comment also states that the name Colby Canyon is incorrectly used. Please refer to Response to Comment I42-26. In addition, Draft EIR Figure 3-4 shows the approximately 35 acres of open space hillside land to be conserved, located north of the existing Mater Dolorosa Retreat Center. Lastly, Final EIR Chapter 3 includes a few additional clarifications related to the project description, including a few errors correcting the open space deduction from 30 acres to 35 acres. These revisions do not raise new or additional environmental issues concerning the adequacy of the Draft EIR.
- 189-46** This comment identifies that the name Colby Canyon is incorrectly used. Please refer to Response to Comment I42-26. The comment also asks what community benefit would be provided by the open space. As stated in Draft EIR Section 3.2, the open space would be used for wildlife movement, preserve native vegetation communities and drainages, and preserve land adjacent to Bailey Canyon Stream.

- 189-47** The comment restates information included in the Draft EIR related to community benefits and asks for clarification about the dedicated funding source for the long-term park maintenance. Please refer to response I85-11.
- 189-48** The comment states that net-zero water is not a community benefit. However, the net-zero water solution minimizes the project’s burden on existing City infrastructure and further reduces the impact on the environment. Please refer to Global Response GR-1, for additional information related to net-zero water impact.
- 189-49** The comment is concerned about project description details, including the proposed range of home sizes and home stories (both one- and two-story homes). Please refer to response I85-12.
- 189-50** The comment requests that Objective 5 be removed as the reference to Colby Canyon is incorrect. Please refer to Response to Comment I42-26.
- 189-51** The comment asks how the project would facilitate safe and efficient access outlined in Objective 6 and expresses concern about the lack of improvements to streets outside of the project. The comment expresses concern about Carter Avenue being used as ingress and egress to the project site and notes that the current state of West Carter Avenue needs improvement if it will be used as an ingress and egress before the implementation of the project and should be a cost paid by the development. Please refer to Global Response GR-5. It should be noted that the project applicant is proposing off-site widening to Carter Avenue, between the southeastern portion of the project site boundary and Lima Street, including a 6-foot wide sidewalk along the northern portion of Carter Avenue (see Final EIR Section 3.3.12 and Global Response GR-5 for details).
- 189-52** The comment is concerned with whether the enhanced connectivity to Bailey Canyon Wilderness Park would provide a community benefit given that there is already public access to the park. Although public access to Bailey Canyon Wilderness Park already exists, pedestrian access to the Bailey Canyon Wilderness Park and trail would be enhanced through a pedestrian path in the southeast corner of the project site as well as a sidewalk along the northern side of Carter Avenue just outside of the proposed project site, which would provide pedestrian access to the entrance/parking lot of the Bailey Canyon Wilderness Park, off of Carter Avenue (see Final EIR Section 3.3.12, Neighborhood Park and Open Space for details). The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. Therefore, no further response is required or provided.
- 189-53** The comment express concerned with the proposed PDFs related to aesthetics. Please refer to response I85-21.
- 189-54** The comment request that the Draft EIR apply SCAQMD thresholds of significance as the performance standard for MM-AQ-1, as suggested by MIG as part of the third-party independent review process. Please refer to responses I85-22 through I85-25, above. Dudek and MIG coordinated on the approach of what threshold to use and ultimately decided to mass based standards. The mitigation measure is in place to reduce PM<sub>10</sub>, PM<sub>2.5</sub>, and DPM emissions from project construction. The mitigation measure is not solely in place to reduce DPM emissions and health risk impacts. As such, the functional equivalent must reduce the same mass emissions to ensure the PM<sub>10</sub> and PM<sub>2.5</sub>mass thresholds for LSTs are not exceeded.

- 189-55** The comment asks what General Plan policies have been removed because they are not the responsibility of the project to implement and what is the responsibility of the City and not the project. Please refer to Response to Comment I85-26.
- 189-56** The comment expresses concern over the feasibility of the net-zero water solution. Please refer to Global Response GR-1 and Response to Comments I85-27 and I89-18.
- 189-57** The comment is concerned with the project's inconsistency with the project site's existing Zoning Code and General Plan land use designations. Please refer to Global Response GR-7.
- 189-58** The comment expresses concern regarding how payment of development fees would be used to mitigate impacts to fire services. Please refer to Response to Comment I89-25.
- 189-59** The comment states that the FPP should be more project specific and that the FPP places responsibility on individuals for fire planning. The comment is concerned with the sufficiency of the "Ready, Set, Go!" approach outlined in the FPP. The FPP is general and relies on what is required by code because the purpose of the regulations is to help reduce fire hazards. Based on the analysis of the fire environment (which is provided in the FPP), it was determined that with the planned approach for wildfire protection, which includes fuel modification zones, ignition resistant structures, access providing primary and secondary alternatives, water and fire flow to the code, etc., the project would have all the necessary protections such that wildfire risk is reduced to acceptable levels. This is evidenced by the fire marshal agreeing with the FPP's conclusions and accepting the document. The responsibility of implementing these policies does not fall on individuals. See response I85-34 regarding the "Ready, Set, Go!" approach.
- 189-60** The comment expresses concern about the adequacy of Carter Ave being used for ingress and egress in the case of evacuation. Please refer to Global Response GR-4 and Global Response GR-5.
- 189-61** The comment expresses concern with the project's potential inconsistency with Policy Hz7 and R3.2 from the Draft Safety Element Update (now the adopted Hazard Prevention Element). Please refer to Global Response GR-3.
- 189-62** The comment states that the project is inconsistent with policies and objectives relating to transportation in the general plan. Please refer to Global Response GR-7, Final EIR Section 4.11, Land use and Planning, and Final EIR Section 4.17, Transportation.
- 189-63** The comment states that the project would result in significant traffic impacts and would be inconsistent with Objective L53 of the general plan. Please refer to Global Response GR-6 and Global Response GR-7.
- 189-64** The comment states that the project is inconsistent with policies and objectives relating to transportation and safety in the general plan, specifically related to walking and bicycling. Please refer to Global Response GR-7 as well as Final EIR Section 4.11, Land use and Planning, and Final EIR Section 4.17, Transportation.
- 189-65** The comment expresses general concern about safety and traffic on neighboring streets by focusing roadway improvements within the boundaries of the project site. Please refer to Response to Comment I85-52, Global Response GR-5. More specifically, in order to address concerns related to safety issues along Carter Avenue and outside of the boundaries of the proposed project site, the

project applicant is proposing off-site widening to Carter Avenue, between the southeastern portion of the project site boundary and Lima Street, which would ensure that Carter Avenue would comply with existing code within and outside of the project site (see Final EIR Section 3.3.12 and Global Response GR-5 for details).

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Comment Letter I90

From: john clarke <jack1947cool@gmail.com>  
Sent: Monday, October 4, 2021 3:02 PM  
To: Vincent Gonzalez  
Subject: DraftEIR Comments

CAUTION: This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Please include my comments on the Draft EIR for response in the final EIR.

I 190-1

Neighbourhood Incompatibility: The Project is incompatible with the surrounding neighbourhood and fails to capture the true spirit of the neighbourhood. The 42 homes are larger and on smaller lots; the Project has an over abundance of two story homes while the neighbourhood has primarily one story homes; the Project has sidewalks and wide roads while the neighbourhood has no sidewalks and narrow roads; the Project will remove mature trees while the neighbourhood is full of trees that provide shade and beautiful canopies.

I 190-2

Traffic Dangers: The Project creates severe traffic and safety issues for the residents of Carter, Grove, Lima and Sunnyside that are not addressed by the Project. Cars regularly speed on these streets, run stop signs and compete with pedestrians who are forced to share the roads, as there are no sidewalks. These streets were not designed as thru streets for a 42 unit development. The street size on Carter Avenue by Bailey Canyon (proposed as an ingress/egress to the Project) cannot accommodate autos, pedestrians, emergency and county construction equipment. The Draft EIR fails to represent the severe danger relying on a roadway of 20 feet can cause.

I 190-3

I 190-4

Wildfire Dangers: The Project proposes building in a very high fire hazard zone as stated by the Sierra Madre Fire Department. The City's General Plan goal clearly states to avoid building in this zone to avoid future wildfire situations that have devastated towns and communities in California. Utilizing Carter Avenue as the second means of egress/ingress for emergency purposes is questionable as Carter is a small one car lane that would have difficulty accommodating emergency vehicles and residents evacuating. In recognition of this, it is increasingly becoming extremely difficult to buy homeowner's insurance if you live in the foothills. In reality, a fire of 42 homes would likely spread endangering all of Sierra Madre and its residents.

I 190-5

I 190-6

I 190-7

I 190-8

Water Dangers: The Project appears to address water usage in a disingenuous fashion by promoting 'net-zero' water impact. The true definition of net-zero water is 'Net zero water creates a water-neutral building where the amount of alternative water used and water returned to the original water source is equal to the building's total water consumption'. This Project clearly does not meet this definition and has to create one of its own, which implies no impact on Sierra Madre water usage with the additions of 42 homes and families, landscaping and pools. In reality, the Project's 'net zero' proposes to buy 50 years of water to offset water usage. There is no inflationary factor built into the price calculations and it is unlikely that the cost of water today will be the same in 50 years, or 10 years, or 5 years, particularly given a long lasting drought. It is an illogical work around to appear to be a solution to the scarcity of water in a years long drought. It does not solve the problem of 'no water' and uses 'smoke and mirrors' to promote the wrong project in the wrong place at the wrong time. In addition, the Project failed to discuss the importance of the property in percolating water to restore our groundwater or mention that the property is an alluvial fan that is instrumental in this process.

I 190-9

I 190-10

I would urge the Planning Commission and City Council to reject this Project and seek alternatives that are more Sierra Madre Quality and Sierra Madre Smart.

I 190-11

Thank you,

John Clarke

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## Response to Comment Letter I90

Individual  
John Clark  
October 4, 2021

- I90-1** This comment requests the following comments (Comments I90-2 through I90-11) be included in the responses to comments of the Final EIR. As shown, the commenter's request has been recorded as part of this Final EIR.
- I90-2** The comment expresses concern over the compatibility of the project with the current neighborhood. As analyzed in Draft EIR Section 4.11, Land Use and Planning, the project is consistent with Goal 2 and 3 of the General Plan through development regulations and design guidelines to be compatible with the surrounding neighborhood. In addition, the design guidelines of the Specific Plan establish site planning and design, architectural design, and landscape design standards that would address and protect visual character, privacy, and the quality of public and private views. See also Draft EIR Section 4.1, Aesthetics, for a detailed analysis of the project's potential for visual impacts, which were determined to be less than significant. It should be noted that although the project would result in removal of trees on site, the proposed landscape plan would result in an increase of trees on site as compared to existing conditions.
- I90-3** The comment expresses safety concerns related to increased traffic and safety issues with cars speeding, running stop signs, and sharing the roads with pedestrians. Regarding an increase in traffic, please refer to Global Response GR-6 . Please refer to Response to Comment I85-52, related to safety concerns.
- Concerns about illegal activity, such as speeding and running stop signs is not within the scope of the required environmental analysis under CEQA. As such, no response is required.
- I90-4** The comment states that the streets surrounding the project, specifically Carter Avenue by Bailey Canyon would not be able to accommodate cars, pedestrians, emergency vehicles and construction equipment. Please refer to Global Response GR-5.
- I90-5** The comment states that the project is within a VHFHSZ and that the City's general plan states to avoid building in this zone. Please refer to Global Response GR-3 .
- I90-6** The comment expresses concern regarding Carter Avenue being used as the second means of egress/ingress for emergency vehicles and evacuation. Please refer to Please refer to Global Response GR-4 and Global Response GR-5 .
- I90-7** The comment expresses concern over the ability for residents to be able to get homeowners insurance in the foothills. Ability to obtain insurance is not within the scope of the required environmental analysis under CEQA. As such, no response is required.
- I90-8** The comment suggests that fire within the 42 homes would put other residents in danger. Please refer to Global Response GR-3 and the language below from the FPP (Appendix F2 of the Draft EIR):

As determined during the analysis of this site and its fire environment, the project site, in its current condition, may include characteristics that, under favorable weather conditions, could have the potential to facilitate fire spread. Under extreme conditions, wind-driven wildfires from nearby undeveloped land could cast embers onto the property. Once the project is built, the project's on-site fire potential will be much lower than its current condition due to conversion of wildland fuels to buildings, parking areas, managed landscapes, fuel modification areas, improved accessibility for fire personnel, and structures built to the latest ignition and ember resistant fire codes.

- I90-9** The comment expresses concern over the Net Zero Water Impact. Please refer to Global Response GR- 1 and Response to Comment I2-13.
- I90-10** The comment states that the project failed to discuss the alluvial fan and the benefit it has to groundwater recharge. Please refer to Response to Comment I32-2.
- I90-11** The comment expresses general opposition for the project. The comment does not raise any issue concerning the adequacy of the Draft EIR.

Comment Letter I91

Vincent Gonzalez,

Dear Vincent, I am concerned about several areas of the "Meadows" DEIR as outlined in their report.

TREES: I've been told by the developer that they plan to replace the trees that will be cut down and will not only replace the 100 mature identified trees but also will plant several more throughout the development. However, many of the established, mature trees are irreplaceable given the fact that they are more fire-resistant, provide more shade and most importantly, less water to maintain. I believe that the project needs to at least preserve the grove of coastal oaks which are providing habitat for birds and food for the deer and bears.

WATER: In addition to the Net-Zero plan of off-setting the increased use of water, the project needs to include the ban of lawns and swimming pools. There can be no mitigation or replacement of water in this time of extreme drought, particularly since there is no excess water available to be purchased.

WILDFIRE: I am seriously concerned about the circulation plans of traffic in terms of evacuation in case of a wildfire. While the homes will be built to a higher standard than most of the surrounding homes, the problem is in an eventual evacuation procedure. There is a bottleneck at the area where Carter enters the proposed development, and at the junctions of Grove, Lima, and Sunnyside. Carter narrows to a point where fire equipment entering the area of the Monastery and the evacuating vehicles from the development and residents from Grove and Lima will create a back-up on all the side streets. Mitigation can come in the form of a fire road where there is a barrier between the park and the south-side neighbors. This fire road could be integrated into the park plans so that it would be a part of the park itself and not used as a permanent road but could be utilized in case of an emergency.

Thank you for the chance to give feedback on this important development.

Pat Alcorn  
741 E. Grandview Ave.  
Sierra Madre

I 191-1  
I 191-2  
I 191-3  
I 191-4  
I 191-5  
I 191-6  
I 191-7

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## Response to Comment Letter I91

Individual  
Pat Alcorn  
October 4, 2021

- I91-1** The comment expresses general concern about the project. The comment does not raise any issue concerning the adequacy of the Draft EIR.
- I91-2** This comment expresses concern about the removal and replacement of trees from the project site. The comment specifically is concerned about mature trees being more fire resistant, having more shade, and require less water to maintain. As stated in Draft EIR Section 3.3.4, the Conceptual Landscape Plan would use fire resistant and drought tolerant tree species. The comment also states that the developer has told them that the developer plans to replace the trees that have been cut down. Relocation of existing protected and non-protected trees is being evaluated and will be determined in the final design phase of the project and will be based on the existing conditions of the trees. Please refer to Global Response GR-2 .
- I91-3** The comment states that the project should include a ban of lawns and swimming pools in addition to the Net Zero Water Impact to reduce water usage. Impacts to water supply is less than significant with the inclusion of PDF-UTL-1 and no mitigation, such as a prohibition on lawns or pools, would be required.
- I91-4** The comment states that there is no water available to be purchased and there can be no mitigation or replacement of water available. Please refer to Global Response GR-1.
- I91-5** The comment expresses concern about evacuation in the case of a wildfire, specifically at the entrance to the project on Carter Avenue. Please refer to Global Response GR-4 and Global Response GR-5 .
- I91-6** The comment suggests a mitigation measure in the form of a fire road to be integrated into park plans to be utilized in the case of an emergency. Please refer to FPP (Appendix F2 of the Draft EIR) and Global Response GR-4 .
- I91-7** The comment provides concluding remarks that do not raise new or additional environmental issues concerning the adequacy of the Draft EIR.

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Comment Letter I92

**From:** Chris Spensley <chrisspensley@icloud.com>  
**Sent:** Monday, October 4, 2021 2:01 PM  
**To:** Vincent Gonzalez  
**Subject:** Fwd: Questions on DEIR for Bailey Meadows Development

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Sent from my iPhone

Begin forwarded message:

**From:** Maria Karafilis <mariakarafilis@gmail.com>  
**Date:** October 4, 2021 at 11:54:10 AM PDT  
**To:** Chris Spensley <chrisspensley@icloud.com>  
**Subject:** Questions on DEIR for Bailey Meadows Development

From: Christopher Spensley  
642 Fairview Ave  
Sierra Madre, CA 91024

Thank you for the opportunity to comment on the DEIR for the "Meadows at Bailey Canyon"

Please retain a copy for the administrative record.

Please respond to these comments in the Final EIR and please put me on the list of people to notify when the Final EIR is complete.

I strongly object to the proposed housing development. It is inconsistent with the Policies and Values of our General Plan. I am especially concerned with:

- 1) 101 mature trees will be removed, including 10 protected Oaks. The Oaks will be replaced with smaller Oaks and other small trees (requiring a great deal of water to become established) SM has a Forest Management Plan with a mission to preserve "Canopies" for their environmental and aesthetic benefit. 101 large canopied trees will be destroyed. **Why are you flouting the SM Forest Management Plan and denuding the area? How will you prevent rock and landslides and impact on wildlife when these mature trees are destroyed?**

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I 192-1  
I  
I 192-2  
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I 192-3  
I 192-4

2) **I strongly oppose a change in zoning, a change in our General Plan and a change in the regulations** that other residents have to follow.

I 192-5

3) In the Alternatives section presented in the Draft EIR, **why did you choose to feature only a maximum-sized institution building as opposed to one we could have such as an assisted-living facility such as the Kensington, which is under 60,000 sq feet, as would be a high school? Why are you not presenting all options to citizens?** Please present another institutional option.

I 192-6

4) **How, specifically, will the project ensure there will be no increased fire risk and address successfully two crucial elements in the proposed safety element given the area is an extremely high fire severity zone?** The two safety elements below are particularly relevant—please address specifically in the EIR:

I 192-7

Hz 2.12 All new residential developments in hazard areas shall have at least two emergency evacuation routes (i.e., points of ingress and egress)

Objective Hz7: Avoid expanding development into undeveloped areas in Very High Fire Severity Zone

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## Response to Comment Letter I92

Individual  
Christopher Spensley  
October 4, 2021

- I92-1** This comment requests the following comments (Comments I92-2 through I92-7) be included in the responses to comments of the Final EIR. As shown, the commenter's request has been recorded as part of this Final EIR.
- I92-2** The comment expresses general opposition for the project. The comment does not raise any issue concerning the adequacy of the Draft EIR.
- I92-3** The comment expresses concern regarding tree removal and incompatibility with the Sierra Madre Forest Management Plan. Please refer to Global Response GR-2.
- I92-4** The comment asks how removal of trees will impact wildlife and rock and landslides. As concluded in Draft EIR Section 4.7, Geology and Soils, the project site is located outside of any potential landslide zone; therefore, impacts associated with landslides would be less than significant. Regarding wildfire, please refer to Global Response GR-3.
- I92-5** The comment expresses opposition to the proposed change in zoning and regulations. As stated in Draft EIR Section 4.11, Land Use and Planning:
- Implementation of the project would require amendments to the General Plan, Zoning Code, Zoning and Land Use maps, and approval of the Specific Plan. The General Plan and Zoning Code amendments would primarily change this land use designation from Institutional to Specific Plan. The approval of the Specific Plan would provide guidelines and standards for the implementation of future development of the project.
- The comment does not raise any issue concerning the adequacy of the Draft EIR.
- I92-6** The comment asks for another institutional alternative to be provided and states that the Draft EIR is not presenting all options to citizens. Please refer to Response to Comment I26-10.
- I92-7** The comment asks how the project will have no increased fire risk and is concerned that the project is not consistent with elements of the proposed Draft Safety Element (now the adopted Hazard Prevention Element). Please refer to Global Response GR-3 and Response to Comment I90-8.

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Comment Letter 193

**From:** S Hood <scottthehood@gmail.com>  
**Sent:** Monday, October 4, 2021 4:35 PM  
**To:** Vincent Gonzalez  
**Subject:** comments on draft EIR, The Meadows at Bailey Cayon

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

The EIR appears too often to be a cut and paste job from the library of Dudek from past multi-acre housing developments that is sadly not tailored to the proposed "Meadows..." project. When a topic becomes unavoidably specific to this project, the depth of research becomes very shallow. The EIR is therefore inadequate, which makes it hard to comment on specifically. Nonetheless, following are brief comments on the sections on Fire and Trees that serve as examples of problems with this draft EIR. Note these comments do not represent the only problems with the EIR.

193-1  
 193-2

Fire

- The EIR states that wildfires have "burned within 5 miles of the project site". Using 5 miles is an irresponsibly wide margin as to past threats and certainly future threats from wildfires. Everyone in town knows fires have come much closer, probably within a few hundred yards (quote that instead). To put 5 miles into perspective, the Mount Wilson Observatory is only 3.5 miles from the project site. The EIRs use of "within 5 miles" seems like a shade of corruption in service of the client. At the very least this wording should be changed from "within 5 miles" to "within 1 mile". And even that understates proximity.
- Given the risk of wildfires, the report should do a study of how close fires have actually come as well as a study of the directions and angles of the surrounding canyons and potential directions of burns. And it should account for the much higher risk today and in the future compared to past wildfires.
- The EIR attempts to brush over the enormous wildfire risk and increased risk of having the project completed by stating that the project "would not exacerbate wildfire risks provided that the appropriate fire prevention management activities are implemented as required by FPP and SMMC." This places the responsibility and blame on the very limited resources of the city without any analysis as to the city's capabilities and resources.
- According to the California Fire Marshall Fire Severity Map, the proposed project site sits far within the most severe fire risk zone, a higher zone rating than many fires that have occurred in recent years and at the same risk level as places such as Paradise.
- While the purpose of the report is to explore the impacts from the project, the above bullet points should be considered and mentioned. A bridge of more flammable material between the mountains and existing houses south of the proposed project certainly increases the risk. Putting the responsibility onto the city and its agencies is irresponsibly convenient.

193-3  
 193-4  
 193-5

Trees

The removal of 101 mature trees is a significant impact, not to mention a great irony given the name of the project.

- Cutting down trees releases carbon dioxide into the atmosphere. Mature trees, which these are, release even more carbon.
- Mature trees have deeper roots established over decades or even up to over 200 years. Deeper roots are more resistant to drought, obviously a major issue, and to other effects of climate change.
- This project is in the highest fire danger area according to the California Fire Marshall. Old trees are much more resistant to fire given their thick bark and elevated crowns. Young coast live oaks cannot survive fire, but old mature ones can.

193-6

- Young coast live oaks will not provide the shade cover of mature trees.
- All of the 101 trees are part of an ecosystem developed over decades if not hundreds of years. Removing them will have a great effect on other plants and animals that is not even attempted to be understood in this report.
- Coast live oaks are affected by sudden oak death, a pathogen that has been killing them off in certain areas across the state. These trees are becoming more and more rare. It should not be considered a replacement to kill mature coast oaks and put in young oaks without fire resistance and mature root structures.
- The EIR does not address whether the young coast live oaks will come from trees grown from acorns sourced from a different region or from the trees that are to be cut down? If they are from a different region, this would reduce the genetic diversity of the species.
- It is unlikely that the 10 young coast live oak trees will all live through the first few years, which means this area is certain to have less coast oak trees in the near future.
- What is also certain is that the 10 young trees will be much smaller, so the biomass of these young trees will be far less than the mature trees there now.
- Bringing in nursery trees grown in other regions may bring in the sudden oak death pathogen possibly leading to the death of far more of our trees.
- The EIR does not identify the other trees on the chopping block. While they may get around any current protected tree status, this does not mean they do not have unique qualities or declining numbers and are very likely important to our environment.

↑  
I93-6  
Cont.

Scott Hood, Sierra Madre resident

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Please do not send any business related emails to this email address. They will not be responded to or acted upon.  
Please use official business email address only.

## Response to Comment Letter I93

Individual  
Scott Hood  
October 4, 2021

- I93-1** This comment expresses the opinion of the commenter and does not provide a critique or comment specific to any component or issue of the Draft EIR; however, please refer to Responses to Comments I93-2 through I93-19, below, for responses relative to specific environmental issues raised by the commenter.
- I93-2** The comment is an introduction to comments that follow.
- I93-3** The comment expresses concern about the use of a 5-mile radius of fire history around the site and suggests that a 1-mile radius around the site would provide a better idea of how close fires have gotten to the site. A 5-mile radius is a more conservative approach which includes an assessment of multiple fires over a larger area and provides a greater understanding of fire behavior in the project vicinity. A fire history map has been provided in the FPP (Appendix F2) which shows fire history in the site vicinity.
- I93-4** The comment suggests that the Draft EIR should include analysis on the proximity of fires as well as the direction the fire has come from. This analysis can be found in the FPP (Appendix F2) under the Fire Behavior Modeling that was performed using BehavePlus software. This analysis provides information about the type and intensity of fire given the topography, vegetation, and weather of the site. Information about fire history is also found in Section 2.2.4 of the FPP (see Appendix F2).
- I93-5** This comment expresses concern over the responsibility placed on the City of Sierra Madre's resources and the project being located in a VHFHSZ. Please refer to Global Response GR-3 . As stated in Draft EIR Section 4.15.5, Impacts Analysis, in Section 4.15, Public Services, the Sierra Madre Fire Department would provide fire protection services to the project site and impacts would be less than significant.
- I93-6** This comment expresses concern about the tree removal and replacement that will happen as a result of this project. The commenter's concerns about tree removal include tree resistance to drought and wildfire, impacts to plants and wildlife, the removal of non-protected trees with their own unique qualities, and release of carbon dioxide. Please refer to Global Response GR-2 . Mitigation measure MM-BIO-3 would replace protected trees and the proposed Conceptual Landscaping Plan includes the planting of an increased number of trees at the project site, as compared to existing conditions. The commenter's concern related to carbon dioxide generation is not a topic that is within the scope of the environmental analysis required by CEQA. Nonetheless, the amount of tree reduction proposed is not significant enough to result in any loss of carbon dioxide. As such, no response is required.

Additionally, the comment expresses concern about the trees that will be replacing the trees removed as a result of the project. The comment is specifically concerned with sudden oak death being introduced to the area, survival of replacement trees, and genetic diversity reduction of the species. Nurseries inspect trees and make sure that they are pest and disease free before sale and planting. In addition, implementation of MM-BIO-3, Protected Tree Replacement, would be implemented to reduce the impacts to the City's protected trees to less than significant by requiring the 1:1 replacement of those protected trees impacted by development and conducting a 5-year monitoring program to ensure their continued viability. All tree replacement would comply with City of Sierra Madre regulations outline in Chapter 12.20 of the SMCC.

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Comment Letter I94

**From:** CAROL Parker <acpparkercalif@msn.com>  
**Sent:** Monday, October 4, 2021 4:53 PM  
**To:** Vincent Gonzalez  
**Subject:** Against the housing at the Monastery

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Dear Mr Gonzalez,

I am a lifetime resident of Sierra Madre. And, this is a wonderful town and must be respected for its small town values and culture.

I 194-1

If these homes are built it will drastically change Sierra Madre in too many negative ways.

1. We are already living in a terrible drought. The idea of purchasing more water is clearly unrealistic and seems like a very irresponsible idea. If a developer can "purchase" water, then why don't cities do the same for farming areas and to help put out more fires? And, for humans to drink water? This is pure insanity.

I 194-2

2. The traffic is already horrible and the people who live on the hill will be speeding up and down Sunnyside and Lima to get to school, work, shop....and are a danger to the people who live on these very narrow streets. Have you ever tried to drive from Lima to Baldwin on SMBldvd? It is already overcrowded and these residents will add to the traffic problems which already exist.

I 194-3

3. The beautiful trees are going to be cut down? How horrible. Why can the developer cut down trees but we residents who need trees trimmed or cut down or ignored.. I am referring to city trees on private property. Plus, there is not enough emphasis on GLOBAL WARMING. Why??

I 194-4  
I 194-5

I dread the dirt and trucks and overcrowding of our streets if these homes get built. It will be a nightmare.

I 194-6

Sincerely,  
Carol Parker  
368 Marposa

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## Response to Comment Letter I94

Individual  
Carol Parker  
October 4, 2021

- I94-1** The comment expresses general opposition to the project. The comment does not raise any issue concerning the adequacy of the Draft EIR.
- I94-2** The comment expresses concern regarding the feasibility of the purchase of future water. Please refer to Global Response GR-1.
- I94-3** The comment expresses concern regarding speeding on the narrow streets of Lima Street and Sunnyside Avenue and expresses that the streets are already overcrowded. Concerns about illegal activity, such as speeding is not within the scope of the required environmental analysis under CEQA. Regarding traffic conditions, please refer to Global Response GR-6 .
- I94-4** The comment expresses concern over the tree removal. Please refer to Global Response GR-2.
- The commenter also expresses frustration about residents being ignored when trees need to be cut down or trimmed. The comment does not raise any issue concerning the adequacy of the Draft EIR; therefore, no further response is required or provided.
- I94-5** The comment expresses concern over global warming impacts. Please refer to Draft EIR Section 4.8, Greenhouse Gas Emissions, for information about greenhouse gas emissions and climate change.
- I94-6** The comment expresses general opposition to the project. The comment does not raise issues concerning the adequacy of the Draft EIR.

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Comment Letter I95

**From:** ghickman1@aol.com  
**Sent:** Monday, October 4, 2021 4:42 PM  
**To:** Vincent Gonzalez  
**Subject:** Hickman Comments DEIR Meadows at Bailey Canyon Specific Plan  
**Attachments:** DEIR Meadows Bailey Canyon Specific Plan Hickman Comments 10.04.21ver1.1.pdf

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Oct. 04. 2021  
4:41PM

Hello Mr. Gonzalez,  
Please find my DEIR comments in the attachment regarding the Meadows at Bailey Canyon Specific Plan.

- An e-mail reply confirming receipt would be welcome.

regards,  
Glenn Hickman  
480 Fair View Ave

I  
↓ I95-1

October 4, 2021

To: City of Sierra Madre  
Planning  
232 W. Sierra Madre Boulevard  
Sierra Madre, Ca. 91024

Attn: Director Vincent Gonzalez  
vgonzalez@cityofsierramadre.com

From: Glenn Hickman  
480 Fairview Ave.  
Sierra Madre, Ca. 91024

Cc: <https://www.stophousingproject.com/>  
<https://www.preservesierramadre.com/>

Re: Draft Environmental Impact Report for The Meadows at Bailey Canyon Specific Plan  
Hickman Comments

Thank You for the opportunity to comment as found below. Please retain a copy for the administrative record. Please respond to these comments in the Final EIR and please include me in the list of people to notify when the Final EIR is available.

Irrespective of whether my following comments are deemed material for inclusion in the EIR, at minimum they should be advanced as mitigation measures and matured throughout the development process, including into the Specific Plan, the Subdivision Map (recorded covenants and conditions of approval) and HOA (Cc&R's and bylaws). Some of my comments are highlighted with symbols and pertain to the entire section regarding those processes and documents: "\*" relevant to the: 1) subdivision map covenants and conditions of approval; "!" relevant to the 2) specific plan; "#" relevant to the 3) HOA CCR's and bylaws if part of the residential ownership.

195-1  
Cont.

**\*! # INSOLVENCY – INCOMPLETED PROJECT: Special Development Completion and Sales Bond:**

- **Background:** Sierra Madre has several abandoned subdivision projects blighting its community. An incomplete subdivision of this magnitude and potential blight, should the economy or other factors result in Owner/Developer insolvency, warrants a Special Development Bond for a Bonding Company to complete the development in a definitive timeframe. A Subdivision Covenant and Condition of Approval is required to execute this and should not be confused with the performance and bonding requirements the Owner/Developer requires of the Contractor. After all the controversy regarding this Development and all the sweat equity and resources to be expended by any and all entities would it not be in the City's and City Leadership's best interests to negate the risk of an Incomplete Development – Community Blight?

195-2

**CEQA PROCESS ISSUES**

- **Responsible Agencies Not Identified:** Responsible Agencies of relevance appear to have been overlooked in the Application. Bailey Canyon Debris Basin and Park: 1) Calif Dept of Parks & Recs; 2) California Dept of Water Resources Division of Safety of Dams; 3) Los

195-3

DEIR Meadows Bailey Canyon Specific Plan Hickman Comments 10.04.21ver1.1.docx

Angeles County Dept of Public Works; 4) LA County Flood Control District (during the EIR process, not just the Subdivision Mapping process as found in the Municipal Code).

- **8.5 Alternatives Under Consideration:** Given the Relevance that this Project forges for proponents by advancing Revenue to the General Fund and also compliance with RHNA Housing (be it in the future per the General Plan DEIR); and opponents evidenced by Community Outrage in need of Community Calming, uncertainty of outcomes in a complex multi-approval process (zone change, specific plan, etc. etc.), it appears logical that the “rule of reason” would suggest the DEIR consider a General Obligation Bond Alternative to Purchase the Property, which it did not.
  - **Proposed Alternative 4: General Obligation Bond Alternative: to purchase the property and append Existing Bailey Park with a “Conservation Park”:** would counter the perceptions by some of a Legislative Taking from the People in favor of One Stakeholder, the Monastery. It would provide site suitability (mitigation of seismic uncertainty and hazard, provide for the City of Sierra Madre to meet Quimby City-wide Park Goals, current conformance with the General Plan and current Zoning; calming of the Community to avoid possible Political backlash, etc.), including economic viability for the Landowner which has been professed to be of major consequence.
    - Community Folklore, associated with Preserve Sierra Madre, an advocacy coalition, suggests that an \$11 million dollar purchase of the property was proposed to no avail. That said, a credible and transparent Alternative should be considered for what might oblige \$200 to \$300 dollars per year on the property taxes for 30 years for a \$20 to \$30 million dollar purchase. This Alternative should not be summarily dismissed based on rhetoric or folklore and pursued with credible resources and legitimacy.
      - Jaffray Sanders, institutional financial consultants, (which I have no connections), is an obvious nationally recognized entity to facilitate a credible CEQA Alternative for an Alternative 4, General Obligation Bond or similar institutional placement in mitigation to development.
    - Alternative 1: No Project/No Build Alternative: is a typical EIR alternative; however the proposed Alternative
  - **Alternatives 2: Existing Zoning and Land use Designation Communal Residential Facility Alternative & Alternative 3: Existing Zoning and Land Use Designation: Private School Alternative -or- Any Institutional Alternative (added for emphasis):** would more than likely never come to consideration because of the two Late Quaternary Faults on the property; and history of the Sierra Madre Earthquake and Epicenter (possibly under the property) rendering sever damage to an Institutional Structure for removal.



**\*I# 4.7 GEOLOGY AND SOILS: HAZARD IS SITE SIGNIFICANT: To Suggest NO PROJECT – No Alternatives 2 & 3 – No Structures – Potential Alternative 4 and Alternative 1**

- **DEIR Documents:** Table ES-1 Summary of Project Impacts: Geology and Soils: & Appendix E, Geologic Section of EIR: “Would the project directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving: a. Rupture of a known earthquake fault.....Geology Special Publication 42?” ..... is “Less than Significant.”
  - **Less than Significant is Premature:** The impact statement of “Less than significant” is premature and the corroborating Appendix E (even with the borings taken to suggest a

DEIR Meadows Bailey Canyon Specific Plan Hickman Comments 10.04.21ver1.1.docx

response to a requirement for “detailed site-specific geologic exploration”) appears to not be in alignment with the depth and breadth of required analysis to negate the severity of the two Late Quaternary Faults. In fact, the report in Appendix E appears to represent a preliminary soils report.

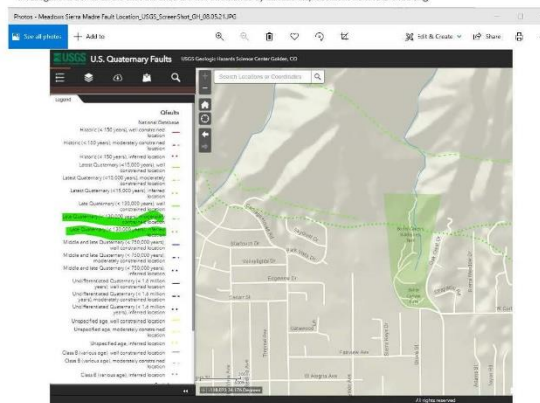
- Less than Significant in Conflict:** The statement “Less than Significant” is also in conflict with Applicant’s own DEIR’s Section: Geology and Soils 4.7.2 Relevant Plans, Policies, and Ordinances (see insert below); wherein stated that “Late Quaternary .....faults .....are consider potentially active. ....and requires detailed site-specific geologic explorations to determine whether building setbacks need be established. IE. Can the structures proposed be built where proposed? Will they indirectly become community blight if not reconstructed after an earthquake? And, most importantly will there be potential loss, injury, or death?
  - The USGS Quaternary Fault Map (see insert):** depicts two (2x) Late Quaternary faults (moderately constrained and inferred) which traverse the project site and in fact may have been the underlying cause for the earth movement resulting in the prior institutional buildings fatal damage in 1991 and demolition. Relevant, is that the existing monastery institutional structure was apparently less impacted, possibly confirming that the two (2x) faults are in fact under the proposed project; and compelling a detailed exploration – possibly horizontal open cut trenching.
    - Noteworthy, the rhetoric and narrative to compel a Zone Change from Institutional to Residential, suggesting an Institutional Project would have more impacts than Residential, is neutered by the fact that the uncertainty of two active faults (unless deemed otherwise with proof positive) would result in no project, no funding, no insurance.

**Alquist-Priolo Earthquake Fault Zoning Act**

The Alquist-Priolo Earthquake Fault Zoning Act of 1972 (California Public Resources Code Sections 2621–2630) regulates development and construction of buildings intended for human occupancy to avoid the hazard of surface fault rupture. The act helps define areas where fault rupture is most likely to occur. The act groups faults into categories of active, potentially active, and inactive. Historic and Holocene age faults are considered active.

.....

.....Cities and counties affected by the zones must regulate certain development projects within the zones. They must withhold development permits for sites within the zones until geologic investigations demonstrate that the sites are not threatened by surface displacement from future faulting.



DEIR Meadows Bailey Canyon Specific Plan Hickman Comments 10.04.21ver1.1.docx

195-5  
Cont.



- **Site-Specific Geological History:** This specific site’s recent geological and seismic history has not been completely and correctly characterized. 1) A major institutional structure (3 stories, circa 1920’s) was so severely damaged from the Sierra Madre named 5.8 magnitude earthquake, June 28, 1991, at 7:43, that it was demolished. 2) The USGS Quaternary Fault Map depicts faults which traverse the project site and in fact were probably the underlying cause for the earth movement resulting in the institutional buildings fatal damage and demolition. At the scale of the maps found in Exhibit E and or the USGS Interactive Fault Mapping.....the faults in question could exist directly under the proposed project. Appropriate Field Exploration (refuting Appendix E to be adequate) will determine age and location with more certainty given the site-specific seismic history, future risk and IF the site was the Epicenter for the Sierra Madre Quake.
- **Precedent of Nearby Geological and Seismic History Requiring Detailed Exploration:** The geological and seismic history at the City of Arcadia’s Foothills Middle School, within 3 miles of the project, also within seismic risk to the active RAYMOND Fault, required detailed field exploration and seismic modeling/analysis in 2010 in order to rule out an on-site fault hazard.
- **Minimum Earthquake Insurance Mitigation:** At a minimum, a mitigation should compel the Developer to secure Earthquake Insurance, with written commitments, to pass thru as a mandatory requirement for the new home buyers, recorded in the Final Map, and a CCR/By-laws of the HOA. A commitment to secure and require Earthquake Insurance would avoid the risk of future community blight resulting from an earthquake rendering residential structures in disrepair due to lack of insurance. Clearly, post-earthquake Community Blight was evident after several of the regional earthquakes.

195-6

195-7

**\*! # 4.14 POPULATION AND HOUSING: ADU’s - Use & Occupancy:**

- **No ADU’s In Perpetuity.** There should be No Future means, administrative, legislative, or otherwise, to convert through any process, in any venue, the Properties in this subdivision so as to add an ADU. This is a new development which unto itself, will be adding to the City’s RHNA legislated requirements (as narrated in the DEIR and as found in the DEIR General Plan Amendment) to conform with RHNA legislation. Addition of an ADU in the future would be double dipping to meet legislation and disingenuous to the CEQA process. This development unlike existing housing stock will be in conformance with the Cities duties to address the State’s demand for the democratization for housing. Tracking No ADU’s should specifically be addressed in this CEQA process and thereafter monitored in the progression of development and post occupancy of the homes. It should run with the legal description for each parcel and into the HOA CC&R and bylaws. A failure in this transparency with an untimely introduction at any time may result in a CEQA and Development process challenge. Latent ADU scoping may constitute a project change after the review period ends and prior to approval of the project.

195-8

**\*! # 4.15 PUBLIC SERVICES & 4.16 RECREATION: DEDICATED PARK:**

- **Sierra Madre Community Exclusive Park Use:** Sierra Madreans should have Exclusive Use with non-visible secured perimeters and surveillance to avoid all the direct and indirect impacts resulting from non-community users. In fact, the DEIR references the Park as a “Dedicated Neighborhood Park” ..... and also .....for “Project Residents and Nearby Residents.” Whereas parks are neighborhood and community benefits, they also can become places of destination resulting in overuse, poor maintenance, homeless encampments, etc. in detriment to the community and planned intentions.

195-9

DEIR Meadows Bailey Canyon Specific Plan Hickman Comments 10.04.21ver1.1.docx

- **Mature Landscaping at Installation:** The park requires a 20Ft matured landscaped buffer (as if the park had been there for 20 years, and as depicted in the City Council Update March 2021 and throughout the Development Documents); and should not include park physical uses (to mitigate privacy, noise, and light trespass) adjacent to existing residential.
- **Geometrical Barrier Design Issue:** The park presents itself as an amenity for the first row of houses, development mitigation buffer benefit and Quimby fee mitigation / enticement, rather than a community accessible park, because of its: 1) limited access on the East and West edges of a longitudinal land locked pocket park; 2) the leveraging of the existing Bailey Park – parking, toilet facility, etc.
- **Park Dedicated ADA / Toilet Facility:** Toilet Access and Toilet ADA compliance is not apparent in the DEIR documents and should not leverage / overburden existing Bailey Canyon’s unisex toilet; without DEIR collaboration and that Responsible Agency.
- **Inadequate Parking:** The 7 stalls depicted appear inadequate, with intentions to comeingle the existing parking at Bailey Canyon Park, with continuing overburden to North Grove Street.
- **Grading:** The Park should not have a vertical grade separation abutting the existing residential, to avoid vista down slope privacy issues into existing residential.
- **Site Elements:** The Park requires a solid 8 ft high fence, positive drainage to not trespass over adjacent private property, including landscaping and irrigation restoration to the existing residential side of the adjacency.

195-9  
Cont.

**\*I# 4.17 TRANSPORTATION:**

- **No Project Gates:** There should be no gates or if gates are acquiesced in benefit to the Developer, no manipulative design to present the park as if the Sierra Madre Community is not welcome.
- **No Vehicular Use of Existing Crestvale Drive:** Whereas the existing grades might accommodate road access to Existing Crestvale Drive, negating the intended use of West Carter Ave., that should be clearly stipulated upfront to avoid any deviation in the process. Images are an inadequate record and the narratives are not absolute.
- **No Vehicular Use of North Grove Street:** There should be “T” intersection public improvements (curb, gutter, physical barrier – not just “no right turn signage”) to prevent vehicular use of existing North Grove Street using a right turn from existing West Carter Ave. Inevitably, the intended “secondary ingress/egress” will result in a right turn by-pass short cut using North Grove Street to Grandview. North Grove Street Parking is already burdened by existing Bailey Park users, with a narrow vehicular free board. And, clearly residents on North Grove would not welcome “No Parking” because of the proposed projects overburden today or in the future. The Meadows Specific plan: 1) page 21 diagram: depicts exclusive tie-in and use of West Carter Ave., not North Grove Street, however certainty in public works improvements to preclude use and over burden to North Grove Street should be a mitigation in the EIR, and not simply deferred into the future to the Subdivision Process and City Engineer, because of its relevance. This should be enacted by way of narrative and detailed design throughout.
- **Certainty of Improvements to West Carter Ave.:** The Section 4.15.5 Impact Analysis is DEIR conceptual as to the proposed scope of West Carter Improvements and appears to be in conflict with Page 23 of the Specific Plan wherein narrated that the existing West Carter Ave. tie-in will remain as is (inferring no intentions to improve). West Carter Ave.: 1) appears to be less than 20Ft, is not a functioning street with failing pavement, has non-compliant lighting, no curbs – gutters – sidewalks, defective drainage and the linkage to Lima Street appears equally questionable. West Carter Ave. is designated as a secondary ingress and egress access throughout the Development documents, however that functionality will not exist unless improved and the Responsible Agencies – LA County Public Works, Flood Control, Parks, etc.

195-10

195-11

DEIR Meadows Bailey Canyon Specific Plan Hickman Comments 10.04.21ver1.1.docx

engaged early. West Carter Ave is narrated in the DEIR to be secondary ingress and egress and appears to be somewhat disingenuous given the realities of use and impacts. Just because the DEIR states secondary utilization, that is not certainty to mitigate the impacts to North Grove Ave and North Lima Street. The City Engineer and Public Works should provide input in the DEIR and not wait to parlay a solution in definitive design using the Subdivision process and Plan Check. West Carter Ave. improvements from the Development to Lima should be specifically identified as a cost of the Development not Sierra Madre taxpayers. Pages 57 and 109 in the Specific Plan conveniently does not address the West Carter Ave. tie-in Scope and should. Storm drainage conceptual design narrated in Section 4.19 Storm Drainage and depicted in Figure 3-7 in the DEIR, appears to use West Carter for surface water transport (see DEIR Section 4.19)

- **Vehicular Access tie-in at Carter and along Carter adjacent to the existing park:** A sound and headlights wall should be constructed along the existing residential. Any street lighting be designed to minimize / mitigate impact to residential property.
- **Provide Vehicular Traffic Flow PTV VISSIM Software Modeling Results:** to demonstrate vehicular impacts to N. Grove Street, FairView Ave, GrandView Ave, West Carter Ave, N. Lima Street, North Sunnyside Ave, etc.

I95-11  
Cont.

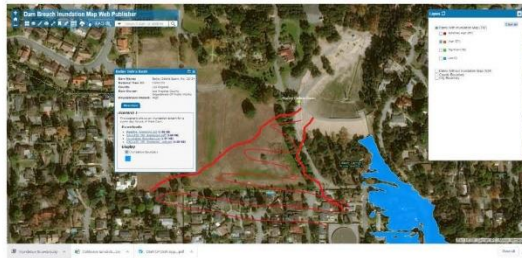
I95-12

**\*I# 4.19 UTILITIES AND SERVICE SYSTEMS – STORMWATER DRAINAGE:**

- **Proposed Underground Storm Water Retention Storage Gallery Under Park Risks and Ownership:** (Reference DEIR Figure 3-7 Proposed Drainage Plan): The 63,500 cu.ft., 2400 lineal feet long, 63500 cu.ft., 5ft diameter, underground storm water retention storage “infiltration” gallery should be identified upfront as a cost and risk obligation to both the Developer, in the Final Map and HOA CC&R’s / Bylaws. It should be, in perpetuity, insured for performance, anomalous miscalculated filtration and infiltration, instantaneous failure impacts, and have a cost strategy / accountability for ongoing maintenance / inspections and replacement. The seismic location imposes a higher degree of hazard and impact to such a structure, proposed at a higher elevation (be it underground) to lower elevation existing residential properties and downstream drainage infrastructure. Additionally, a sustainability storm drain structure with good intentions to not impact and overburden the existing infrastructure may in fact be more detrimental to the existing infrastructure and water quality treatment as proposed with negative impacts to the aquifer. Sierra Madre has anecdotal history of contaminated wells and aquifer.
- **Stormwater New 24-inch Surface Culvert at Crestvale Drive Drainage Pathway Problem and Eyesore:** Referencing Page 4.19-14 of the DEIR, the proposed stormwater assumed overflow (if not retained) out of the proposed retention storage structure (gallery, percolation tank or otherwise is unclear) under the park..... thru a new 24-inch surface culvert, will more than likely inundate the surface flow capacity of Crestvale and basin structures in Fairview Ave. with addition inundation of the downslope properties along Fairview, addresses 480, 470, 460, 450. A positive design with underground pipe in Crestvale Drive should be implemented with connection to the existing stormwater structures in Fairview.
- **Bailey Canyon Debris Basin Bread and Inundation Risks to Project: BASIN Failure:** The DEIR does not reference adjacent risks of relevance and mitigations resulting from a possible Bailey Canyon Debris Basin failure or inundation (see enhanced referenced image found below). If the perfect one-hundred-year storm were to occur, compromising both the Storm Water Retention Storage Gallery under the Park and also a breach to the Debris Basin there would be a neighborhood catastrophe. Absent of the Storm Water Retention Storage Gallery compromise there would be impact as well. The DEIR should address this and include mitigation measures.

I95-13

DEIR Meadows Bailey Canyon Specific Plan Hickman Comments 10.04.21ver1.1.docx



195-13  
Cont.

**9. REFERENCES: SECTION 4.7: GEOLOGY AND SOILS: APPEARS MYOPIC**

- **Omission of Plain and Obvious Public Records:** The DEIR, including its References appear to be myopic regarding site-specific seismic on-site faults hazards and history, noting that this project would not have come before the Community and City Legislators had there not been a catastrophic impact to the site and prior structures due to the Sierra Madre Earthquake Epicenter (at the project site?).
- **Sierra Madre Historical Preservation Society: Southern California Story: Seeking the Better Life in Sierra Madre, Michele Zack: Page 251: regarding the Sierra Madre 1991 Earthquake and the 3 Story Monastery Building which was demolished (an image of the structure to be demolished is included in that citation).**
  - <https://smhps.org/archives.html>

195-14

END Page 7 of 7

DEIR Meadows Bailey Canyon Specific Plan Hickman Comments 10.04.21ver1.1.docx

## Response to Comment Letter I95

Individual  
Glenn Hickman  
October 4, 2021

- I95-1** The comment is an introduction to comments that follow. This comment requests the following comments (Comments I95-2 through I95-14) be included in the responses to comments of the Final EIR. As shown, the commenter's request has been recorded as part of this Final EIR.
- I95-2** The comment expresses concern about the project not being completed leading to community blight. The comment does not raise any issue concerning the adequacy of the Draft EIR. As discussed in Section 3.3.13, construction of the proposed project is anticipated to be completed in February 2025.
- I95-3** The comment expresses concern about certain responsible agencies not being identified in the application. Responsible Agencies are agencies that hold discretionary approval as part of the project implementation. Discretionary actions for this project are listed in Draft EIR Section 3.4 and responsible agencies are listed in Draft EIR Section 3.5. The Los Angeles County Flood Control District and Los Angeles Department of Public Works received the NOA for the Draft EIR. The California Department of Parks and Recreation and the California Department of Water Resources Division of Safety of Dams do not have any discretionary approvals required for this project and are not considered a responsible agency under CEQA.
- I95-4** The comment suggests that a bond alternative to purchase the property for a conservation park should have been included amongst the alternatives. Please refer to Response to Comment I26-10. The City appreciates the commenter's recommendation. However, the bond alternative would not meet most of the project objectives and given that the project does not result in any significant and unavoidable impacts, the bond alternative would not reduce or eliminate any significant and unavoidable impacts associated with the project. Per CEQA Guidelines Section 15126.6, an EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason. Draft EIR Chapter 8, Alternatives, considers four feasible alternatives, including the no project alternatives, that were considered by the City. In addition, the City notes that this comment includes economic issues associated with the suggested bond alternative that do not appear to relate to any physical effect on the environment.
- The comment also suggests that Alternative 2, considered in Draft EIR Chapter 8, Alternatives, would not be feasible given the faults near the property. It should be noted that the proposed project would take place on the same side as Alternative 2. Impacts related to geology and soils, including potential impacts associated with faults have been addressed in Draft EIR Section 4.7, Geology and Soils. A comparison of these impacts with Alternative 2 was included in Draft EIR Chapter 8.
- I95-5** The comment expresses concern about the geologic hazards on the project site. The comment states that Appendix E only appears to be a preliminary soils report. It should be noted that Appendix E of the

Draft EIR is a geotechnical report that includes analysis of the geologic conditions and constraints on the site. It should be noted that the excerpt from 4.7.2 that was provided in the comment states the definitions of Late Quaternary and Quaternary faults as defined by the Alquist-Priolo Earthquake Fault Zoning Act, it does not state that there are Late Quaternary faults on the site. Please refer to Response to Comment I36-7.

**195-6** The comment states that the geological history of the site was not complete and suggests that a detailed exploration be performed to rule out an on-site fault hazard. Information about the local geologic setting can be found in Appendix E of the Draft EIR. Please refer to Response to Comment I42-19 and I50-7.

**195-7** The comment states that the developer should be forced to secure earthquake insurance. As stated in Draft EIR Section 4.7, the impacts of seismic hazards have been reduced to less than significant levels, and no additional mitigation would be required. Requirement to obtain insurance is not within the scope of the required environmental analysis under CEQA. As such, no response is required.

**195-8** The comment suggests that there should be no accessory dwelling units permitted on the project site and states that additional ADUs should be specifically addressed through the CEQA process. Please see Response to Comment I28-5.

**195-9** The comment provides the following suggestions for the proposed neighborhood park: exclusive use for the City's residents; a mature landscaping installation; an-ADA compliant toilet facility; vertical grade separation above existing residential development; an incorporation of an 8-foot high fence. Additionally, the comment states that the park is not a community accessible park and has inadequate parking. The comment does not raise any issue concerning the adequacy of the Draft EIR. Final EIR Section 3.3.2 provides details regarding the proposed neighborhood park.

**195-10** The comment provides the following suggestions related to transportation: no gates; no access through Crestvale Drive; and no use of North Grove Street. It should be noted that access through Crestvale Drive will not occur as a result of the project. The comment does not raise any issue concerning the adequacy of the Draft EIR; therefore, no further response is required or provided.

**195-11** The comment expresses concern about Carter Avenue being used as a secondary ingress and egress to the project site and notes that the current state of West Carter Avenue needs improvement if it will be used as an ingress and egress before the implementation of the project and should be a cost paid by the development. Please refer to Global Response GR-5.

The comment also brings up issues not related to the adequacy of the Draft EIR, such as who would pay for development of Lima Street. The comment also provides a brief summary of the project's proposed stormwater plan. However, this comment does not raise any issue concerning the adequacy of the Draft EIR.

**195-12** The comment requests traffic flow modeling results that show project impacts on streets such as Grove Street, Fairview Avenue, Grandview Avenue, Carter Avenue, Lima Street, and Sunnyside Avenue. Appendix K, Traffic Conditions Analysis, of this Final EIR has been provided in response to public comments on surrounding street segments. It should be noted that Appendix K has been provided for informational purposes only and does not constitute new information under CEQA, nor does it change

or modify the findings of the Draft EIR. Please refer to Appendix K of this Final EIR for additional information on surrounding roadway segments and intersections analyzed and taken into consideration as part of the proposed project. Please refer to Global Response GR-6 .

**I95-13** The comment expresses concern about the performance of the stormwater retention storage gallery and how it would impact existing infrastructure connected to it. Additionally, the comment expresses concern about debris basin failure. As stated in Draft EIR Section 4.19, Utilities and Service Systems, through the implementation of the drainage plans, impacts to drainage facilities would be less than significant levels. In addition, the northeastern portion of the Mater Dolorosa Retreat Center, located north of the site, flows to the Bailey Canyon Debris Basin to the east and discharges into Arcadia Wash. The project site does not flow towards the Bailey Canyon Debris Basin.

The comment raises economic issues related to the proposed storm drain system that do not appear to relate to any physical effect on the environment. In addition, the comment misquotes the information presented on Draft EIR page 4.19-14 and states that the new 24-inch surface culvert would result in inundation. As discussed on page 4.19-14 of the Draft EIR, a 24-inch RCP would be located in the southeastern portion of the project site and would run in the east to west direction into the proposed retention gallery, within the proposed park. The proposed retention storage gallery would be approximately 24 inches below ground and will promote water quality treatment through infiltration. Stormwater that is not retained in the underground storage gallery retention system or infiltrated into the ground would be routed to the southeast corner of the proposed park and exit to Crestvale Drive via a 24-inch surface culvert to the MS4 downstream to Arcadia Wash. Flows would then be conveyed via the MS4 to the receiving waters of Arcadia Wash, an open concrete lined channel located approximately 1 mile southeast of the project site. Therefore, this proposed feature would not result in inundation.

Regarding impacts on the project associated with Bailey Canyon Debris Basin failure or inundation, it should be noted that this would be considered an impact on the project from the environment and not vice versa. Therefore, this would not be considered a CEQA issue.

**I95-14** The comment states that the references section for Draft EIR Section 4.7 does not include references about site-specific geological hazards. Please refer to Appendix E of the Draft EIR for references for geotechnical report and Chapter 9 for additional references used to prepare Draft EIR Section 4.7.

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Comment Letter I96

Comment Letter I96

I have reviewed the draft EIR, Zoning Amendment, Appendices and Specific Plan for the Monastery Project and make the following comments for inclusion into the public record.

I96-1

Project Impacts – It is the role of the PC and CC to ‘determine if the potential significant impacts of the project have been fully mitigated below a level of significance and if any alternative meets the key objectives of the Project while reducing environmental impact’. While the Draft EIR overwhelmingly claims that most project impacts are insignificant and the 6 that are potentially significant can be reduced through mitigation to insignificant, we will present detailed information that disproves this. We begin with a discussion of the Project Impacts.

I96-2

There are eight objectives of the proposed project. The Project does not meet five of them as outlined below:

Objective 1: Plans have not been submitted for ‘long range development’ as stated. This is a short term, one phase project. For many reasons which will be discussed further, this Project should not be considered a model for future development. The Project does not ‘ensure community compatibility with our small town character’ as the zoning and development standards proposed are significantly different from our residential zoning code and design standards.

I96-3

Objective 4: The objective of a ‘high quality community sensitively sited within the sites existing natural topography’ and ‘minimizes traffic impacts to adjacent sites’ fails on both counts. The project will destroy all existing natural topography and replace it with three levels of grading for three rows of concrete pads; the widening of two roads and the addition of three; and will remove over 100 mature trees and all vegetation and wildlife habitat from the site. Critically, the Project provides no information, no traffic studies, no plans, no recommendations, nothing to minimize traffic impacts to adjacent streets. In a glaring omission, the Project fails to mention impacts on neighbouring streets.

I96-4

Objective 5: This objective purports to ‘dedicate approximately 30 acres of hillside open space directly behind the Retreat Center in order to preserve Colby Canyon.’ This objective fails on two points: a) Portions of the land to be donated do not belong to the Monastery property, but to Pasadena and Sierra Madre. And b) Colby Canyon is located in the Angeles National Forest approximately 24 miles north of the property and has no discernible relationship to the Monastery.

I96-5

Objective 6: The Project fails to provide ‘street improvements for safe efficient access from North Sunnyside Avenue’. North Sunnyside Ave begins at Sierra Madre Blvd and runs for 6 blocks north before entering private Monastery property. Per the Project Plan, street improvements are only made to North Sunnyside after it enters the private Monastery property, ignoring the 6 blocks south of the Project that will be used as the primary access to the property. The Project seeks only ‘safe, efficient access’ at the property line – not before, where it is needed the most.

I96-6

Objective 7: This objective claims a ‘net zero impact on local water supplies to minimize burdens on existing City, infrastructure and environmental impact’. The project provides no details other than pre-purchasing 50 years of water at today’s price and storing it for future use. The Project provides no details on how it will meet real ‘net zero’ impact guidelines established by the US Department of Energy. <https://www.energy.gov/eere/femp/net-zero-water-building-strategies>. The Project fails

I96-7

to provide details on how it 'minimizes burdens on City's infrastructure' and 'minimizes impact on the environment'.

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Cont.

It is recommended that the Planning Commission and City Council request the missing supporting details and information from the developer before discussing the Discretionary Actions that are required as the Project does not realistically and honestly assess the projects impacts on the community.

196-8

The Project discusses the following potentially significant impacts and purports to address them to less than significant thru mitigation. Attempts to do so fail in the following areas.

**Aesthetics**

***Would the project have a substantial adverse effect on a scenic vista?***

Yes, the Project would block current views of the San Gabriel Mountains from the neighbouring homes on the west and south side of the development. The Project is comprised of a majority of two story homes that would compromise the views that the homeowners now enjoy. The vista from the park area would be minimal as it is the lowest point of the project. When the park trees are mature, they would block visibility to the mountains.

196-9

**Biological Resources:**

***Would the Project have a 'substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive or special status species in local or regional plans, policies or regulation, or by the Ca Dept of Fish and Game or US Fish and Wildlife Service'?***

To answer this, a Dudek biologist conducted one field survey on May 29, 2020. Time unknown. The survey methodology is flawed as it only occurred on one day, time and duration both unknown. It is likely, however, that it was conducted during normal business hours 9 to 5. Many animals are visible in early morning, evening hours and at night. It is highly unlikely that a quick snapshot of any meadow area during our working hours will result in animal/bird sightings. For example, bats are off in the evening 20 minutes before dusk and the biologist would have to have bat detection devices that record the sonar pitch - which is different for each species. Townsend's Big Eared Bat is listed by the State of California. All bats need insects and water. If their survey was not done during the bat flight, it needs to be stated. Bats are not present if there are no insects to feed on. As noted below, the California Department of Fish and Wildlife (CDFW) recommends a 'project-level biological resources survey provide a thorough discussion and adequate disclosure of potential impacts to bats and roosts from project construction and activities including (but not limited to) ground-disturbing activities (e.g., mobilizing, staging, drilling, and excavating) and vegetation removal'.

196-10

In addition, in December 2019, the project area was heavily sprayed with chemicals by the Monastery ostensibly to kill tumbleweeds. The result transformed a once beautiful green meadow occupied by ground squirrels, rabbits, snakes, gophers, deer, birds and coyote into a barren

196-11  
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uninhabitable wasteland. The pictures below show before and after the devastating impacts of destroying the food source and habitat of local wildlife.



196-11  
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It is not surprising that no wildlife or plant materials were found five months after the application of chemicals.

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| Cont.

Further, the survey did not address seed bank or lasting roots of native plants that are found at this elevation all across the foothills.

| 196-12

Appendix C1 lists 43 special-status wildlife species with recorded occurrences in the project site, with 37 listed under federal and/or California endangered species acts, noting that there is a low potential for occurrence due to lack of suitable habitat as illustrated above. Concerns about project impact on wildlife corridors, such as along the foothills of the San Gabriel Mountains were not addressed. CDFW notes that development occurring adjacent to natural habitat areas such as wildlife corridors could have direct or indirect impacts on wildlife. Impacts result from increased human presence, traffic, noise, and artificial lighting. Increased human-wildlife interactions could lead to injury or mortality of wildlife. For instance, as human population and communities expand into wildland areas, there has been a commensurate increase in direct and indirect interaction between mountain lions/bears and people. As a result, the need to relocate or humanely euthanize mountain lions and bears may increase for public safety. CDFW recommends that the developer thoroughly analyze whether the project may impact wildlife corridors. Impacts include habitat loss and fragmentation, narrowing of a wildlife corridor, and introduction of barriers to wildlife movement. Additional analysis is needed of the projects direct and indirect impacts on wildlife resulting from increased human presence, traffic, noise, and artificial lighting.

| 196-13

Eleven bat species were noted with low occurrence due to lack of habitat and noted that the pallid bat which roosts in trees 'would be expected to leave if the tree is disturbed'. No doubt, removing over 100 trees would result in loss of habitat and nesting for many birds and give them no other option but leaving. CDFW advises that numerous bat species are known to roost in trees and structures throughout Los Angeles County (Remington and Cooper 2014). In urbanized areas, bats use trees and man-made structures for daytime and night-time roosts. Accordingly, CDFW recommends the project provide measures to avoid potential impacts to bats. Bats are considered non-game mammals and are afforded protection by state law from take and/or harassment (Fish & G. Code, § 4150; Cal. Code of Regs., § 251.1). Project construction and activities, including (but not limited to) ground disturbance, vegetation removal, and any activities leading to increased noise levels may have direct and/or indirect impacts on bats and roosts. CDFW recommends a project-level biological resources survey provide a thorough discussion and adequate disclosure of potential impacts to bats and roosts from project construction and activities including (but not limited to) ground-disturbing activities (e.g., mobilizing, staging, drilling, and excavating) and vegetation removal. If necessary, to reduce impacts to less than significant, a project-level environmental document should provide bat-specific avoidance and/or mitigation measures [CEQA Guidelines, § 15126.4(a)(1)].

| 196-14

The impacts to Nesting Birds was labelled a 'potentially significant impact' and could occur 'if vegetation clearing and tree removal is undertaken during the breeding season from February 1 through August 31'. In addition, 'these activities would also affect herbaceous vegetation that could support and conceal ground-nesting species' 'Project activities that result in the loss of bird nests, eggs and young would be in violation of one or more of California Fish and Game codes and be potentially significant'.

The California Department of Fish and Wildlife recommends that the project 'avoid potential impacts to nesting birds. Project activities occurring during the bird and raptor breeding and nesting season could result in the incidental loss of fertile eggs or nestlings, or otherwise lead to nest abandonment'. They also recommend that 'measures be taken to fully avoid impacts to nesting birds and raptors. Ground-disturbing activities (e.g., mobilizing, staging, drilling, and excavating) and vegetation removal should occur outside of the avian breeding season which generally runs from February 15 through August 31 (as early as January 1 for some raptors) to avoid take of birds, raptors, or their eggs'.

There are no plans to follow these recommendations in the Draft EIR.

The CDFW states 'the biggest threat to birds is habitat loss and conversion of natural vegetation into another land use such as development (e.g., commercial, residential, industrial). In the greater Los Angeles region, urban forests and street trees, both native and some non-native species, provide habitat for a high diversity of 13 birds (Wood and Esaian 2020). Some species of raptors have adapted to and exploited urban areas for breeding and nesting (Cooper et al. 2020). For example, raptors (Accipitridae, Falconidae) such as red-tailed hawks (*Buteo jamaicensis*) and Cooper's hawks (*Accipiter cooperii*) can nest successfully in urban sites. Red-tailed hawks commonly nest in ornamental vegetation such as eucalyptus (Cooper et al. 2020).

The CDFW recommends surveys by a qualified biologist with experience conducting breeding bird and raptor surveys. Surveys are needed to detect protected native birds and raptors occurring in suitable nesting habitat that may be disturbed and any other such habitat within 300 feet of the project disturbance area, to the extent allowable and accessible. For raptors, this radius should be expanded to 500 feet and 0.5 mile for special status species, if feasible. Project personnel, including all contractors working on site, should be instructed on the sensitivity of the area. Reductions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.

The developer proposed the implementation of **MM-BIO-1** to reduce the impacts to nesting birds during construction as follows:

**MM-BIO-1: Nesting Bird Avoidance.** Initiation of construction activities (i.e., initial vegetation clearing) should avoid the migratory bird nesting season (February 1 through August 31), to reduce any potential significant impact to birds that may be nesting on the project site. If construction activities must be initiated during the migratory bird-nesting season, an avian nesting survey of the project site and contiguous habitat within 500 feet of all impact areas must be conducted for protected migratory birds and active nests. The avian nesting survey shall be performed by a qualified wildlife biologist within 72 hours prior to the start of construction in accordance with the MBTA and California Fish and Game Code. If an active bird nest is found, the nest shall be flagged and

196-15

mapped on the construction plans along with an appropriate no disturbance buffer, which shall be determined by the biologist based on the species' sensitivity to disturbance (typically 50 feet for common, urban-adapted species, 300 feet for other passerine species, and 500 feet for raptors and special-status species). The nest area shall be avoided until the nest is vacated and the juveniles have fledged. The nest area shall be demarcated in the field with flagging and stakes or construction fencing. A qualified biologist (with the ability to stop work) shall serve as a construction monitor during those periods when construction activities will occur near active nest areas to ensure that no inadvertent impacts on these nests occur.

I96-15  
Cont.

We would argue that this is another example of a mitigation measure that does not conform to CEQA Guidelines that is feasible, effective, manageable and fully enforceable in order to be effective and successfully implemented to achieve the desired result.

In conclusion, the Biological Resources Report failed to provide a thorough discussion of direct, indirect, and cumulative impacts affecting project biological resources. There was no discussion regarding Project-related indirect impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats or riparian ecosystem. Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas were not discussed or evaluated. There was no discussion of the potential adverse impacts from lighting, noise, use of chemicals or temporary and permanent human activity.

I96-16

***Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?***

The Project response is that the removal of 10 protected trees onsite would result in 'potentially significant impacts'. However, after mitigation, it is reduced to 'less than significant'.

Removing over 100 trees is a significant environmental impact, not only to the Monastery property, but to the neighbouring community as well. Four goals and objectives of the City's General Plan relative to trees support this position:

Goal 1: Continued preservation and protection of existing trees.

Goal 2: Increase of the City's community forest.

Objective R10: Maintaining and enhancing the City's significant tree resources.

Policy R10.2. Continue to develop tree preservation and protection measures.

I96-17

The project fails to meet these critical goals and responds with the same sentence: "The Specific Plan includes a Tree and Planting Plan which includes the planting of new trees and will adhere to the City's Tree Preservation and Protection Ordinance," which includes replacing only 10 trees as they are protected. The Project does not value the contribution that the remaining 90+ trees have for the environment and the community. This does not mean they do not have unique qualities or declining numbers and are very likely important to our environment. Mature trees have deeper roots established over decades and deeper roots are more resistant to drought and to other effects of climate change. As this Project is in a very high fire zone, it is important to note that mature trees

of any kind are much more resistant to fire given their thick bark and elevated crowns. Young coast live oaks cannot survive fire, but old mature ones can.

196-17  
Cont.

The project disregards Goal 1 completely by removing over 100 mature trees, making it impossible to preserve and protect them. It appears that 100% of the trees on the project will be removed. No attempts to preserve and integrate them into the project have been made. All of the 101 trees are part of an ecosystem developed over decades. Removing them will have a negative effect on other plants and animals that has not been thoroughly studied in this DraftEIR.

***Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?***

196-18

Yes, the Project conflicts with the LA County Sustainability Plan as it fails to ensure a climate-appropriate, healthy urban tree canopy that is equitably distributed. The urban forest is an essential part of a healthy community, made up of trees on both public and private lands. Spread equitably and supported by other urban greening measures, a well-managed urban forest throughout LA County can deliver healthier soils, biodiversity, habitats, shading from heat, and greater community health and well-being. The Plan prioritizes resilient, climate-appropriate trees, understory vegetation, and native biodiversity. The plan conserves mature trees and properly manages resources to ensure that trees thrive in our urban environment. Removing over 100 trees conflicts with this plan.

***Would the project have a cumulative effect on biological resources?***

196-19

The Project has a cumulative effect on biological resources. This property is the largest undeveloped parcel of land left in Sierra Madre. With the approval of the Stonegate Project to build 29 homes at the base of the foothills to the east, the value of this parcel in its present state has increased significantly.

If it is developed, this parcel will destroy the natural habitats of the native plants and animals that have depended on this area for almost 100 years. If approved, this development will be situated on the very last large parcel of land in the Eastern San Gabriel foothills, a significant loss for all of us. The Water Conservation Authority ranked the Monastery property very in high in conservation value in their Foothills Open Space Acquisition Study due to its watershed value, adjacency to protected lands, and potential for habitat restoration.

**Cultural Resources**

***Would the Project have a cumulative effect on cultural resources?***

196-20

As the Project area is at the base of the foothills on sloping land, there is a distinct possibility that indigenous people lived in this area and have left behind evidence of their presence that will give us

greater insights into them. Historical maps show the existence of springs. The area hasn't been surveyed. The age of the soil, gentle slope and access to water make it likely the area was inhabited. Sensitivity mapping of local foothill areas show high sensitivity in the Monastery area and the site is a high priority for a cultural resource study. Bulldozing the area and building 42 homes, roads, driveways and sidewalks would destroy the opportunity to learn more about the cultural resources this area may offer.

196-20  
Cont.

**Energy**

*Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?*

Yes, the Project fails to incorporate high performance building standards for new County buildings beyond the current LEED Gold standard, such as Passive House, Zero Net Energy, Net Zero Water, Net Zero Waste, the Living Building Challenge and the WELL Building Standard. The Project incorporates the minimum standards required by current building codes and does not work to elevate the Project.

196-21

**Greenhouse Gas Emissions**

*Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

Yes, the project conflicts with the LA County Sustainability Plan. The 2015 LA County Greenhouse Gas Emissions Inventory, a component of the LA County Sustainability Plan, states that Greenhouse Gas Emissions from Transportation total 42% of all emissions. The project does not address the reduction of these emissions in its project as its occupants would be totally dependent on vehicles for transportation, as the project runs counter to current state wide efforts to construct housing with ½ mile of public transportation.

196-22

**Hydrology and Water Quality**

*Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?*

The Watershed Conservation Authority (WCA), states that imported water is not as sustainable as ground water. Building structures will compromise the ability to sustain the water. Reducing the amount of land and increasing the amount of storm water if this water has to be imported; will have to be cleaned, which is expensive for the taxpayers.

196-23



Create an integrated and resilient water system Water management in LA County today reflects a historically siloed view that failed to recognize the interconnectedness of all water, including groundwater, surface water, rainwater, and wastewater. This approach has led to a complex, disjointed system that is not well-suited to adapting to the needs of a rapidly growing region and changing climate. Building on the successful passage of the Safe Clean Water Program (Measure W), which promises to support an integrated and holistic approach to storm water management, the region must invest in a 21st-century water system that prioritizes multi-benefit management strategies that restore and mimic natural processes and cycles.

196-23  
Cont.

***Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?***

The Watershed Conservation Authority (WCA) advises that this development is situated on *the very last large parcel of land in the Eastern San Gabriel foothills which retains a connection between the canyons and the alluvial fan*. Alluvial fans have particularly high rates of infiltration as water can sink deep into the ground and recharge aquifers. Protecting the remaining recharge areas such as the Monastery undeveloped is a critical part of protecting our region's watersheds. This land was ranked very in high in conservation value in the agency's Foothills Open Space Acquisition Study due to its watershed value, adjacency to protected lands, potential for habitat restoration, and for public access. The Project will cover the existing 20 acre parcel with 42 building pads, driveways, sidewalks and roads that will substantially impact the percolation of rainfall levels into the ground. Collecting water in two 36 inch drains and discharging it into a water gallery at the southernmost end of the property interferes with groundwater recharge. Any excess will be sent into the city's storm water system.

196-24

***Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on or off site;***

***Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?***

No, at this time the city cannot buy any additional water for this project under the NetZero Impact Plan. The entire State of California is in a drought, reservoirs are at an all time low and mandatory water conservation is in effect in many cities at this time. It is expected that more cities will be making conservation demands of their communities with no extra water available for purchase in the foreseeable future. Even if water were available, the Net Zero Plan is misleading as it gives the impression that there is no water use and the impact on the City will be zero. This is not true. As the Project argues the value of its 'net zero' water usage, the project will have double the impact on water usage as it plans to now buy all the water it needs for the next 50 years and store it for future use, while homeowners will still use and pay for municipal water going forward. At the present time there is no water available for purchase. Given the present drought conditions, there is no guarantee

196-25

that this is a viable option going forward. California is in a drought, reservoirs are at an all time low and mandatory water conservation is in effect currently in many cities. It is just a matter of time before the Governor implements restrictions in southern California. The Project fails to provide a convincing argument that storing water today results in net zero water usage, as homeowners will still use and pay for municipal water going forward.

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I96-25  
Cont.

**Land Use and Planning**

***Would the project physically divide an established community?***

Despite its efforts to be Sierra Madre compatible and seamlessly integrate the Project into the community, the Project fails to do so in its attempts. Its design creates four physical 'buffers' on all sides of the property that create artificial barriers distancing the Project from its neighbours. Despite frequent use of the word connectivity, the Project fails to show discernible linkages for pedestrians and bicyclists. Even the park has no pedestrian linkage to the Sunnyside neighbourhood to the south or the Bailey Canyon Park to the east. The Project sidewalks end at the Project resulting in pedestrians walking a narrow street with no sidewalks to access the park. The Project result is a Project that sets itself apart from the established community and gives the impression of a gated community without the gate. The Project failed to accept the challenge of creating a cohesive, complementary development with a vision that is truly 'Sierra Madre quality'.

I96-26

**Transportation**

***Would the project result in inadequate emergency access?*** The project results in inadequate emergency access from Carter Avenue. The road has no sidewalks and is not wide enough to accommodate the confluence of cars leaving the area during an emergency and the emergency vehicles trying to enter.

I96-27

**Wildfire**

***Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?***

***Due to slope, prevailing winds, and other factors, would the project exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?***

One of the goals of the LA County Sustainability Plan is to 'Limit development in high climate-hazard areas'. Development locations should be carefully scrutinized with consideration for climate hazards such as wildfire, flooding, extreme heat, and sea level rise. Climate science allows us to identify the areas that are most at risk, including floodplains and the urban-wildland interface at the edge of developed areas. Wildfire is an integral component of ecological processes in LA County, but it is also on the rise due to hotter temperatures and changing precipitation patterns, posing a risk to

I96-28  
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lives. LA County is already seeing longer droughts punctuated by intense rain events, which not only increases fire risk, but leads to flood vulnerability. In planning for these climate-related hazards, it is important to ensure large-scale development avoids areas prone to these risks.

As personally witnessed by residents, the western portion of the Monastery field is recognized as an emergency landing site by both Search and Rescue and responding fire departments. The Search and Rescue statistician estimates that they use this important staging area for their vehicles and attendant air rescue helicopters once every two years.

**Objective Hz7 – “Avoid expanding development into undeveloped areas in a Very High Fire Severity Zone.”** The Project is inconsistent with this objective of the General Plan and precludes the development of this parcel below the Monastery. This objective is crystal clear and no development should be considered in this location for the safety of all Sierra Madre residents.

196-28  
Cont.

**Would the project expose people or structures to significant risks, including down slope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?**

Yes, it is highly likely that the Project area would be the victim of flooding or landslides following heavy rain after a fire has destroyed the hillsides.

196-29

**Would the project have a cumulative effect on wildfire?**

The Project would have a cumulative effect on wildfire as it provides a new fuel source for a hungry fire that would endanger the rest of the community. To try and reduce the fuel for future fire events, the California Conservation Corp has spent weeks clearing brush and trees from the Bailey Canyon area adjacent to the property. As of the morning of October 4<sup>th</sup>, crews from LA County were working the debris basin removing brush and trimming trees in Bailey Canyon. It seems counter intuitive to spend thousands of man hours removing fuel from the area and then approve a 42 unit fuel-intensive project that would replace an open meadow that has little to no fuel. The Project would provide a ‘gateway’ for a fire to flow south down the mountain by prevailing winds, ignite homes and because of the large amount of fuel, and endanger all homes on nearby streets.

196-30

**Project’s Consistency with City of Sierra Madre’s General Plan Goals and Policies**

The Draft EIR responded to selected General Plan Goals, Policies and Objectives and responded that the Specific Plan is consistent with the majority of them as noted in Section 4.11.1 Projects Consistency with City of Sierra Madre’s General Plan Goal and Policies. The Project believes it is Consistent with all but three of the City’s General Plan Goals. These include importing water from SGVMWD, no bicycle facilities and removing over 100 mature trees on the property. The following review and comments show that there are a number of inconsistencies between the General Plan and the Project Specific Plan.

196-31

**Chapter One: Land Use**

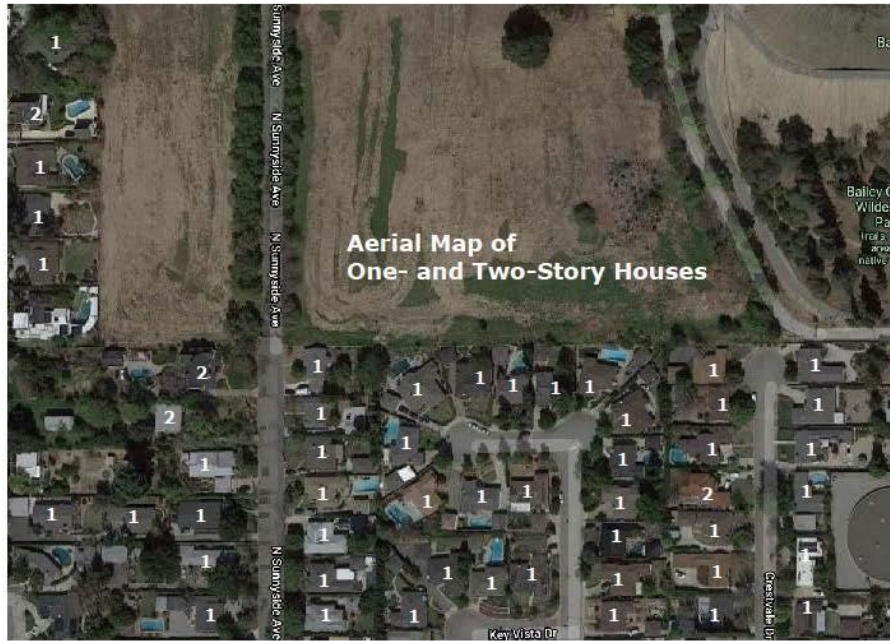
The Zoning Map Amendment which is required to change the zoning from institutional to residential states that 'The subject property is currently surrounded by single family residential land uses to the west and south. As such, the proposed project is consistent with existing adjacent land uses'. The Project is not consistent with existing adjacent land uses as the subject property is bordered by an institutional facility and open space to the north on 71 acres as well as a Wilderness Park, debris basin and open space to the East.

**Goal 2: 'Preserve and enhance the diversity in the character of residential neighbourhoods ensuring that new development is compatible in its design and scale with older established development in the surrounding neighbourhood without attempting to replicate or mass produce a style of development'.**

*DraftEIR Response: 'The Specific Plan would assist in the implementation of this Goal through the provision of development regulations and design guidelines, which would be compatible with existing surrounding neighbourhoods'.*

My Response: The majority of lot sizes and square footage of the houses do not enhance or preserve the diversity of the adjacent residential community as it is not compatible in design or scale with established nearby homes. There are 51 one story and only 4 two story houses in the neighbourhood. The opposite is currently planned for the Project, with the majority being two story and the rest one story as shown in the picture below. Neighbouring homes have larger setbacks, no sidewalks or parkways, mature trees and many design styles, not four. The resulting look and feel of the project will be 'cookie cutter' and stand out noticeably on the hillside.

196-32



**Goal 3:** 'Ensure that development is done in harmony with its neighbourhood, and preserves and protects privacy and mountain views of neighbouring properties'.

*Draft EIR Response:* 'Consistent. The Specific Plan includes development regulations and design guidelines for the project site created to be compatible with the surrounding neighbourhood. The development will be designed in a manner that is sensitive to scenic viewpoints and/or view sheds through building design, site layout and building heights'.

The project is not harmonious or compatible with the nearby neighbourhoods in lot and home sizes and is deliberately isolated on all four sides with 'buffer zones' that create physical barriers from the community. The Project is very similar to a gated community but without the gate. There is little to no integration with the neighbourhood. The project claims it is 'sensitive' to scenic viewpoints but fails to provide any supporting details. 'Sensitive' is not the same as 'consistent.' The Project is not consistent with this goal without convincing detail.

196-33

**Goal 4:** 'Ensure that development is done to maximize water conservation practices to reduce and minimize the impact on the City's local water supply and the ability to serve its water customers'.

196-34

*Draft EIR Response: 'Consistent. The development would comply with City requirements by having net zero water usage for the first 50 years after construction. Additionally, the project would include the incorporation of green infrastructure into the design to promote water conservation'.*

As the project argues the value of its 'net zero' water usage, the project will have double the impact on water usage as it plans to now buy all the water it needs for the next 50 years and store it for future use, while homeowners will still use and pay for municipal water going forward. At the present time there is no water available for purchase. Given the present drought conditions, there is no guarantee that this is a viable option going forward. California is in a drought, reservoirs are at an all time low and mandatory water conservation is in effect currently in many cities. It is just a matter of time before the Governor implements restrictions in southern California. The Project fails to provide a convincing argument that storing water today results in net zero water usage, as homeowners will still use and pay for municipal water going forward.

More to the point, the Project fails to implement the strategies established by the Department of Energy in their Net Zero Water Requirements as follows: A net zero water building is designed to:

- Minimize total water consumption
- Maximize alternative water sources
- Minimize wastewater discharge from the building and return water to the original water source.

Net zero water creates a water-neutral building where the amount of alternative water used and water returned to the original water source is equal to the building's total water consumption.

However, if the building is not located within the watershed or aquifer of the original water source, then returning water to the original water source will be unlikely. In those cases, a net zero water strategy would depend on alternative water use. Alternative water is a sustainable water source not derived from fresh-, surface-, or groundwater sources. Alternative water includes:

- Harvested rainwater, storm water, sump-pump (foundation) water
- Gray water
- Air-cooling condensate
- Rejected water from water purification systems
- Reclaimed wastewater
- Water derived from other water reuse strategies.

A net zero water building uses alternative water sources to offset the use of freshwater.

A net zero water building closes the loop on the water system by returning water to the original water source. Wastewater can be treated and recharged. Storm water can also recharge the original water source.

'Net zero water usage' is a moving target that seeks a solution that will stick. First, it was encouraging all city residents to use 'low flow' devices to reduce their water consumption, but the City Manager advised that it would be too difficult and time consuming to implement and manage. Then, it was defined that the project would buy (at today's prices) all the water needed for the next 50 years based on today's consumption. As clarified later in this document, the Project fails to

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incorporate the Department of Energy’s guidelines on Net Zero Water into the development. As of today, net zero water usage still seeks a valid, practical solution that can be implemented to meet this goal.

**Goal 5: ‘Institute conservation measures so that the demand for water matches the City’s local supply’.**

*The Project repeatedly uses the following sentence: “The project would achieve a net-zero impact on local water supplies to offset the demand placed on existing supplies and provides supplemental water to the City, available to serve the public”.*

That sentence is used to answer all the following Policies and was discussed in detail above:

**Policy L1.1.6 “...new residential development... .. reduces and minimize the impact on the City’s water supply and its ability to serve its water customers”**

**Policy L4.3: “Ensure new development... .. incorporate water conservation measure that reduce and minimize the impact on the city’s water supply and its ability to serve its customers”**

**Policy L8.3: “Consider a water impact fee to apply to new residential dwelling units... .. to fund water fixture retrofits of existing homes and other water conservation measures”**

In addition to answering using the above sentence, no water impact fee is being assessed.

**Goal 8: ‘Preserve existing and provide additional constructed and natural open space’.**

*DraftEIR Response: Consistent. The project would comply with the City’s Goal of providing additional open space. The Specific Plan establishes open spaces zones on the project site, including the incorporation of a public park at the southern area of the Plan area, and includes the dedication to the City or other perpetual conservation of approximately 45 acres of open space hillside land.*

The Project is not consistent because it reduces the amount of open space by destroying the 17 acres of meadow open space in order to construct 42 homes, streets, parkways, driveways and sidewalks. The project further misleads by defining open space as individual balconies. An over-developed ‘park’ of less than 3 acres sandwiched between two residential areas as a ‘buffer zone’ is on the low end of meeting criteria for ‘open space’. Further, it is known that portions of the 45 acre donation of open space are already owned by the city of Sierra Madre and another section is within the boundary of the city of Pasadena.

**Goal 9: ‘Preserve the hillside areas in order to protect the environment and mountain views, obtain a balance between developed areas and the hillside wilderness, and establish the role of the hillside as an entry point into wildland areas’.**

*DraftEIR Response: Consistent. The Specific Plan includes the dedication to the City or other perpetual conservation of approximately 45 acres of open space hillside land to the north of the Mater Dolorosa Retreat Center.*

The Project is not consistent because the hillside areas are unbuildable and not pertinent to the developer’s response. The dedication of 45 acres does not meet this goal as there is no ‘balance’

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between the project and the hillside wilderness; there is an institution on 23 acres between the project and the wilderness. In addition, nowhere does the project establish the role of the hillside as an entry point into wildland areas. In fact, it presents misinformation in its project objectives to preserve Colby Canyon and Trail for wildlife movement as Colby Canyon is located in the Angeles National Forest approximately 24 miles north of the property and has no discernible relationship to the Monastery.

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**Objective L1: 'Continuing the existing pattern of residential housing development'.**

*Draft EIR Response:* Consistent. The Specific Plan assists with the implementation of this Objective as it creates similar low-density residential and open space land uses as compared to those surrounding the Plan area.

The Project is not consistent with this Objective as existing neighbourhood housing patterns feature a preponderance of one story homes. This Project features a majority of two story homes. The Project contains sidewalks, parkways and full size streets. (46 feet) Surrounding streets patterns contain several road widths from small (20 feet) wide (Carter Avenue) to medium size ( ) Grove Street.

Only within its project boundaries is there a noticeable pattern of repetitive housing styles.....cookie cutter homes.....similar square footage on similar lot sizes on same size streets.

Objective L4 – The Project is not consistent as it fails to 'conserve the existing tree canopy or increase shade tree canopy' or 'preserve and enhance community aesthetics and property values thru increased canopy cover' as per the City's Community Forest Management Plan. The project does, in fact, remove over 100 of the existing trees, some of which are close to 100 years old. The proposed project trees are a poor replacement for the existing mature trees as the majority are small to medium size trees with limited canopy. Several species require high water to survive. The project is inconsistent as it purports to dedicate land that does not belong to them.

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Policy L4.2 – The project is inconsistent with both the General Plan and current zoning, in that it requires substantial amendments to both. So much so, that it necessitates creation of a Specific Plan that overrides the General Plan that was created by over 100 Sierra Madre citizens over a 5 year period.

Policy L5 and Policy L5.1– The Project is inconsistent with existing grid patterns as it establishes an inverted 'U' pattern criss-crossed by 3 horizontal, same size roads A, B and C. This pattern does not exist at the northern part of the city.

Policy L6 and L6.2 – The Project is not consistent, 'harmonious or compatible with the nearby neighbourhoods' in both lot and home sizes. Being 'sensitive' to scenic viewpoints is not the same as protecting privacy and mountain views of neighbours. What does this mean? Sensitive is not the same as consistent. The EIR states that the Project would 'appear to be consistent' with the visual environment. It does not as neighbourhoods have mature trees throughout and the Project puts more homes in the same amount of space. it seeks to cram twice as many homes into space as neighbouring streets. 'Appears to be' is not the same as 'is consistent'.



Policy L7 – Development is not consistent with neighbouring homes which are mostly one story. .  
The project shows only pictures of 2 story homes and does not provide location of any possible one story homes.

Policy L7.2 Project is inconsistent with General Plan as it disregards the General Plan and substitutes its own Specific Plan.

Policy L7.4 – Project is not consistent with General Plan as it ignores established setbacks and creates its own. ‘Complement’ is not the same as ‘consistent’. Landscaping is not consistent and does not reflect Sierra Madre vegetation patterns as the project removes all mature trees that would help facilitate the integration of this project into the surrounding neighbourhood.

Policy L8.3 - Project is not consistent as it fails to ‘implement a water impact fee to fund retrofits of existing homes.’ As the project argues the value of its ‘net zero’ water usage, the project will have double the impact on water usage as it plans to now buy all the water it needs for the next 50 years and store it for future use. At the present time there is no water available for purchase. Given the present drought conditions, there is no guarantee that this is a viable option going forward. Homeowners will still use and pay for municipal water going forward. The Project fails to provide a convincing argument that storing water today results in net zero water usage.

Policy L17 – The project is inconsistent as it fails to protect existing views and uses the word ‘sensitive’ to describe its attention to the hillside without describing in concrete terms what this means; but appears to be a work around ‘consistent’

Policy 17.2 – The project is not consistent with this policy as it requires the use of detached garages and all of the home designs show the garage attached to the home.

Policy L 20 – The project is not consistent as it does not maintain ‘mass and scale with existing Sierra Madre homes’ on the south and west as project homes are larger and lots smaller.

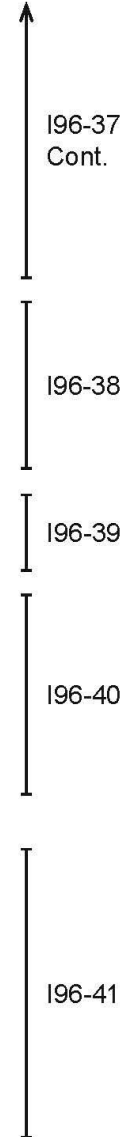
Policy L 20.1 – The project is not consistent with surrounding development, as it does not ‘maintain existing front yard setbacks’ and creates smaller, alternate ones in the Specific Plan.

**Historic Preservation**

Objective L44 – The project is not consistent with ‘preserving natural open space areas’ because it proposes to destroy 17 acres of meadow open space in order to construct 42 homes, streets, driveways and sidewalks. An over-developed ‘park’ of less than 3 acres sandwiched between two residential areas as a ‘buffer zone’ is on the low end of meeting criteria for ‘open space’. Further, it is known that portions of the 45 acre donation of open space are already owned by the city of Sierra Madre and another section is within the boundary of the city of Pasadena.

Policy 44.1 – Project is not consistent with ‘support the purchase of hillside property’ and so states.

Objective 45 - The Project is not consistent as it does not ‘acquire additional natural open space area’. It, in fact, destroys 20 acres of current open space.



Housing:

Goal 1.0: The Project is not consistent as it does not ‘maintain and enhance the quality of existing housing and ensure that new residential development is consistent with Sierra Madre’s small town character’ or Goal 2.0: ‘Facilitate the provision of a range of housing types to meet community needs’. The Project will look oddly out of place as it is designed with buffers on all four sides that will isolate it from the community at large. The Project repetitively repeats four housing styles in a cookie cutter pattern that is not representative of existing housing. The Project puts larger homes on smaller lots and creates density that exceeds local housing standards.

Policy 1.1: Maintain sustainable neighbourhoods with quality housing, infrastructure and open space that fosters neighbourhood character and the health of residents.

Policy 2.1: The Project is not consistent with ‘encouraging diversity in the type, size, price and tenure of residential development in Sierra Madre, while maintaining quality of life goals’ as the Project provides only similar sizes and similar pricing in the range of \$3 to \$5 million. The Project does nothing to assist the City in meeting its regional housing numbers as it only addresses housing in the above moderate range and ignores 75% of the housing required. The Project proposes development that is now considered to be outdated and inconsistent with current housing goals.

Policy 2.2: The Project does not provide ‘adequate housing sites through appropriate zoning and land use designations, consistent with Sierra Madre’s regional housing growth needs’. The Project is not consistent with the intent of this state wide mandate as it only addresses one of the four housing needs - above moderate. It does nothing to address very low, low or moderate housing growth needs, so desperately needed in California.

Policy 2.5: The Project is not consistent with this Policy to ‘encourage the construction of new, well designed second units in residential zones’ as a means of addressing a portion of Sierra Madre’s regional housing needs. The Project does not address the impact that second units would have on the Project.

Policy 5.3: The Project is not consistent as the proposed plan states that it is possible for any of the homes to use solar panels, however it is not the plan that they all have them or that any of them have them. So the proposed plan does not promote the use of such alternatives, and so is inconsistent with the General Plan policy.

Policy 5.4: The Project is inconsistent with this policy as it does not incorporate ‘transit and other transportation alternative such as walking and bicycling’ into the design. The project has a “mobility plan” which is simply roads and sidewalks within the new project. There is no plan for alternatives and no continuity with the neighbours.

Circulation:

Goal 1: The project is not consistent, as the ‘balanced transportation system’ only addresses vehicular and pedestrian travel with roads and sidewalks and on-street parking. There are no plans

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for bicycle lanes. The word 'system' implies connectivity with the surrounding neighbourhoods, but there is no pedestrian linkage as the surrounding streets do not have sidewalks and there is no practical access to transit systems.

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Goal 2: The project is not consistent as it does not 'promote safe and well-maintained streets' and addresses only the streets within the project and does not address the many safety issues this project will cause for streets surrounding the project. It says nothing about the impact of safe and maintenance as the result of 3-400+ car trips on neighbouring streets and the residents of Carter, Lima, Grove and Sunnyside. A thorough analysis of these impacts needs to be completed to fully understand the projects safety issues on the neighbouring community. Two areas need to be addressed:

How the project would implement street sections that slow traffic.  
How users would differentiate between the main Sunnyside entrance and the ingress/egress secondary access road, Carter Avenue.

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Goal 3: The project is not consistent as it does not 'preserve quiet neighbourhoods with limited thru traffic'. It repeats the same cut and paste responses for the above two goals. In reality, the project does nothing to preserve quiet surrounding neighbourhoods to the west and south. It does, in fact, increase thru traffic by a minimum of 300-400+ car trips a day, an increase of over 300%. To get to the project, the cars will have to travel local streets including Sunnyside, Lima, Carter and Grove. There is no mention of the impact of traffic on these streets. A study needs to be conducted to study the impacts of the development on adjacent streets.

Once again, the response only addresses traffic within the project itself and not its impact on the community.

Objective L51: The project is not consistent as it does nothing to 'address cyclists or pedestrians in their 'balanced circulation system' and there is no connectivity for pedestrians or bicyclists from the project into the community at large. The Project is inconsistent as it fails to develop a multi-modal transportation system for pedestrians and cyclists.

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The project is so far out of range of public transportation that it is not a viable option. Owners that are able to afford to live in his neighbourhood are not likely to use mass transit, preferring to use their cars necessitating increased usage of surrounding.

Policy L51.2: The Project is not consistent with the policy to 'limit the development of new roadways or the expansion of existing roadways', as it fails both objectives. It creates two new roadways and expands 100 % of the existing roads in the project.

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Policy L51.5: The project is inconsistent with this policy to 'encourage and support the use of non-automotive travel throughout the City'. In reality, it is not addressing this in any way other than a limited myopic view of a 'circular system using non-vehicular modes of transportation in a system of pedestrian pathways within the project site'. Again, looking from the inside-out with no discernible impact on non-automotive travel throughout the City.

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Policy L51.6: The project is inconsistent as it does nothing to address non-vehicular travel. EIR needs to provide details how a buffer along existing adjacent homes encourages residents to walk and bicycle through the area.

Policy L51.8: The Project is inconsistent with this policy to 'prioritize improvements for nonvehicular modes like bicycles, pedestrians, and transit to eliminate the need for new or expanded roadways and intersection improvements like traffic signals'. There are no bicycle paths through the Project, no pedestrian connectivity with surrounding neighbourhood and the increased traffic on local roads will like require intersection improvements.

Objective L52: The project is inconsistent for its failure to 'improve streets to maintain levels of safety to vehicles, cyclists and pedestrians'. The proposed project is likely to result in transportation related hazards to both cyclists and pedestrians. The surrounding neighbourhood streets that feed into the project were not designed to handle an increase in traffic of 300-400+ additional car trips a day and the project does nothing to improve the safety of any of the existing residents of local streets nor does it address maintenance costs for those streets due to increased traffic. Per the LA County Sustainability Plan, total vehicle miles travelled is one indicator of an area's dependence on single-occupant vehicle travel. This mode of travel, while traditionally the most convenient option, is carbon- and resource-intensive. Average daily VMT has been trending upwards. In 2017 it was at nearly 21.9 miles per person per day.

Traffic fatalities and severe injuries are serious public health threats: on average, one person is killed every four days as a result of a traffic collision on unincorporated County roadways. Further, people walking and biking are the most vulnerable road users. In fact, traffic collisions are the leading cause of death for children in LA County and also place older residents at heightened risk. In 2015, there were 1,091 severe injuries or fatalities across LA County. (LA County Sustainability Plan)

It is also stated that the project would not result in impacts to existing levels of service at any nearby intersection. That is incorrect. It is highly likely that multiple stop signs will be required at the intersection of Carter and Grove to control traffic volume to prevent accidents.

Policy L52.8: The project is inconsistent as it fails to 'incorporate bicycle facilities into the design of land use'. The Project states that 'due to the small size and scope of this project, bicycle facilities would not be implemented. Although no bicycle facilities and improvements are proposed under the project, the project would not impact existing bicycle facilities in the vicinity of the project, including the existing bicycle lanes within Sierra Madre Boulevard. Nonetheless, because bicycle facilities would not be required, the project would be inconsistent with these policies'.

Policy L52.9: The project is inconsistent as it does nothing to implement 'sidewalk continuity with existing neighbourhoods'. There is no linkage from the project into the community. The lack of sidewalk continuity increases the isolation of the project from the rest of Sierra Madre and makes it inconsistent with the city's general plan.

Objective L53: The project is inconsistent, as it fails to 'protect local neighbourhoods from through traffic'. It does protect its future residents from through traffic - as the project is a stand-alone U-shaped community, but it ignores the tremendous impact on its residential neighbours. Interestingly, 'Carter Avenue would become an egress and ingress lane and would still allow access

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to the Mater Dolorosa Retreat Center'. This is a 100% change from its existing use as a small, 20 foot wide dead end road. 'unbelievably, there is no discussion of the increased traffic (300-400+ vehicle trips daily) caused by project residents on the surrounding residential neighbourhoods and how they will be protected from this intrusion of through traffic on Lima, Sunnyside, Carter and Grove. This is an unacceptable analysis of Objective L53.

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**Chapter Two: Resource Management**

**Hillside Preservation**

Goal 3: The Project is not consistent because it does not 'provide public access to the San Gabriel Mountains via parks, trails and roads.' The project creates the illusion of connectivity from the project park to Bailey Canyon Park. In reality, because the project is next to the Park, connectivity is achieved by walking or driving down Carter Avenue and entering the park. There is no special pathway; in fact, the Project sidewalk ends at Project boundary, forcing walkers on Carter, a 20 foot street with no sidewalks.

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Goal 4. - Energy Conservation The Project provides the bare minimum of 'sustainable development attributes for water and energy conservation' and stretches to be consistent with this Goal. The Project touts compliance with CALGreen, but mentions nothing about more stringent and environmentally-friendly LEED building standards.

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**Tree Preservation:**

- Goal 1 - Continued preservation and protection of existing trees.
- Goal 2 - Increase of the City's community forest.
- Objective R10 - Maintaining and enhancing the City's significant tree resources.
- Policy R10.2 - Continue to develop tree preservation and protection measures.

The project is not consistent with these four simple, easy-to-understand goals in the General Plan. Removing over 100 trees is a significant environmental impact, not only to the Monastery property, but to the neighbouring community as well.

The project fails to meet these critical goals and responds with the same 'cut and paste' sentence: 'The Specific Plan includes a Tree and Planting Plan which includes the planting of new trees and will adhere to the City's Tree Preservation and Protection Ordinance', which includes replacing only 10 trees as they are 'protected'.

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The project disregards Goal 1 completely by removing over 100 mature trees, making it impossible to preserve and protect them. It appears that 100% of the trees on the project will be removed. No attempts to preserve and integrate them into the project them have been made.

Goal 2, increasing the community forest - has been ignored by removing 100% of mature trees. Replacing fully grown trees that are food and habitat sources, with young, immature trees will not compensate for the loss of this irreplaceable community forest.

Objective R10.1 is disregarded by the project. Instead of maintaining and enhancing these valuable and priceless City resources, the developer has chosen to remove them. Instead of trimming and

shaping these mature trees for future generations to enjoy, they will be cut down and destroyed, a whole-hearted, irreplaceable loss for a recognized 'Tree City USA'.

The California Department of Fish and Wildlife (CDFW) recommends that the project 'avoid removal of any native trees, large and dense-canopied native and non-native trees, and trees occurring in high density and recommends avoiding impacts to trees protected by the City's Tree Ordinance. CDFW also recommends avoiding impacts to understory vegetation (e.g., ground cover, sub shrubs, shrubs, and trees).

The developer's plan to replace 'at least ten trees on site' for the 100 removed and planting new young trees falls woefully short of increasing the community's forest. In both cases, it will be decades before the baby trees grow into the mature trees that now gracefully adorn the Monastery property. Notably around the Monastery buildings to the north.

The developer states that the 10 trees would be subject to a 5 year monitoring effort by an independent 3<sup>rd</sup> party arborist. And that this 'may' result in recommendations of remedial actions for poor or declining health. This is vague as there are no details regarding the recipient of this report, the party required to take actions and fund the recommendations/replacements if needed or whether the findings are required as well as party responsible for overseeing the monitoring. As such, it falls short of meeting the following criteria:

As noted by the CDFW, mitigation measures must be feasible, effective, implemented, and fully enforceable/imposed by the lead agency through permit conditions, agreements, or other legally binding instruments (Pub. Resources Code, § 21081.6(b); CEQA Guidelines, §§ 15126.4, 15041). A public agency shall provide the measures that are fully enforceable through permit conditions, agreements, or other measures (Pub. Resources Code, § 21081.6). CDFW recommends that the City prepare mitigation measures that are specific, detailed (i.e., responsible party, timing, specific actions, location), and clear in order for a measure to be fully enforceable and implemented successfully via a mitigation monitoring and/or reporting program (CEQA Guidelines, § 15097; Pub. Resources Code, § 21081.6).

Policy R10.8: The Project is not consistent with the need to 'continue to monitor construction projects with regard to grading and construction effects on trees, tree removal and replacement' as all trees on the development site will be removed to facilitate construction.

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**Water Resources:**

**Goal 1: The Project is not consistent with 'conservation of the City's water resources'.**

Consistent: The proposed project states it would 'incorporate water conservation measures guided by the development regulations and design guidelines of the Specific Plan'. These measures are insufficient to conserve our water resources. The Project again refers to the net zero impact plan which is unachievable in today's drought conditions. Their water conservation measures are those implemented by the bulk of Sierra Madre residents years ago and were inadequate to address needed conservation.

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Goal 3: The Project is inconsistent with the goal to 'link growth to the availability of water'. The Project proposes to buy water now to achieve a net zero impact on local water supplies but fails to provide convincing details that support this as a viable response. Their proposal to buy water now is unattainable as water is not available to purchase and they have failed to provide an alternative that is workable and consistent with this Goal. There is no available water for purchase; therefore there should be no development growth.

Objective R14: The Project is inconsistent as that it provides no details on 'Ensuring adequate water availability for future growth in the City.' Their proposed plan to purchase water now fails because water is not available and proposed measures only partially address water conservation.

Goal 4: The Project is not consistent with the goal to 'use local sources of groundwater rather than imported water' for development needs. It again provides the unattainable goal of net zero by purchasing 50 years worth of water now (that is not available). The Project fails to meet the sustainability goals of Los Angeles County by using ground water and not water sourced from outside the region. The Metropolitan Water District advises that in '2017, approximately 59% of water used in LA County was sourced from outside the region. Only 9% came from local recycled water sources and 32% was sourced from local groundwater resources'. One of the goals of the LA County Sustainability Plan is to increase the use of groundwater and rely less on water from outside the region. The Project notes that because it would use imported water from SGVMWD, the project would be inconsistent with this goal.

Objective R12: The Project is not consistent with the objective to 'optimize the use of water resources' as it fails to provide water efficiency measures to reduce indoor and outdoor water use above current CALGreen standards.

Objective R15: The Project is not consistent with the objective to 'conserve water during times of drought' and provides the same disproved net-zero impact response and basic water conservation measures that not proven to be effective during a drought.

**Air Quality:**

Objective R23: The Project is inconsistent with this objective to 'reduce the amount of vehicular emissions in Sierra Madre'. The 2015 LA County Greenhouse Gas Emissions Inventory, a component of the LA County Sustainability Plan, states that Greenhouse Gas Emissions from Transportation total 42% of all emissions. The project does not address the reduction of these emissions in its project as its occupants would be totally dependent on vehicles for transportation, as the project runs counter to current state wide efforts to construct housing within a ½ mile of public transportation.

Policy 22.2: The Project is not consistent with the policy to 'Prohibit the development of land uses and land use practices which would contribute significantly to poor air quality'. The LA County Sustainability Plan advises that single family housing developments are a building practice of the past as they are not environmentally friendly, contribute to greenhouse gas emissions and fail to address current housing needs.

**Chapter Three: Hazard Prevention**

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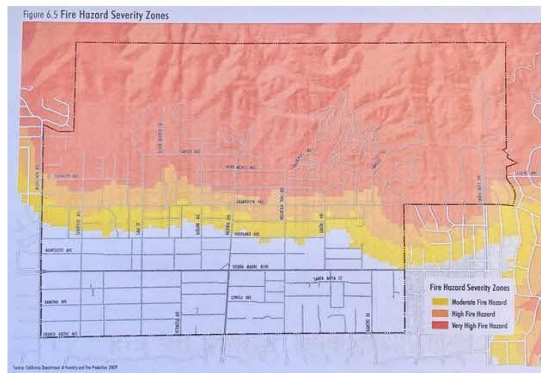
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**Fire Safety/WILDFIRES**

**Objective Hz7 – “Avoid expanding development into undeveloped areas in a Very High Fire Severity Zone.”**

**Policy Hz2.5 Assess the impacts of incremental increases in development density and related traffic congestion on fire hazards and emergency response time, and ensure through the development review process that new development will not result in a reduction of fire protection services below acceptable levels.**

The project site is located in a very high fire hazard severity zone as shown below, according to the Cal Dept of Forestry and Fire Protection and the Sierra Madre Fire Department. It is inconsistent with the General Plan that states not to build in a high fire zone. Parts of Sierra Madre have been evacuated three times in the last 35 years, and the incidence and intensity of wildfires has been increasing. Putting homes and people in danger in the event of a fire is foolhardy and stretches already limited fire response. In the event of a fire, responders are forced to protect structures and are not able to fight fires and create breaks. This development would necessitate Carter Avenue being identified as a red flag street in the event of a fire emergency as it is not wide enough to accommodate emergency vehicles.



The LA County Sustainability Plan states that ‘development should be limited in high climate-hazard areas, such as wildfire, flooding, extreme heat, and sea level rise. Climate science allows us to identify the areas that are most at risk, including urban-wildland interface at the edge of developed areas. Wildfire is an integral component of ecological processes in LA County, but it is also on the rise due to hotter temperatures and changing precipitation patterns, posing a risk to lives. LA County is already seeing longer droughts punctuated by intense rain events, which not only increases fire risk, but leads to flood vulnerability. In planning for these climate-related hazards, it is important to ensure development avoids areas prone to these risks’.

**Flood/Landslide:**

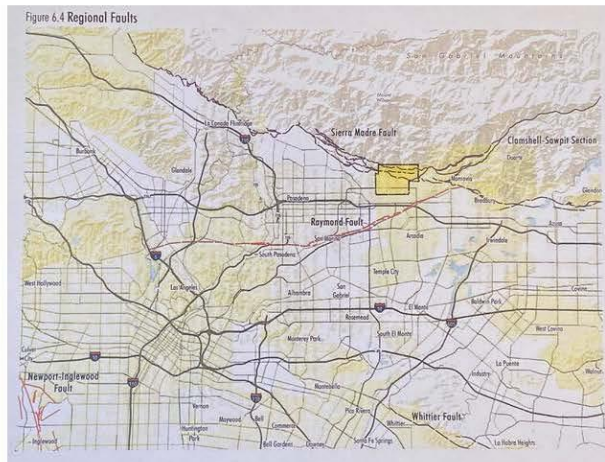
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**Policy Hz6.2:** The Project is not consistent with the policy to 'require that the landscape of open space areas provide the maximum permeable surface area to reduce site runoff, and prohibit the paving of a majority of these areas'. The Project states that it would 'introduce more impervious area that would result in more surface runoff.' It provides an inadequate response that 'a new storm water drainage system would assist in reducing runoff velocities' without providing a supportive analysis. It is obvious that the Project significantly alters the existing open meadow area by adding 42 non-permeable concrete pads, sidewalks, walkways, driveways, road and curbs which do not allow the natural percolation of water into the soil. The Project artificially forces water into two north/south storm drains that direct water to the southernmost portion of the property where it is expected to percolate into an area that is less than 20% of the previous open meadow. It provides for little percolation of the acreage above the park. The Project is inconsistent with this policy.

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**Seismic Safety:** The Project lies in the Sierra Madre earthquake fault zone as seen in the map below:



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**Noise:**

**Policy Hz14.2:** The Project is inconsistent as it provides no information on how it will 'control the noise levels associated with transportation and general circulation patterns in the City to ensure the residential quality of the community'. The project is not consistent because it does not address additional noise levels from the 3-400+ new car trips a day on the neighbouring streets of *Sunnyside, Grove, Carter and Lima*.

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**Chapter Four: Community Service**

**Law Enforcement:**

Policy C1.2: The Project provides the same ‘cut and paste’ response to all four General Plan Objectives and Policies that states that paying an impact fee will satisfactorily address all four General Plan goals. The Project is inconsistent as it fails to provide the required assessment or analysis of the impact of the Project on police response times and service calls. The SMPD states that the Project would affect response times and service ratios. The Project argues that the payment of a one-time development fee in the amount of approximately \$2,000 per home (total of \$84,000) would offset the increased personnel or equipment required to maintain acceptable service ratios, but fails to provide details on how this amount over 50 years would do so.

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Policy C4.3: The Project is inconsistent with this General Plan policy as it fails to provide any passive prevention measures being addressed by this development as required.

**Recreation Services:**

Objective C6: The Project is inconsistent with this objective to provide ‘quality recreation, leisure and social programs and facilities for the various segments of the Sierra Madre community’. The proposed project struggles to convince us that the small 3 acre park that serves as a buffer between the project and homes on the south end of the project and also serves as a cover for the 63,500 cubic foot water retention storage gallery underneath meets this objective. There are no provisions for leisure and social programs for the community.

**Policy C8.1: Continue a park maintenance program to secure the existing nature and beauty of the City Parks and open space areas.**

The project is labelled as ‘Consistent’. However, the proposed project has nothing to do with a future maintenance program for either the park or open space.

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**Policy C8.3: Install and replace existing landscape with native and drought resistant plants in City parks where deterioration has occurred.**

The project is labelled as ‘Consistent’. However, it will only install in the small 3 acre park.

Policy C11.2: The Project is inconsistent with this policy to ‘maintain and update a maintenance and repair plan for existing and future City facilities’ as it would neither maintain or update a maintenance and repair plan for the small park.

**Transit Services:**

Objective C30: The Project provides again provides a ‘cut and paste’ response to all three General Plan Objectives and Policies addressing public safety by stating improvements to Sunnyside and Carter and the creation of three new roads. The Project is inconsistent as it adds 3-400+ new car trips a day on the neighbouring streets of Sunnyside, Grove, Carter and Lima street and claims the proposed project “would not result in new traffic hazards...” and provides no analysis to support this statement. The Project would “implement street sections that slow traffic and create a safe and

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pleasant small neighbourhood environment”. However, they are addressing only the roads within the Project boundaries, not the surrounding neighbourhoods. They have repeatedly failed to address the Project’s many impacts on the city streets that will be utilized to access this project. A traffic and impact study of these streets as a result of this Project needs to be undertaken to evaluate the impact of over 400+ additional car trips on small local roads that were not designed or built to become access routes to a housing development. Two are dead end: Grove providing access to Bailey Canyon parking lot and Carter providing access to the debris basin. The Project has further failed to do a safety analysis of the increased traffic on the pedestrians and bicyclists who use neighbouring streets daily as these streets do not have sidewalks.

Policy C30.2: The EIR and Project say they are consistent with this, using the same sentence describing the new roads and connections in the new project and profess to “implement street sections that slow traffic and create a safe and pleasant small neighbourhood environment”. Again, only referring to streets within the Project boundaries, not the surrounding neighbourhoods which will bear the brunt of traffic and suffer the negative consequences.

Policy C30.3: The Project is inconsistent with ‘maintaining safety and efficient circulation’; again, using the same cut and paste response. The Project has failed to initiate a Traffic Study incorporating the neighbouring streets that would be utilized to access this development. The village atmosphere that residents in the area now enjoy would be destroyed forever with no compensating value.

**Public Services:**

Policy C31.5: The Project is not consistent with this policy that ‘requires new development capture for percolation on site the maximum practical amount of storm water’. The Project states that it would ‘introduce more impervious area that would result in more surface runoff.’ It provides an inadequate response that ‘a new storm water drainage system would assist in reducing runoff velocities’ without providing a supportive analysis. It is obvious that the Project significantly alters the existing open meadow area by adding 42 non-permeable concrete pads, sidewalks, walkways, driveways, road and curbs which do not allow the natural percolation of water into the soil. The Project artificially forces water into two north/south storm drains that direct water to the southernmost portion of the property where it is expected to percolate into an area that is less than 20% of the previous open meadow. The Project is inconsistent with this policy.

**Tree Preservation**

***Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?***

It is obvious that removing over 100 trees is a significant environmental impact, not only to the Monastery property, but to the neighboring community as well. It is clear that the Project conflicts with the City’s tree ordinance as it fails to comply with the following goals:

Goal 1: Continued preservation and protection of existing trees.

Goal 2: Increase of the City’s community forest.

Objective R10: Maintaining and enhancing the City’s significant tree resources.

Policy R10.2. Continue to develop tree preservation and protection measures.

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The project fails to meet these critical goals and responds with the same sentence: “The Specific Plan includes a Tree and Planting Plan which includes the planting of new trees and will adhere to the City’s Tree Preservation and Protection Ordinance,” which includes replacing only 10 trees as they are protected.

The project disregards Goal 1 completely by removing over 100 mature trees, making it impossible to preserve and protect them. It appears that 100% of the trees on the project will be removed. No attempts to preserve and integrate them into the project have been made.

Goal 2, increasing the community forest – has been ignored by removing 100% of mature trees. Replacing fully grown trees, that are food and habitat sources, with young, immature trees with not compensate for the loss of this irreplaceable community forest.

Objective R10.1 is disregarded by the project. Instead of maintaining and enhancing these valuable and priceless City resources, the developer has chosen to remove them. Instead of trimming and shaping these mature trees for future generations to enjoy, they will be cut down and destroyed, a whole-hearted loss for a recognize “Tree City USA.”

**Cumulative effects**

If this Project is developed, it will destroy the last large parcel of land in Sierra Madre. With the development of Stonegate, there will be no more open parcels of this size in our community.

The cumulative impacts of losing both to development affects biodiversity and groundwater.

The Projects’ Biological Resources Report failed to provide a thorough discussion of direct, indirect, and cumulative impacts affecting project biological resources. There was no discussion regarding Project-related indirect impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats or riparian ecosystem. Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas were not discussed or evaluated. There was no discussion of the potential adverse impacts from lighting, noise, use of chemicals or temporary and permanent human activity.

The Project failed to discuss the property’s connection with the eastern San Gabriel foothills and investigate its roll in recharging the Raymond Basin. A noted earlier, this development is situated on *the very last large parcel of land in the Eastern San Gabriel foothills which retains a connection between the canyons and the alluvial fan*. Alluvial fans have particularly high rates of infiltration. There, water can sink deep into the ground and recharge aquifers. Keeping remaining recharge areas as undeveloped as possible is a critical part of protecting our region’s watersheds and creates an integrated and resilient water system. This Project fails to recognize the interconnectedness of all water, including groundwater, surface water, rainwater, and wastewater. It exacerbates a disjointed system that is not well-suited to adapting to the needs of a rapidly growing region and changing climate. Building on the successful passage of the Safe Clean Water Program (Measure W), which promises to support an integrated and holistic approach to storm water management, the region must invest in a 21st-century water system that prioritizes multi-benefit management strategies that restore and mimic natural processes and cycles.

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It is important to note that *The Water Conservation Authority* ranked the Monastery property very in high in conservation value in their Foothills Open Space Acquisition Study due to its watershed value, adjacency to protected lands, and potential for habitat restoration.

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In striving to meet the Paris Climate Agreement, we have an opportunity and urgency to design buildings that are more energy and water efficient, carbon conscious, and healthy and supportive to their residents. LA County’s new buildings should have a minimal impact on countywide emissions and the environment. This Project hasn’t proven that its impact is minimal.

LA County’s landscapes and ecosystems span islands, mountains, deserts, beaches, and coastlines. The region is home to the largest set of threatened and endangered plants and animals in the continental United States, and it is the most urbanized area to be designated one of Conservation International’s global Biodiversity Hotspots. In addition to providing habitats for flora and fauna to thrive, the diverse landscapes throughout LA County offer residents and communities areas to be active and exercise or relax, greatly improving health and emotional well-being. The region’s ecosystems, habitats, and biodiversity are under stress from development projects like this. If it is developed, this parcel will destroy the natural habitats of the native plants and animals that have depended on this area for almost 100 years.

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**Conclusion**

The DraftEIR makes statements without supporting facts, analyses or documentation .

In order to provide a repetitious response of ‘consistent’, it provides responses for only a portion of the goal, objective or policy and ignores the rest.

When the Project struggles to be ‘consistent’, it substitutes words of other meaning, such as sensitive’ or ‘compliment.

The Project does not realistically and honestly assess the projects impacts on the community.

It makes a number of errors that should have been caught and corrected.

It provides repetitive ‘cut and paste’ responses that, in many cases, did not address the issue.

The Project fails to meet the objectives it set at the beginning of the Draft EIR.

The Project is not consistent with the General Plan goals and objectives and replaces it with its own ‘Specific Plan’ that is not in the community’s best interests. It would be a mistake for the City to override the General Plan in favour of this Specific Plan for all the reasons previously noted in this review of the DraftEIR. It would be a ‘defining’ moment in Sierra Madre history to allow a Project of this poor design that is so contrary to ‘Sierra Madre quality’ in our community and allow the Specific Plan to set development design standards for future housing.

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## Response to Comment Letter I96

Individual  
Lynne Collman  
October 4, 2021

- I96-1** This comment requests the following comments (Comments I96-2 through I95-71) be included in the responses to comments of the Final EIR. As shown, the commenter's request has been recorded as part of this Final EIR.
- I96-2** The comment is introductory in nature and expresses the commenter's opinion that the project will result in significant impacts.
- I96-3** The comment states that the project does meet Project Objective 1 because the development would be one phase, the project is not compatible with the current zoning and design standards, and the project is not compatible with the existing community character. Please refer to Global Response GR- 7. In addition, as concluded in Draft EIR Section 4.11 the project would work in harmony with neighborhood character through regulations and design guidelines which would be compatible with existing neighborhoods. In addition, as discussed in Section 4.1.5, Impact Analysis, of Section 4.1, Aesthetics, the project's impacts to aesthetics would be less than significant.
- I96-4** The comment states that the project does meet Project Objective 4 because it adds development to the site and does not provide information regarding traffic impacts to adjacent streets. Please refer to Global Response GR-6.
- I96-5** The comment states that the project does meet Project Objective 5 because portions of the land do not belong to the Monastery Property and Colby Canyon is not located near the property. Please refer to Response to Comments I42-15 and I42-26.
- I96-6** The comment states that the project does meet Project Objective 6 because it does not provide safe and efficient access at North Sunnyside Avenue, south of the project. This objective is met because the project will construct roads that comply with SMMC standards. As discussed in Draft EIR Section 3.3.6.1, the proposed project would include reconfiguration of North Sunnyside Avenue, located within the western portion of the site, which would be moved farther to the west. North Sunnyside Avenue would transition from a width of 40 feet at its existing terminus to a varying 54- to 56.5-foot right-of-way within the project site, with curbs and gutters, parking and planting areas on both sides, a landscaped parkway and sidewalk on the west side, and tree plantings on the east side of the street. There is no evidence that these improvements would result in a safety impact. Final EIR Section 4.17 details consistency with existing General Plan policies and objectives highlighting the need for safety. Impacts associated with transportation, including roadway safety, were found to be less than significant.
- I96-7** The comment states that the project does meet Project Objective 7. Please refer to Global Response GR-1.
- I96-8** The comment requests that the Planning Commission and City Council request missing supporting details and information before making a decision. The City acknowledges this comment, and notes that it is not related to the adequacy of the Draft EIR. Additional information has been provided throughout Responses to Comments I96-1 through I96-71.

- I96-9** The comment states that the project would have impacts on scenic vistas because it would impact views from neighboring homes. Please refer to Response to Comment I77-7.
- I96-10** The comment expresses concern about the timing of biological surveys for the project, specifically as it relates to impacts to bats. Please refer to Response to Comment A1-7. The commenter is correct that the filed visit occurred on May 29, 2020.
- I96-11** The comment states that chemical spraying occurred on the site in 2019 and impacted wildlife and plants on the site. However, the City is unaware of any record of such spraying or evidence that such spraying changed the baseline conditions on the project site. Regardless, surveys for biological resources were conducted May 29, 2020 (as described in Appendix C1 of the Draft EIR) and determined the project site does not contain suitable habitat or connections to other large undeveloped areas to support wildlife corridors. Additionally, as described in Appendix C1 to the Draft EIR, the United States Fish and Wildlife Service does not designate the site as a critical habitat nor is the project site not located within any habitat conservation plan or natural community conservation plan. As discussed in CEQA Guidelines Section 15125(a)(a), generally, the lead agency should describe the physical conditions as they exist at the time the notice of preparation (NOP) is published. The NOP for the proposed project was published June 24, 2020. Therefore, the baseline conditions and environmental setting for biological resources were accurately described.
- I96-12** The comment states that the survey did not address seed banks or lasting roots of native plants. The project site has been historically removed of native vegetation and depleted the native seed bank. The current seed bank is expected to be composed of the current vegetation, which consists of non-native vegetation.
- I96-13** The comment expresses concern about impacts to wildlife corridors, general biological resources concerns, and human interactions with mountain lions/bears. Please refer to Response to Comment I67-1 for a discussion related to wildlife corridors and Response to Comment A1-17 for discussion related to human interactions with mountain lions/bears. In addition, as discussed in Draft EIR Section 4.4, Biological Resources, impacts to biological resources would be less than significant with mitigation.
- I96-14** The comment expresses concern related to impacts to bat habitat and suggests implementation of bat-specific mitigation measures. Please refer to Response to Comment A1-7 and A1-9. A project-level biological resources survey, mentioned by the commenter, has been prepared and included as Draft EIR Appendix C1.
- I96-15** The comment expresses concern related to impacts to nesting bird species and states that MM-BIO-1 would not be sufficient. Please refer to Response to Comments A1-20 and A1-22.
- I96-16** The comment provides conclusionary remarks about how impacts to biological resources were not adequately evaluated. Please refer to Response to Comment A1-22.
- I96-17** The comment expresses concern about the removal of trees with project implementation. Please refer to Global Response GR-2.



- I96-18** The comment states that the project is inconsistent with the Los Angeles County Sustainability Plan. The LA County Sustainability Plan<sup>9</sup> applies only to unincorporated areas of Los Angeles County, and does not apply within the incorporated City of Sierra Madre.
- I96-19** The comment states that the project would have a cumulative impact on biological resources due as the project site is the largest parcel of land left in the City. as discussed in Draft EIR Section 4.4, impacts to biological resources would be less than significant with mitigation. Please refer to Draft EIR Chapter 5, Cumulative Effects, which states that no cumulatively-considerable impacts related to biological resources would occur.
- I96-20** The comment states that there is potential for cultural resources to be found on the project because of the site characteristics and that cumulative impacts would occur. Please refer to Draft EIR Section 5.4.5, Cultural Resources, which determined that impacts to cultural resources would be less than significant with mitigation. In addition, please refer to Draft EIR Chapter 5, Cumulative Effects, which states that no cumulatively-considerable impacts related to cultural resources would occur.
- I96-21** The comment states that the project fails to incorporate high performance building standards beyond the current LEED Gold Standard and meets the minimum standards. The project would comply with building code standards which include energy efficiency requirements. As stated in Draft EIR Section 4.6, Energy, the project would result in less than significant impacts related to inefficient, wasteful, or unnecessary consumption of energy resources.
- I96-22** The comment states that the project would conflict with the Los Angeles County Sustainability Plan's greenhouse gas requirements. Please refer to Response to Comment I96-18.
- I96-23** The comment states that the region must invest in an up-to-date water system that can meet water requirements and mimic the natural water cycle. The City acknowledges this comment, and it does not pertain to the adequacy of the Draft EIR.
- I96-24** The comment expresses concern related to the project's impacts on groundwater recharge, given that the site is located in an alluvial fan. Please refer to Response to Comment I32-2.
- I96-25** The comment expresses concern about impacts to erosion as they relate to the alteration of the drainage pattern and the project's net-zero water impact. As discussed in Draft EIR Section 4.10, with implementation of project design features, impacts associated with substantial erosion or siltation on or off site would be less than significant. Regarding the project's net-zero water impact, please refer to Global Response GR-1.
- I96-26** The comment states that the project would physically divide the community due to creation of buffers, and lack of pedestrian and bicyclist linkages to the project site. The concerns mentioned by the commenter would not result in division of the community. As concluded in Draft EIR Section 4.11, Land Use and Planning, the project would not physically divide a community. It should also be noted that, the project applicant is proposing off-site widening to Carter Avenue, between the southeastern portion of the project site boundary and Lima Street, which would include a 6-foot sidewalk along the northern portion of Carter Avenue (see Final EIR Section 3.3.12 and Global Response GR-5 for details).

<sup>9</sup> County of Los Angeles. 2019. Los Angeles Countywide Sustainability Plan. <https://ourcounty.lacounty.gov/plan>

- I96-27** The comment expresses concern about emergency access from Carter Avenue. Please refer to Global Response GR-4 and Global Response GR-5.
- I96-28** The comment provides background information related to wildfire, flood, extreme heat, and sea level rise that do not pertain to the adequacy of the Draft EIR. The comment also states that the project is inconsistent with Objective Hz7 and the LA County Sustainability Plan. Please refer to Global Response GR-3 and I96-18. Lastly, the comment expresses concern related to the use of the site as an emergency landing site. Please refer to Response to Comment I10-1.
- I96-29** The comment states that the project is likely to be a victim of flooding or landslides after a fire has destroyed the hillsides. As concluded in Draft EIR Section 4.20, Wildfire, impacts associated with downslope and downstream flooding post- fire would be less than significant.
- I96-30** The comment states that the project would have a cumulative impact on wildfire risks because the project would provide a gateway for fire to flow into the neighborhood. As stated in Chapter 5, the project would not result in cumulatively considerable impacts to wildfire. Please refer to Global Response GR-3.
- I96-31** The comment states that the project has more inconsistencies than what is stated in Draft EIR Section 4.11. The City acknowledges this comment, and notes that it is an introduction to the comments that follow. Please see Responses to Comments I96-32 through I96-70.
- I96-32** The comment states that the project is inconsistent with Goal 2 of the General Plan as it is inconsistent with adjacent land uses and design of nearby residences; because of the limited two-story homes in the area; and neighborhood characteristics such as larger setbacks, no sidewalks, and mature trees. See Global Response GR-7. In addition, as concluded in Draft EIR Section 4.11 the project would work in harmony with neighborhood character through regulations and design guidelines which would be compatible with existing neighborhoods. In addition, as discussed in Section 4.1.5, Impact Analysis, of Section 4.1, Aesthetics, the project's impacts to aesthetics would be less than significant. It should be noted that, once the project is complete, the proposed landscape plan would result in an increase in trees on site, as compared to existing conditions. Lastly, related to the size of the proposed residences and their compatibility with nearby uses, please refer to Response to Comment I76-9.
- I96-33** The comment states the project is not compatible with Goal 3 because the project would not preserve scenic views and states that the project is isolated using buffer zones. Please refer to Global Response GR-7. In addition, as discussed in Final EIR Section 4.11.5, the proposed project includes development regulations and design guidelines for the project site created to be compatible with the surrounding neighborhood. The proposed project is designed in a manner that is sensitive to scenic viewpoints and/or viewsheds through building design, site layout and building heights. Therefore, the project would be consistent with Goal 3 of the General Plan.
- I96-34** The comment states that the project is inconsistent with Goal 4 of the of the General Plan and expresses concern that there is no water available for purchase. Please refer to Global Response GR- 1 and Global Response GR-7. In addition, as discussed in Final EIR Section 4.11.5, the proposed project would comply with City regulations per Goal 4 and would incorporate green infrastructure into the project design to promote water conservation; thus, the proposed project would be consistent with this goal.

**196-35** The comment provides background information related to net-zero water use and states that the project’s net-zero water impact fails to implement the strategies for Net Zero Water Requirement and is not consistent with General Plan Policies L1.6, L4.3, and L8.3. See Global Response GR-1, and Global Response GR-7 . As discussed in Final EIR Section 4.11.5, the proposed project would incorporate water conservation strategies and water conservation measures guided by the development regulations and design guidelines of the Specific Plan into the project design to reduce and minimize the proposed project’s impact on the City’s water supply. As such, the proposed project would be consistent with General Plan Policies L1.6, L4.3, and L8.3.

**196-36** The comment stats that the project is not consistent with General Plan Goal 8 and Goal 9. See Global Response GR-7.

More specifically, regarding Goal 8 of the General Plan, the comment expresses concern that open space is being defined as individual balconies. The project’s proposed open space can be found in Draft EIR Chapter 3, Project Description. Open space on private balconies is not included in the total acres of designated open space. The proposed project would include the incorporation of a neighborhood park and the conservation of approximately 35 acres of protected open space to the City. Therefore, As concluded in Draft EIR Section 4.11, Table 4.11-1, the proposed project would comply with the City’s goal of providing additional constructed open space and would be consistent with Goal 8 of the General Plan. The comment also expresses concern that the proposed open space is owned by the City of Sierra Madre and within the boundary of Pasadena. Please refer to Response to Comment 142-15.

Regarding Goal 9, the comment expresses concern about the designated open space being on a property that is not buildable being used to create balance. As concluded in Draft EIR Section 4.11, the conservation of this area in perpetuity would be consistent with this goal. In addition, it should be noted that the project is not located in a hillside area, as outlined by the City’s General Plan.<sup>10</sup> Therefore, consistency with this goal was not provided in Draft EIR Section 4.11.5. Nonetheless, the project would preserve the 35-acre open space hillside area through a conservation easement. No development would occur within this area. In addition, this goal calls for a balance between developed areas and hillside wilderness. The proposed project would be surrounded by similar development and therefore would not conflict with the existing balance between developed areas and hillside wilderness.

The comment further expresses concern about the preservation of Colby Canyon when there is no relation of Colby Canyon and the project site. Please refer to Response to Comment 142-26.

**196-37** The comment states that the project is inconsistent with Objective L1, L4, Policy L4.2, L5, L5.1, L6, L6.2, L7. As discussed in Draft EIR Section 4.1, the proposed project’s potential to substantially degrade the existing visual character or quality of public views of the site and its surroundings would be less than significant. The proposed project would include project design that is sensitive to the scenic viewsheds and/or viewpoints of the City and would result in the development of low-density residential and open space land uses similar to those surrounding the project site. The proposed project would also result in the creation of through streets A, B, and C. Furthermore, the project would incorporate mitigation measures to reduce all potentially significant impacts to less than significant

<sup>10</sup> City of Sierra Madre. 2015. *City of Sierra Madre General Plan*. [https://www.cityofsierramadre.com/cityhall/strategic\\_planning/general\\_plan](https://www.cityofsierramadre.com/cityhall/strategic_planning/general_plan).

Thus, as concluded in Draft EIR Section 4.11, Table 4.11-1, the proposed project would be consistent with Objectives L1 and L4, and Policies L4.2, L5, L5.1, L6, L6.2, and L7. Please refer to Global Response GR-7.

**I96-38** The comment states that the project fails to implement a water impact fee (Policy L8.3) for the project. Please refer to Response to Comment I74-3 and Global Response GR-1.

**I96-39** The comment states that the project does not protect existing views as required by Policy L17. Please refer to Response to Comment I89-30 and Global Response GR-7.

**I96-40** The comment states that the project is not consistent with Policy 17.2, L20, and L 20.1, which all are policies that have to do with compatibility with current property characteristics. As concluded in Draft EIR Section 4.11, Table 4.11-1, the project would be consistent with these policies through compliance with the design guidelines and the creation of tiered building pads to blend in with the existing landform. See Global Response GR-7.

**I96-41** The comment states that the project is inconsistent with General Plan policies regarding the preservation of open spaces. Please refer to Response to Comment I96-36.

**I96-42** The comment states that the project is not consistent with housing policies from the General Plan. The comment states that the project does not fit the neighborhood character, creates higher density housing that exceeds local standards, and only meets the above moderate range of housing needs. As concluded in Draft EIR Section 4.11 the project would work in harmony with neighborhood character through regulations and design guidelines which would be compatible with existing neighborhoods. Furthermore, the project would comply with all local and state building standards and would not exceed density standards. Please refer to Response to Comment I65-3.

Additionally, the comment expresses concern about analysis for additional units in residential zones. Please refer to Response to Comment I28-5.

**I96-43** The comment states that the project does not promote the use of solar panels and is therefore inconsistent with General Plan Policy 5.3. Please refer to Response to Comment I87-3.

**I96-44** The comment states that the project is inconsistent with general plan policy 5.4 from the Housing element and Goal 1 of the Circulation Element of the General Plan because there are no bike lanes proposed and there are no pedestrian linkages because there are no sidewalks on surrounding streets. Please refer to Response to Comment I47-5 regarding bike lanes. The project would include sidewalks along the proposed streets to promote pedestrian safety and mobility within the project site and local vicinity as well as a 6-foot sidewalk between the southeastern portion of the project site boundary and Lima Street, which includes a 6-foot sidewalk on the north side of Carter Avenue (see Final EIR Section 3.3.12). See Global Response GR-7.

**I96-45** The comment states that the project is not consistent with Circulation Goal 2 and 3 of the General Plan and expresses concern about traffic and the Carter Avenue ingress/egress. As concluded in Final EIR Section 4.11, Table 4.11-1, the proposed project would be consistent with these goals through providing improvements to the City's circulation system by extending public access along North Sunnyside Avenue, the construction of Streets A, B, and C, and improvements to Carter Avenue. In addition, please refer to Global Response GR-4, Global Response GR-5, and Global Response GR-7 .

- I96-46** This comment states that the project is not consistent with Objective L51 because the project fails to address a transportation system for pedestrians and cyclists. As concluded in Final EIR Section 4.11, Table 4.11-1, the proposed project would be consistent with Objective L51 through the incorporation of the proposed sidewalks along the northern side of Carter Avenue, which would promote the use of non-automobile travel and provide access to existing transit facilities. Please refer to Responses to Comments I47-5 and I46-8 and Global Response GR-7.
- I96-47** This comment states that the project is inconsistent with Policy L51.2 because it builds new roadways. As concluded in Draft EIR Section 4.11, the project would be consistent with this policy because the project would not build any new roadways beyond the project site and would only include the reconfiguration of North Sunnyside Avenue and improvements to Carter Avenue.
- I96-48** This comment states that the project is inconsistent with Policy L51.5, L51.6, and L51.8 because the project does not support pedestrian and bike connectivity. Due to the scope of the proposed project, bike facilities would not be included. As discussed in Final EIR Section 4.11.5, the proposed project would be consistent with Policies L51.5, L51.6. The proposed project would be inconsistent with Policy L51.8. However, not constructing bicycle facilities, as required to be consistent with Policy L51.8, would not result in significant environmental impacts. See Global Response GR-7. Please refer to Response to Comment I96-46.
- I96-49** The comment states that the project is inconsistent with Objective L52 of the General Plan and further expresses concern about increased traffic, traffic safety, and sites standards and data from the LA County Sustainability Plan. It should be noted that it was concluded in Draft EIR Section 4.11, Table 4.11-1, that the project was consistent with this policy through the proposed improvements to North Sunnyside Avenue and Carter Avenue, and the development of Streets A, B, and C. Please refer to Global Response GR-6 and Responses to Comments I85-14 and I96-18.
- I96-50** The comment states that the project is inconsistent with Policy L52.8. As concluded in Draft EIR Section 4.11, Table 4.11-1, due to the size and scope of the proposed project, bike facilities would not be required. Please refer to Response to Comment I47-5 and Global Response GR-7 .
- I96-51** The comment states that the project is inconsistent with Policy L52.9. It should be noted that it was concluded in Draft EIR Section 4.11, Table 4.11-1, that the project was consistent with this policy by providing sidewalks throughout the proposed project site and along the northern side of Carter Avenue. Please refer to Response to Comment I46-8.
- I96-52** The comment states that the project is inconsistent with Policy L53. Please refer to Response to Comment I85-45.
- I96-53** The comment stated that the project is inconsistent with Goal 3 of the Resource Management Goals of the general plan because it does not provide access to the San Gabriel Mountains. As concluded in Draft EIR Section 4.11 that the project is consistent with this policy because it does not hinder public access to the San Gabriel Mountains, and it connects to Bailey Canyon Wilderness Park.
- I96-54** The comment stated that the project is inconsistent with Goal 3 of the Resource Management Goals of the general plan because it does not comply with more stringent LEED building standards. See Global Response GR-7 and Response to Comment I96-21. It should be noted that Goal 3 of the Resource Management Chapter of the General Plan relates to public access to the San Gabriel Mountains. As discussed in Final EIR Section 4.11.5, the project would be consistent with this goal.

- I96-55** The comment states that the project is inconsistent with General Plan policies that involve tree preservation. Please refer to Global Response GR-2 and Draft EIR Section 4.11.5, Impact Analysis, of section 4.11, Land Use and Planning, regarding the project’s consistency with the goals, objectives, and policies listed by the commenter
- I96-56** The comment states that the project is inconsistent with General Plan policies that involve water resources, specifically Goal 1, 3, and 4, and Objectives R12, R14, and R15. The comment specifically expresses concern about water supply, the viability of the Net Zero Water Impact, the ability to purchase water, and water conservation. As concluded in Final EIR Section 4.11.5, the proposed project would be consistent with these goals and objectives aside from Goal 4. Please refer to Global Response GR- 1, and Global Response GR-7.
- I96-57** The comment states that the project is inconsistent with General Plan Policy 22.2 and Objective R23 and sites the LA County Sustainability Plan standards as the reason why these are inconsistent with the General Plan. The proposed project’s vehicular emissions are addressed in Draft EIR Section 4.3, Air Quality and 4.8, Greenhouse Gas Emissions, in addition to Final EIR Section 4.17, Transportation. Please refer to Global Response GR-7 and Response to Comment I96-18.
- I96-58** The comment states that the project is inconsistent with General Plan Policy Hz2.5 and Draft Safety Element Update (now the adopted Hazard Prevention Element) Objective Hz7. Please refer to Response to Comment I45-3 regarding Objective Hz7. The comment further expresses concern about impacts to fire protection services, the project being located in a VHFHSZ, and that Carter Avenue would not be able to accommodate emergency vehicles. It should be noted that it was concluded in Draft EIR Section 4.11, Table 4.11-1, that the project is consistent with this General Plan policy as the Sierra Madre Fire Department (SMFD) has reviewed the proposed project and determined no significant impacts to service demands would occur.. Please refer to Response to Comment I4-26, I10-9, and I12- 4, and Global Responses GR-3 and GR-4.
- The comment further cites the Los Angeles County Sustainability Plan as stating that development should be limited in high climate-hazard areas. Please refer to Response to Comment I96-18.
- I96-59** The comment states that the project is inconsistent with General Plan Policy Hz6.2 and expresses concern about the increase in impervious surfaces to the project site. As discussed in Draft EIR Section 4.11, Table 4.11-1, although the proposed project would result in an increase in impervious surfaces, the proposed project would also include a new stormwater drainage system to reduce runoff velocities as well as a proposed neighborhood park and landscaping which would allow percolation of water into underlying soils; thus, the proposed project would not be inconsistent with this policy. Please refer to Global Response GR-7 and Response to Comment I32-2.
- I96-60** The comment states that the project lies within the Sierra Madre earthquake fault zone. Please refer to Response to Comment I36-7.
- I96-61** The comment states that the project is inconsistent with General Plan Policy Hz 14.2 because the Draft EIR does not address the additional noise generated from increased traffic levels in the area. Please refer to Response to Comment I5-2.

- I96-62** The comment states that the project is inconsistent with General Plan Policies C1.2 and C4.3 because the project does not provide analysis of response times and service ratios and does not provide any passive prevention measures. As concluded in Draft EIR Section 4.11, the project applicant would be required to provide payment for development fees that would be used to offset any costs required to maintain emergency services. Thus, the proposed project would not be inconsistent with these policies. Please refer to Global Response GR-7 and Response to Comment I74-4.
- I96-63** The comment states that the project is inconsistent with General Plan policies about recreation services, specifically Objective C6 and Policies C8.1, C8.3, and C11.2. The comment expresses concern about the size of the park, the lack of leisure and social programs provided, and the future maintenance of parks. As stated in Draft EIR Section 4.16.5, Impacts Analysis, in Section 4.16, Recreation, the project is required to provide 0.5 acres of parkland on site to be compliant with the State’s Quimby Act and the SMMC. The project contributes 3.04 acres of parkland and exceeds the minimum standard. The project would create recreation through the dedication of the park, specific leisure and social programs are not required to comply with Objective C6. Please refer to Response to Comment I4-18 about park maintenance and Global Response GR-7.
- I96-64** The comment states that the project is inconsistent with General Plan transit service policies, specifically Objective C30, and Policies C30.2 and C30.3. The comment expresses concern about traffic hazards around the project site and specifically near the project entrances. As concluded in Final EIR Section 4.11, Table 4.11-1, the proposed project would be consistent with these policies by including circulation improvements along Carter Avenue and implementing street sections to slow traffic and create a safe environment within the neighborhood. Please refer to Response to Comment I85-14 through I85-16 and Global Response GR-7.
- I96-65** The comment states that the project is not consistent with Policy C31.5 regarding capturing stormwater. As discussed in Chapter 3, Project Description of the Draft EIR, off-site flows would be directed to the two proposed catch basins located northeast of the project site. In addition, the project would include two storm drain networks located at the eastern and western portion of the project site for on-site runoff. In addition, as discussed in Draft EIR Section 4.11.5, the project would be consistent with this policy.
- I96-66** The comment states that the project is inconsistent with General Plan policies that involve tree preservation. Specifically, Goal 1 and 2, and Policies R10 and R10.2. Please refer to Global Response GR-2 and Response to Comment I96-55.
- I96-67** The comment states that the Draft EIR failed to address impacts related to biological resources. This information can be found in Draft EIR Section 4.4, Biological Resources, and Chapter 5, Cumulative Effects.
- I96-68** The comment states that the project failed to address the property’s connection to the alluvial fan. Please refer to Response to Comment I32-2.
- I96-69** The comment states that the Water Conservation Authority identifies the site as high in conservation value. The comment and notes that it does not raise new or additional environmental issues concerning the adequacy of the Draft EIR.

- 196-70** The comment states that the project should be in light with the Paris Climate Agreement. The project is not required to comply with this requirement. The comment and notes that it does not raise new or additional environmental issues concerning the adequacy of the Draft EIR.
- 196-71** The comment and notes that it provides concluding remarks and general opposition to the project that do not raise new or additional environmental issues concerning the adequacy of the Draft EIR.



Comment Letter I97

**From:** macgone@aol.com  
**Sent:** Monday, October 4, 2021 5:15 PM  
**To:** Vincent Gonzalez  
**Subject:** Monastery Project.

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Dear Mr. Gonzalez,

Every issue that has been addressed by citizen groups and individual citizens regarding this project are valid, well thought out and comprehensive. In all areas, trees, water, fire, wild life, traffic , the goals of the General Plan are not being met and since the General Plan, by definition, is the peoples plan, it cannot be changed without the consent of the owners of it – the people of Sierra Madre, not staff or developers. The people are very much against it.

I 197-1  
I 197-2

There is a very practical issue that has not been addressed and that is the potential to sell these houses. The insurance market in California is very difficult. Homeowners are receiving non-renewal notices and premiums are skyrocketing. In the area proposed, the cost and availability of insurance will be determined by 2 factors : fire protection score and brush score. The fire protection score will be adversely affected by the inadequate ingress and egress and staging area. the brush score will make homeowner insurance unaffordable.

I 197-3

The only option may be the California Fair Plan and it will also be costly. Then the owner will have to obtain additional coverage for theft etc. All lenders will want assurance of complete and adequate insurance coverage in order to close a loan.

With the cost of the home and the astronomical cost of insurance, these homes will likely not be purchased by "our neighbors" as advertised by the developer.

With all of the information you have received to date, it must be evident that this project is a "no win" for the city. Any monies derived from property tax will be eaten by sustaining costs.

The property should be zoned Institutional. Another development like the Kensington is more appropriate, less obtrusive and very much needed. There is no obligation to the developer or the Passionist community to rezone. The obligation is to the citizens of Sierra Madre.

I 197-4

MaryAnn MacGillivray  
Former Mayor and Councilwoman

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## Response to Comment Letter I97

Individual  
MaryAnn MacGillivray  
October 4, 2021

- I97-1** The comment states that the project is not meeting the goals of the General Plan. Please refer to Global Response GR-7.
- I97-2** The comment expresses general opposition to the project. The comment does not raise any issue concerning the adequacy of the Draft EIR.
- I97-3** The comment expresses concern about insurance cost and coverage for homes in the area. According to the State CEQA Guidelines, Section 15064(e) “economic and social changes resulting from a project shall not be treated as significant effects on the environment.” Therefore, the comment does not contain specific concerns related to the adequacy of the environmental analysis in the Draft EIR.
- I97-4** The comment expresses general opposition to the proposed land use designation change for the project site. The comment does not raise any specific issue concerning the adequacy of the Draft EIR.

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Comment Letter I98

**From:** Connor Murphy-Boyd <cmurphyboyd@gmail.com>  
**Sent:** Monday, October 4, 2021 4:48 PM  
**To:** Vincent Gonzalez  
**Subject:** DEIR Response for Meadows at Bailey Canyon

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Good Evening Vincent,

This is in regards to my staunch opposition to the massive housing project being proposed for the Bailey Canyon/Monastery lot.

I have emailed about these concerns previously, but would like to once more consolidate all of them in one email.

Having grown up in Sierra Madre, it was always a town of uniqueness and pride in it being the last semblance of a "small town america." Not having a traffic light, individual characters of houses, taking care of our neighbors, these are all things which I see being lost across the country, and I was always happy to come home to Sierra Madre, a beacon to other small towns to remember their roots. This housing development goes against all of that through the cookie-cutter designs, drastic increase to traffic, reduction in our already depleted water supply, dangerous addition to an already high fire zone, all for prioritization of profit over city wellbeing.

I98-2

I98-3

This whole process has felt rushed, hidden, and pushed through to make sure our comments were not heard. I do believe this lot can be developed for something greater than quickly built/sold houses, something that contributes to the strong history of Sierra Madre, not one that takes away from it.

Thank you,  
Connor Murphy-Boyd  
Designer, B.Architecture  
(626) 615-2662

I98-1  
I98-4  
I98-5

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## Response to Comment Letter I98

Individual  
Connor Murphy-Boyd  
October 4, 2021

- I98-1** The comment expresses general opposition to the project. The comment does not raise any specific issue concerning the adequacy of the Draft EIR.
- I98-2** The comment expresses general concern about an increase in traffic. Please refer to Global Response GR-6.
- I98-3** The comment expresses general concern about impacts to the water supply as a result of project implementation. As concluded in Draft EIR Section 4.11.5, Impacts Analysis, in Section 4.11, Land Use and Planning, impacts to groundwater supply would be less than significant.
- I98-4** The comment expresses concern about the project being located in a VHFHSZ. Please refer to Global Response GR-3.
- I98-5** The comment expresses concern that the process has felt rushed and that there was not an opportunity for comments to be heard. Please refer to Response to Comment I74-2 regarding public meetings held.

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Comment Letter I99

From: Ally Arrieta <allyarrieta@gmail.com>  
Sent: Monday, October 4, 2021 3:53 PM  
To: Vincent Gonzalez  
Subject: DEIR Comments for The Meadows at Bailey Canyon

CAUTION: This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Dear Mr. Gonzalez:

Below are my comments/concerns with the DEIR for the proposed housing project known as The Meadows at Bailey Canyon. I ask that you retain a copy for the administrative record and respond to these comments in the final EIR. I would also like to be put on the list of people to notify when the final EIR is complete.

I99-1

In general, I strongly object to this development project as it is not at all suitable for the City of Sierra Madre, nor for the area in which it is located. The proposed project is also significantly inconsistent with our General Plan and Municipal Code and opposed by the vast majority of residents in Sierra Madre.

My specific comments/concerns are as follows:

1. **WATER:** Regardless of what the developer promises to do, water is becoming an increasingly scarce resource. Lakes, rivers and reservoirs are drying up all over the Southwestern United States. There is no water source that can ever guarantee the delivery of water in the future under these conditions. Until the drought conditions improve, it would be the height of irresponsibility to bring additional users on line, such as what would occur with the additional of 42 homes. Our General Plan, Goal 4, states that use of local sources of groundwater rather than imported water (such as what is being proposed under the 'Net Zero Water Impact' proposal from NUW) must be used for new developments. The only solution if the drought continues is going to be rationing and higher water rates for existing users. The Meadows project would an already dire water supply situation into a catastrophe. The developer has promised this project will be a 'net zero impact' on our water supply. However, our own City Manager, Jose Reynoso, stated in a Planning Commission meeting several weeks ago that purchasing 50 years of water for the 42 homes is not possible, because the water is not available and he's not sure when it will be. Therefore 'net zero impact' is not factual. As a result there will be a huge impact to our existing water supply. Even if the developer offers to retrofit areas in Sierra Madre to offset the water use by the Meadows, that will only be a short-term fix. If the drought gets worse as many experts project will occur, and the developer has already done these retrofits, it means the City has no further options except rationing and higher water rates. This is the height of irresponsibility to approve this project with the significant water issues at play.

I99-2

2. **FIRE:** The proposed project site is within 5 miles of where 74 wildfires have burned since the beginning of the historical fire data record. Additionally, the proposed project site is designated as a Local Responsibility Area Very High Fire Hazard Severity Zone by the California Department of Forestry and Fire Protection (CAL FIRE). Our own City Policy Hz7 of the Safety Element of the General Plan states 'to avoid expanding development into undeveloped areas in Very High Severity Fire Zones. Additionally, City Policy R3.2 states 'to ensure that wildland open space, including the areas of the city designated as High Fire Hazard Severity Zone remains undeveloped so as to mitigate the flood cycles that follow wild land fires in the natural open space. Both of these Sierra Madre policies both

I99-3

emphatically state development must not occur in the very high fire severity zones, such as where the proposed project is. The CALDOR fire in central California started in August 2021 and is still not fully contained. To date it has burned 221,774 acres and burned 782 homes, many of which were built of the same 'fire resistant' materials, the developer is saying these homes would be composed of. In 2020, there were 9,639 fires in California with 10,488 homes lost to wild fire, again, many of these homes were also composed of 'fire retardant' materials, and 31 lives lost. Last August, helicopters were using the fields at the Monastery for staging for fire-fighting efforts for the Bobcat fire. It is unconscionable that the City leadership would even consider a housing proposal in such a fire prone area that would endanger lives and property.

199-3  
Cont.

3. **TRAFFIC:** The November 10, 2020 Fehr and Peers traffic study indicated there would be a 118% increase in traffic on weekdays and 129% increase in traffic on weekends. With this data, there is no doubt the project will create extremely significant intrusion and increase of thru traffic. The DEIR indicated just from construction alone there would be close to 70,000 trips. The increased traffic from the project will result in a significant decrease in air quality. Also, the additional ingress/egress required for a project of this magnitude located at Carter creates a very dangerous area affecting car and pedestrian traffic, especially where Carter intersects with Grove and Lima. This area is already significantly congested with residents walking and driving. Either a car is going to hit head-on with another car or a pedestrian is going to get hurt or killed. Then if the traffic of another 42 homes is layered on top of this, it could become catastrophic. A critical purpose of having an additional ingress/egress is so that people can evacuate safely in the event of an emergency and so that emergency vehicles can quickly access the property. For the reasons outlined above, it would not be feasible under the conditions I describe now as well as what they would be should this project get approved. The traffic on Sunnyside will destroy the character of that street and the quality of life for the residents. I can remember attending a City Council meeting a few years ago where residents on Sunnyside were concerned about the traffic only coming from the Mater Dolorosa Retreat Center. If you now add to that the traffic coming from 42 additional homes, deliveries, guests, and a public park, Sunnyside will be ruined. Sunnyside also does not have sidewalks and simply cannot support the increase in traffic resulting from a project of this magnitude.

199-4

4. **TREES:** Chapter 2 - Tree Preservation: Goal 1: Continued preservation and enhancing the City's significant tree resources. The proposed project would remove over 100 trees, including protected oak trees. Additionally, every mature tree along the beautiful drive from the entry gates of the Monastery at the top of Sunnyside up to the Retreat Center will be destroyed. These are mature trees that have been there for many years and are irreplaceable.

199-5

5. **SEISMIC IMPACT:** The proposed project is within a few hundred feet of the significant Sierra Madre Earthquake Fault. The DEIR also states the soil on the proposed project site is weak and not currently suitable. A large monastery building was destroyed during a significant earthquake some years ago. It is not safe to build at this site so close to an active earthquake fault.

199-6

6. **AESTHETICS:** Contrary to the precepts in the General Plan and Municipal Code, neighbors immediately adjacent and to the west of the project will have their views, privacy and value of their properties significantly affected by this project. Despite commitments made by Mater Dolorosa over the years about mitigating the impact of their project on the neighbors, that is not the case. Policy L6.2 of the City's General Plan states that any new or expanded structures in residential neighborhoods do not unreasonably obstruct significant mountain or basin views. This project would not achieve that.

199-7

7. **LAST REMAINING OPEN SPACE:** The last large special open space in Sierra Madre will be destroyed with this project. As a result, wildlife such as deer, coyote, bobcats, falcons, bears and other wildlife will be displaced.

199-8

8. **LACK OF VIABLE ALTERNATIVES:** There have no viable alternatives presented to this proposed housing development. The DEIR does not show any environmental or other impacts from any alternative projects. From the beginning, only huge institutional projects have been shared or rather used to 'scare' residents into supporting this project. However, a reasonably sized and well designed institutional development has not been even explored. Many residents would be supportive of such a project because the lot coverage, traffic, water use and overall impact would be significantly less.

199-9

In conclusion, the City of Sierra Madre has no obligation to support, much less approve this poorly conceived and planned project and waive required compliance by the developer to existing zoning and General Plan requirements. For the reasons outlined above, I don't believe any of the outlined concerns and other serious concerns can be effectively mitigated without declining this project and seriously exploring other viable development alternatives.

199-10

Thank you.

Ally Arrieta

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## Response to Comment Letter I99

Individual  
Ally Arrieta  
October 4, 2021

- I99-1 Please refer to Response to Comment I77-1.
- I99-2 Please refer to Response to Comment I77-2.
- I99-3 Please refer to Response to Comment I77-3.
- I99-4 Please refer to Response to Comment I77-4.
- I99-5 Please refer to Response to Comment I77-5.
- I99-6 Please refer to Response to Comment I77-6.
- I99-7 Please refer to Response to Comment I77-7.
- I99-8 Please refer to Response to Comment I77-8.
- I99-9 Please refer to Response to Comment I77-9.
- I99-10 Please refer to Response to Comment I77-10.

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Comment Letter I100

**From:** Susan Neuhausen <neuhausen.susan@gmail.com>  
**Sent:** Monday, October 4, 2021 10:44 AM  
**To:** Vincent Gonzalez  
**Cc:** Barbara Velturo; Alexander Arrieta  
**Subject:** DEIR for the "Meadows at Bailey Canyon."  
**Attachments:** DEIR alternatives SLN.docx

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

October 4, 2021

Dear Vincent:

Thank you for the opportunity to comment on the DEIR for the "Meadows at Bailey Canyon." Below are my comments and questions on environmental impact. Please retain a copy for the administrative record.

Please respond to these comments in the Final EIR, and put me on the list of people to notify when the Final EIR is complete.

Please see the attached document on my concern related to lack of information on alternatives.

Sincerely,

Susan Neuhausen

491 Grove St

[neuhausen.susan@gmail.com](mailto:neuhausen.susan@gmail.com)

I100-1

Date: October 4, 2021

To: Vincent Gonzalez

From: Susan Neuhausen  
491 Grove St  
Neuhausen.susan@gmail.com

Re: DEIR for the "Meadows at Bailey Canyon"  
Traffic and safety

Thank you for the opportunity to comment on the DEIR for the "Meadows at Bailey Canyon." Below are my comments and questions on Section II-5 New alternatives are not considered. Please retain a copy for the administrative record.

Please respond to these comments in the Final EIR, and put me on the list of people to notify when the Final EIR is complete.

I object to the proposed housing development. It is inconsistent with the Policies and Values of our General Plan. I am concerned that alternatives are not being considered. As stated in the Draft Subsequent EIR, there are no analyses of any new alternatives to the project, and those are required.

Here is the paragraph from the Draft EIR:

"The 2015 General Plan EIR analyzed two alternatives: the No Project/Current General Plan Alternative and the Reduced Development Alternative. The Draft Subsequent EIR does not include analyses of any new alternatives to the project. New alternatives are required in a subsequent EIR when new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete" shows that one or more alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, or alternatives that are considerably different from those analyzed in the 2015 program EIR would substantially reduce one or more significant effects on the environment (CEQA Guidelines Section 15162). There is no new information meeting the definition of Section 15162. The conditions within the City and its SOI are largely the same as when the 2015 DEIR was certified and the General Plan update approved."

Clearly, there are alternatives to the proposed subdivision. Based on comments that I heard when the developer presented in the park over the summer, residents are more in favor of keeping the site zoned institutional and building a modest assisted-living facility that would benefit the aging priests and others in our community. The footprint and disruption to the environment and neighbors would be much less than the proposed subdivision.

I did back-of-the-envelope calculations as follows: If one makes an assumption of average house size of 3700 square feet (approximately the mean of 2700 and 4250 square foot of the range of house sizes plus 200 square feet for garage = 3700 square feet) x 42 houses = 155,400 square feet of building. The size of the Kensington is 58,000 square feet (<https://www.lpiarchitecture.com/the-kensington-sierra-madre/>). In the scenario of building a Catholic school, the California allowance for schools is 73, 80, and 95 square feet per student for elementary, middle school, and high school respectively (<https://www.ede.ca.gov/ls/fa/sf/completesch.asp>). Even if they built a middle school for 500 students, that would be 40,000 square feet, still much smaller than their threat of a massive institution of unknown function.

The developer is using scare tactics that they will build a large institution, possibly a Catholic school, if they cannot build the proposed subdivision. They presented an alternative of a large institution at their presentation

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I100-4



in the park in the summer, in the material they sent out, and in a recent telephone survey. People in our community have been receiving calls to complete an online survey on the monastery development. The telemarketers conducting the survey state they do not know who hired their company. The survey is skewed and will provide biased answers. For example, one question asks the interviewee to choose between the housing project or a huge institutional project. This survey is inappropriate given that the identity of the provider is not given and the questions are skewed without the ability to comment on the answers or questions.

↑  
I100-4  
Cont.

For an institutional project similar in type and size to the Kensington, the environmental impact would be much smaller as it would take up less acreage, fewer roads and infrastructure would need to be constructed, and the construction time, noise, dirt, etc. would be much shorter and smaller respectively. In addition, there would be less traffic once completed than 42 houses will require. It is incumbent upon the city to consider other options.

I100-5

Please ensure that Section II.5 of the EIR is appropriately completed. What are all the alternatives to the Meadows at Bailey Canyon project? A range of options needs to be presented, e.g., leaving it as it is and selling to a Conservancy, building a modest assisted living facility, or building a new retreat center.

I100-6

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## Response to Comment Letter I100

Individual  
Susan Neuhausen  
October 4, 2021

- I100-1** This comment requests the following comments (Comments I100-2 through I100-6) be included in the responses to comments of the Final EIR. As shown, the commenter's request has been recorded as part of this Final EIR.
- I100-2** The comment expresses general opposition to the project and expresses concern regarding the project's inconsistency with the General Plan and lack of alternatives. Please refer to Global Response GR-7. Draft EIR Chapter 8, Alternatives, provides a discussion of four proposed alternatives, including the No Project Alternative.
- I100-3** The comment expresses concern about a lack in alternatives provided in the Draft EIR and suggests that keeping the site institutional would be more appropriate. The comment also includes an excerpt from the 2015 General Plan Draft Subsequent EIR. It should be noted that the excerpt is from the 2015 General Plan EIR and not from the Draft EIR prepared for the proposed project. The alternatives provided for the project are provided in Draft EIR Chapter 8, Alternatives, not the Subsequent EIR. Per CEQA Guidelines Section 15126.6, an EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason. Draft EIR Chapter 8, Alternatives, considers four feasible alternatives, including the no project alternatives, that were considered by the City. The comment also provides calculations related to home sizes as related to potential school sizes. An Existing Zoning and Land Use Designation: Private School Alternative (Alternative 3) was analyzed as an alternative to the proposed project (see Draft EIR Section 8.6.2).
- I100-4** The comment states that community surveying was not done appropriately for the project and the presentations about development of the project site gave limited alternatives. Any project-specific information, including maps of the proposed project site, were provided for during the scoping meeting for informational purposes only to provide the public with general intent and scope of the project. The information, materials, map, and analysis provided in the public review Draft EIR dated July 2021 contains the project specific information associated with the project details being proposed and will be included as part of the design package for consideration by the City of Sierra Madre as part of any discretionary action and decision-making process. Please refer to Response to Comment I100-3, above, regarding the concern related to limited alternatives.
- I100-5** The comment states that an institutional project that is smaller in scale would be more appropriate and would have less of an environmental impact. As stated in Draft EIR Chapter 8, a reduced intensity institutional alternative (Alternative 3) was considered but ultimately rejected because it would not have substantially lessened one or more of the significant effects of the projects as compared to the alternatives that were included.

**I100-6** The comment states that there needs to be a completed alternatives analysis performed. The completed alternatives analysis of the Draft EIR can be found in Chapter 8. Please refer to Response to Comment I100-3, above.

Comment Letter 1101

ELLEN L. MUNOZ  
340 N. LIMA STREET  
SIERRA MADRE, CA 91024

October 3, 2021

Victor Gonzales  
Director of Planning & Community Preservation  
City of Sierra Madre  
232 W. Sierra Madre Blvd  
City of Sierra Madre, CA

RE: The Meadows at Bailey Canyon

I am very concerned about the above-referenced proposed plan.

I 1101-1

We have lived in Sierra Madre since April 1958. While living on the south side of East Laurel (near Baldwin) from 1958 – September 1964, I witnessed the entire mountainside aflame several times. In September of 1964, we moved to North Lima (above Grand View) where we still reside. During the years on North Lima, we have been notified to prepare for evacuation three times, notified to evacuate in 2008. Our friends living on Oak Crest were evacuated many times because of fires in the mountains. Our last prepare for evacuation notice was the Bobcat Fire last year. The smoke from this fire was particularly harmful to Sierra Madre residents.

In the 980's, we stood at the trail just inside the monastery property and watched a fire burn down to the statue of Jesus on the cross with St. John and Mary kneeling beside the cross. Later an artist painted the scene and entitled it "He Still Watches Over Us". Fortunately for Sierra Madre, the wind changed direction and the fire moved north. Sierra Madre was saved.

1101-2

Haven't the builders in California learned not to build in high-fire areas, near earthquake faults, mud slide areas, wildlife habitats???

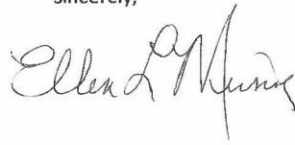
Remember when it used to rain in Southern California? In the 1980s it was necessary to clean out the debris basin above Bailey Canyon to prepare for the next heavy rain. For 24 hours a day, for over two months, large dump trucks hauled out the dirt that had been washed into the basin. The route they used – Lima Street. All day and all night, it felt like the aftershocks from an earthquake. Fortunately our house is well build, so the foundation was not damaged from the constant shaking.

- The traffic going in and coming out of the project will impact Sunnyside, Carter, Grove, Lima and Baldwin. Grove is so narrow that when Baily Canyon hikers park their cars on both sides of the street (which happens often), it becomes a one-way street. It's even difficult to walk one's dog on those days because it's necessary to walk in the middle of the street! On many of these streets there are no sidewalks therefore pedestrians must walk in the street. I1101-3
- Imagine the traffic when heavy cement trucks, large diesel trucks hauling building supplies, utility trucks for electricity and gas, all necessary for work on the projects, are driving our narrow streets at the same time? Would a fire engine, an ambulance or police car even be able to get through in case of a tragedy or life emergency? The additional traffic will create more air pollution. I1101-4
- In 1991, Sierra Madre had its own earthquake! The epicenter was in the mountains behind the Monastery. The Monastery Chapel was destroyed. Many houses in Sierra Madre were damaged. We lost two chimneys, extensive roof damage, plus many household items broken. At that time the deductible on the Earthquake Policy was \$10,000. Today the deductible is \$100,000. I1101-5
- The Monastery grounds are a wildlife habitat. When we could walk the grounds, we would see deer, coyotes, rabbits, skunks, owls, bear and even a mountain lion was sighted. Where are these animals going?? The trees on the property are important to the air quality in our community. The destruction of these irreplaceable mature trees would be a sacrilege! I1101-6
- Then there is the water shortage in California. How much longer will the drought last? With drought comes fires. If we have heavy rains again there will be mud and mud slides. In 1969 there were mud slides on Chaparral, a street off W. Carter. The sister of one of my daughter's friends was seriously injured when a hillside of mud plunged into the family room of their home. I1101-7 I1101-8
- An additional 42 houses will only add to a need for more water. What about police and fire protection? I1101-9 I1101-10
- This project will not help the housing crises in California. Low-income home buyers and many middle-class home buyers will not be able to afford to purchase and maintain these houses (mortgages, taxes, fire insurance, earthquake insurance, utilities, landscaping, gardeners, etc.) This development will not improve the housing problem in California. I1101-11
- Sierra Madre must not allow outside contractors/builders/developers to destroy our beloved Foothill Community! Remember what happened at One Carter? Years of negotiations, endless meetings, investigations into the contractor's past, destruction of the hill side, wildlife habitat destroyed, costly lawsuits, (and if I remember correctly, Sierra Madre never received the settlement that was awarded) and for what??? Empty lots. I1101-12

Sierra Madre does not need a large housing project that will cause tremendous problems and destruction in the lives of Sierra Madre residents and will negatively impact life for years in our community. Please keep our little community one of the best places to live in Southern California.

↑  
1101-12  
Cont.

Sincerely,



P.S During the years 1965-1975, my children had several friends who owned horses – yes, horses could be owned by Sierra Madre residents! Their friends would bring their horses to our yard, pick up my children to ride with them on the monastery grounds. And these horses were ridden in the Sierra Madre Fourth of July Parade. Of course, that ended many years ago, but the memories are a Sierra Madre treasure.

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1101-13

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## Response to Comment Letter I101

Individual  
Ellen Munoz  
October 3, 2021

- I101-1** The comment expresses general opposition to the project. The comment does not raise any issue concerning the adequacy of the Draft EIR; therefore, no further response is required.
- I101-2** The comment provides information about previous fires and debris removal that has occurred in the City. The comment does not raise any issue concerning the adequacy of the Draft EIR. Please see Global Response GR-4 for a discussion related to wildfire.
- I101-3** The comment expresses concerns related to traffic on Sunnyside, Carter, Grove, Lima, and Baldwin. Please refer to Global Response GR-6.
- Additionally, the comment expresses concern about the narrow portion of Carter before the entrance to the project site. Please refer to Global Response GR-5. It should be noted that the project applicant is proposing off-site widening to Carter Avenue, between the southeastern portion of the project site boundary and Lima Street, which includes a 6-foot sidewalk along the northern portion of Carter Avenue (see Final EIR Section 3.3.12 and Global Response GR-5 for details).
- Lastly, the comment expresses concerns related to emergency evacuation. Please refer to Global Response GR-4.
- I101-4** The comment states that additional traffic would create more air pollution. Impacts to air quality were analyzed in Draft EIR Section 4.3, Air Quality. As discussed in this section, impacts to air quality would be less than significant with mitigation.
- I101-5** The comment provides information about previous earthquakes that has damaged the Monastery building and expresses economic concerns related to earthquake damage that do not pertain to the adequacy of the Draft EIR. It should be noted that, due to the age of the Mater Dolorosa Retreat Center, this existing building was not constructed to current building code standards. The proposed project would be required to adhere to the most current CBC standards to minimize the effects of earthquakes and other geotechnical hazards.
- I101-6** The comment expresses concern about the destruction of habitat and loss of trees as a result of the project. Please refer to Response to Comment I65-17 and Global Response GR-2.
- I101-7** The comment states that there is a water shortage in California and with drought can increase risk to fires. As concluded in Draft EIR Section 4.20, Wildfire, impacts related to wildfire would be less than significant. The comment does not raise any issue concerning the adequacy of the Draft EIR; therefore, no further response is required.
- I101-8** The comment expresses concern about landslides, as they relate to wildfire. Please refer to Response to Comment I45-7. In addition, as discussed in Section 4.20.5, Impact Analysis, of Section 4.20, Wildfire, through implementation of measures outlined in the FPP (see Draft EIR Appendix F2), impacts associated with slope, prevailing winds, and other factors, that would cause the project to exacerbate wildfire risks would be less than significant.

- I101-9** The comment expresses concern about additional need for water for the 42 homes. Please refer to Global Response GR-1.
- I101-10** The comment expresses concern regarding police and fire protection being impacted by the project. As discussed in Draft EIR Section 4.15.5, Impacts Analysis, in Section 4.15, Public Services, with payment of development fees, impacts to fire and police protection services would be less than significant.
- I101-11** The comment expresses that the project will not improve the housing crisis. The comment expresses the opinions of the commenter and does not raise any issue concerning the adequacy of the Draft EIR.
- I101-12** The comment expresses general opposition to the project and notes that it raises political issues that do not appear to relate to any physical effect on the environment. The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR.
- I101-13** The comment does not raise any issue concerning the adequacy of the Draft EIR; therefore, no further response is required.

Comment Letter 1102

From: deb sheridan <debsheridan2000@yahoo.com>
Sent: Monday, October 4, 2021 12:27 PM
To: Vincent Gonzalez
Subject: Draft EIR The Meadows at Bailey Canyon (Monastery Property)

CAUTION: This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Dear Director Gonzalez and All Concerned,

When the proposal for 42 luxury homes on the Monastery property was first proposed, I thought it might be a tolerable project. Once the 500 page draft EIR report was published, and I had an opportunity to study it, I am greatly disturbed by it. Here are my main objections:

1. This is a designated high fire hazard severity zone, per the California Department of Forestry and Fire Protection. That in itself should make this property unbuildable. This goes against two Objectives of our General Plan of 2015. Objective Hz5.a - "Limit risk of wildfire through public education and development planning." Development planning would stay out of a high fire zone, especially one that has come so close to burning three times in the 35 years I've lived here.

Objective Hz7 - "Avoid expanding development into undeveloped areas in a Very High Fire Severity Zone." The town of Paradise, also in a Very High Fire Severity Zone, nearly burned entirely to the ground (90%).

Global warming is real, wildfires worldwide are increasing in frequency and intensity, and especially in California. I live north of Grand View, and was on voluntary evacuation just a year ago during the Bobcat fire, which came within 1 1/2 miles of Sierra Madre. In 2008, the call for mandatory evacuation came at Midnight. That was the Sierra Madre fire, and many residents north of Grand View had their homeowner's insurance rates increased greatly, or were cancelled altogether.

2. This is also in close proximity to an earthquake fault. The Sierra Madre earthquake of 1991 destroyed one of the buildings on the Monastery property. Rather than rebuild it for an estimated \$5 million, the Mater Dolorosa priests chose to tear it down. Twenty-two homes were condemned along Sunnyside and Lima, and there was damage to 403 structures, resulting in \$12.5 million in damages. This in itself should make the property unbuildable.

3. Water. Once again we are in a drought - two years into the drought - the Colorado River as well as most lakes and rivers are at unprecedented low levels. Our City Council in 2014 put a moratorium on building, which halted this project. The developer has assured the City of "net zero" water usage, meaning they will purchase water up front for the next 50 years and store it for future use. There is no water to be purchased, and for 50 years? According to Jane Tsong, Project Manager for the Watershed Conservation Authority (WCA), it would be impossible to predict what net zero will be for the next 50 years. Especially given our current drought situation, and climate change, which seems to be here to stay. This also violates the General Plan - Objective R12 - "Optimizing the use of water and water resources," and Policy L4.3 - "Ensure that the new development and the expansion of existing uses incorporate water conservation measures that reduce and minimize the impact on the

I102-1

I102-2

I102-3

I102-4

City's water supply and its ability to serve its customers." This in itself should make the property unbuildable.

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I102-4  
Cont.

This property is part of an alluvial plain, the only one of its kind along the foothills between Sierra Madre and Claremont. Building 42 large homes, with the needed infrastructure will make storm water recapture that much more difficult.

4. **Traffic.** Traffic is expected to increase by 300-400 (and possibly more) vehicles per day along the side street of Sunnyside. Additionally, Carter is expected to carry some of the burden, with travelers going down Lima and Grove. No mention is made of the many delivery and service trucks that are typical of a neighborhood such as this one. There are no plans for a bicycle lane. Sidewalks may be put in on Carter and Sunnyside, but I am puzzled as to how this is to take place on residents' property.

I102-5

5. **Housing** - 42 houses of 2700-4000 square footage are much larger than those of the surrounding neighborhood. There will be "some" one story houses, yet, we have asked several times and the answer from the New Urban West representatives are "Don't know yet." If one looks at the map of the surrounding neighborhood, those homes consist of much smaller homes - only 4 are two story and 51 are one story. These homes will be walled off from the neighborhood. This violates Vision and Guiding Principal #5 - "Ensure development is done in harmony with its neighborhood, while maintaining the character of the town and without unduly burdening existing city services and infrastructure or impacting the environment."

I102-6

6. **Trees** - The developer's Specific Plan calls for the removal of 100 mature trees. The plan is to replace them, but it takes about 20 years for a tree to reach maturity. They need water to grow and thrive, and our drought may never end. Meanwhile, the needed canopy that helps reduce global warming is gone. There is no plan to build the houses around the mature trees, even the 10 protected coastal oaks in order to save them.

I102-7

I was on the General Plan Update Steering Committee, which took five years to implement with countless meetings, workshops, with many residents. This is "the Constitution of the City - the residents." There are three main issues that cannot be mitigated, and the other three areas of concern add to it.

I102-8

Deb Sheridan  
635 Valle Vista Drive  
Sierra Madre

## Response to Comment Letter I102

Individual  
 Deb Sheridan  
 October 4, 2021

- I102-1** The comment is an introduction to comments that follow and notes that it expresses general opposition for the proposed project and does not raise any issue concerning the adequacy of the Draft EIR. No further response is required.
- I102-2** The comment raises concern regarding the project site's location within a VHFHSZ. Additionally, the comment states that the project would be inconsistent with objectives of the General Plan associated with fire safety. Please refer to Global Response GR-3 and Global Response GR-7.
- I102-3** The comment includes information regarding the Sierra Madre Earthquake of 1991 and expresses concerns related to the proximity of an earthquake fault. It should be noted that, due to the age of the Mater Dolorosa Retreat Center, this existing building was not constructed to current building code standards. The proposed project would be required to adhere to the most current CBC standards to minimize the effects of earthquakes and other geotechnical hazards. No further response is required.
- I102-4** The comment expresses concern associated with the net-zero impact on the water supply and inconsistencies with General Plan Objective R12 and Policy L1.6 (incorrectly cited as policy L4.3). For information regarding the proposed project's net-zero water impact, please refer to Global Response GR-1. For information regarding General Plan consistency, please refer to Global Response GR-7 . As discussed in Final EIR Section 4.11, the project would be consistent with Policy L1.6 and R12.
- The comment states that implementation of the proposed project would make stormwater capture more difficult. As discussed in Chapter 3, Project Description of the Draft EIR, off-site flows would be directed to the two proposed catch basins located northeast of the project site. In addition, the project would include two storm drain networks located at the eastern and western portion of the project site for on-site runoff. As discussed in Draft EIR Section 4.19, Utilities and Service Systems, the project would not result in impacts to stormwater drainage.
- I102-5** The comment expresses concern regarding traffic impacts to Carter Avenue and Sunnyside Avenue. Sidewalks would not be placed on residents' properties. Please refer to Global Response GR-6 .
- I102-6** The comment expresses concern regarding the exact size and height of the proposed residences and states that the project would be inconsistent with Guiding Principle #5, regarding ensuring development is done in harmony with its neighborhood.
- Guiding Principle #5 of the City's General Plan states: "Ensure that development is done in harmony with its neighborhood, while maintaining the character of the town and within unduly burdening existing city services and infrastructure or impacting the environment. The Specific Plan includes design details of the proposed project to ensure that the proposed project would not degrade the visual character of the community. As discussed throughout Chapter 4 of the Draft EIR, with implementation of mitigation, the project's impacts on the environment would be less than significant. As concluded in Draft EIR Section 4.11 the project would work in harmony with neighborhood character through regulations and

design guidelines which would be compatible with existing neighborhoods. Please refer to Response to Comments I4-7 through I4-9, regarding lot sizes and number of stories. In addition, Please refer to Global Response GR-7 for additional discussion related to consistency with the General Plan.

- I102-7** The comment expresses concern that proposed project would result in the removal of 100 trees and replacing them with trees that are have not yet reached maturity. Please refer to Global Response GR-2 .
- I102-8** The comment provides concluding remarks on issues that have been addressed above that do not raise an issue related to the adequacy of the Draft EIR.

Comment Letter 1103

**From:** Philip Yao <philip.b.yao@gmail.com>  
**Sent:** Monday, October 4, 2021 4:47 PM  
**To:** Vincent Gonzalez  
**Cc:** Alicia Yao; Daniel Yao; Marites  
**Subject:** Comments on DEIR for the Meadows at Bailey Canyon (Yao, Family 513 Sierra Keys Drive, Sierra Madre, CA 91024)

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Mr. Vincent Gonzalez,

We object to the proposed Meadows at Bailey Canyon. This proposed development is inconsistent with Sierra Madre’s General Plan; and, if approved, it would result in irreparable damage to our unique Sierra Madre community and endanger the health and wellbeing of all Sierra Madre residents.

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A few of my concerns are as follows:

1. The proposed development of 2,500 to 3,800 square feet homes does not reflect the predominantly smaller single family homes bordering and nearby the Mater Dolorosa Passionist Retreat Center. This is in direct violation of our General Plan’s Summary Of Land Use Goals 1 through 3. Personally, the proposed development will result in a wall of houses that will obscure all of my view of Mater Dolorosa and the mountains. It will increase the noise level to my property. Lastly, the higher elevation proposed park will destroy my privacy.

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1103-2  
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1103-3  
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2. Mater Dolorosa Passionist Retreat Center is zoned Institutional and there are many Sierra Madre community activities that appear in our General Plan. One that is not listed is that the open field serves as a natural firebreak for the community adjacent to it, even though Mater Dolorosa is in a High Fire Hazard Zone. If 42 new homes are allowed to be built, the firebreak will be gone and those 42 homes will be classified as High Fire Hazard Zone for insurance. It will likely cause the surrounding homes to be similarly classified, increasing insurance costs and deductibles.

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3. The EIR traffic assessment is wrong. The proposed development will increase traffic and will endanger those who live by Sunnyside and Carter. My family has lived on Sierra Keys adjacent to Mater Dolorosa for close to 40 years; so, I know firsthand how dangerous the cross traffic at Fairview and Sunnyside is. Adding additional automobiles from 42 families will only increase the likelihood of accidents! Citing correspondence from Miya Edmonson (IGR/CEQA Branch Chief) to Vincent Gonzalez - Currently the project is designed in a way that induces a high number of trips per household due to being exclusively large-lot, single-family residential. In addition, automobile emission from these families will further stress respiratory health of the residents adjacent to this proposed development, as starting an automobile emits the most pollution.

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1103-5  
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1103-6  
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4. The water usage assessment is wrong. It is not net-zero and it is grossly underestimated. It is not 55 gallons per person per day as even the USGS estimates that on average, each person uses about 80-100 gallons of water per day, for indoor home uses. In addition, water for landscape, pools, etc must be included.

I  
1103-7

Regards,

Philip, Alicia, Daniel, and Marites Yao

513 Sierra Keys Drive

Sierra Madre, CA 91024



## Response to Comment Letter I103

Individual

Phillip, Alicia, Daniel, and Marites

October 4, 2021

- I103-1** The comment expresses concern that the project would be inconsistent with the City' General Plan and would result in irreparable damage. Please refer to Global Response GR-7.
- I103-2** The comment expresses concern that the project would be inconsistent with nearby development and therefore in violation of Land Use Goals 1 and 3. The City's General Plan Land Use Element Goal 1 is to "Preserve the existing street and block patterns currently established throughout the City and provide additional non-vehicular connectivity where it is currently lacking in the downtown commercial area." This policy, as well as a discussion on the project's consistency with this policy has been added to Table 4.11- 1 in Final EIR Section 4.11, Land Use and Planning. As discussed in this section, the proposed project would include configurations and improvements of existing North Sunnyside Avenue and Carter Avenue as well as development of Streets A, B, and C, which are proposed as through streets, to connect to North Sunnyside Avenue and Carter Avenue. Therefore, the proposed project would maintain the general pattern of the existing streets and improve circulation within the project site. Regarding non-vehicular connectivity, this portion of the policy is related to the downtown commercial area. However, the proposed project would include a Mobility Plan, which provides for a circulation system using private vehicular and non-vehicular modes of transportation in a system of public roadways and pedestrian pathways within the project site. In addition, as stated in Table 4.11-1, the project would be consistent with Land Use Element Goal 3 as the proposed project includes development regulations and design guidelines for the project site created to be compatible with the surrounding neighborhood and is designed in a manner that is sensitive to scenic viewpoints and/or viewsheds through building design, site layout and building heights. Please refer to Global Response GR- 7.
- I103-3** The comment expresses concern about private views, privacy, and noise levels on the commenter's property. Draft EIR Section 4.13, Noise, identified potentially significant temporary noise impacts during construction activities and mitigation was incorporated to reduce impacts to a less than significant level. A significant impact would occur when construction takes place near the project boundaries, specifically impacting sensitive receptors such as the single-family residences to the west and south of the project site (See Table 4.13-5, Construction Noise Levels at Noise-Sensitive Uses, of the Draft EIR). However, with the incorporation of mitigation measure MM-NOI-1, the City and/or the Construction Contractor would be required to implement noise reduction measures during all construction activities which would ensure compliance with the applicable noise limits and reduce impacts to a less than significant level. Noise reduction measures would include administrative controls, engineering controls, and noise barriers. Given this, the project does address concerns related to noise impacts. For information about impacts to private views and privacy it should be noted that, although private views are not protected by CEQA, the design guidelines of the Specific Plan outline site planning and design, architectural design, and landscape design standards that would be implemented as a design of the project to ensure that visual character and quality of public and private views are not degraded.
- I103-4** The comment states that the project would remove the current natural fire break for the community and would likely increase fire insurance costs for the surrounding area. It should be noted that fire insurance raises economic issues that do not appear to relate to any physical effect on the environment. Nonetheless, please refer to Global Response GR-3.

- I103-5** The comment expresses concern about traffic and traffic safety. Please refer to Global Response GR-6 and Response to Comment I85-14.
- I103-6** The comment expresses concern about respiratory health associated with air pollution from the increase in vehicles in the area. As discussed in Draft EIR Section 4.3, Air Quality, with implementation of MM-AQ-1, impacts to air quality would be less than significant. In addition, construction and operation of the project would not contribute to exceedances of the NAAQS and CAAQS for NO<sub>2</sub>. Health effects that result from NO<sub>2</sub> and NO<sub>x</sub> include respiratory irritation, which could be experienced by nearby receptors during the periods of heaviest use of off-road construction equipment. However, project construction would be relatively short term, and off-road construction equipment would be operating at various portions of the site and would not be concentrated in one portion of the site at any one time. Construction and operation of the project would exceed localized thresholds for PM<sub>10</sub> or PM<sub>2.5</sub> and may contribute to exceedances of the NAAQS and CAAQS for particulate matter or may obstruct the SCAB from coming into attainment for these pollutants. However, the project would not result in substantial DPM emissions during construction and operation, and therefore, would not result in significant health effects related to DPM exposure. Additionally, the project would implement dust control strategies and be required to comply with SCAQMD Rule 403, which limits the amount of fugitive dust generated during construction and MM-AQ-1, which requires use of California Air Resources Board (CARB)-certified Tier 4 Interim engines or equipment outfitted with CARB verified diesel particulate filters during construction. As shown in Draft EIR Section 4.3.7, Level of Significance After Mitigation, with implementation of MM-AQ\_1, localized construction impacts and potential health effects associated with these impacts during construction of the project would be less than significant with mitigation.
- I103-7** The comment states that the water usage assessment is wrong because of the uses of 55 gallons of water per person per day and the exclusion of outdoor water usage such as landscaping and pools. SB 606 and AB 1668 has identified 55 gallons per person per day as a target objective for urban water agencies to meet.<sup>11</sup> Please refer to Global Response GR-1. In addition, please see Final EIR Section 4.19.5, Impacts Analysis, in Section 4.19, Utilities and Service Systems, for information on how outdoor water use was calculated and included in the water usage estimation. Although no swimming pools are proposed, future homeowners can potentially install swimming pools. However, any future installation would comply with city code requirements related to pool installation.

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<sup>11</sup> California Water Boards. 2018. Water Efficiency Bill Fact Sheet. June 7, 2018. [https://www.waterboards.ca.gov/publications\\_forms/publications/factsheets/docs/water\\_efficiency\\_bill\\_factsheet.pdf](https://www.waterboards.ca.gov/publications_forms/publications/factsheets/docs/water_efficiency_bill_factsheet.pdf)

Comment Letter I104

From: Karen Rowinsky <karen@karenrowinsky.com>  
Sent: Monday, October 4, 2021 4:56 PM  
To: Vincent Gonzalez  
Subject: Draft EIR

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

When the proposal for 42 luxury homes on the Monastery property was first proposed, I thought it might be a tolerable project. Once the 500 page draft EIR report was published, and I had an opportunity to study it, I am greatly disturbed by it. Here are my main objections:

I104-1

1. **This is a designated high fire hazard severity zone, per the California Department of Forestry and Fire Protection.** That in itself should make this property unbuildable. This goes against two Objectives of our General Plan of 2015. Objective Hz5.a - "Limit risk of wildfire through public education and **development planning.**" Development planning would stay out of a high fire zone, especially one that has come so close to burning three times in the 35 years I've lived here.

I104-2

Objective Hz7 - "Avoid expanding development into undeveloped areas in a **Very High Fire Severity Zone.**" The town of Paradise, also in a Very High Fire Severity Zone, nearly burned entirely to the ground (90%).

Global warming is real, wildfires worldwide are increasing in frequency and intensity, and especially in California. I live north of Grand View, and was on voluntary evacuation just a year ago during the Bobcat fire, which came within 1 1/2 miles of Sierra Madre. In 2008, the call for mandatory evacuation came at Midnight. That was the Sierra Madre fire, and many residents north of Grand View had their homeowner's insurance rates increased greatly, or were cancelled altogether.

I104-3

2. **This is also in close proximity to an earthquake fault.** The Sierra Madre earthquake of 1991 destroyed one of the buildings on the Monastery property. Rather than rebuild it for an estimated \$5 million, the Mater Dolorosa priests chose to tear it down. Twenty-two homes were condemned along Sunnyside and Lima, and there was damage to 403 structures, resulting in \$12.5 million in damages. This in itself should make the property unbuildable.

I104-4

3. **Water.** Once again we are in a drought - two years into the drought - the Colorado River as well as most lakes and rivers are at unprecedented low levels. Our City Council in 2014 put a moratorium on building, which halted this project. The developer has assured the City of "net zero" water usage, meaning they will purchase water up front for the next 50 years and store it for future use. There is no water to be purchased, and for 50 years? According to Jane Tsong, Project Manager for the Watershed Conservation Authority (WCA), it would be impossible to predict what net zero will be for the next 50 years. Especially given our current drought situation, and climate change, which seems to be here to stay. This also violates the General Plan - Objective R12 - "Optimizing the use of water and water resources," and Policy L4.3 - "Ensure that the new development and the expansion of existing uses incorporate water conservation measures that reduce and minimize the impact on the City's water supply and its ability to serve its customers." This in itself should make the property unbuildable.

I104-5  
I104-6

This property is part of an alluvial plain, the only one of its kind along the foothills between Sierra Madre and Claremont. Building 42 large homes, with the needed infrastructure will make storm water recapture that much more difficult.

I 1104-7

4. **Traffic.** Traffic is expected to increase by 300-400 (and possibly more) vehicles per day along the side street of Sunnyside. Additionally, Carter is expected to carry some of the burden, with travelers going down Lima and Grove. No mention is made of the many delivery and service trucks that are typical of a neighborhood such as this one. There are no plans for a bicycle lane. Sidewalks may be put in on Carter and Sunnyside, but I am puzzled as to how this is to take place on residents' property.

I 1104-8

5. **Housing** - 42 houses of 2700-4000 square footage are much larger than those of the surrounding neighborhood. There will be "some" one story houses, yet, we have asked several times and the answer from the New Urban West representatives are "Don't know yet." If one looks at the map of the surrounding neighborhood, those homes consist of much smaller homes - only 4 are two story and 51 are one story. These homes will be walled off from the neighborhood. This violates Vision and Guiding Principal #5 - "Ensure development is done in harmony with its neighborhood, while maintaining the character of the town and without unduly burdening existing city services and infrastructure or impacting the environment."

I 1104-9

6. **Trees** - The developer's Specific Plan calls for the removal of 100 mature trees. The plan is to replace them, but it takes about 20 years for a tree to reach maturity. They need water to grow and thrive, and our drought may never end. Meanwhile, the needed canopy that helps reduce global warming is gone. There is no plan to build the houses around the mature trees, even the 10 protected coastal oaks in order to save them.

I 1104-10

Thank you for your time and attention to this very concerning matter.

Karen Rowinsky  
Sierra Madre Resident

Karen Rowinsky, LCSW  
Pronouns: she, her, hers  
626-483-1135  
<http://www.karenrowinsky.com>

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## Response to Comment Letter I104

Individual  
Karen Rowinsky  
October 4, 2021

- I104-1** The comment expresses general opposition for the proposed project but does not raise any issue concerning the adequacy of the Draft EIR. No further response is required.
- I104-2** The comment expresses concern about the consistency with the General Plan Draft Safety Element and the project's location in a Very High Fire Hazard Severity Zone (VHFHSZ). Please refer to Global Response GR-3.
- I104-3** The comment expresses concern about fire history in the area and the increased insurance rates as a result of the fires. As concluded in Draft EIR Section 4.20, Wildfire, impacts related to wildfire would be less than significant. Please refer to Global Response GR-3. In addition, insurance is not within the scope of the required environmental analysis under CEQA. As such, no response is required.
- I104-4** The comment expresses concern about the project's proximity to an earthquake fault. Please refer to Response to Comment I36-7.
- I104-5** The comment expressed concern about the water usage of the project. Please refer to Global Response GR-1.
- I104-6** The comment states that the project is not consistent with the water resource policies in the General Plan, particularly Objective R12 Policy L1.6 (incorrectly cited as policy L4.3). Please refer to Response to Comment I02-4.
- I104-7** The comment states that the project site is part of an alluvial fan and expresses concern about losing the ability for the site to capture water. Please refer to Response to Comment I32-2.
- I104-8** The comment expresses concern about the increase in traffic, lack of sidewalks in the surrounding area, no plans for bicycle lanes, and the addition of delivery and service trucks. Please refer to Response to Comment I47-5 regarding bike lanes. Please refer to Global Response GR-6, regarding increases in traffic in the surrounding neighborhood; delivery and service trucks are included in the traffic analysis. Sidewalks will not be placed on residents' properties.
- I104-9** The comment expresses concern about neighborhood consistency, specifically about the size of the proposed homes. Please refer to Response to Comment I90-2 and I85-12.
- I104-10** The comment expresses concern regarding the removal of trees on the project site, specifically the ability for the trees to reach maturity. Please refer to Global Response GR-2.

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Comment Letter 1105

Monday, October 4, 2021

Dear Mr. Gonzalez, Mayor Arizmendi, Mayor Pro Tem Goss, Council Member Garcia, Council Member Kriebs, Council Member Parkhurst,

First, I appreciate all of the work you all do on behalf of our very special small town. I have served on 2 commissions here in town and on a previous ad hoc general plan committee during the tenure of Mayor Rob Stockley. I mention this because I know the amount of time, energy and study that is necessary when serving on a commission and the City Council requires ever so much more of the above. And you get a lot of very emotional letters and speeches from people like me. So, I preface this letter by acknowledging your hard and caring work and to thank you for your service, dedication and your commitment to preserving our dear Sierra Madre.

I am writing regarding the DEIR for the proposed zone change and proposed large housing development at the Mater Delarosa Monastery. I want to start by saying how disturbing it was that this project was trotted out in the middle of an unprecedented deadly pandemic, (not to mention unprecedented social and political upheaval) where people weren't supposed to leave their homes or were afraid to leave their homes. They no longer were able to congregate and talk to each and be apprised of what was going on in the city. It felt devious and immediately put a lot of people in a place of distrust of the process and the entities involved.

Anytime I read something that says, "No significant impact", or "less than significant impact" by someone who neither lives in the place they are studying, nor will have to live there once whatever is being proposed actually happens, I tend to find it has little to no credibility to the people directly affected. Anyone who lives here, especially in the affected area, knows in their soul that this project is going to have a tremendous adverse, negative affect on their daily lives, for example: just 2 cars making one trip away from 42 homes and one return trip a day, just one, which is an extremely conservative number, means 168 cars zipping down our street(s) and back again. 168 cars compared to the current number. Do you leave your and return just once a day? Or do you come

1105-1

1105-2

and go several times? HUGE impact. Just because a document say there's no "significant" impact doesn't mean a thing to those of us living in the immediate area. Citywide we are already experiencing near gridlock conditions whenever one of the 8 schools in our tiny city begins their day and ends their day. One of those schools is located right in the neighborhood that is in the development zone and has recently gone from a high school to a K-12. It is almost impossible to even move through the area now. Adding hundreds, that's right, hundreds of more daily car trips; residents, delivery vehicles, gardeners, garbage trucks, etc. through this small area is going to deeply impact the people who live here, some who have worked their entire adult lives to be able to live here, only to suddenly find their peace, safety, quality of life and likely their property values take a HUGE hit. Our downtown is already very difficult to move through. I see people making U-turns every trip I make downtown and there is rarely if ever a police officer around. I've been someone who has almost been hit by one of these people making illegal U-turns. There is nobody enforcing that U-turn law. Rarely enforcing it. It happens all the time **because of the traffic**. We can't handle any more traffic in our downtown! People avoiding town are racing through the residential areas. This is an insane proposition. I don't know where the pressure is coming from or if there is pressure, but you have the power to say NO to 42 houses, NO to a zoning change. I would be interested in knowing what an institutional use would look like, but the developer wants to get the most money they can out of our town and big expensive houses is the only way to get it. Even "mitigating" with fewer (even larger homes) is a non-starter for a good many of us, whether you hear from those people or not. This DEIR is a cumbersome, dense document that not everyone has the time or even the comprehension to get through it, understand it, or comment on it. I hope you take that into consideration during your deliberations. I am not being hyperbolic when I tell you that this proposed development is a mistake on a grand scale. I would feel somewhat better about it if there were fewer homes, single story, not packed together and affordable so young families could buy a home here. But that is not what this is. It feels like a money grab and a greedy one at that.

It's offensive to have someone say that cutting down 100 mature trees, some of them hundreds of years old, is not significant. Replanting trees

1105-2  
Cont.

1105-3

1105-4



is not anywhere near retaining mature trees. Every time you cut down a mature tree, you're releasing climate warming carbon dioxide and losing something irreplaceable. You're disturbing wildlife habitats that have been in place for decades.

I105-4  
Cont.

Putting 42 houses in highly dangerous fire areas that the General Plan asks we not do, is offensive and quite frankly, stupid. Those proposed homeowners will likely be unable to insure their homes against fire (people who live on Sunnyside voiced that they already are having difficulty getting insurance) and yet they will be in the highest hazardous fire zone there is. A California moratorium guaranteeing insurance in wildfire-threatened areas lapsed on September 26, 2021, putting hundreds of thousands of homes at the mercy of the market. As many as 2.4 million homes are at risk of losing protection in 2021 as grace periods expire.

I105-5

Sitting in a Planning Commission meeting (for hours) that is supposed to be addressing water, as in where will the water come from for this enormous project and having a commissioner, several commissioners, blather on about the condition of our pipes and where the pipes are and how many pipes there are rather than addressing WHERE THE WATER WILL COME FROM is offensive. Clearly, one particular commissioner had already made up his mind that he wants the development and was trying to keep the discussion away from where the water will come from when we are presently in a water emergency. It is offensive and highly hypocritical for the City to ask us, the community, to conserve water and then imply that we have plenty of water! Enough water for 42 additional houses! Why should we conserve, spend thousands of dollars to rip out our lawns and re-landscape our yards only so some developer can build his 42 mansions? Why? This drought is worse than the one where we had a moratorium on new water meters and yet, the same commissioner doesn't talk about that, he talks about the size of our pipes. He used up so much time talking away from the actual subject. People; working people, old people, people with children who desperately try to get to these meetings to hear something of substance only to have one man wasting their precious time, my precious time, talking about nothing. Deeply offensive, deeply disappointing and deeply arrogant.

I105-6

It seems like the decision has already been made and the onus has been put on US, the citizenry of our most precious Sierra Madre, who have made their wishes known by giving their time to participate in the crafting of the general plan, to have to defend our town from the very people we voted in who promised to preserve this irreplaceable treasure of Sierra Madre. From what I was able to get through in the EIR water is mentioned as net-zero. It's not going to have any affect on us existing folks and our water future. That is simply NOT true. It is a deceitful term. Have a BIG meeting, a real meeting. Tell the truth about the water. Where is 50 years worth going to come from when, according to the scientists and water specialists and the Metropolitan Water District say we maybe have two years worth of water security. Why won't anyone use the word water? It's because you all know there is no water and things look dire for all the western states including ours. Many farmers have already been stripped of their water this year. Next year could be worse. An unprecedented water emergency has been declared on the Colorado River, which has NEVER happened before in its history, due to dwindling water and where a good portion of our water supply comes from. The Hyatt Power plant at Lake Oroville in California, which generates some of our electricity has been taken offline due to falling lake levels in an effort to preserve critical water supplies. You have been alerted. Before you make any decision, I sincerely hope you will stop with the magical thinking where water is concerned, where environment is concerned, where traffic is concerned, where noise is concerned, where quality of life is concerned. We don't deserve this. And just so you know, there are many people who are afraid to speak out against this project because they are Catholic and don't want to publicly speak against the Catholic Church.

1105-6  
Cont.

I don't envy the position you're in, but I hope you will look at this in a clear-eyed manner. If it sounds like a dangerous proposal to you, knowing this town intimately as you do, vowing to preserve our dear town as you all did, knowing that we are in a dangerous water emergency, which is guaranteed to get much worse in the coming years, please think very carefully about this. Listen to your gut. I trust you are looking out for my and the rest of your constituencies best interest, not a developer's. We want to preserve our vulnerable little town. If this re-zoning and proposed development go through...

1105-7

this will be your legacy. Yours, Rachelle Arizmendi, Gene Goss, Edward Garcia, Kelly Kriebs, Robert Parkhurst, Bob Spears, Tom Denison, John Hutt, William Pevsner and Peggy Dallas.

↑  
1105-7  
Cont.

Respectfully yours,

Karin Delman  
540 W. Laurel Avenue  
Sierra Madre, CA 91024

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## Response to Comment Letter I105

Individual  
Karin Delman  
October 4, 2021

- I105-1** The comment is an introduction to comments that follow and does not raise any specific issue related to the adequacy of the Draft EIR.
- I105-2** The comment expresses general concern regarding traffic congestion associated with the proposed project. Please refer to Global Response GR-6.
- I105-3** The comment expresses general opposition to the proposed project. However, the comment does not raise any specific issue related to the adequacy of the Draft EIR.
- I105-4** The comment expresses concern regarding the tree removal within the project site and general wildlife habitat concerns. Please refer to Global Response GR-2 and Final EIR Section 4.4, Biological Resources.
- I105-5** The comment expresses general concerns regarding the project site being located within a VHFHSZ. Please refer to Global Response GR-3.
- I105-6** The comment expresses concern regarding water supply. Please refer to Global Response GR-1.
- I105-7** The comment provides general concluding remarks and opposition to the project that do not raise new or additional environmental issues concerning the adequacy of the Draft EIR.

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Comment Letter 1106

**From:** Helena Karafilis <helenakarafilis@gmail.com>  
**Sent:** Monday, October 4, 2021 2:10 PM  
**To:** Vincent Gonzalez  
**Subject:** Housing development

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Helena Karafilis-Spensley  
642 Fairview Ave, Sierra Madre, CA 91024

Thank you for the opportunity to comment on the DEIR for the "Meadows at Bailey Canyon"  
Please retain a copy for the administrative record.  
Please respond to these comments in the Final EIR and please put me on the list of people to  
notify when the Final EIR is complete.

1106-1

I strongly object to the proposed housing development. It is inconsistent with the Policies and  
Values of our General Plan. I am especially concerned with:

1106-2

1) 101 mature trees will be removed, including 10 protected Oaks. The Oaks will be replaced with  
smaller Oaks and other small trees (requiring a great deal of water to become established) SM has  
a Forest Management Plan with a mission to preserve "Canopies" for their environmental and  
aesthetic benefit. 101 large canopied trees will be destroyed. Why are you flouting the SM Forest  
Management Plan and denuding the area? How will you prevent rock and landslides and impact on  
wildlife when these mature trees are destroyed?

1106-3  
1106-4

2) I strongly oppose a change in zoning, a change in our General Plan and a change in the  
regulations that other residents have to follow.

1106-5

3) In the Alternatives section presented in the Draft EIR, why did you choose to feature only a  
maximum-sized institution building as opposed to one we could have such as an assisted-living  
facility such as the Kensington, which is under 60,000 sq feet, as would be a high school? Why are  
you not presenting all options to citizens? Please present another institutional option.

1106-6

4) How, specifically, will the project ensure there will be no increased fire risk and address  
successfully two crucial elements in the proposed safety element given the area is an extremely high  
fire severity zone? The two safety elements below are particularly relevant—please address  
specifically in the EIR:

1106-7

Hz 2.12 All new residential developments in hazard areas shall have at least two emergency evacuation routes (i.e., points of ingress and egress)

Objective Hz7: Avoid expanding development into undeveloped areas in Very High Fire Severity Zone

Please address these concerns.

Sincerely,

Helena Karafilis-Spensley



↑  
1105-7  
Cont.



## Response to Comment Letter I106

Individual  
Helena Karafilis Spensley  
October 4, 2021

- I106-1** This comment requests the following comments (Comments I106-2 through I106-7) be included in the responses to comments of the Final EIR. As shown, the commenter's request has been recorded as part of this Final EIR.
- I106-2** This comment is the same as comment from I92-2. Please refer to Response to Comment I92-2.
- I106-3** This comment is the same as comment from I92-3. Please refer to Response to Comment I92-3.
- I106-4** This comment is the same as comment from I92-4. Please refer to Response to Comment I92-4.
- I106-5** This comment is the same as comment from I92-5. Please refer to Response to Comment I92-5.
- I106-6** This comment is the same as comment from I92-6. Please refer to Response to Comment I92-6.
- I106-7** This comment is the same as comment from I92-7. Please refer to Response to Comment I92-7.

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Comment Letter 1107

From: Matthew Bryant <mvnbryant@aol.com>
Sent: Monday, October 4, 2021 11:57 AM
To: Vincent Gonzalez
Subject: from Matt Bryant re; DEIR Comments for The Meadows at Bailey Canyon

CAUTION: This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

To: Vincent Gonzalez

From: Matt Bryant
635 Edgeview Drive
Sierra Madre, CA 91024

Re: DEIR for the Meadows at Bailey Canyso

Dear Mr. Gonzalez:

Below are my comments/concerns with the DEIR for the proposed housing project known as The Meadows at Bailey Canyon. I ask that you retain a copy for the administrative record and respond to these comments in the final EIR. I would also like to be put on the list of people to notify when the final EIR is complete.

1107-1

In general, I strongly object to this project as not suitable for the area in which it is located, inconsistent with our General Plan and Municipal Code and opposed by the vast majority of residents in Sierra Madre. My specific comments/concerns are as follows:

1. The additional ingress/egress required for a project of this magnitude located at Carter creates a dangerous choke point affecting vehicular traffic and pedestrian traffic particularly where Carter intersects with Grove and Lima. My wife and I recently decided to go for a walk at Bailey Park. As we drove up Grove from Fairview towards Bailey Park there were cars parked on both sides of the street on Grove. This is caused because the parking at Bailey Park is inadequate to meet the demand which causes overflow parking onto Grove. As we drove north on Grove towards the park, other cars were coming down Grove in the opposite direction. Because there was not room to pass simultaneously, one of the cars had to find a place to pull to the side to let the other car pass. That had to be done while dodging pedestrians who had parked on Grove and were walking toward the park on a street without sidewalks. This is already a congested mess and an accident waiting to happen. Either a car is going to hit head-on with another car or a pedestrian is going to get hurt or killed. One or the other is bound to happen. And the conditions that I'm describing exist right now. If you add to this, the additional traffic from 42 homes, deliveries, guests and a public park, it becomes an accident waiting to happen. It simply doesn't work. Please consider my statement as putting the City of Sierra Madre on notice of a dangerous condition that will be made exponentially worse with the approval of this project. The City of Sierra Madre does not need the kind of legal exposure that would result from this project.

1107-2

2. The whole purpose of having an additional ingress/egress is so that people can evacuate safely in the event of an emergency and so that emergency vehicles can quickly access the property. For the reasons outlined above, it would not be feasible under the conditions I describe now as well as what they would be should this project gets approved.

1107-3

3. Regardless of what the developer promises to do, water is becoming an increasingly scarce resource. Lakes, rivers and reservoirs are drying up all over the Southwestern United States. There is no water source that can ever guarantee the delivery of water in the future under these conditions. Until the drought conditions improve, it would be the height of irresponsibility to bring additional users on line. The only solution if the drought continues is going to be rationing and higher water rates for existing users. The Meadows project could turn a disaster into a catastrophe. The developer promises "net zero" water use. That simply can't be achieved. Even if they offer to retrofit areas in Sierra Madre to offset the water use by the Meadows, that will only be a short-term fix. If the drought gets worse as many experts project will occur, and the developer has already done these retrofits, it means the City has no where to go. The retrofitting will have already been done to bring this project on line and now the City will have nowhere to go except rationing and higher water rates.

1107-4

- 4. The traffic on Sunnyside will destroy the character of that street and the quality of life for the residents. I can remember attending a City Council meeting a few years ago where residents on Sunnyside were concerned about the traffic only coming from the Mater Dolorosa Retreat Center. If you now add to that the traffic coming from 42 additional homes, deliveries, guests, and a public park, Sunnyside will be ruined. Sunnyside also does not have sidewalks and simply cannot support the increase in traffic resulting from a project of this magnitude.

1107-5
- 5. Every mature tree along the beautiful drive from the entry gates of the Monastery at the top of Sunnyside up to the Retreat Center will be destroyed. These are mature trees that have been there for years. They are irreplaceable. The project could have worked around this but instead chose to maximize profit at the expense of a well-designed project.

1107-6
- 6. With the passage of SB-9 and SB-10, the City of Sierra Madre has lost control over its zoning regulations. If this project were to be approved, there is no telling what owners of the newly-built homes could do if they were so inclined to do so. They could each put an ADU unit in or add more dwellings and the City of Sierra Madre would be powerless to stop them. None of that is being taken into account in the DEIR. It would further aggravate every concern I have mentioned whether it's traffic, water or in emergencies.

1107-7
- 7. According to the Natural Hazard Zone Disclosure Report for this property, it is located in the highest fire hazard zone. Owners would not be able to obtain normal insurance and instead would have to buy an expensive policy using the California Fair Plan. No other insurance company would touch a property in this kind of high fire hazard zone. The property also has an active earthquake fault either underneath or very close by. As is common knowledge, a large Monastery building was destroyed some years back after an earthquake. It is also located in a dangerous landslide zone. The property is also located in a protected species zone including potential or existing habitat for the California Spotted Owl and Hoary Bat among other species.

1107-8  
1107-9  
1107-10  
1107-11
- 8. In preparation for the project, Mater Dolorosa sprayed a chemical over the entire 22 acres that destroyed almost all plant life and vegetation. There has been no efforts at dust mitigation whatsoever. When the wind blows, dust rolls off the barren land into the air and onto neighboring properties causing allergies and more severe respiratory and other health issues. Construction of a housing project will only make the conditions worse.

1107-12
- 9. Contrary to the precepts in the General Plan and Municipal Code, neighbors immediately adjacent and to the west of the project will have their views, privacy and value of their properties significantly affected by this project. Despite promises by Mater Dolorosa over the years about mitigating the impact of their project on the neighbors, that is not the case. We still do not know if the homes are going to be 1-story or 2-story. But when we see a pattern of conduct that puts profit over people, we can guess what story homes they intend to put in.

1107-13
- 10. The last large parcel of open space in Sierra Madre will be obliterated. The wildlife including deer, coyote, bobcats, falcons, bears and other wildlife will be displaced.

1107-14
- 11. The area to be donated above the Monastery has been deemed to be a generous gift to the community. That land is not buildable, valuable land. Mater Dolorosa and their Developer have cleverly offered that up as a "concession" when in reality, all it does is shift the responsibility and liability for maintaining the land from Mater Dolorosa over to the City of Sierra Madre and its taxpayers. This is hardly a benefit to the community.

1107-15
- 12. The Meadows has been a staging area in the event of fires as well as for mountain rescues. By developing this land with a large housing project, not only do we remove it as a valuable staging area, we also further stress our police and fire departments with additional people that may need evacuation and their homes protected. Add to that the difficulty of getting emergency vehicles into the project as a result of the road conditions along Sunnyside and Carter and, once again, this project only makes difficult conditions even worse.

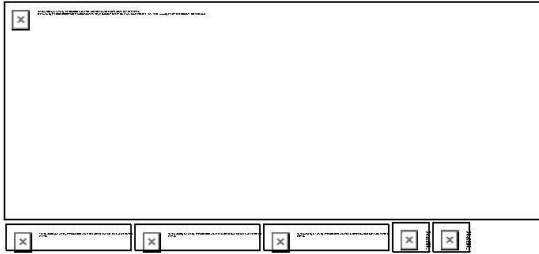
1107-16
- 13. A well-designed institutional development has not been fairly or adequately explored. From the get go, only very scary institutional projects have been offered as an alternative to this residential project when that is simply not the case. The lot coverage, setbacks, traffic, water use and impact on the neighbors appear to be a lot less with an institutional project. I also believe the vast majority of residents would be in favor of such a project.

1107-17
- In conclusion, the City of Sierra Madre has no obligation to support this horrible project just because Mater Dolorosa and their developer, New Urban West want to maximize their profit at our expense. I don't believe that the concerns outlined above can be mitigated without a drastic change to this project or an alternative use.

1107-18

Thank you.  
Matt Bryant

635 Edgeview Drive  
Sierra Madre, CA 91024  
626-695-7807



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## Response to Comment Letter I107

Individual  
Matthew Bryant  
October 4, 2021

- I107-1** The comment expresses general opposition to the project and requests the following comments be included in the responses to comments of the Final EIR. As shown, the commenter's request has been recorded as part of this Final EIR. . Regarding consistency with the General Plan, please refer to Global Response GR-7.
- I107-2** The comment raises concerns regarding the design of the Carter Avenue and potential safety hazards to motorists and pedestrians. Please refer to Global Response GR-5.
- I107-3** The comment expresses concern regarding emergency evacuation relative to the ingress/egress design proposed for Carter Avenue. Please refer to Global Response GR-4 and Global Response GR-5.
- I107-4** The comment expresses concern regarding water availability during drought conditions and potential exacerbation of water supply issues with implementation of the proposed project. Please refer to Global Response GR-1.
- I107-5** The comment expresses concern regarding future traffic volumes on Sunnyside Avenue and potential degradation to the character of the street. Sunnyside Avenue is currently the primary entrance to the Mater Dolorosa Retreat Center and will serve as a two-way access for the proposed project. The comment states that Sunnyside Avenue does not have sidewalks above Algeria Avenue. Please note that Sunnyside has sidewalks on both sides of the street between West Algeria Avenue and Fairview Avenue. However, no sidewalks are present north of Fairview Avenue. The proposed project would be consistent with Objective L51 of the City's Land Use Element, which states "developing a balanced and multi-modal transportation system to serve the needs of all roadway users, including motorists, public transit patrons, pedestrians and cyclists," because the proposed project would include a landscaped parkway and sidewalk on the west side of North Sunnyside Avenue, and a sidewalk between proposed A, B, and C Streets, enhancing pedestrian safety and mobility (Draft EIR Section 4.17.4, Project Design Features, in Section 4.17, Transportation). Therefore, the proposed project has a less than significant impact to the City's circulation system. Please refer to Global Response GR-6 for information about traffic impacts.
- I107-6** The comment expresses concern regarding tree removal that would occur as part of project implementation. Please refer to Global Response GR-2.
- I107-7** The comment expresses concern regarding the passage of Senate Bill (SB) 9 and SB 10 and associated indirect effects of potential future development allowed under these senate bills. Please see Response to Comment I28-5for discussion regarding SB 9. Regarding the comment's concern for SB 10, this bill was recently passed and signed by the Governor and will take effect in January 2022. The new law provides that local agencies (e.g., City of Sierra Madre) may adopt an ordinance to allow up to 10 dwelling units on any parcel, at a height specified in the ordinance, if the parcel is located within a transit-rich area or urban infill site. Pursuant to SB 10, adoption of such an ordinance would not be

subject to CEQA.<sup>12</sup> The proposed project does not request or benefit from the provisions of SB 10. As previously discussed above, the project as proposed requests the approval of a Specific Plan, which is subject to CEQA as shown in these Responses to Comments. As such, no change or addition to the Draft EIR is required.

- I107-8** The comment expresses concern regarding the project location within a high fire hazard severity zone. Please refer to Global Response GR-3.
- I107-9** The comment expresses concern regarding earthquake hazards and the project proximity to fault zones. Please refer to Response to Comment I36-7 and Response to Comment I36-7. Regarding the commenter's concern about damage to the Mater Dolorosa Retreat Center, it should be noted that, due to the age of the Mater Dolorosa Retreat Center, this existing building was not constructed to current building code standards. The proposed project would be required to adhere to the most current CBC standards to minimize the effects of earthquakes and other geotechnical hazards.
- I107-10** The comment expresses concern regarding landslide hazards. As concluded in Draft EIR Section 4.7, Geology and Soils, the project site is located outside of any potential landslide zone and is not located within a seismic hazard zone, therefore, impacts associated with landslides would be less than significant.
- I107-11** The comment expresses concern regarding potential impacts to the California Spotted Owl and Hoary Bat, as well as general impacts to on-site habitat. Regarding the spotted owl, the CDFW Spotted Owl Viewer (CDFW 2021) does not have recent records of California spotted owl (*Strix occidentalis occidentalis*) in the local vicinity, with the nearest being a 1974 record from almost two miles to the northeast and there are several ridges between the project and the record location. As such, the potential for occurrence of the species was not assessed due to the lack of recent local records and the distance to the nearest record. The species is typically found in old-growth mixed conifer forest, often with an understory of oaks and other deciduous hardwoods. The potential habitat is most often found in deep-shaded canyons (canopy closure greater than 40%), on north-facing slopes, and within 300 meters of water. The project site lacks suitable habitat for the species, so the species is not expected breed in the area. As with most birds, there is potential for the species to be a transient in the area during foraging, but project activities would not be expected to impact the species. Regarding hoary bat, the Biological Resources Report provided as Appendix C1 of the Draft EIR, specifically Appendix C of the report, Special-Status Wildlife Species Potential to Occur on the Project Site, determined the hoary bat is not expected to occur on site due to lack of suitable habitat. Draft EIR Section 4.4, Biological Resources, analyzes potential impacts to habitat and provides mitigation measures MM-BIO-1 through MM-BIO-3 which would reduce impacts to biological resources to a level that is less than significant.
- I107-12** The comment expresses concern regarding chemical spraying at the site by the Mater Dolorosa Retreat Center. The comment does not raise any issue concerning the adequacy of the Draft EIR. Activities undertaken by the Mater Dolorosa Retreat Center are outside the control of the project Applicant and serve as baseline conditions at the project site.

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<sup>12</sup> Holland and Knight. 2021. SB 10 to Facilitate Upzonings, But Does Not Include CEQA Exemption for Corresponding Projects. September 10, 2021. <https://www.hklaw.com/en/insights/publications/2021/09/sb-10-to-facilitate-upzonings>.



- I107-13** The comment expresses concern regarding private residential views being impacts by implementation of the proposed project. Protection of private views is not within the purview of CEQA; therefore, impacts to private views are not considered an environmental impact under CEQA. Impacts to public viewpoints or other sensitive views within the project area that would result following implementation of the project are analyzed in Draft EIR Section 4.1, Aesthetics.
- I107-14** The comment expresses concern regarding impacts to wildlife, including deer, coyote, bobcats, falcons, bears and other wildlife. All potential impacts to sensitive wildlife species are analyzed in Draft EIR Section 4.4. Mitigation measures MM-BIO-1 through MM-BIO-3 would reduce impacts to biological resources, including wildlife, to a level that is less than significant. Additional impact analysis is provided in the Biological Resources Report provided as Appendix C1 of the Draft EIR.
- I107-15** The comment expresses concern regarding the land donation north of the Retreat Center. As discussed in Final EIR Section 3.2, Project Objectives, one of the objectives of the proposed project is to preserve the hillside open space area by conserving approximately 35 acres north of the Mater Dolorosa Retreat Center to the City in order to preserve a portion of Bailey Canyon and the Bailey Canyon Trail, which would be used by wildlife movement up and down slope; preserve native vegetation communities and drainages; and preserve land adjacent to the Bailey Canyon stream. It should be noted that no development is proposed within this 35-acre open space hillside conservation area. The comment does not raise any issue concerning the adequacy of the Draft EIR; therefore, no further response is provided. Conservation
- I107-16** The comment states that the project site currently serves as a fire protection staging area and expresses concern regarding emergency evacuation. Please refer to Global Response GR-4 for general concerns related to wildfire. Regarding the loss of the site as a fire response/helicopter landing area, see Response to Comment I10-1.
- I107-17** The comment expresses concern regarding the potential alternatives analyzed in lieu of the proposed project. Potential alternatives analyzed for the proposed project are provided in Draft EIR Chapter 8, Alternatives. Refer to Response to Comment I26-10.
- I107-18** The comment provides concluding remarks that do not raise new or additional environmental issues concerning the adequacy of the Draft EIR.

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Comment Letter I108

Heather Allen  
431 Grove Street  
Sierra Madre, Ca.

Dear Mr. Gonzalez,

My name is Heather Allen. I have been a resident at 431 Grove Street since 1973.

Thank you for the opportunity to comment on the DEIR for the "Meadows at Bailey Canyon".

Please respond to my comments in the final EIR, and retain a copy of this letter for the administrative record.

I object to the proposed housing development. The following are my concerns:

The land is zoned institutional, yet the developer wants to build many homes. This is not allowed in an institutional zone. Even if the city council grants the applicant a residential zone change, many large houses on small lots is not keeping within Sierra Madre's character or the surrounding neighborhood.

There are two late quaternary earthquake faults on the site. This was not even mentioned in the DEIR. It is imprudent to build any homes on earthquake fault lines.

Over the years, I have noticed an increase of traffic and parking on Grove Street, particularly on the weekends when people come to Bailey Canyon. The addition of a park is only going to intensify these problems. I feel that a park is a benefit to the developer and the people who move into the Meadows, but it is a disadvantage to the current residents.

I have also noticed an increase in noise over the years. In the 1980's, Grove Street was very quiet. But now, at times, the noise is unbearable. (It seems like an endless cacophony of mowers, blowers, and noise from various nearby home construction/repair projects.) I cannot imagine the misery that may be added to this by the construction and maintenance of 42 additional homes!

Carter is too narrow to be used as an ingress/egress for the project, particularly if there is a fire. I have lived through three mountain fires while residing on Grove. I know first hand the intense stress of having to hurriedly pack and evacuate under smoky, windy conditions. (Once you evacuate, the authorities may close the street and not allow you back into your home.) I can only imagine the chaos and safety concerns that would arise when many panicked residents try to evacuate on Carter only to run into more traffic jams on Grove and Lima because the current residents are trying to leave at the same time. This is certainly a recipe for disaster.

For all the above reasons, I object to this proposed development. I feel that the Monastery and the developer have little or no consideration for the residents who already live here. I understand the concept of private property rights, but no one has a "right" to build if the project infringes on someone else's rights. If approved, this proposed development will lessen our property values, pose serious safety concerns, and ultimately undermine our quality of life.

Sincerely,  
Heather Allen  
hla@webtv.net

I108-1

I108-2

I108-3

I108-4

I108-5

I108-6

I108-7

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## Response to Comment Letter I108

Individual  
Heather Allen  
October 4, 2021

- I108-1** The comment expresses general opposition for the proposed project and requests the following comments (Comments I108-2 through I108-7) be included in the responses to comments of the Final EIR. As shown, the commenter's request has been recorded as part of this Final EIR.
- I108-2** This comment states that this project is not allowed in the current institutional zoning of the project and states that the project would not be consistent with the surrounding neighborhood characteristics. Please refer to Global Response GR-7.
- I108-3** The comment states that there are two late quaternary faults on site that were not identified in the Draft EIR. Please refer to Response to Comments I36-7 and I95-5.
- I108-4** The comment states that Bailey Canyon experiences parking problems around the park and suggests that the addition of a new park would exacerbate the parking issues. The proposed park would include a small parking lot. Additionally, the topic of parking is not an environmental issue required for evaluation under CEQA. Further, please refer to Response to Comment I10-17.
- I108-5** The comment expresses concern about the addition of construction and operational noise resulting from the project. Please refer to Response to Comments I36-6 and I65-14.
- I108-6** The comment expresses concern regarding Carter Avenue being used as an emergency ingress/egress for the project. Please refer to Global Response GR-4.
- I108-7** The comment expresses general opposition for the proposed project but does not raise any issue concerning the adequacy of the Draft EIR. No further response is required.

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Comment Letter I109

**From:** Brian Stieler <brian.stieler@gmail.com>  
**Sent:** Monday, October 4, 2021 11:58 AM  
**To:** Vincent Gonzalez  
**Subject:** Opposed to Meadows at Bailey canyon

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Hello Mr. Gonzalez,

I am a Sierra Madre resident, and I strongly oppose the new development. We moved to Sierra Madre because of the small quaint atmosphere. I really don't want to see more homes built here and ruining the beautiful landscape.

I 1109-1

Thank you  
Brian Stieler

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## Response to Comment Letter I109

Individual  
Brian Stieler  
October 4, 2021

- I109-1** The comment expresses general opposition to the proposed project but does not raise any issue concerning the adequacy of the Draft EIR.

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Comment Letter I110

**From:** Steve Haegelin <shaegelin@gmail.com>  
**Sent:** Monday, October 4, 2021 12:18 PM  
**To:** Vincent Gonzalez  
**Subject:** Comments on the Draft EIR for The Meadows at Bailey Canyon

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

To: Vincent Gonzalez

From: Teng Hik Khoe, Kiok Gwat Khoe

Re: Comments on the Draft EIR for The Meadows at Bailey Canyon

We live at 523 Sierra Keys Drive and our backyard abuts the southern end of the Monastery grounds. We object to the project and have the following concerns about the EIR

I 1110-1

1) The proposed development goes against the City's own Safety Element Hz 2.12 and Hz 7 requiring two points of escape (Carter is not a "real" road to serve so many homes and easily blocked) and avoiding expansion into undeveloped, high fire risk areas, respectively. In addition, removing the natural fire break provided by the Monastery grounds will put existing homes, like ours, at risk.

I 1110-2

2) The proposed development plan for Carter ignores the Sierra Madre requirement for 30ft wide streets and is not suitable for the large number of trips from so many homes.

I 1110-3

3) The proposed development goes against the City's Forest Plan of maintaining mature trees to preserve the existing canopy by removing 101 mature trees and 10 Protected Oaks.

I 1110-4

4) The proposed development's two story homes will destroy the views from the backyard of our home which we have enjoyed for 45 years. Our lot is substantially below the southern border of the Monastery, and two story homes will prevent us from seeing much of the view we currently enjoy. They are also not in keeping with the architecture of our neighborhood.

I 1110-5

Sincerely,

Teng Hik Khoe &  
Kiok Gwat Khoe

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## Response to Comment Letter I110

Individual

Teng Hik Khoe and Kiok Gwat Khoe

October 4, 2021

- I110-1** The comment expresses opposition for the proposed project but does not raise any specific issues concerning the adequacy of the Draft EIR.
- I110-2** The comment expresses concern regarding impacts to evacuation routes, specifically within Carter Avenue, and the project's consistency with the Draft Safety Element Update. Please refer to Global Response GR-3, Global Response GR-4, and Global Response GR-5.
- I110-3** The comment states that the design of Carter Avenue ignores the City's 30-foot roadway width requirement. Please refer to Global Response GR-5.
- I110-4** The comment raises concerns regarding the removal of trees on the project site. Please refer to Global Response GR-2.
- I110-5** The comment raises concerns regarding the proposed project's impact to private views. Please refer to Response to Comment I77-7.

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Comment Letter I111

From: robertg [mailto:robertg@sgds.com]  
Sent: Tuesday, October 5, 2021 10:03 AM  
To: Vincent Gonzalez <vgonzalez@cityofsierramadre.com>  
Subject: Meadows dEIR - Specific Plan inconsistency

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

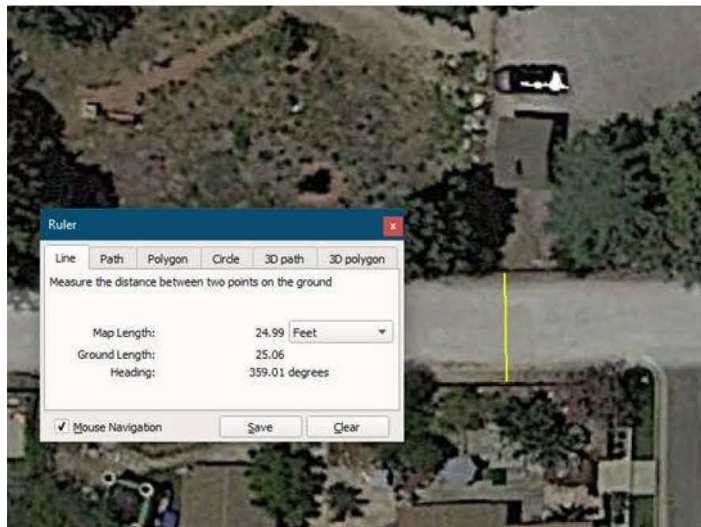
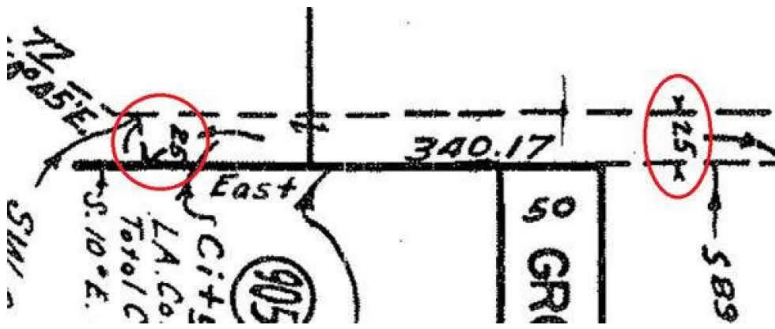
Vincent, there is an inconsistency between the Meadows draft EIR and the Specific Plan.

The right-of-way section of Carter that the city owns south of Bailey Canyon Park is listed as being 20' wide in the Specific Plan (page 20) and 25' wide in the dEIR.

According to the Assessor's map and measuring on Google Earth the right-of-way is 25' wide. Maybe the paved street itself is physically 20'.

Robert Gjerde

I111-1



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## Response to Comment Letter I111

Individual  
Robert Gjerde  
October 5, 2021

- I111-1** The comment states that there is an inconsistency between the Specific Plan and the Draft EIR regarding the right-of-way of Carter Avenue. The Specific Plan has been revised to reflect this change. Please refer to Global Response GR-5.

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Comment Letter 1112

5 October 2021

To whom it may concern

I oppose the Meadows project.

First, this whole project swept upon us in the cloud of COVID. I did not hear anything until this EIR situation came up. How can that be for something so profound? Perhaps all was done technically legally. But for something this large, the residents should have been much more in the conversation.

1112-1

So we are left responding to a very confusing EIR. Not being a lawyer I found it confounding.

I did try to read the EIR through, however. Here are my concerns in MY language, the language of an average citizen who feels as though the situation was never clearly presented.

1. All the zoning rules, setbacks, values of the General Plan, etc. that need to be changed to make this happen. Why? Is changing everything to make this happen for the good of the city or the people around this massive development? To make all these changes, allow all these exceptions seems very selective and unfair. I doubt that any other resident would be allowed even one or two of these changes let alone that multitude that are being proposed. As someone who was required to follow quite draconian rules for a building project, I protest. However I followed the rules because underneath it all I respected that the rules, zones, codes etc. were there by common consent of the residents and meant to maintain the qualities we value.
2. There is no water to buy. So the net zero argument is ridiculous. We are in an unprecedented drought/climate change situation and creating 42 more homes using water that the city will have to provide when the rest of the residents are looking at undoubtedly mandatory cutbacks in water is foolish. I guess we are getting sort of bribed with money for this non available water, but money, although it may fix pipes cannot create water.
3. Fire. This area was zoned as high danger because it is. This is another example of sweeping away recommendations in our code and general plan to please this project with no real reasoning why that should be allowed. The type of fires today, although slowed by our better fire protection in buildings, clearly does not stop the destruction. Forty-two more (million+)\$ homes to protect also appears foolish.
4. Nature. Again, protections for oaks and other plants are being swept away for this project. Why? In this case the oaks will take generations to grow back, the root system under the ground etc. also will take generations. Five years of taking care of some saplings does not replace the PROTECTED oaks that will not be protected.
5. Traffic. It is ludicrous to imagine that 42 houses with at least 2 cars per house and all the support systems associated with them will not affect our traffic. Already that area is stressed by Alverno and its now TWO schools, LaSalle, and Bailey Canyon. None of the roads were built for this situation and none of the fixes address that. North Sunnyside even now is very busy in the morning with every heading out to the schools and work. This would just get even worse!
6. Other options. There must be and are other options, but because there are no plans or EIR for those we can not clearly say that an institution or fewer homes or multi family homes would not work better for the good of our town.

1112-2

1112-3

1112-4

1112-5

1112-6

1112-7

All in all, I do not see how changing everything to make this happen benefits the town, its values, the rules and guidelines the town has in place or the trust we put in those we put in positions of authority to protect those rules and vales. Yes, it brings in money. But the money, as stated, does not buy way of life, safety, full grown and supported nature, water or protection from climate change. At the end of the day, I ask the city council and city planning commissions to do their job, maintain the plans, codes and zoning that are in place. Although the monastery of course has a right to sell, whomever owns does NOT have the right to do whatever THEY feel is best for them and their bottom line.

1112-8

Sincerely,



Beth Kerns

196 N. Sunnyside

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## Response to Comment Letter I112

Individual  
Beth Kerns  
October 5, 2021

- I112-1** The comment expresses general opposition for the proposed project and includes an introduction for comments to follow.
- I112-2** The comment expresses general opposition to the project, particularly related to changes to the proposed zone and land use designation. Please refer to Global Response GR-7.
- I112-3** The comment expresses concern related to drought and the project's water supply and net-zero impact. Please refer to Global Response GR-1.
- I112-4** The comment expresses concern associated with wildfires. Please refer to Global Response GR-3 .
- I112-5** The comment expresses concern regarding the tree removal and tree replacement of the protected coast live oak located on the project site. Please refer to Global Response GR-2.
- I112-6** The comment expresses general concerns relating to traffic. Please refer to Global Response GR-6 .
- I112-7** The comment states that the Draft EIR does not include other options. Project alternatives were analyzed in Chapter 8 of the Draft EIR. Pursuant to CEQA Guidelines, all EIRs must include a "range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives" (14 CCR 15126.6[a]). Four project alternatives are included in the Draft EIR. Further details of the project alternatives for the proposed project are discussed in Draft EIR Chapter 8, Alternatives.
- I112-8** The comment provides concluding remarks and general opposition to the project that do not raise new or additional environmental issues concerning the adequacy of the Draft EIR.

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# ES Executive Summary

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This Environmental Impact Report (EIR) is an informational document intended for the use by the City of Sierra Madre (City), other public agencies, and members of the general public in evaluating the potential environmental effects of the proposed The Meadows at Bailey Canyon Specific Plan Project (project or proposed project).

California Environmental Quality Act (CEQA) Section 21002 requires that an EIR identify the significant effects of a project on the environment and provide measures or alternatives that can mitigate or avoid these effects. This Draft EIR evaluates the environmental effects associated with development of the project and discusses the manner in which the project's significant effects can be reduced or avoided through the implementation of mitigation measures or feasible alternatives to the proposed project. In accordance with Section 15130 of the CEQA Guidelines, this EIR also includes an examination of the effects of cumulative development.

This summary provides a brief synopsis of (1) the proposed project, (2) results of the environmental analysis contained within this environmental document, (3) alternatives to the proposed project that were considered, and (4) major areas of controversy and issues to be resolved by decision makers. This summary does not contain the extensive background and analysis found throughout the individual chapters within the EIR. Therefore, the reader should review the entire document to fully understand the proposed project and its environmental consequences.

## ES.1 Project Location and Project Site

NUWI Sierra Madre LLC (applicant) is proposing to develop an approximately 17.30-acre site (Assessor's Parcel Number 5761-002-008) located at 700 North Sunnyside Avenue (project site). The project site is located within the northwestern portion of the City of Sierra Madre within Los Angeles County, California. The northwestern portion of the project site borders the City of Pasadena, while the base of the San Gabriel Mountains is located approximately 460 feet north of the project site (see Figure 3-1, Project Location, in Chapter 3, Project Description, of this EIR). Approximately 9.19 acres of the 17.30-acre project site would be developed for single-family residential uses; 3.68 would be developed as roadways; and approximately 3.39 acres of the project site would be developed as open space, which includes a 3.04-acre neighborhood public park. A 1.04-acre grading and landscape buffer would be provided within the northern portion of the site.

The project site is surrounded by the Bailey Canyon and Bailey Canyon Wilderness Park to the east, existing single-family residential development to the south and west, and the Mater Dolorosa Retreat Center, which is primarily used to host religious and silent retreats and other activities, to the north. The Mater Dolorosa Retreat Center currently is on the same legal parcel as the project site, which is currently split within three different lot; however, a lot line adjustment would be processed to adjust the boundaries of the three existing lots that make up the Mater Dolorosa Retreat Center and the project site. The lot line adjustment would consolidate the two lots that make up on legal lot for the project site into one and adjust the site's northern boundary farther to the north. There are currently two access roads that run north to south through the project site to the Mater Dolorosa Retreat Center, including North Sunnyside Avenue, which crosses through the western portions of the site, and Carter Avenue, which extends through the eastern portion of the site. North Sunnyside Avenue would become a public road that would serve the project site and provide access to the Mater Dolorosa Retreat Center, while Carter Avenue would be improved to provide secondary egress and ingress access to the site, as well as internal circulation throughout the project site. An additional access road traverses the northern portion of the site from east to west, from Carter Avenue to North Sunnyside Avenue. The Mater Dolorosa Retreat Center is not a part of the project site, and no changes in use are proposed. Open space areas lie to the north of the Mater Dolorosa

Retreat Center. Of this open space area, approximately 35 acres is proposed to be dedicated as part of the project to the City to be protected open space; however, this open space ~~dedication~~ conservation easement area is not considered part of the project site.

## ES.2 Project Description

The proposed project would include the adoption of The Meadows at Bailey Canyon Specific Plan (Specific Plan), which would establish the zoning and development standards to guide future development of 42 detached single-family residential units and approximately 3.39 acres of open space (including 3.04-acre dedicated neighborhood park), within the 17.30-acre project site. A 1.04-acre grading and landscape buffer would be located within the northern portion of the project site (see Figure 3-2, Conceptual Site Plan, in Chapter 3 of this EIR). In addition to the ministerial lot line adjustment required to consolidate the two lots that make up the project site into one and adjust the site's northern boundary further to the north, the discretionary actions before the City include a proposed General Plan amendment to change the land use designation for the project site from Institutional to Specific Plan, and a zone change to change the zoning of the project site from Institutional to Specific Plan.

Community benefits would include the new public park, net-zero water impact, establishing a dedicated funding source for long-term park maintenance, and the open space conservation easement~~dedication~~.

The project would include reconfiguration of North Sunnyside Avenue and improvement of Carter Avenue, which traverse the project site. Public access for both of these roads currently ends at the Mater Dolorosa Retreat Center's gates at the southern portion of the site. Under the proposed project, access to the project site provided via North Sunnyside Avenue would become public up to the portion of the existing legal parcel to be retained as the Mater Dolorosa Retreat Center. Carter Avenue would serve as secondary access to the proposed project as well as provide internal circulation within the project site.

### ES.2.1 Project Objectives

The following are the objectives of the proposed project:

1. Provide for orderly planning and long-range development of the project site to ensure community compatibility with the distinctive small-town character unique to the Sierra Madre community through adoption of a specific plan that establishes zoning and development standards.
2. Ensure new uses are compatible with the existing community by establishing comprehensive development standards and architectural guidelines through adoption of a specific plan that will guide future development.
3. Provide above-moderate income housing, in accordance with the 6th Cycle Regional Housing Needs Assessment (RHNA).
4. Develop a high-quality single-family residential community that is sensitively sited within the existing natural topography of the site and its surroundings and serves to minimize traffic impacts to adjacent streets.
5. Preserve the hillside open space area by dedicating approximately 30 acres north of the Mater Dolorosa Retreat Center to the City, in order to preserve a portion of Bailey Colby Canyon and the Bailey Colby Canyon Trail, which would be used by wildlife for movement up and down slope; preserve native vegetation communities and drainages; and preserve land adjacent to the Bailey Colby Canyon stream.
6. Provide street improvements to facilitate safe and efficient access to the site from North Sunnyside Avenue.



7. Achieve a net-zero impact on local water supplies to minimize burdens on existing City infrastructure and the impact on the environment.
8. Provide public benefits and amenities to the neighboring community, through a development agreement with the City, including a neighborhood public park and enhanced connectivity to the Bailey Canyon Wilderness Park and trail system.

## ES.2.2 Discretionary Actions

A discretionary action is an action taken by an agency that calls for the exercise of judgment in deciding whether to approve or how to carry out a project. In addition to the ministerial lot line adjustment required to consolidate the two lots that make up the project site into one and adjust the site's northern boundary further to the north, the proposed project would require consideration of the following discretionary actions by the City:

- Certification of the Final EIR and adoption of a Mitigation Monitoring and Reporting Program pursuant to CEQA
- Approval of amendments to the City of Sierra Madre General Plan including changing the land use designation of the project site from Institutional to Specific Plan
- Approval of amendments to the Zoning Code to change the zoning of the project site from Institutional to Specific Plan
- Approval of amendments to update the City's Zoning and Land Use maps
- Approval of The Meadows Specific Plan
- Approval of the Development Agreement between the Applicant and the City
- Approval of a landscape maintenance district or similar public maintenance entity, for long-term maintenance of the proposed public park

## ES.3 Areas of Controversy

Pursuant to Section 15082 of the CEQA Guidelines, the City circulated a Notice of Preparation (NOP) dated June 24, 2020, to begin a 30-day public review and comment period for interested agencies, organizations, and parties to provide comments regarding potential environmental impacts of the project and issues that should be addressed in the EIR. The NOP was also sent to the State Clearinghouse at the California Office of Planning and Research. The State Clearinghouse assigned a state identification number (SCH No. 2020060534) to this EIR.

Comments received during the NOP public comment period were considered during the preparation of this EIR. The NOP and comments are included in Appendix A1 to this EIR. Five comment letters were received in response to the NOP. Comments covered topics including water supply and regulations, biological resources, transportation, and flood control.

In addition, in August of 2020, the City held three workshops related to the proposed project. Over 100 residents participated in the City's workshops related to the proposed project and EIR. The Specific Plan has been prepared to establish comprehensive development standards for the proposed project, to ensure timely and adequate infrastructure, open space, and high-quality design. At all three of the workshops held in August 2020, the EIR was discussed in detail and participants provided comments to the City, which were memorialized and included in the record.

Due to COVID-19 and its related restrictions now easing, and in order to hear from as many residents as possible, the City held an additional in-person informational meeting to discuss the Draft EIR. The City has conducted this meeting to present the EIR process and to receive written public comments and suggestions regarding the scope and content of the EIR. The meeting has been held on Wednesday, July 14, 2021 from 6:00 p.m. – 7:30 p.m. at Memorial Park, located at 222 West Sierra Madre Boulevard. During and after this meeting, 47 comment letters were received, which focused on environmental issue areas such as water supply, traffic/transportation, circulation, loss of open space and natural habitat, wildfire, aesthetics, drought, climate change, zoning and land use designations, drainage and stormwater runoff, biological resources, wildlife, wildlife movement, air quality, public services, geologic hazards, noise, dust, wastewater/sewer system, and alternatives. These environmental issue areas have all been extensively analyzed in this Draft EIR. Public comments received in relation to this meeting have been incorporated into Appendix A2 of this EIR.

## ES.4 Issues to Be Resolved by the City Council

The issues to be resolved by the decision-making body are whether to adopt the proposed project and whether the potential significant impacts of the project with respect to air quality, biological resources, cultural resources, geology and soils, land use and planning, noise, and tribal cultural resources have been fully mitigated below a level of significance or if additional measures are required. Lastly, the City would determine whether any alternative might meet the key objectives of the project while reducing its environmental impact.

## ES.5 Project Alternatives

Pursuant to the CEQA, Guidelines, EIRs are required to “describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives” (14 California Code of Regulations [CCR] Section 15126.6[a]). This EIR “must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation” (CCR Section 15126.6[a]) The consideration of alternatives is required even if the alternatives “would impede to some degree the attainment of the project objectives, or would be more costly” (CCR Section 15126.6[b]).

### ES.5.1 Alternative 1: No Project/No Build Alternative

CEQA Guidelines Section 15126.6 requires the inclusion of a No Project/No Build Alternative (Alternative 1) to be analyzed. Under Alternative 1, no development would occur on the project site. Accordingly, the site characteristics of this alternative would be equivalent to the existing conditions for each category analyzed in Chapter 4, Environmental Analysis, of this EIR.

### ES.5.2 Alternative 2: Existing Zoning and Land Use Designation: Communal Residential Facility Alternative

The Existing Zoning and Land Use Designation: Communal Residential Facility Alternative (Alternative 2) assumes development of group homes, developmentally disabled, or senior care facilities, consistent with the existing Institutional zoning and General Plan land use designation of the project site. Therefore, no rezone or General Plan

Amendment would be required under this alternative. Alternative 2 would be developed on the same approximately 17.30-acre project site as the proposed project. Based on the 35% maximum lot coverage required by the zoning code, the maximum allowable footprint based on existing zoning would allow for development of approximately 275,000 square feet. This alternative would not include a publicly accessible neighborhood park, which is a component of the proposed project. Carter Avenue would be improved similar to the proposed project and would be used as secondary egress and ingress access to the site. North Sunnyside Avenue would remain a private street under this alternative.

### ES.5.3 Alternative 3: Existing Zoning and Land Use Designation: Private School Alternative

The Existing Zoning and Land Use Designation: Private School Alternative (Alternative 3) would include development of a private school, consistent with the existing Institutional zoning and General Plan land use designation of the project site. Therefore, no rezone or General Plan Amendment would be required under this alternative. Based on the 35% lot coverage required by the zoning code, the maximum allowable footprint based on existing zoning would allow for development of approximately 275,000 square feet. No neighborhood park would be developed under this alternative. Carter Avenue would be improved similar to the proposed project and would be used as secondary egress and ingress access to the site. North Sunnyside Avenue would remain a private street under this alternative.

### ES.5.4 Alternative 4: Reduced Development/No Park Alternative

The Reduced Development Alternative (Alternative 4) would include development of 34 detached single-family residential units on the same approximately 17.30-acre project site representing an approximately 20% reduction from the proposed project. Alternative 4 would require the same discretionary actions as the proposed project to change the existing Institutional zoning and General Plan land use designation to allow for development of residential uses. Under the proposed project, the proposed public park would be maintained by a landscape maintenance district or similar public maintenance entity. Because of reduced number of units under this alternative, there would not be enough funds to maintain a public park in accordance with City standards. Therefore, Alternative 4 would not include a neighborhood park. Although fewer units would be developed under this alternative, the lot size of each residential unit would be increased. Similar to the proposed project, the Reduced Development Alternative would also result in reconfiguration of North Sunnyside Avenue and improvements to Carter Avenue. Primary access to the project site would be provided by North Sunnyside Avenue, which would be publicly accessible. Carter Avenue would be improved similar to the proposed project and would be used as secondary egress and ingress access to the site.

## ES.6 Summary Table

Table ES-1 is a summary of the proposed project's environmental impacts under CEQA, the mitigation measures (MMs) to reduce potentially significant impacts to less than significant, and a determination regarding the level of significance of each potential impact after mitigation.

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measures (MMs) and Project Design Features (PDFs)	Level of Significance After Mitigation
<b>Aesthetics</b>			
Would the project have a substantial adverse effect on a scenic vista?	Less than significant	None required	Less than significant
Would the project substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	Less than significant	None required	Less than significant
In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	Less than significant	None required	Less than significant
Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	Less than significant	<p><b>PDF-AES-1:</b> Lighting at the project site shall comply with Section 3.8.6(A.xii) of the Specific Plan, which includes the following development standards:</p> <ul style="list-style-type: none"> <li>• All lighting of the building, landscaping, parking area, or similar facilities shall be in compliance with the City’s Dark Sky Program.</li> <li>• Lighting shall be hooded and directed downward to reflect away from adjoining properties.</li> <li>• Lighting shall be confined to the lot boundaries and not be oriented towards neighboring properties to protect privacy.</li> <li>• Pedestrian-scaled street lighting shall be provided within the proposed park areas pedestrian routes of travel to enable visibility and safety.</li> </ul>	Less than significant

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measures (MMs) and Project Design Features (PDFs)	Level of Significance After Mitigation
		<p>In addition, skylights proposed at the project site shall comply with Section 5.5.6 of the Specific Plan, which includes the following architectural design requirements:</p> <ul style="list-style-type: none"> <li>• Skylight materials and elements should be consistent with the selected architectural style and be fully integrated into the roof design.</li> <li>• Skylights shall employ the following strategies:                             <ul style="list-style-type: none"> <li>○ Glazing should be clear, flat, or non-reflective.</li> <li>○ Tubular, domed, or “bubble” skylights shall not be used.</li> <li>○ Skylights should be mounted on the same plan and angle as the roof.</li> </ul> </li> </ul> <p>To eliminate skyward glare, interior lights should not be oriented upward through skylights.</p> <p><b>PDF-AES-2:</b> Solar panels shall comply with requirements outlined in Section 5.5.6 of the Specific Plan which includes the following, to reduce potential for glare:</p> <ul style="list-style-type: none"> <li>• Solar panels shall include materials and elements that are consistent with the selected architectural style and shall be fully integrated into the roof design.</li> <li>• Solar panels shall be oriented to the south to maximize efficiency and establish visual consistency across buildings.</li> <li>• Flashing, sheet metal, and framing should be colored to match the roof material.</li> </ul>	

**Table ES-1. Summary of Project Impacts**

<b>Environmental Topic</b>	<b>Impact?</b>	<b>Mitigation Measures (MMs) and Project Design Features (PDFs)</b>	<b>Level of Significance After Mitigation</b>
Would the project have a cumulative effect on aesthetic resources?	Less than significant	PDF-AES-1 and PDF-AES-2 (see above)	Less than significant
<b><i>Agriculture and Forestry Resources</i></b>			
Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	No impact	None required	No impact
Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?	No impact	None required	No impact
Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	No impact	None required	No impact
Would the project result in the loss of forest land or conversion of forest land to non-forest use?	No impact	None required	No impact
Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	No impact	None required	No impact
Would the project have a cumulative effect on agriculture and forestry resources?	No impact	None required	No impact

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measures (MMs) and Project Design Features (PDFs)	Level of Significance After Mitigation
<i>Air Quality</i>			
Would the project conflict with or obstruct implementation of the applicable air quality plan?	Less than significant	None required	Less than significant
Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	Less than significant	<p><b>MM-AQ-1:</b> Prior to the City’s issuance of the demolition and grading permits for the Project, the Applicant shall demonstrate to the satisfaction of the Planning Division that its construction contractor will use a construction fleet wherein all 50-horsepower or greater diesel-powered equipment is powered with California Air Resources Board (CARB)-certified Tier 4 Interim engines or equipment outfitted with CARB verified diesel particulate filters.</p> <p>An exemption from this requirement may be granted if: (1) the Applicant documents equipment with Tier 4 Interim engines are not reasonably available, and (2) functionally equivalent diesel PM emission totals can be achieved for the project from other combinations of construction equipment (Tier 3 with level 3 diesel particulate filter, electric, compressed natural gas, hydrogen, etc.). For example, if a Tier 4 Interim piece of equipment is not reasonably available at the time of construction and a lower tier equipment is used instead (e.g., Tier 3), another piece of equipment could be upgraded to a Tier 4 Final or replaced with an alternative-fueled (not diesel-fueled) equipment to offset the emissions associated with using a piece of equipment that does not meet Tier 4 Interim standards. Before an exemption may be granted, the Applicant’s construction contractor shall: (1) demonstrate that at least two construction fleet owners/operators in Los Angeles County were contacted and that those</p>	Less than significant

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measures (MMs) and Project Design Features (PDFs)	Level of Significance After Mitigation
		owners/operators confirmed Tier 4 Interim equipment could not be located within Los Angeles County during the desired construction schedule; and (2) the proposed replacement equipment has been evaluated using the California Emissions Estimator Model (CalEEMod) or other industry standard emission estimation method, and documentation provided to the Planning Division confirms that necessary project-generated functional equivalencies in the diesel PM emissions level are achieved.	
Would the project expose sensitive receptors to substantial pollutant concentrations?	Potentially significant	<b>MM-AQ-1.</b> (see above)	Less than significant
Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	Less than significant	None required	Less than significant
Would the project have a cumulative effect on air quality resources?	Less than significant	None required	Less than significant
<b>Biological Resources</b>			
Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	Potentially significant impacts to nesting birds if vegetation clearing is undertaken during the breeding season	<b>MM-BIO-1: Nesting Bird Avoidance.</b> Initiation of construction activities (i.e., initial vegetation clearing) should avoid the migratory bird nesting season ( <del>February-January 1</del> through <del>August 31</del> <u>September 15</u> ), to reduce any potential significant impact to birds that may be nesting on the project site. If construction activities must be initiated during the migratory bird-nesting season, an avian nesting survey of the project site and contiguous habitat within 500 feet of all impact areas must be conducted for protected migratory birds and active nests. The avian nesting survey shall be performed by a qualified wildlife biologist within 72 hours prior to the start of	Less than significant



Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measures (MMs) and Project Design Features (PDFs)	Level of Significance After Mitigation
		<p>construction in accordance with the MBTA and California Fish and Game Code.</p> <p>If an active bird nest is found, the nest shall be flagged and mapped on the construction plans along with an appropriate no disturbance buffer, which shall be determined by the biologist based on the species' sensitivity to disturbance (typically 50 feet for common, urban-adapted species, 300 feet for other passerine species, and 500 feet for raptors and special-status species). The nest area shall be avoided until the nest is vacated and the juveniles have fledged. The nest area shall be demarcated in the field with flagging and stakes or construction fencing. A qualified biologist (with the ability to stop work) shall serve as a construction monitor during those periods when construction activities will occur near active nest areas to ensure that no inadvertent impacts on these nests occur.</p>	
<p>Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?</p>	<p>Potentially significant</p>	<p><b>MM-BIO-2: Invasive Species.</b> The use of invasive plant species listed in the California Invasive Plant Council's Inventory as having a rating of Limited, Moderate, or High shall not be allowed for landscaping purposes.</p>	<p>Less than significant</p>
<p>Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?</p>	<p>Potentially significant</p>	<p><b>MM-BIO-2</b> (see above)</p>	<p>Less than significant</p>

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measures (MMs) and Project Design Features (PDFs)	Level of Significance After Mitigation
Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	Potentially significant impacts to nesting birds if vegetation clearing is undertaken during the breeding season	<b>MM-BIO-1</b> (see above)	Less than significant
Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	Removal of <u>14</u> protected trees on-site, the project would result in potentially significant impacts	<p><b>MM-BIO-3: Protected Tree Replacement.</b> The City's Tree Preservation and Protection Ordinance (Chapter 12.20) identifies tree replacement requirements for tree removal associated with a development project. In total, ten protected trees may be removed. As such, they shall be replaced at a minimum with a 24-inch box tree, on a 1:1 basis with a like species. The specific location of individual mitigation tree plantings on site would be addressed in the mitigation planting plan or landscape design plan prepared for the site.</p> <p>In addition, all mitigation tree plantings shall be subject to a 5-year monitoring effort by an independent third-party certified arborist. The monitoring effort shall consider growth, health, and condition of the subject trees to evaluate success. The monitoring effort may result in a recommendation of remedial actions should any of the tree plantings exhibit poor or declining health. <u>In addition, because trees the project will have direct impacts to trees, an arborist would be required to be present on-site during the proposed widening of Carter Avenue, per the City's Tree Preservation and Protection Ordinance.</u></p>	Less than significant
Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	No impact	None required	No impact

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measures (MMs) and Project Design Features (PDFs)	Level of Significance After Mitigation
Would the project have a cumulative effect on biological resources?	Less than significant	None required	Less than significant
<b>Cultural Resources</b>			
Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	Less than significant	None required	Less than significant
Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	Potentially significant impacts to previously undiscovered archaeological resources	<p><b>MM-CUL-1: Workers Environmental Awareness Program.</b> All construction personnel and monitors who are not trained archaeologists shall be briefed regarding unanticipated discoveries prior to the start of ground disturbing activities. A basic presentation shall be prepared and presented by a qualified archaeologist, <u>in coordination with the Gabrieleño Band of Mission Indians-Kizh Nation</u>, to inform all personnel working on the project about the archaeological sensitivity of the area. The purpose of the WEAP training is to provide specific details on the kinds of archaeological materials that may be identified during construction of the project and explain the importance of and legal basis for the protection of significant archaeological resources. Each worker shall also be instructed on the proper procedures to follow in the event that cultural resources or human remains are uncovered during ground-disturbing activities. These procedures include work curtailment or redirection, and the immediate contact of the on-call archaeologist and if appropriate, Tribal representative. Necessity of training attendance should be stated on all project site plans intended for use by those conducting the ground disturbing activities.</p>	Less than significant

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measures (MMs) and Project Design Features (PDFs)	Level of Significance After Mitigation
		<p><b>MM-CUL-2: On-Call Archaeological Construction Monitoring.</b> A qualified archaeologist shall be retained and on-call to respond and address any inadvertent discoveries identified during ground disturbing activities. A qualified archaeological principal investigator, meeting the Secretary of the Interior’s Professional Qualification Standards, shall oversee and adjust all monitoring efforts as needed (increase, decrease, or discontinue monitoring frequency) based on the observed potential for construction activities to encounter cultural deposits or material as well as determine, for purposes of Native American monitoring, when initial ground disturbing activities are complete. The archaeological monitor shall be responsible for maintaining daily monitoring logs for those days monitoring is required. If monitoring is ultimately required, an archaeological monitoring report shall be prepared within 60 days following completion of ground disturbance. This report shall document compliance with approved mitigation and all monitoring efforts as well as include an appendix with copies of all daily monitoring logs. The final report shall be submitted to the South Central Coastal Information Center (SCCIC).</p> <p><b>MM-CUL-3: Unanticipated Discovery of Archaeological Resources.</b> In the event that potential archaeological resources (sites, features, or artifacts) are exposed during construction activities involving ground disturbance for the proposed project, all construction work occurring within <del>50</del> 100-feet of the find shall immediately stop until a qualified archaeologist can evaluate the significance of the find and determine whether</p>	

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measures (MMs) and Project Design Features (PDFs)	Level of Significance After Mitigation
		<p>additional study is warranted. This avoidance buffer may be adjusted following inspection of this area by the qualified archaeologist. Depending upon the significance of the find under CEQA (14 CCR 15064.5[f]; PRC Section 21082), the archaeologist may simply record the find and allow work to continue. If the discovery proves significant under CEQA, additional work, such as preparation of an archaeological treatment plan, testing, or data recovery may be warranted.</p>	
<p>Would the project disturb any human remains, including those interred outside of dedicated cemeteries?</p>	<p>Potentially significant impacts to unanticipated discovery of human remains</p>	<p><b>MM-CUL-4 Unanticipated Discovery of Human Remains.</b> In accordance with Section 7050.5 of the California Health and Safety Code, if human remains are found, the county coroner shall be immediately notified of the discovery. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains, <u>and no less than 100 feet from are of discovery</u>, shall occur until the county coroner has determined, within 2 working days of notification of the discovery, the appropriate treatment and disposition of the human remains. If the county coroner determines that the remains are, or are believed to be, Native American, he or she shall notify the Native American Heritage Commission (NAHC) in Sacramento within 24 hours. In accordance with California Public Resources Code, Section 5097.98, the NAHC must immediately notify those persons it believes to be the most likely descendant from the deceased Native American. The most likely descendant shall complete his/her inspection within 48 hours of being granted access to the site. The designated Native American representative would then determine, in consultation with the property owner, the disposition of the human remains.</p>	<p>Less than significant</p>

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measures (MMs) and Project Design Features (PDFs)	Level of Significance After Mitigation
Would the project have a cumulative effect on cultural resources?	Potentially significant impacts to previously undiscovered archaeological resources and unanticipated discovery of human remains	<b>MM-CUL-1, MM-CUL-2, MM-CUL-3, and MM-CUL-4</b> (see above)	Less than significant
<b>Energy</b>			
Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	Less than significant	None required	Less than significant
Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	Less than significant	None required	Less than significant
Would the project have a cumulative effect on energy resources?	Less than significant	None required	Less than significant
<b>Geology and Soils</b>			
Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:			
a. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42?	Less than significant	<b>PDF-GEO-1. Ground Shaking and Seismic Design Criteria.</b> During the design phase of the proposed development on site, the project shall comply with the Earthquake Design Regulations of Chapter 16, Section 1613 of the California Building Code (CBC) 2019. Based on the mapped values, the coefficients and factors apply to the lateral-force design for the proposed structures at the site are outlined in Appendix E, Geotechnical Investigation. Terrace deposits are at grade and Class D is recommended.	Less than significant

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measures (MMs) and Project Design Features (PDFs)	Level of Significance After Mitigation
		<p><b>PDF-GEO-2. Grading.</b> Grading of the site will consist of cut and fill operations to create building pads and associated streets. Grading shall involve the removal and recompaction or artificial fill and loose terrace deposits (see <b>MM-GEO-1</b>) in addition of mass-excavation of the project site. The following shall be incorporated during grading activities:</p> <ul style="list-style-type: none"> <li>• <u>Monitoring:</u> All earthwork, including clearing, site preparation, and fill replacement, shall be conducted with engineering control, under observation and testing by the geotechnical engineer and in accordance with the requirements of a site-specific geologic and geotechnical engineering report.</li> </ul> <p><b>PDF-GEO-3. Site Preparation.</b> The following shall be incorporated during site preparation activities:</p> <ul style="list-style-type: none"> <li>• <u>Existing Structure Location:</u> The general contractor shall locate all surface and subsurface structure on the site or on the approved grading plan prior to preparing the ground.</li> <li>• <u>Existing Structural Removal:</u> Any underground structures, including septic tanks, wells, pipelines, foundations, utilities, that have not been located prior to grading shall be removed or treated in a manner recommended by the Geotechnical Engineer.</li> <li>• <u>Clearing and Stripping:</u> The construction areas shall be cleared and stripped of all vegetation, trees, bushes, sod, topsoil, artificial fill, debris, asphalt, concrete and other deleterious material prior to fill placement.</li> </ul>	

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measures (MMs) and Project Design Features (PDFs)	Level of Significance After Mitigation
		<ul style="list-style-type: none"> <li>• <u>Removals</u>: Removals of suitable soil shall be performed on the site in accordance with the soils report.</li> <li>• <u>Subgrade Preparation</u>: Subgrade for foundations, pavement areas, overexcavations, and for those areas receiving any additional fill be prepared by scarifying the upper 12 inches and moisture conditioning, as required to obtain at least optimum moisture, but not greater than 120 percent of optimum. The scarified areas shall be compacted to at least 90 percent of the maximum laboratory density, as determined by ASTM D-1557-12 compaction method. All areas to receive fill should be observed by the Geotechnical Engineer prior to fill placement.</li> <li>• <u>Subgrade Inspection</u>: Prior to placing fill, the ground surface to receive fill should be observed, tested, and approved by the Geotechnical Engineer.</li> </ul> <p><b>PDF-GEO-4. Fill Placement.</b></p> <ul style="list-style-type: none"> <li>• <u>Laboratory Testing</u>: Representative samples of materials to be utilized as compacted fill shall be analyzed in a laboratory to determine their physical properties. If any material other than that previously tested is encountered during grading, the appropriate analysis of this material should be conducted.</li> <li>• <u>On-Site Fill Material</u>: The on-site soils are adequate for re-use in controlled fills provided the soils do not contain any organic matter, debris, or any individual particles greater than 12 inches in diameter.</li> </ul>	



Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measures (MMs) and Project Design Features (PDFs)	Level of Significance After Mitigation
		<ul style="list-style-type: none"> <li>• <u>Rock Fragments</u>: Rock fragments less than 12 inches in diameter may be utilized in the fill, provided they are not placed in concentrated pockets, surrounded with fine grained material, and the distribution of the rocks is supervised by the Geotechnical Engineer. Any rock fragments over 6 inches should be kept below a depth of 5 feet. Rocks greater than 12 inches in diameter should be taken off-site, placed in fill areas designated as suitable for rock disposal, or placed in accordance with the recommendations of the Geotechnical Engineer.</li> <li>• <u>Subgrade Verification and Compaction Testing</u>: Regardless of material or location, all fill material should be placed over properly compacted subgrades in accordance with the Site Preparation section of Appendix E, Geotechnical Investigation, of this EIR. The condition of all subgrades shall be verified by the Geotechnical Engineer before fill placement or earthwork grading begins. Earthwork monitoring and field density testing shall be performed during grading to provide a basis for opinions concerning the degree of soil compaction attained.</li> <li>• <u>Fill Placement</u>: Approved on-site material shall be evenly placed, watered, processed, and compacted in controlled horizontal layers not exceeding eight inches in loose thickness, and each layer should be thoroughly compacted with approved equipment. All fill material should be moisture conditioned, as required to obtain at least optimum moisture, but not greater than 120 percent of optimum moisture content. The</li> </ul>	

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measures (MMs) and Project Design Features (PDFs)	Level of Significance After Mitigation
		<p>fill shall be placed and compacted in horizontal layers, unless otherwise recommended by the geotechnical engineer.</p> <ul style="list-style-type: none"> <li>• <u>Compaction Criteria - Shallow Fills</u>: For fills less than 40 feet in vertical thickness, each layer shall be compacted to at least 90 percent of the maximum laboratory density for material used as determined by ASTM D-1557-12. The field density shall be determined by the ASTM D-1556-07 method or equivalent. Where moisture content of the fill or density testing yields compaction results less than 90 percent, additional compaction effort and/or moisture conditioning, as necessary, shall be performed, until the fill material is in accordance with the requirements of the Geotechnical Engineer.</li> <li>• <u>Fill Material - Moisture Content</u>: All fill material placed shall be moisture conditioned, as required to obtain at least optimum moisture, but not greater than 120 percent. If excessive moisture in the fill results in failing results or an unacceptable pumping condition, then the fill shall be allowed to dry until the moisture content is within the necessary range to meet the required compaction requirements or reworked until acceptable conditions are obtained.</li> <li>• <u>Keying and Benching</u>: All fills should be keyed and benched through all topsoil, slopewash, alluvium or colluvium or creep material, into sound terrace deposits or firm material where the slope receiving fill is steeper than 5:1 (Horizontal: Vertical) or as determined by geotechnical engineer. The standard acceptable</li> </ul>	

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measures (MMs) and Project Design Features (PDFs)	Level of Significance After Mitigation
		<p>bench height is four feet into suitable material. The key for side hill fills shall be a minimum of 15 feet within firm materials, with a minimum toe embankment of 2 feet into firm material, unless otherwise specified by the geotechnical engineer.</p> <ul style="list-style-type: none"> <li>• <b>Drainage Devices:</b> Drainage terraces and subdrainage devices shall be constructed in compliance with the ordinances of the controlling governmental agency, or with the recommendations of the Geotechnical Engineer and Engineering Geologist.</li> <li>• <b>Cut-Fill Transition:</b> Where a cut-fill transition is present beneath planned structures, the cut area shall be overexcavated three feet below the bottom of proposed footings and the excavated material shall be replaced as compacted fill to reduce the transition condition. These guidelines shall also be followed in areas where lots are underlain by soils or rock with differential expansion potential and also for lots located above descending buttress and stabilization fills.</li> </ul> <p><b>PDF-GEO-5. Grading Control.</b> Grading control activities shall comply with the following:</p> <ul style="list-style-type: none"> <li>• <b>Grading Inspection:</b> Earthwork monitoring and field density testing shall be performed by the Geotechnical Engineer during grading to provide a basis for opinions concerning the degree of soil compaction attained. The Contractor shall receive a copy of the geotechnical engineer's Daily Field Engineering Report, which shall indicate the results of field density tests for that</li> </ul>	

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measures (MMs) and Project Design Features (PDFs)	Level of Significance After Mitigation
		<p>day. Where failing tests occur or other field problems arise, the contractor shall be notified of such conditions by written communication from the geotechnical engineer in the form of a conference memorandum, to avoid any misunderstanding arising from oral communication.</p> <ul style="list-style-type: none"> <li>• <u>Subgrade Inspection</u>: All processed ground to receive fill and overexcavations should be inspected and approved by the Geotechnical Engineer prior to placing any fill. The contractor should be responsible for notifying the geotechnical engineer when such areas are ready for inspection. Inspection of the subgrade may also be required by the controlling governmental agency within the respective jurisdictions.</li> <li>• <u>Subgrade Testing</u>: Density tests shall also be made on the prepared subgrade to receive fill, as required by the Geotechnical Engineer.</li> <li>• <u>Density Testing Intervals</u>: In general, density tests shall be conducted at minimum intervals of 2 feet of fill height or every 500 cubic yards. Due to the variability that can occur in fill placement and different fill material characteristics, a higher number of density tests may be warranted to verify that the required compaction is being achieved.</li> </ul> <p><b>PDF-GEO-6. Cut Slopes.</b> Cut slope activities shall comply with the following:</p> <ul style="list-style-type: none"> <li>• <u>Gradient</u>: All cut slopes shall be designed at a gradient of 2:1 or less.</li> </ul>	

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measures (MMs) and Project Design Features (PDFs)	Level of Significance After Mitigation
		<ul style="list-style-type: none"> <li>• <u>Observation</u>: The Engineering Geologist shall observe all cut slopes excavated in rock, lithified or formation material at vertical intervals not exceeding ten feet.</li> <li>• <u>Change of Conditions</u>: If any conditions not anticipated in the preliminary report such as perched water, seepage, lenticular or confined strata of a potentially adverse nature, unfavorably inclined bedding, joints or faults planes, or areas of unstable material are encountered during grading, these conditions shall be analyzed by the engineering geologist and geotechnical engineer, and recommendations shall be made to treat these problems.</li> <li>• <u>Protection</u>: Cut slopes that face in the same direction as the prevailing drainage shall be protected from slopewash by a non-erosive interceptor swale placed at the top of the slope.</li> <li>• <u>Criteria</u>: Unless otherwise specified in the geotechnical and geological report, no cut slopes shall be excavated higher or steeper than that allowed by the ordinances of controlling governmental agencies.</li> <li>• <u>Drainage Devices</u>: Drainage terraces shall be constructed in compliance with the ordinances of controlling governmental agencies, or with the recommendations of the geotechnical engineer or engineering geologist.</li> </ul> <p><b>PDF-GEO-7. Fill Slopes.</b> Fill slopes activities shall comply with the following:</p> <ul style="list-style-type: none"> <li>• <u>Gradient</u>: All fill slopes shall be designed at a gradient of 2:1 or less.</li> </ul>	

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measures (MMs) and Project Design Features (PDFs)	Level of Significance After Mitigation
		<ul style="list-style-type: none"> <li>• <u>Slope Face - Compaction Criteria</u>: The contractor shall be required to obtain a minimum relative compaction of 90 percent out to the finish slope face of fill slopes, buttresses and stabilization fills. This may be achieved by overbuilding the slope a minimum of five feet, and cutting back to the compacted core, <u>or</u> by direct compaction of the slope face with suitable equipment, or by any other procedure which produces the required compaction. If the method of achieving the required slope compaction selected by the contractor fails to produce the necessary results, the contractor should rework or rebuild such slopes until the required degree of compaction is obtained. Slope testing shall include testing the outer six inches to three feet of the slope face during and after placement of the fill. In addition, during grading, density tests will be taken periodically on the flat surface of the fill three to five feet horizontally from the face of the slope.</li> <li>• <u>Slope Face - Vegetation</u>: All fill slopes shall be planted or protected from erosion by methods specified in the geotechnical report, or required by the controlling governmental agency.</li> </ul> <p><b>PDF-GEO-8. Utility Trenching and Backfill.</b> Utility trenching and backfill activities shall comply with the following:</p> <ul style="list-style-type: none"> <li>• <u>Utility Trenching</u>: Open excavations and excavations that are shored shall conform to all applicable Federal, State and local regulations.</li> </ul>	

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measures (MMs) and Project Design Features (PDFs)	Level of Significance After Mitigation
		<ul style="list-style-type: none"> <li>• <u>Backfill Placement</u>: Approved on-site or imported fill material shall be evenly placed, watered, processed, and compacted in controlled horizontal layers not exceeding eight inches in loose thickness, and each layer should be thoroughly compacted with approved equipment. All fill material shall be moisture conditioned, as required to obtain at least optimum moisture, but not greater than 120 percent of optimum moisture content. The fill shall be placed and compacted on a horizontal plane, unless otherwise recommended by the geotechnical engineer.</li> <li>• <u>Backfill Compaction Criteria</u>: Each layer of utility trench backfill shall be compacted to at least 90 percent of the maximum laboratory density determined by ASTM D- 1557-12. The field density shall be determined by the ASTM D-1556-07 method or equivalent. Where moisture content of the fill or density testing yields compaction results less than 90 percent, additional compaction effort and/or moisture conditioning, as necessary, shall be performed, until the compaction criteria is reached.</li> <li>• <u>Exterior Trenches Adjacent to Footings</u>: Exterior trenches, paralleling a footing and extending below a 1H:1V plane projected from the outside bottom edge of the footing, shall be compacted to 90 percent of the laboratory standard. Sand backfill, unless it is similar to the in-place fill, shall not be allowed in these trench backfill areas. Density testing, along with probing, should be accomplished to verify the desired results.</li> </ul>	

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measures (MMs) and Project Design Features (PDFs)	Level of Significance After Mitigation
		<ul style="list-style-type: none"> <li>• <b>Pipe Bedding:</b> We recommend that a minimum of 6 inches of bedding material shall be placed in the bottom of the utility trench. All bedding materials shall extend at least 4 inches above the top of utilities which require protection during subsequent trench backfilling. All trenches shall be wide enough to allow for compaction around the haunches of the pipe.</li> <li>• <b>Groundwater Migration:</b> Backfilled utility trenches may act as French drains to some extent, and considerable groundwater flow along utility bedding and backfill shall be expected. Wherever buried utilities, or structures which they may intersect, could be adversely affected by such drainage, provisions shall be made to collect groundwater migrating along the trench lines. These situations include where buried utilities enter buildings, particularly where they enter below grade mechanical rooms, and where buried utilities enter junction boxes or switching stations that are intended to remain dry. Measures that remedy this include, but are not limited to, placement of perforated drain pipes below and continuous with bedding materials, and placement of seepage barriers such as lean mix concrete or controlled density fill (CDF).</li> </ul> <p><b>PDF-GEO-9. Construction Considerations.</b> Construction activities shall comply with the following:</p> <ul style="list-style-type: none"> <li>• <b>Erosion Control:</b> Erosion control measures, when necessary, shall be provided by the contractor during grading and prior to the</li> </ul>	



Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measures (MMs) and Project Design Features (PDFs)	Level of Significance After Mitigation
		<p>completion and construction of permanent drainage controls.</p> <ul style="list-style-type: none"> <li>• <b>Compaction Equipment:</b> It is also the contractor's responsibility to have suitable and sufficient compaction equipment on the project site to handle the amount of fill being placed and the type of fill material to be compacted. If necessary, excavation equipment shall be shut down to permit completion of compaction in accordance with the recommendations contained herein. Sufficient watering devices/equipment shall also be provided by the contractor to achieve optimum moisture content in the fill material.</li> <li>• <b>Final Grading Considerations:</b> Care shall be taken by the contractor during final grading to preserve any berms, drainage terraces, interceptor swales, or other devices of a permanent nature on or adjacent to the property.</li> </ul> <p><b>PDF-GEO-10. Temporary Excavations.</b> Where the necessary space is available, temporary unsurcharged embankments may be slope back without shoring. The slope should not be cut steeper than 5 feet and below at near vertical temporary gradient, and above 5 feet at a 1:1 temporary gradient. In areas where soils with little or no binder are encountered, shoring or flatter excavation slopes shall be made. The recommended temporary excavation slopes do not preclude local raveling or sloughing. Where sloped embankments are used, the top of the slope should be barricaded to prevent equipment and heavy storage loads within five feet of the top of the slope. If the temporary construction</p>	

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measures (MMs) and Project Design Features (PDFs)	Level of Significance After Mitigation
		<p>embankments are to be maintained for long periods, berms should be constructed along the top of the slope to prevent runoff water from eroding the slope faces. The soils exposed in the temporary backcut slopes during excavation shall be observed by qualified personnel so that modifications of the slopes can be made if variations in the soil conditions occur. On-site grading should not undermine support of existing offsite improvements.</p> <p><b>PDF-GEO-11. Drainage/Landscape Maintenance.</b>                      The southern area of the site, where the proposed park would be located, may be used for stormwater infiltration. The site is underlain by mostly sandy soil, which have acceptable infiltration rates. However, additional subsurface exploration and infiltration testing shall be required in this area to determine the actual soil infiltration rates for design purposes of the system used. Any infiltration systems shall be setback a sufficient distance from proposed structures and adjacent properties to avoid adverse impacts. These distances shall be determined with future studies.</p> <p>In areas of residential development, water shall not be allowed to pond or seep into the ground, or flow over slopes in a concentrated manner. Roof gutters and yard drains shall be provided. Pad drainage shall be directed toward the street or any approved watercourse area swale via non-erosive channel, pipe and/or dispersion devices. In addition to control of landscape watering, pad drainage shall slope away from structures.</p>	

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measures (MMs) and Project Design Features (PDFs)	Level of Significance After Mitigation
		<p><b>PDF-GEO-12. Conventional Foundation Recommendations.</b> Appendix E includes recommendations for foundation design, including bearing subgrades, subgrade verification, footing depth and width, and bearing pressures, provided for preliminary design purposes and the final expansion index shall be determined following grading. Conventional or post-tensioned foundations shall be used to support the proposed structures. All footings should meet current slope setback requirements. Foundations shall be designed for low expansive soil conditions. The proposed project shall comply with conventional foundation design, as outlined in the final design of the project.</p> <p><b>PDF-GEO-13. General Recommendations.</b> The project shall comply with the following general recommendations:</p> <ol style="list-style-type: none"> <li>1. <u>Drainage and Site Maintenance:</u> All slab foundation areas shall be moisture conditioned to at least optimum moisture, but no more than 5 percent above optimum moisture for a depth of at least 12 inches below subgrade for low expansion index soil. The post-tensioned slab designer shall determine if the moisture penetration is sufficient for this design. The subgrade soil moisture shall be observed by a soil engineer or his/her representative prior to pouring concrete. It is suggested the above stated moisture be obtained and maintained at least a suggested 2 days prior to pouring concrete.</li> <li>2. A 10-mil Visqueen vapor barrier shall be placed underneath habitable area slabs and/or slabs</li> </ol>	

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measures (MMs) and Project Design Features (PDFs)	Level of Significance After Mitigation
		<p>with floor coverings. This barrier can be placed directly on the subgrade soils, but should be overlain by a two-inch layer of imported sand. This vapor barrier shall be lapped and sealed (especially around the utility perforations) adequately to provide a continuous waterproof barrier under the entire slab.</p> <p>3. Surface water shall be kept from infiltrating into the subgrade adjacent to the house foundation system. This may include, but not be limited to rain water, roof water, landscape water and/or leaky plumbing. The lots are to be fine graded at the completion of construction to include positive drainage away from the structure and roof water will be collected via gutters, downspouts, and transported to the street in buried drain pipes. Homebuyers should be cautioned against constructing open draining planters adjacent to the houses, or obstructing the yard drainage in any way.</p> <p>4. Utility trenches beneath the slabs shall be backfilled with compacted native soil materials, free of rocks.</p> <p>5. Subgrade soil beneath footings and slabs should be premoistened prior to placement of concrete.</p> <p>6. Standard County of Los Angeles structural setback guidelines are applicable, except where superseded by specific recommendations by the project geologist and geotechnical engineer.</p> <p>7. Building or structure footings shall be set back a horizontal distance, consistent with the requirements of Appendix E.</p>	

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measures (MMs) and Project Design Features (PDFs)	Level of Significance After Mitigation
		<p>8. Prior to placing concrete in the footing excavations, an inspection shall be made by our representative to ensure that the footings are free of loose and disturbed soils and are embedded in the recommended material.</p> <p><b>PDF-GEO-14. Retaining Walls.</b> Retaining wall footings should be founded into compacted fill or dense terrace deposits. The near surface on site soils have a low expansion index and should be confirmed prior to foundation construction. The equivalent fluid pressures recommended are based on the assumption of a uniform backfill and no build-up of hydrostatic pressure behind the wall. To prevent the build-up of lateral soil pressures in excess of the recommended design pressures, over compaction of the fill behind the wall should be avoided. This can be accomplished by placement of the backfill above a 45-degree plane projected upward from the base of the wall, in lifts not exceeding eight inches in loose depth, and compacting with a hand-operated or small, self-propelled vibrating plates.</p> <p><b>1. Conventional (Yielding) Retaining Walls.</b> All recommendations for active lateral earth pressures contained herein assume that the anticipated retaining structures are in tight contact with the fill soil (or dense alluvium) that they are supposed to support. The earth support system must be sufficiently stiff to hold horizontal movements in the soil to less than one percent of the height of the vertical face, but should be free-standing to the point that they yield at the top at least 0.1 percent of the height of the wall.</p>	

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measures (MMs) and Project Design Features (PDFs)	Level of Significance After Mitigation
		<p>2. <b>Earth Pressures on Conventional (Yielding) Retaining Walls.</b> The earth pressures on walls retaining permeable material, compacted fill, or natural soil shall be assumed equal to that exerted by an equivalent fluid with densities consistent with those listed in Appendix E.</p> <p>3. <b>Restrained (Non-Yielding) Walls.</b> Restrained (Non-Yielding) Walls shall be constructed consistent with ASTM D-1557-12, and the requirements of Appendix E.</p> <p>4. <b>Seismic Pressures for Retaining Walls.</b> Seismic Pressures for Retaining Walls shall be constructed consistent with the requirements of Appendix E.</p> <p><b>PDF-GEO-15. General Recommendations for Retaining Walls.</b> The following general recommendations shall be implemented for construction of retaining walls:</p> <ul style="list-style-type: none"> <li>• Any anticipated superimposed loading, such as upper retaining walls, other structures, within a 45-degree projection upward from the wall bottom, except retained earth, shall be considered as surcharge and provided in the design.</li> <li>• A vertical component equal to one-third of the horizontal force so obtained may be assumed at the application of force.</li> <li>• The depth of the retained earth shall be the vertical distance below the ground surface, measured at the wall face for stem design or measured at the heel of the footing for overturning and sliding.</li> <li>• The walls shall be constructed with weep holes near the bottom, on five-foot centers or with</li> </ul>	

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measures (MMs) and Project Design Features (PDFs)	Level of Significance After Mitigation
		<p>perforated drainpipe in a gravel envelope at the bottom and behind the wall. A one-foot thick zone of clean granular, free-draining material should be placed behind the wall to within three feet of the surface. On-site soil may be used for the remainder of the backfill and should be compacted to 90 percent relative compaction as determined by ASTM Test Designation D-1557-12.</p> <ul style="list-style-type: none"> <li>• A concrete-lined swale is recommended behind retaining walls that can intercept surface runoff from upslope areas. The surface runoff shall be transferred to an approved drainage channel via non-erosive drainage devices.</li> </ul>	
b. Strong seismic ground shaking?	Less than significant	PDF-GEO-1 through PDF-GEO-15 (see above)	Less than significant
c. Seismic related ground failure including liquefaction?	Potentially significant to seismic-related ground failure due to presence of artificial fill	<p><b>MM-GEO-1: Removal and Recompaction of Artificial Soil.</b> Prior to the commencement of any construction activity on site, the project contractor shall remove and recompact all artificial soil present within the limits of proposed grading, as deep as 18 feet bgs,</p> <p>PDF-GEO-1 through PDF-GEO-15 (see above)</p>	Less than significant
d. Landslides?	Less than significant	None required	Less than significant
Would the project result in substantial soil erosion or the loss of topsoil?	Less than significant	PDF-GEO-7 through PDF-GEO-9 (see above)	Less than significant
Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	Potentially significant to unstable soils due to presence of artificial fill	PDF-GEO-1 through PDF-GEO-15 and MM-GEO-1 (see above)	Less than significant
Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	Less than significant	PDF-GEO-12 (see above)	Less than significant

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measures (MMs) and Project Design Features (PDFs)	Level of Significance After Mitigation
Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	No impact	None required	No impact
Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Potentially significant impacts to any unique paleontological resources	<b>MM-GEO-2: Paleontological Monitoring and Resource Treatment.</b> Prior to the commencement of any grading activity on site, the project Applicant shall retain a Qualified Paleontologist meeting the Society of Vertebrate Paleontology (SVP) standards and guidelines, subject to the review and approval of the City’s Planning Department. The paleontologist shall prepare a Paleontological Resources Impact Mitigation Program (PRIMP) for the proposed project. The PRIMP shall be consistent with the guidelines of the Society of Vertebrate Paleontology. The Qualified Paleontologist shall attend the pre-construction meeting and their representative, the Qualified Monitor, shall be on site during all rough grading and other significant ground-disturbing activities at depths greater than 5 feet below the ground surface. In the event that paleontological resources (e.g., fossils) are unearthed during grading, the Qualified Monitor shall temporarily halt and /or divert grading activity to allow recovery of paleontological resources. The area of discovery shall be roped off with a 50-foot radius buffer. Once documentation and collection of the find is completed, the Qualified Monitor shall remove the rope and allow grading to recommence in the area of the find.	Less than significant
Would the project have a cumulative effect on geology and soils resources?	Potentially significant impacts to any unique paleontological resources	<b>PDF-GEO-1</b> through <b>PDF-GEO-15</b> and <b>MM-GEO-1</b> and <b>MM-GEO-2</b> (see above)	Less than significant



Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measures (MMs) and Project Design Features (PDFs)	Level of Significance After Mitigation
<b><i>Greenhouse Gas Emissions</i></b>			
Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Less than significant	None required	Less than significant
Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	Less than significant	None required	Less than significant
Would the project have a cumulative effect on greenhouse gas emissions?	Less than significant	None required	Less than significant
<b><i>Hazards and Hazardous Materials</i></b>			
Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Less than significant	None required	Less than significant
Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	Less than significant	None required	Less than significant
Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	No impact	None required	No impact
Would the project be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	Less than significant	None required	Less than significant

**Table ES-1. Summary of Project Impacts**

<b>Environmental Topic</b>	<b>Impact?</b>	<b>Mitigation Measures (MMs) and Project Design Features (PDFs)</b>	<b>Level of Significance After Mitigation</b>
For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	No impact	None required	No impact
Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Less than significant	<b>PDF-WF-1</b> (see below)	Less than significant
Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	Less than significant	<b>PDF-WF-1</b> (see below)	Less than significant
Would the project have a cumulative effect on hazards or hazardous materials?	Less than significant	<b>PDF-WF-1</b> (see below)	Less than significant
<b>Hydrology and Water Quality</b>			
Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	Less than significant	None required	Less than significant
Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	Less than significant	<b>PDF-UTL-1.</b> (see below)	Less than significant
Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	Less than significant	None required	Less than significant
a. result in substantial erosion or siltation on or off site;	Less than significant	<b>PDF-GEO-7</b> and <b>PDF-GEO-9</b> (see above)	Less than significant

**Table ES-1. Summary of Project Impacts**

<b>Environmental Topic</b>	<b>Impact?</b>	<b>Mitigation Measures (MMs) and Project Design Features (PDFs)</b>	<b>Level of Significance After Mitigation</b>
b. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site;	Less than significant	None required	Less than significant
c. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	Less than significant	None required	Less than significant
d. impede or redirect flood flows?	Less than significant	None required	Less than significant
In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?	Less than significant	None required	Less than significant
Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	Less than significant	None required	Less than significant
Would the project have a cumulative effect on hydrology or water quality resources?	Less than significant	<b>PDF-GEO-7</b> and <b>PDF-GEO-9</b> (see above)	Less than significant
<b>Land Use and Planning</b>			
Would the project physically divide an established community?	Less than significant	None required	Less than significant
Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	Potentially significant	<b>MM-BIO-3</b> (see above)	Less than significant
Would the project have a cumulative effect on land use resources?	Less than significant	<b>MM-BIO-3</b> (see above)	Less than significant

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measures (MMs) and Project Design Features (PDFs)	Level of Significance After Mitigation
<b>Mineral Resources</b>			
Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	Less than significant	None required	Less than significant
Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	Less than significant	None required	Less than significant
Would the project have a cumulative effect on mineral resources?	Less than significant	None required	Less than significant
<b>Noise</b>			
Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	Potentially significant temporary noise impact during construction activities when construction takes place near the project boundaries and potentially significant operational noise impacts from HVAC noise, depending upon the noise emission level of the selected residential HVAC systems.	<p><b>MM-NOI-1:</b> The City and/or their Construction Contractor shall implement the following noise reduction measures during all construction activities:</p> <ul style="list-style-type: none"> <li>A temporary noise barrier shall be constructed along the project site’s southern and western boundaries. The construction noise barrier shall be a minimum of 8 feet in height. The barrier may be constructed of 3/4-inch Medium Density Overlay (MDO) plywood sheeting, or other material of equivalent utility having a surface weight of 2 pounds per square foot or greater. Alternatively, prefabricated acoustic barriers are available from various vendors. When barrier units are joined together, the mating surfaces of the barrier sides should be flush or overlap with one another. Gaps between barrier units, and between the bottom edge of the barrier panels and the ground, should be closed with material</li> </ul>	Less than significant

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measures (MMs) and Project Design Features (PDFs)	Level of Significance After Mitigation
		<p>that will completely fill the gaps, and be dense enough to attenuate noise.</p> <ul style="list-style-type: none"> <li>• Construction noise reduction methods such as shutting off idling equipment, installing temporary acoustic barriers around stationary construction noise sources, and, where feasible, use of electric air compressors and similar power tools, rather than diesel equipment, shall be employed.</li> <li>• Equip all construction equipment (fixed or mobile) with properly operating and maintained mufflers, consistent with or exceeding manufacturers’ standards.</li> <li>• Ensure that construction equipment engine enclosures and covers as provided by manufacturers shall be in place during operation.</li> <li>• Place all stationary construction equipment so that the equipment is as far as feasible from noise-sensitive receptors and so that the emitted noise is directed away from the noise-sensitive receptors.</li> <li>• Locate equipment and materials staging in areas that will create the greatest distance between staging area noise sources and noise-sensitive receptors during project construction.</li> <li>• Ensure that construction equipment is shut down when not in use.</li> <li>• Limit haul truck deliveries to the same hours specified for the operation of construction equipment.</li> </ul> <p><b>MM-NOI-2:</b> In order to ensure that the proposed projects’ HVAC systems do not result in an exceedance of applicable noise standards (i.e., an increase of more</p>	

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measures (MMs) and Project Design Features (PDFs)	Level of Significance After Mitigation
		than 6 dBA in the City of Sierra Madre), the HVAC system for each residence shall have a maximum noise level specification not to exceed 72 dBA sound power level (equivalent to a sound pressure level of 47 dBA at a measured distance of 25 feet (7.6 meters) over a reflecting plane.	
Would the project result in generation of excessive groundborne vibration or groundborne noise levels?	Less than significant	None required	Less than significant
For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	No impact	None required	No impact
Would the project have a cumulative effect on noise resources?	Potentially significant temporary noise impact during construction activities when construction takes place near the project boundaries and potentially significant operational noise impacts from HVAC noise, depending upon the noise emission level of the selected residential HVAC systems.	<b>MM-NOI-1</b> and <b>MM-NOI-2</b> (see above)	Less than significant

**Table ES-1. Summary of Project Impacts**

<b>Environmental Topic</b>	<b>Impact?</b>	<b>Mitigation Measures (MMs) and Project Design Features (PDFs)</b>	<b>Level of Significance After Mitigation</b>
<b><i>Population and Housing</i></b>			
Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	Less than significant	None required	Less than significant
Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	No impact	None required	No impact
Would the project have a cumulative effect on housing and/or population resources?	Less than significant	None required	Less than significant
<b><i>Public Services</i></b>			
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:			
Fire protection?	Less than significant	None required	Less than significant
Police protection?	Less than significant	None required	Less than significant
Schools?	Less than significant	None required	Less than significant
Parks?	Less than significant	None required	Less than significant
Other public facilities?	Less than significant	None required	Less than significant
Would the project have a cumulative effect on public services resources?	Less than significant	None required	Less than significant
<b><i>Recreation</i></b>			
Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	Less than significant	None required	Less than significant

**Table ES-1. Summary of Project Impacts**

<b>Environmental Topic</b>	<b>Impact?</b>	<b>Mitigation Measures (MMs) and Project Design Features (PDFs)</b>	<b>Level of Significance After Mitigation</b>
Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	Less than significant	None required	Less than significant
Would the project have a cumulative effect on recreation resources?	Less than significant	None required	Less than significant
<b>Transportation</b>			
Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	Less than significant	None required	Less than significant
Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	Less than significant	None required	Less than significant
Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Less than significant	None required	Less than significant
Would the project result in inadequate emergency access?	Less than significant	None required	Less than significant
Would the project have a cumulative effect on transportation resources?	Less than significant	None required	Less than significant
<b>Tribal Cultural Resources</b>			
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size			



Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measures (MMs) and Project Design Features (PDFs)	Level of Significance After Mitigation
and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:			
<p>a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?</p>	<p>Potentially significant impacts to previously undiscovered tribal cultural resources</p>	<p><b>MM-TCR-1 Native American Monitoring.</b> Prior to the commencement of any ground disturbing activity at the Project site, <u>with a minimum of 30 days advance written notice</u>, the project applicant shall retain a Native American Monitor approved by the Gabrieleño Band of Mission Indians-Kizh Nation (Consulting Tribe on this project pursuant to Assembly Bill A52). A copy of the executed contract shall be submitted to the City of Sierra Madre Planning and Building Department prior to the issuance of any permit necessary to commence a ground-disturbing activity. <u>The applicant will inform the Gabrieleño Band of Mission Indians-Kizh Nation of the day, time, and location of the Workers Environmental Awareness Program (WEAP) preconstruction meeting, with a minimum of 5 days advance written notice, as well as make provisions for participation in the training.</u> The Tribal monitor will only be present on-site during the construction phases that involve initial ground-disturbing activities. Initial ground-disturbing activities is defined as initial mass grading and associated movement of sediments from their place of last deposition prior to commencement of the Project. (Initial ground disturbing activities <u>includes but is not necessarily limited to, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching does not include site preparation, grubbing, clearing, potholing, surveying, auguring, or tree removals.</u>) As it pertains to Native American monitoring, this</p>	<p>Less than significant</p>

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measures (MMs) and Project Design Features (PDFs)	Level of Significance After Mitigation
		<p>definition excludes movement of sediments after they have been initially disturbed or displaced by Project-related construction.</p> <p>The Tribal Monitor will complete daily monitoring logs that will provide descriptions of the day’s activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when the qualified archaeologist has determined, <u>and in good faith consultation with the Gabrieleño Band of Mission Indians-Kizh Nation</u>, that all initial ground-disturbing activities on the Project Site (as defined above) are completed, or when the qualified archaeologist and Tribal Representatives/Monitor have indicated that all upcoming ground-disturbing activities at the Project Site have little to no potential for impacting Tribal Cultural Resources (whichever defined threshold is met first). Upon discovery of any Tribal Cultural Resources, construction activities shall cease in the immediate vicinity of the find and a buffer of <u>50 <del>100</del></u>-feet will be established where no ground disturbing work will be allowed to occur until the find can be assessed and if required, treated according to CEQA requirements. All Tribal Cultural Resources unearthed by project activities shall be evaluated by the qualified archaeologist retained on-call and Tribal monitor approved by the Consulting Tribe. If the resources are Native American in origin, the Consulting Tribe will retain it/them in the form and/or manner the Tribe deems appropriate, for educational, cultural and/or historic purposes. If human remains and/or grave goods are discovered or recognized at the Project Site, all ground disturbance shall immediately cease within 100 feet</p>	

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measures (MMs) and Project Design Features (PDFs)	Level of Significance After Mitigation
		of the find and suspected extent of human remains as determined by the qualified archaeologist retained on-call and Tribal monitor approved by the Consulting Tribe. The county coroner shall be notified per Public Resources Code Section 5097.98, and Health & Safety Code Section 7050.5. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2). Work may continue on other parts of the Project Site (outside the 100-foot buffer) while evaluation and, if necessary, mitigation takes place (CEQA Guidelines Section 15064.5[f]).	
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	Potentially significant impacts to previously undiscovered tribal cultural resources	<b>MM-TCR-1</b> (see above)	Less than significant
Would the project have a cumulative effect on tribal cultural resources?	Potentially significant impacts to previously undiscovered tribal cultural resources	<b>MM-TCR-1</b> (see above)	Less than significant
<b>Utilities and Service Systems</b>			
Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of	Less than significant	<b>PDF-UTL-1.</b> Prior to issuance of a building unit, the project applicant will provide funds to the City to <u>achieve one of the following</u> :  1. Purchase supplemental water from the San Gabriel Valley Municipal Water District	Less than significant

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measures (MMs) and Project Design Features (PDFs)	Level of Significance After Mitigation
which could cause significant environmental effects?		<p>(SGVMWD) in an amount equal to the anticipated total indoor and outdoor water demand of each residential unit over a 50-year period. This purchase would be in addition to the City's existing agreement with SGVMWD providing for the purchase of supplemental imported water.</p> <p><u>2. Creation of a lawn retrofit program, which would provide homeowners with a grant provided to replace their lawn with turf;</u></p> <p><u>3. Improvements to existing water infrastructure, such as pipe leakage fixes.</u></p>	
Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	Less than significant	PDF-UTL-1 (see above)	Less than significant
Would the project result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	Less than significant	None required	Less than significant
Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	Less than significant	None required	Less than significant
Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	Less than significant	None required	Less than significant
Would the project have a cumulative effect on utilities and/or service systems resources?	Less than significant	PDF-UTL-1 (see above)	Less than significant

**Table ES-1. Summary of Project Impacts**

Environmental Topic	Impact?	Mitigation Measures (MMs) and Project Design Features (PDFs)	Level of Significance After Mitigation
<b>Wildfire</b>			
Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?	Less than significant	<b>PDF-WF-1.</b> The proposed project shall comply with the requirements outlined in the Fire Protection Plan (FPP) (Appendix F2) during construction and operations.	Less than significant
Due to slope, prevailing winds, and other factors, would the project exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	Less than significant	<b>PDF-WF-1.</b> (see above)	Less than significant
Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	Less than significant	<b>PDF-WF-1</b> (see above)	Less than significant
Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	Less than significant	None required	Less than significant
Would the project have a cumulative effect on wildfire?	Less than significant	<b>PDF-WF-1</b>	Less than significant

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# 1 Introduction

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This chapter of the Environmental Impact Report (EIR) describes the purpose, scope, and legislative authority of the EIR, the intent of the California Environmental Quality Act (CEQA) and other pertinent environmental rules and regulations, and the environmental review process. The chapter also describes the structure, required contents, and intended uses of the EIR by the City of Sierra Madre (City) and other potential responsible or trustee agencies.

## 1.1 Project Purpose and Background

This EIR addresses the environmental effects associated with adoption of the proposed The Meadows at Bailey Canyon Specific Plan Project (project or proposed project). Implementation of the project requires a City of Sierra Madre General Plan Amendment to change the land use designation for the project site from Industrial to Specific Plan; a zone change for the project site from Industrial to Specific Plan; an amendment to the General Plan land use map and zoning map; approval of The Meadows at Bailey Canyon Specific Plan (Specific Plan); approval of a Development Agreement between NUWI Sierra Madre LLC (the applicant) and the City of Sierra Madre; and approval of a landscape maintenance district or similar public maintenance entity for long-term maintenance of the proposed public park. The proposed Specific Plan is available for review online at the following location:

- [https://www.cityofsierramadre.com/cityhall/city\\_manager\\_s\\_office/transparency](https://www.cityofsierramadre.com/cityhall/city_manager_s_office/transparency)

The Mater Dolorosa Retreat Center currently is on the same legal parcel as the project site, which is currently split within three different lots. A lot line adjustment would be processed to adjust the boundaries of the three existing lots that make up the Mater Dolorosa Retreat Center and the project site. The lot line adjustment would consolidate the two lots that make up on legal lot for the project site into one and adjust the site's northern boundary further to the north. The General Plan amendment, zone change, and Specific Plan will only apply to the parcel on which the project will be developed and will have no effect on the Mater Dolorosa Retreat Center lot. Future actions would include the processing of a tentative map to subdivide the project site into 42 residential lots and open space lots for the neighborhood park, and potentially a parcel map to create a separate lot for the approximately ~~350~~ acre hillside open space area proposed to be ~~dedicated~~ conserved to for the City of Sierra Madre, pursuant to a development agreement to be entered into between the City and the Applicant.

This EIR was prepared in accordance with CEQA (Public Resources Code, Section 21000 et seq.), the CEQA Guidelines (14 CCR Section 15000 et seq.), and the City's environmental review procedures. The City is the lead agency for the EIR and processing of the project.

This EIR provides decision makers, public agencies, and the public with detailed information about the potential for significant adverse environmental impacts to occur as a result of the proposed project. Similarly, responsible agencies will use this EIR to fulfill their legal authority associated with permits issued for the project. The analysis and findings in this document reflect the independent judgment of the City.

## 1.2 Scope of the Environmental Impact Report

Pursuant to Section 15161 of the CEQA Guidelines, this document was prepared as a "project EIR" and is "focused primarily on the changes in the environment that would result from the development" (i.e., the build out of the proposed project). Where environmental impacts have been determined to be potentially significant, this EIR

presents mitigation measures directed at reducing those adverse environmental effects. The development of mitigation measures provides the lead agency with ways to substantially lessen or avoid the significant effects of the project on the environment, to the degree feasible. Alternatives to the proposed project are presented to evaluate whether there are alternative development scenarios that can further minimize or avoid significant impacts associated with the project.

## 1.3 Environmental Procedures

### 1.3.1 California Environmental Quality Act Compliance

The California Public Resources Code (Section 21000 et seq.) requires the preparation and certification of an EIR for any project that a lead agency determines may have a significant effect on the environment. This EIR has been prepared in compliance with all criteria, standards, and procedures of CEQA and the CEQA Guidelines (14 CCR Section 15000 et seq.).

### 1.3.2 Notice of Preparation and Scoping

CEQA establishes mechanisms whereby the public and decision makers can be informed about the nature of a proposed project and the extent and types of impacts that the project and its alternatives would have on the environment, should the project or alternatives be implemented. Pursuant to Section 15082 of the CEQA Guidelines, the City circulated a Notice of Preparation (NOP) dated June 24, 2020, to interested agencies, organizations, and parties which began a 30-day public comment period on the scope of the EIR. The NOP was also sent to the State Clearinghouse at the California Office of Planning and Research. The State Clearinghouse assigned a state identification number (SCH No. 2020060534) to this EIR.

The NOP is intended to encourage early consultation regarding the proposed action so that agencies, organizations, and individuals are afforded an opportunity to respond with specific comments and/or questions regarding the scope and content of the EIR.

Comments received during the NOP public comment period were considered during the preparation of this EIR. The NOP and comments are included in Appendix A1 to this EIR. Five comment letters were received in response to the NOP. Comments covered topics including water supply and regulations; biological resources; transportation; and flood control. Table 1-1 outlines these comment letters and concerns outlined.

**Table 1-1. Notice of Preparation Comment Letters**

Commenter	Date Received	General Comments
Caltrans	July 6, 2020	Vehicle miles traveled and greenhouse gases, Caltrans permits for transportation of heavy construction equipment or materials.
Native American Heritage Commission	June 30, 2020	Assembly Bill 52, Senate Bill 18, and Native American consultation, discussion of impacts and appropriate mitigation for tribal cultural resources.
State Water Resources Control Board	July 6, 2020	Compliance with regulations for potable and recycled water as well as for separation of water mains and conveyances/piping, and cross-connection requirements.



Table 1-1. Notice of Preparation Comment Letters

Commenter	Date Received	General Comments
CDFW	July 31, 2020	Concerns regarding nesting birds; Crotch bumble bee; least Bell's vireo; bat species; landscaping and invasive species; tree removal; fuel modification; human-wildlife interference; biological baseline assessment; direct, indirect, and cumulative impacts; wetland resources. In addition, CDFW provided general comments regarding jurisdictional waters, compensatory mitigation for impacted sensitive habitats, long-term management of mitigation lands, translocation/salvage of plants and animal species, and moving out of harm's way.
LACFD	July 30, 2020	Flood permits required for LACFD facilities, erosion and wildfire associated with hillsides to the north of the site, maintenance of LACFD flood control facilities, location of LACFD flood drains; assessment and mitigation of impacts to flood or debris control basins; potential impacts to Bailey's Debris Basin.

Caltrans = California Department of Transportation; CDFW = California Department of Fish and Wildlife; LACFD = Los Angeles County Flood Control District

In August of 2020, the City held three workshops related to the proposed project. Over 100 residents participated in the City's workshops related to the proposed project and EIR. The Specific Plan has been prepared to establish comprehensive development standards for the proposed project, to ensure timely and adequate infrastructure, open space, and high-quality design. At all three of the workshops held in August 2020, the EIR was discussed in detail and participants provided comments to the City, which were memorialized and included in the record.

Due to COVID-19 and its related restrictions now easing, and in order to hear from as many residents as possible, the City held an additional in-person informational meeting to discuss the Draft EIR. The City conducted this meeting to present the EIR process and to receive written public comments and suggestions regarding the scope and content of the EIR. The meeting has been held on Wednesday July 14, 2021, from 6:00 p.m. – 7:30 p.m. at Memorial Park, located at 222 West Sierra Madre Boulevard. During and in regards to this meeting, 47 comment letters were received that focused on environmental issue areas such as water supply, traffic/transportation, circulation, loss of open space and natural habitat, wildfire, aesthetics, drought, climate change, zoning and land use designations, drainage and stormwater runoff, biological resources, wildlife, wildlife movement, air quality, public services, geologic hazards, noise, dust, wastewater/sewer system, and alternatives. These environmental issue areas have all been extensively analyzed in this Draft EIR. Public comments received in relation to this meeting have been incorporated into Appendix A2 of this EIR.

Based on the scope of the proposed project as described in the NOP and comments provided at the 2021 meeting, the following issues were determined to be potentially significant and are addressed in Chapter 4, Environmental Analysis, of this EIR:

- Aesthetics
- Agricultural Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils Greenhouse Gas Emissions

- Hazards and Hazardous Emissions
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

### 1.3.3 Overview of the EIR Process

This EIR will be made available to members of the public, public agencies, and interested parties for a 60-day public comment period in accordance with Section 15105 of the CEQA Guidelines. Public comment of the EIR is intended to focus “on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated” (14 CCR 15204). The Notice of Completion of the EIR will be filed with the State Clearinghouse as required by Section 15085 of the CEQA Guidelines. In addition, the Notice of Availability of the EIR will be distributed pursuant to Section 15087 of the CEQA Guidelines. Interested parties may provide comments on the EIR in written form. This EIR and all related technical appendices are available for review upon request during the 60-day public comment period online at the following location:

- [https://www.cityofsierramadre.com/cityhall/city\\_manager\\_s\\_office/transparency](https://www.cityofsierramadre.com/cityhall/city_manager_s_office/transparency)

Once the 60-day public comment period has concluded, the City will review all public comments on the EIR, provide written responses to comments, and authorize revisions to the EIR text, if necessary. The final Mitigation Monitoring and Reporting Program will be incorporated into the Final EIR. Mitigation measures contained in the EIR consider future monitoring requirements and are written in sufficient detail to address impacts of the proposed project, referencing the appropriate implementing permits and plans. If one or more significant environmental impacts are identified, written findings for each of those significant effects must be adopted by the City identifying the impact and how the impact has been reduced to less than significant. If any impact is determined to be significant, but not mitigable to less than significant, the City must adopt findings accompanied by a statement of overriding considerations explaining the reasons why the project will be approved despite its impacts. The Final EIR includes all comment letters received, final written response to comments, and any edits made to the EIR as a result of public review/comment, if necessary.

## 1.4 Intended Uses of the EIR

According to Section 21002.1(a) of CEQA, “[t]he purpose of an environmental impact report is to identify the significant effects of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided.” This EIR provides relevant information concerning the potential environmental effects associated with construction and operation of the proposed project and identifies and evaluates potentially significant effects that may result from implementation of the proposed project. It is intended for use by decision makers and the public.

As the designated lead agency, the City has assumed responsibility for preparing this EIR. When deciding whether to approve the proposed project, the City will use the information provided in this EIR to consider potential impacts to the physical environment associated with the proposed project. The City will consider all written comments

received on the EIR during the 60-day public comment period in making its decision to certify the EIR as complete and in compliance with CEQA and in making its determination whether to approve or deny the project. In the final review of the proposed project, the lead agency will consider the document, environmental considerations, economic and social considerations, if applicable, in determining the most appropriate course of action.

After certification of the Final EIR, agencies with permitting authority over all or portions of the project will use the Final EIR as the basis for their evaluation of environmental effects related to the project and approval or denial of other applicable permits or authorizations.

## 1.5 Organization and Content of the EIR

This EIR is organized to provide a project-level analysis of the potentially significant environmental impacts, mitigation measures, and alternatives for the proposed project. To describe the direct, indirect, and cumulative impacts, mitigation measures, and alternatives for the proposed project, this EIR is organized as follows:

- Executive Summary outlines the conclusions of the environmental analysis and a summary of the project alternatives analyzed in the EIR. This chapter also includes a table summarizing all environmental impacts identified in this EIR along with the associated mitigation measures proposed to reduce or avoid each impact.
- Chapter 1, Introduction, serves as a foreword to this EIR, introducing the project background, applicable environmental review procedures, and format of the EIR.
- Chapter 2, Environmental Setting, describes the project location and physical environmental setting.
- Chapter 3, Project Description, provides a thorough description of the proposed project, project objectives, and required discretionary approvals.
- Chapter 4, Environmental Analysis, provides an analysis of the potentially significant environmental impacts identified, and proposed mitigation measures to reduce or avoid any potentially significant impacts.
- Chapter 5, Cumulative Impacts, provides an analysis of the cumulative effects of the proposed project.
- Chapter 6, Growth Inducement, discusses the project’s potential growth-inducing impact.
- Chapter 7, Significant Irreversible Environmental Changes, addresses impacts that have been identified as significant and irreversible.
- Chapter 8, Alternatives, analyzes a range of reasonable alternatives to the proposed project that would lessen or avoid significant environmental effects of the proposed project.
- Chapter 9, References, provides a compiled list of references cited in each section of the EIR.
- Chapter 10, List of Preparers, provides a list of persons that contributed to the preparation of this EIR.
- Appendices include various technical studies and correspondence prepared for the project, as listed in the table of contents.

## 1.6 Mitigation Monitoring and Reporting Program

The City will prepare a Mitigation Monitoring and Reporting Program prior to project approval. The Mitigation Monitoring and Reporting Program will include all mitigation measures outlined in the EIR, the responsible entity for implementation, implementation timing (prior to construction, during construction, post-construction), and any follow-up reporting requirements (such as submittal of materials to regulatory agencies). The City, as the designated lead agency, is responsible for enforcing and verifying that each mitigation measure is implemented as required.

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# 2 Environmental Setting

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This chapter provides a description of the existing site conditions, surrounding land uses, and land use planning context relevant to the proposed The Meadows at Bailey Canyon Specific Plan Project (project or proposed project).

## 2.1 Existing Site Conditions

The approximately 17.30-acre project site (Assessor's Parcel Number 5761-002-008) is located at 700 North Sunnyside Avenue, within the northwestern portion of the City of Sierra Madre (City), within the County of Los Angeles (County), California. The project site is currently undeveloped, aside from two access roads.

### 2.1.1 Surrounding Land Uses

The northwestern portion of the project site borders the City of Pasadena, and the San Gabriel Mountains are located approximately 460 feet north of the site. The site is surrounded by Bailey Canyon, Bailey Canyon Debris Basin, and Bailey Canyon Wilderness Park to the east; existing single-family residential development to the south and west; and the Mater Dolorosa Retreat Center, which is primarily used to host religious and silent retreats and other activities to the north. The Mater Dolorosa Retreat Center currently is on the same parcel as the project site, which is currently split within three different lots. A lot line adjustment would be processed to adjust the boundaries of the three existing lots that make up the Mater Dolorosa Retreat Center and the project site. The lot line adjustment would consolidate the two southern lots that make up the project site as one lot and adjust the northern boundary of this new lot further to the north. The Mater Dolorosa Retreat Center is not a part of the proposed project and no changes to that use or that site are proposed. There are two access roads through the project site to the Mater Dolorosa Retreat Center, one of which serves as emergency access only.

### 2.1.2 Existing Topography and Soils

Soils on the site consist of Holocene alluvium soils, located within the northwestern portion of the site, as well as Pleistocene alluvial deposits, located in the eastern and southern portions of the site. Artificial fill and terrace deposits underlie the project site. Artificial fill present on site consists of brown, silty, very fine sands and fine to coarse sands that are dry to damp, and loose to medium dense. Artificial fill is unsuitable for structural support. Terrace deposits present on site extent to a maximum depth of 30 feet, and consist of reddish brown, silty/clayey, fine to coarse sands with gravels that were damp to moist and are medium to very dense. These deposits were derived from runoff of the San Gabriel Mountains, located to the north of the site (Appendix E). The topography of the site ranges from 1,178 to 1,111 feet above mean sea level.

### 2.1.3 Existing Trees and Vegetation

The project site consists of maintained areas of ornamental, non-native grassland, and paved roadways. The non-native grasslands are mowed and composed of almost entirely non-native grasses and herbaceous annuals. No sensitive communities or riparian habitat occur on the project site. In addition, 101 trees, including 10 coast live oak (*Quercus agrifolia*) trees are present at the project site (see Section 4.4, Biological Resources). A few areas to the north and east of the project site, notably associated with Bailey Canyon, could support riparian habitat (see Section 4.4).

## 2.1.4 Climate

The South Coast Air Basin (SCAB) is characterized as having a Mediterranean climate (typified as semiarid with mild winters, warm summers, and moderate rainfall). The general region lies in the semi-permanent high-pressure zone of the eastern Pacific; as a result, the climate is mild and tempered by cool sea breezes. The usually mild climatological pattern is interrupted infrequently by periods of extremely hot weather, winter storms, or Santa Ana winds. Moderate temperatures, comfortable humidity, and limited precipitation characterize the climate in the SCAB. The average annual temperature varies little throughout the SCAB, averaging 75°F. However, with a less-pronounced oceanic influence, the eastern inland portions of the SCAB show greater variability in annual minimum and maximum temperatures. All portions of the SCAB have recorded temperatures over 100°F in recent years. Although the SCAB has a semiarid climate, the air near the surface is moist because of the presence of a shallow marine layer. Except for infrequent periods when dry air is brought into the SCAB by offshore winds, the ocean effect is dominant. Periods with heavy fog are frequent, and low stratus clouds, occasionally referred to as “high fog,” are a characteristic climate feature. Annual average relative humidity is 70% at the coast and 57% in the eastern part of the SCAB. Precipitation in the SCAB is typically 9–14 inches annually and is rarely in the form of snow or hail because of typically warm weather. The frequency and amount of rainfall is greater in the coastal areas of the SCAB (WRCC 2020).

In the City, the climate is typically warm during summer when temperatures tend to be in the 80s and cool during winter when temperatures tend to be in the 50s. The warmest month of the year is August with an average maximum temperature of 88.5°F, whereas the coldest month of the year is January with an average minimum temperature of 45.1°F. The wettest month of the year is January with an average rainfall of 4.93 inches (WRCC 2020).

## 2.1.5 Access

Regional access to the project site is provided via Interstate (I) 210, which runs east to west and is located approximately 1.6 miles south of the project site. In addition, regional access is provided State Route (SR) 164, which runs north to south, and is located approximately 1.7 miles southwest of the site. From these highways, regional access to and from the project is possible via Michillinda Avenue, located to the west of the site, which is the only street considered a major street in the City’s General Plan Circulation Element (City of Sierra Madre 2015). Michillinda Avenue runs through the City of Pasadena, located to the west of the project site, and the City of Arcadia, located to the south and east of the City, and provides a connection to I-210.

The site is directly accessible by two existing roadways, North Sunnyside Avenue, a north/south road that crosses through the western portions of the site, and Carter Avenue, an east/west road that extends from north to south through the eastern portion of the site. An additional access road traverses the northern portion of the site from east to west. Direct access to the site is currently private and gates are located at the southern portion of the site along both North Sunnyside Avenue and Carter Avenue.

## 2.2 Existing Zoning and Land Use Designations

The project site is both zoned and designated as Institutional (I) in the City’s Zoning Code and General Plan, respectively (City of Sierra Madre 2015, 2017).

# 3 Project Description

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This section provides a description of the proposed The Meadows at Bailey Canyon Specific Plan Project (project or proposed project). As required by Section 15124 of the California Environmental Quality Act (CEQA) Guidelines, this section of the Environmental Impact Report (EIR) includes the precise location of the project site, a statement of the project objectives, a general description of project characteristics and proposed infrastructure facilities, and summary of the discretionary actions that would be required.

## 3.1 Project Location and Project Site

NUWI Sierra Madre LLC (applicant) is proposing to develop an approximately 17.30-acre site (Assessor's Parcel Number 5761-002-008) located at 700 North Sunnyside Avenue (project site). The project site is located within the northwestern portion of the City of Sierra Madre (City), within Los Angeles County, California. The northwestern portion of the project site borders the City of Pasadena, while the base of the San Gabriel Mountains is located approximately 460 feet north of the site (see Figure 3-1, Project Location). Approximately 9.19 acres of the 17.30-acre project site would be developed for single family residential uses; 3.68 acres would be developed as roadways; and approximately 3.39 acres of the project site would be developed as open space, which includes a 3.04-acre neighborhood public park. A 1.04-acre grading and landscape buffer would be provided at the northern portion of the site.

The project site is surrounded by Bailey Canyon and Bailey Canyon Wilderness Park to the east, and existing single-family residential development to the south and west, and the Mater Dolorosa Retreat Center, which is primarily used to host religious and silent retreats and other activities, to the north. It should be noted that the Mater Dolorosa Retreat Center is on the same legal parcel as the project site, which is currently split within three different lots; however, a lot line adjustment would be processed to adjust the boundaries of the three existing lots that make up the Mater Dolorosa Retreat Center and the project site. The lot line adjustment would consolidate the two southern lots that make up the project site as one lot and adjust the northern boundary of this new lot further to the north. There are currently two access roads that run north to south through the project site to the Mater Dolorosa Retreat Center, including North Sunnyside North Sunnyside Avenue, which crosses through the western portions of the site, and Carter Avenue, which extends along the eastern portion of the site. North Sunnyside Avenue would become a public road that would serve the project site and provide access to the Mater Dolorosa Retreat Center, while Carter Avenue would be improved to provide secondary egress and ingress access to the site, as well as provide internal circulation throughout the project site. An additional access road traverses the northern portion of the site from east to west, from Carter Avenue to North Sunnyside Avenue. The Mater Dolorosa Retreat Center is not a part of the project site, and no changes in use are proposed. Open space areas lie to the north of the Mater Dolorosa Retreat Center. Of this this open space area approximately 35 acres are proposed to be ~~dedicated~~ conserved to for the City as protected open space; however, this open space ~~dedication~~ conservation easement area is not considered part of the project site.

## 3.2 Project Objectives

The following are the objectives of the proposed project:

1. Provide for orderly planning and long-range development of the project site to ensure community compatibility with the distinctive small-town character unique to the Sierra Madre community through adoption of a specific plan that establishes zoning and development standards.
2. Ensure new uses are compatible with the existing community by establishing comprehensive development standards and architectural guidelines through adoption of a specific plan that will guide future development.

3. Provide above-moderate income housing, in accordance with the 6th Cycle Regional Housing Needs Assessment (RHNA).
4. Develop a high-quality single-family residential community that is sensitively sited within the existing natural topography of the site and its surroundings and serves to minimize traffic impacts to adjacent streets.
5. Preserve the hillside open space area by ~~dedicating~~ conserving approximately 35 acres north of the Mater Dolorosa Retreat Center to the City, in order to preserve a portion of Bailey Colby Canyon and the Bailey Colby Canyon Trail, which would be used by wildlife for movement up and down slope; preserve native vegetation communities and drainages; and preserve land adjacent to the Bailey Colby Canyon stream.
6. Provide street improvements to facilitate safe and efficient access to the site from North Sunnyside Avenue.
7. Achieve a net-zero impact on local water supplies to minimize burdens on existing City infrastructure and the impact on the environment.
8. Provide public benefits and amenities to the neighboring community through a development agreement with the City, including a neighborhood public park and enhanced connectivity to the Bailey Canyon Wilderness Park and trail system.

### 3.3 Project Description

The proposed project would establish The Meadows at Bailey Canyon Specific Plan (Specific Plan), which would establish the zoning and development standards to guide future development of single-family residential uses on approximately 9.19 acres of the 17.30-acre project site, and 3.39 acres of open space (including a 3.04-acre neighborhood public park). A 1.04-acre grading and landscape buffer would be located within the northern portion of the project site (see Figure 3-2, Conceptual Site Plan). In addition to the ministerial lot line adjustment required to consolidate the two lots that make up the project site into one and adjust the site’s northern boundary further to the north, the discretionary actions before the City include a proposed General Plan amendment to change the land use designation for the project site from Institutional to Specific Plan, and a zone change to change the zoning of the project site from Institutional to Specific Plan (see Section 3.4, Discretionary Actions). Table 3-1 outlines the proposed land uses at the project site.

**Table 3-1. Land Use Summary**

Zone <sup>1</sup>	Use Type	Other Land Uses	Acres (gross)	Dwelling Units
RL	Detached, Single-Family Dwellings	Private Drives, Landscape Areas, Parking	9.19	42
OS	Public Park, and Open Space Lots	Pedestrian Paths, Natural Features, Landscaping, Play Equipment, Picnic Area and Seating, Parking, Detention Basin and Water Treatment	3.39	—
<b>Circulation</b>				
—	Project Roadways	North Sunnyside Avenue, Carter Avenue, Streets A, B, and C	3.68	—
<b>Grading and Landscaping Buffer</b>				
—	Grading and Landscaping Buffer	Landscaping	1.04	—
<b>Total</b>			<b>17.30</b>	<b>42</b>

<sup>1</sup> As designated in the Specific Plan  
 RL = Residential Low Density; OS = Open Space.



Community benefits would include the new public park, net-zero water impact, establishing a dedicated funding source for long-term park maintenance, and the open space ~~dedication~~conservation easement. The proposed project components are outlined in greater detail below. In addition, the proposed project includes ~~dedication~~conservation to the City of an approximately ~~350~~ acre open space area, located on the hillside to the north of the project and the existing Mater Dolorosa Retreat Center.

### 3.3.1 Residential Development

The proposed project is the adoption of the Specific Plan, which would provide zoning and development standards for future development of the 17.30-acre project site. The Specific Plan provides for two land uses on the project site: single family residential development and open space/neighborhood park. The Specific Plan's residential component will provide for the development of 42 detached single-family dwellings ranging from 2,700 to ~~3,800~~ 4,000 square feet with a minimum lot size of ~~8,500~~ 7,800 square feet. The gross density of the project is approximately 2.5 dwelling units per acre. The proposed residences would be one to two stories. The proposed residential area would make up approximately 9.19 acres of the project site (see Figure 3-2, Conceptual Site Plan).

### 3.3.2 Neighborhood Park and Open Space

The Specific Plan also includes the development of an approximately 3.04-acre dedicated neighborhood public park at the southernmost portion of the project site (see Figure 3-3, Proposed Park Conceptual Plan). The proposed park would feature resilient play surfacing, a slope slide, a play structure and features, seat walls, benches, picnic areas, large turf areas, a parking lot, decomposed granite trail, and a water quality treatment and detention basin. The proposed public park's location along the southern boundary of the site provides enhanced connectivity to the Bailey Canyon Wilderness Park to the east. Pedestrian access to the Bailey Canyon Wilderness Park and trail would be enhanced through a pedestrian path in the southeast corner of the project site as well as a sidewalk along the northern side of Carter Avenue just outside of the proposed project site, which would provide pedestrian access to the entrance/parking lot of the Bailey Canyon Wilderness Park, off of Carter Avenue (see Section 3.3.12 for details). The location also provides the closest access to existing residential uses and serves as a buffer to existing homes, ensuring compatibility between existing uses and the proposed development. Additionally, the Specific Plan provides for development of approximately 0.35 acres of passive open space located to the east of North Sunnyside Avenue and west of Carter Avenue, adjacent to Streets A and B (see Figure 3-2). Proposed open space would be maintained by the project's homeowner's association while the proposed public park would be maintained by a landscape maintenance district or similar public maintenance entity,

### 3.3.3 Open Space ~~Dedication~~Conservation Easement

In addition to the 3.39 acres of open space and neighborhood park, to be developed on the project site, ~~to be developed on the project site,~~ the proposed project also proposes ~~dedication~~conservation to for the City of approximately 35 acres of open space hillside land, located north of the existing Mater Dolorosa Retreat Center (see Figure 3-4, Open Space ~~Dedication~~Conservation Easement Area). The open space area is currently owned by the Mater Dolorosa Retreat Center. Conveyance of this open space hillside land to the City would be effectuated through execution of a development agreement between the City and project applicant/landowner andconservation easement would be recorded.

### 3.3.4 Conceptual Landscape Plan

The Specific Plan incorporates a Conceptual Landscape Plan (see Figure 3-5, Conceptual Landscape Plan), which would use fire-resistant and drought tolerant tree and plant species to create a natural and safe environment. All plant species proposed, both native and non-native, have been chosen due to their ability to thrive in the City climate. The Conceptual Landscape Plan was developed in consultation with the Sierra Made Community Forest Management Plan and the Los Angeles County Fire Department Fuel Modification Guidelines. A landscape buffer is proposed within the northern perimeter of the project site, which would provide a landscape buffer and screening between the Mater Dolorosa Retreat Center's existing amphitheater and lookout point and the proposed homes on the northern end of the project site. The proposed landscape buffer would be maintained by the Mater Dolorosa Retreat Center.

### 3.3.5 Wall and Fence Plan

The Specific Plan would incorporate a Wall and Fence Plan, which would outline the location of proposed slump block walls, top of slope view fences, and retaining walls. The proposed slump block walls would be primarily located near the northern, southern, and western portions of the project site, as well as between residential lots. Top of slope view fences would be primarily located in the rear of the residential lots on Streets A, and C, and the eastern half of residential lots on Street B, as well as near the eastern site boundary. Retaining walls would be primarily located between the southernmost and northernmost residential lots west of North Sunnyside Avenue; along portions of the east side of North Sunnyside Avenue, particularly near the park and the proposed open space to the northeast; and along portions of Carter Avenue.

### 3.3.6 Access and Circulation Network

#### 3.3.6.1 Site Access

The project site is located approximately 1.6 miles north of Interstate 210, which runs east to west, and approximately 1.7 miles north of State Route 164, which runs north to south. These highways provide regional access to the project site. The site is directly accessible by two existing roadways, North Sunnyside Avenue, a north/south road that crosses through the western portion of the site, and Carter Avenue, an east-west road that extends through the eastern portion of the site. Public access within both roads currently ends at the Mater Dolorosa Retreat Center's gates within the southern portion of the site. Under the proposed project, access to the project site provided via North Sunnyside Avenue would become public. Carter Avenue would be improved to provide secondary egress and ingress access to the site, as well as internal circulation throughout the project site (see discussion under Section 3.3.6.2, Internal Circulation). A new gate would be located at the Mater Dolorosa Retreat Center's entrance on the northern end of the North Sunnyside Avenue extension.

#### 3.3.6.2 Internal Circulation

The proposed project would include reconfiguration of North Sunnyside Avenue, located within the western portion of the site, which would be moved farther to the west. North Sunnyside Avenue would transition from a width of 40 feet at its existing terminus to a varying 54- to 56.5-foot right-of-way within the project site, with curbs and gutters, parking and planting areas on both sides, a landscaped parkway and sidewalk on the west side, and tree plantings on the east side of the street. Carter Avenue would transition from its existing 25-foot right-of-way to a varying 44.5- to 46-foot right-of-way within the project site and would have curbs and gutters, and planting areas on both sides, parking on the west side

of the street, and a sidewalk on the west side of the street. A pedestrian path extending from the east side of Carter Avenue would provide pedestrian access to Bailey Canyon Wilderness Park. Lastly, three additional streets that run east to west would be provided within the project site. This includes Streets A, B, and C (see Figure 3-2, Conceptual Site Plan). Street A would have a maximum 38.5-foot right-of-way and a sidewalk and parking on the south side of the street. Streets B and C would have a maximum 42.5-foot right-of-way and a sidewalk and parking on the south side of the streets. The proposed street sections are shown in Figure 3-6, Proposed Street Sections. Lastly, a stop sign would be provided at the southern portion of the project site along Carter Avenue for safety of vehicle and pedestrians.

### 3.3.7 Proposed Utilities

The proposed project would involve improvements to existing utilities. These improvements are discussed in further detail below.

#### 3.3.7.1 Proposed Drainage System and Stormwater Facilities

The proposed project would involve the creation of two independent storm drain networks that convey site runoff to the existing municipal separate storm sewer system (MS4), as shown on Figure 3-7, Proposed Drainage Plan. The first storm drain network proposed would be located within the western portion of the project site, where an existing 36-inch storm drain is present. The proposed project involves removal of portions of this 36-inch pipe, which would be reconstructed under the realigned extension of North Sunnyside Avenue and would connect with a proposed 36-inch reinforced concrete pipe (RCP), to be located at North Sunnyside Avenue, between Street A and Street B. Additionally, two proposed 18-inch RCP lateral connections would be added at the southern end of the project site. Two on-site catch basins are proposed within the southern end of North Sunnyside Avenue to capture runoff generated from the western portion of the project site, and two additional catch basins would be located directly to the northeast of the project site, within the existing Carter Avenue, to capture off-site flows before runoff enters the project site via the North Sunnyside Avenue extension. The western storm drain network would tie in with an existing 36-inch storm drain in North Sunnyside Avenue, at the southwest portion of the site.

The second storm drain network would be located on the eastern portion of the site and would be comprised of 18-inch and 24-inch RCPs. Streets A, B, and C would include two catch basins each, and would each capture and convey surface runoff to the east. The second storm drain network would extent along the majority of Carter Avenue and would also convey surface runoff captured by two catch basins, to be located within the northern portion of the project site. A 24-inch RCP would be located in the southeastern portion of the project site and would run in the east to west direction into the retention gallery within the proposed park and would convey surface runoff from the two proposed catch basins, located on the south end of Carter Avenue. Both proposed RCPs in the eastern storm drain network would discharge to the proposed underground retention storage gallery, which would be located in the southern portion of the project site, within the proposed public park.

A 63,500-cubic foot retention storage gallery, to be located within the public park, would consist of approximately 2,400 linear feet of 60-inch diameter perforated pipe surrounded by gravel bed. This retention storage gallery would be approximately 24 inches below ground and would promote water quality treatment through infiltration. Stormwater not retained in the storage gallery or infiltrated into the ground would be routed to the southeast corner of the proposed park and exit to Crestvale Drive via a 24-inch surface culvert.

Runoff generated within the proposed park would drain via sheet flow and natural concentrated flow to the southeastern portion of the project site and discharge to Crestvale Drive via a 24-inch surface culvert. Portions of the proposed public park would be depressed to promote additional above ground storage and infiltration.

### 3.3.7.2 Proposed Water System

As shown in Figure 3-8, Proposed Water System, the potable water delivery system would consist of a network of water mainlines, to be located within planned roadways. The existing 8-inch water main in the eastern portion of the project site would be removed and reconstructed as a 12-inch water main in within Carter Avenue. Additional 8-inch water mains are proposed within the other planned roadways (North Sunnyside Avenue extension and A, B and C Streets) and would distribute the potable water for connection to laterals located on individual lots. The proposed water mainlines would join the existing water mainlines at North Sunnyside Avenue and Carter Avenue at Lima Street, located approximately 670 feet east of the site, and will tie into the existing Oak Crest transmission main.

In addition, to achieve a net-zero impact on current local water supplies, the project Applicant will provide funds to the City to achieve one of the following (see project design feature [PDF]-UTL-1 under Section 3.3.13, below, and further discussion in Section 4.19, Utilities and Service Systems):

1. Increase the City's water supply through the purchase of additional supplemental water from the San Gabriel Valley Municipal Water District (SGVMWD). The amount of supplemental water purchased will be equal to all anticipated indoor and outdoor water demands for the proposed residential units over a 50-year period. This purchase of additional supplemental water would offset the demand placed on existing supplies and would be in addition to the City's existing agreement with SGVMWD, which allows the City to purchase up to 2,500 acre-feet of supplemental water annually. The additional supplemental water procured by the City as a result of the project will be stored in the Main San Gabriel Groundwater Basin and will be available to serve the public;
2. Create a lawn retrofit program, which would provide homeowners with a grant provided to replace their lawn with turf; or
3. Perform improvements to the City's existing water infrastructure, such as pipe leakage fixes (see project design feature [PDF]-UTL-1 under Section 3.3.13, below, and further discussion in Section 4.19, Utilities and Service Systems);

### 3.3.7.3 Proposed Wastewater System

Figure 3-9, Proposed Wastewater System, depicts the on-site sewer system to serve the project. As shown in Figure 3-9, the proposed sewer system would consist of a network of 8-inch sewer mainlines that would be constructed within planned roadways. The proposed sewer mainlines would collect the sewage from laterals located on individual lots. The existing Mater Dolorosa Retreat Center sewer line on the project site would be relocated to be within Carter Avenue, while the existing 8-inch sewer at the southwest corner of the project site would be removed.

### 3.3.7.4 Dry Utilities

Dry utilities, such as electric, natural gas, and telecommunication infrastructure would be required to be installed to serve the proposed project. These dry utilities would be located within underground conduits in the public or private street corridors/rights-of-way in general conformance with the phasing of the Specific Plan. New electricity, telecommunication, and natural gas lines would be constructed underground throughout the project site. Prior to

and during the final infrastructure/improvement plan stages, consultation with all appropriate utilities to determine the extent of the dry utilities needed to serve the project would be required prior to and during the final infrastructure/improvement plan stages.

### 3.3.8 General Plan Land Use Amendment and Zone Change

The proposed project would require a General Plan land use amendment and zone change from Institutional to Specific Plan.

### 3.3.9 Subdivision Map Act

As discussed in Section 3.1, Project Location and Project Site, the Mater Dolorosa Retreat Center is on the same parcel as the project site. A lot line adjustment would be processed to consolidate the two lots that make up the project site into one, and adjust the site's northern boundary farther to the north. The Specific Plan, General Plan land use amendment, and zone change will be implemented for the project site only.

#### 3.3.9.1 Tentative Tract Map

Future actions would include the processing of a tentative tract map to subdivide the 17.30-acre project site to create a total of 42 residential lots, plus streets, landscape areas, parking, a public park, landscape buffer, and open space.

### 3.3.10 Grading Plan

A grading plan has been developed for the proposed project and included in Figure 3-10. As shown in Figure 3-10, topography at the project site would be altered to form four tiers (three tiers for the proposed residential development, and one tier for the proposed park), with a slope between each tier. The proposed project would create a maximum slope of 12% and elevations would range from 1,105 feet to 1,195 feet above mean sea level (AMSL). More specifically, extension of North Sunnyside Avenue would create a maximum slope of 12% and an elevation range of approximately 1,200 feet AMSL in the north to 1,110 feet AMSL at the south end. The improvement of Carter Avenue would create a maximum slope of 12% and an elevation range of approximately 1,195 feet AMSL in the north to 1,110 feet AMSL at the south end. Along the northern boundary, Street A (approximately 670 linear feet of road beginning at North Sunnyside Avenue and ending at Carter Avenue) would be created with road elevations of approximately 1,185 feet AMSL. Street B (approximately 715 linear feet of road beginning at North Sunnyside Avenue and ending at Carter Avenue) would be created with road elevations of approximately 1,161 feet AMSL. Street C (approximately 720 linear feet of road beginning at North Sunnyside Avenue and ending at Carter Avenue) would be created with road elevations of approximately 1,145 feet AMSL. The proposed 3.03-acre park, which would be located along the southern boundary of the project site, would have an elevation of 1,105 feet AMSL. All cut slopes would be designed at a gradient of 2:1 or less.

### 3.3.11 Development Agreement

The proposed project would include a Development Agreement, between the applicant and the City, which would govern development of the project site, including vesting the development standards in the Specific Plan, and confirming the project benefits of net-zero impact on water supplies, the proposed open space

~~dedication~~conservation easement, construction of the public park, and allocation of park credits. In addition, the Development Agreements vests the development fee amounts as the existing City fees. Because approval of a Development Agreement is a discretionary action, the Development Agreement components have been addressed in this EIR.

### 3.3.12 Off-Site Improvements

The proposed project would include off-site improvements to Carter Avenue, between the southeastern portion of the project site boundary and Lima Street (see Figure 3-11), Proposed Off-Site Improvements and Figure 3-12, Carter Avenue Offsite Improvement Plan). The applicant would acquire approximately 9 feet of public right-of-way in order to widen Carter Avenue to a total of 24 feet (10 feet for each travel lane plus one 4-foot curb along the southern boundary of Carter Avenue) and a 6-foot sidewalk on the north side of Carter Avenue. The total off-site improvement area would be approximately 4,560 square feet (0.10 acres).

### 3.3.13 Construction

Construction of the project would commence in February 2024 and would last approximately 16 months, ending in May 2025. The analysis contained herein is based on the following assumptions (duration of phases is approximate):

- Clear and Grub: 2 days (February 2024)
- Remedial and Mass Excavation: 12 days (February 2024)
- Import Material to Balance Site: 14 days (February 2024 – March 2024)
- Finish Grading: 17 days (March 2024 – April 2024)
- Building Construction: 14 months (March 2024 – May 2025)
- Wet Utilities: 3 months (April 2024 – June 2024)
- Dry Utilities: 2 months (June 2024 – July 2024)
- Surface Improvements: 2 months (July 2024 – August 2024)
- Architectural Coating: 1 month (January 2025 – February 2025)

Grading would include 3,528 cubic yards of import. Assuming a haul truck capacity of 14 cubic yards per truck, earth-moving activities would result in approximately 252 round trips (504 one-way truck trips) during the Import Material to Balance Site phase.

### ~~3.3.13~~ 3.3.14 Project Design Features

The project design features (PDFs) that would be implemented as part of the proposed project are outlined in Table 3-2.

Table 3-2. Project Design Features

Aesthetics	
PDF-AES-1	<p>Lighting at the project site shall comply with Section 3.8.6(A.xii) of the Specific Plan, which includes the following development standards:</p> <ul style="list-style-type: none"> <li>• All lighting of the building, landscaping, parking area, or similar facilities shall be in compliance with the City’s Dark Sky Program.</li> <li>• Lighting shall be hooded and directed downward to reflect away from adjoining properties.</li> <li>• Lighting shall be confined to the lot boundaries and not be oriented towards neighboring properties to protect privacy.</li> <li>• Pedestrian-scaled street lighting shall be provided within the proposed park areas pedestrian routes of travel to enable visibility and safety.</li> </ul> <p>In addition, skylights proposed at the project site shall comply with Section 5.5.6 of the Specific Plan, which includes the following architectural design requirements:</p> <ul style="list-style-type: none"> <li>• Skylight materials and elements should be consistent with the selected architectural style and be fully integrated into the roof design.</li> <li>• Skylights shall employ the following strategies:                             <ul style="list-style-type: none"> <li>○ Glazing should be clear, flat, or non-reflective.</li> <li>○ Tubular, domed, or “bubble” skylights shall not be used.</li> <li>○ Skylights should be mounted on the same plan and angle as the roof.</li> <li>○ To eliminate skyward glare, interior lights should not be oriented upward through skylights.</li> </ul> </li> </ul>
PDF-AES-2	<p>Solar panels shall comply with requirements outlined in Section 5.5.6 of the Specific Plan which includes the following, to reduce potential for glare:</p> <ul style="list-style-type: none"> <li>• Solar panels shall include materials and elements that are consistent with the selected architectural style and shall be fully integrated into the roof design.</li> <li>• Solar panels shall be oriented to the south to maximize efficiency and establish visual consistency across buildings.</li> <li>• Flashing, sheet metal, and framing should be colored to match the roof material.</li> </ul>
Geology and Soils	
PDF-GEO-1	<p><b>Ground Shaking and Seismic Design Criteria.</b> During the design phase of the proposed development on site, the project shall comply with the Earthquake Design Regulations of Chapter 16, Section 1613 of the California Building Code (CBC) 2019. Based on the mapped values, the coefficients and factors apply to the lateral-force design for the proposed structures at the site are outlined in Appendix E, Geotechnical Investigation. Terrace deposits are at grade and Class D is recommended.</p>
PDF-GEO-2	<p><b>Grading.</b> Grading of the site will consist of cut and fill operations to create building pads and associated streets. Grading shall involve the removal and recompaction or artificial fill and loose terrace deposits (see <b>MM-GEO-1</b>) in addition of mass-excavation of the project site. The following shall be incorporated during grading activities:</p> <ul style="list-style-type: none"> <li>• <b>Monitoring:</b> All earthwork, including clearing, site preparation, and fill replacement, shall be conducted with engineering control, under observation and testing by the geotechnical engineer and in accordance with the requirements of a site-specific geologic and geotechnical engineering report.</li> </ul>
PDF-GEO-3	<p><b>Site Preparation.</b> The following shall be incorporated during site preparation activities:</p> <ul style="list-style-type: none"> <li>• <b>Existing Structure Location:</b> The general contractor shall locate all surface and subsurface structure on the site or on the approved grading plan prior to preparing the ground.</li> </ul>

Table 3-2. Project Design Features

	<ul style="list-style-type: none"> <li>• Existing Structural Removal: Any underground structures, including septic tanks, wells, pipelines, foundations, utilities, that have not been located prior to grading shall be removed or treated in a manner recommended by the Geotechnical Engineer.</li> <li>• Clearing and Stripping: The construction areas shall be cleared and stripped of all vegetation, trees, bushes, sod, topsoil, artificial fill, debris, asphalt, concrete and other deleterious material prior to fill placement.</li> <li>• Removals: Removals of suitable soil shall be performed on the site in accordance with the soils report.</li> <li>• Subgrade Preparation: Subgrade for foundations, pavement areas, overexcavations, and for those areas receiving any additional fill be prepared by scarifying the upper 12 inches and moisture conditioning, as required to obtain at least optimum moisture, but not greater than 120 percent of optimum. The scarified areas shall be compacted to at least 90 percent of the maximum laboratory density, as determined by ASTM D-1557-12 compaction method. All areas to receive fill should be observed by the Geotechnical Engineer prior to fill placement.</li> <li>• Subgrade <u>Inspection</u>: Prior to placing fill, the ground surface to receive fill should be observed, tested, and approved by the Geotechnical Engineer.</li> </ul>
<p>PDF-GEO-4</p>	<p><b>Fill Placement.</b></p> <ul style="list-style-type: none"> <li>• <u>Laboratory Testing</u>: Representative samples of materials to be utilized as compacted fill shall be analyzed in a laboratory to determine their physical properties. If any material other than that previously tested is encountered during grading, the appropriate analysis of this material should be conducted.</li> <li>• <u>On-Site Fill Material</u>: The on-site soils are adequate for re-use in controlled fills provided the soils do not contain any organic matter, debris, or any individual particles greater than 12 inches in diameter.</li> <li>• <u>Rock Fragments</u>: Rock fragments less than 12 inches in diameter may be utilized in the fill, provided they are not placed in concentrated pockets, surrounded with fine grained material, and the distribution of the rocks is supervised by the Geotechnical Engineer. Any rock fragments over 6 inches should be kept below a depth of 5 feet. Rocks greater than 12 inches in diameter should be taken off-site, placed in fill areas designated as suitable for rock disposal, or placed in accordance with the recommendations of the Geotechnical Engineer.</li> <li>• <u>Subgrade Verification and Compaction Testing</u>: Regardless of material or location, all fill material should be placed over properly compacted subgrades in accordance with the Site Preparation section of Appendix E, Geotechnical Investigation, of this EIR. The condition of all subgrades shall be verified by the Geotechnical Engineer before fill placement or earthwork grading begins. Earthwork monitoring and field density testing shall be performed during grading to provide a basis for opinions concerning the degree of soil compaction attained.</li> <li>• <u>Fill Placement</u>: Approved on-site material shall be evenly placed, watered, processed, and compacted in controlled horizontal layers not exceeding eight inches in loose thickness, and each layer should be thoroughly compacted with approved equipment. All fill material should be moisture conditioned, as required to obtain at least optimum moisture, but not greater than 120 percent of optimum moisture content. The fill shall be placed and compacted in horizontal layers, unless otherwise recommended by the geotechnical engineer.</li> <li>• <u>Compaction Criteria - Shallow Fills</u>: For fills less than 40 feet in vertical thickness, each layer shall be compacted to at least 90 percent of the maximum laboratory density for material used as determined by ASTM D-1557-12. The field density shall be determined by the ASTM D-1556-07 method or equivalent. Where moisture content of the fill or density testing yields compaction results less than 90 percent, additional compaction</li> </ul>



Table 3-2. Project Design Features

	<p>effort and/or moisture conditioning, as necessary, shall be performed, until the fill material is in accordance with the requirements of the Geotechnical Engineer.</p> <ul style="list-style-type: none"> <li>• <b>Fill Material - Moisture Content:</b> All fill material placed shall be moisture conditioned, as required to obtain at least optimum moisture, but not greater than 120 percent. If excessive moisture in the fill results in failing results or an unacceptable pumping condition, then the fill shall be allowed to dry until the moisture content is within the necessary range to meet the required compaction requirements or reworked until acceptable conditions are obtained.</li> <li>• <b>Keying and Benching:</b> All fills should be keyed and benched through all topsoil, slopewash, alluvium or colluvium or creep material, into sound terrace deposits or firm material where the slope receiving fill is steeper than 5:1 (Horizontal: Vertical) or as determined by geotechnical engineer. The standard acceptable bench height is four feet into suitable material. The key for side hill fills shall be a minimum of 15 feet within firm materials, with a minimum toe embankment of 2 feet into firm material, unless otherwise specified by the geotechnical engineer.</li> <li>• <b>Drainage Devices:</b> Drainage terraces and subdrainage devices shall be constructed in compliance with the ordinances of the controlling governmental agency, or with the recommendations of the Geotechnical Engineer and Engineering Geologist.</li> <li>• <b>Cut-Fill Transition:</b> Where a cut-fill transition is present beneath planned structures, the cut area shall be overexcavated three feet below the bottom of proposed footings and the excavated material shall be replaced as compacted fill to reduce the transition condition. These guidelines shall also be followed in areas where lots are underlain by soils or rock with differential expansion potential and also for lots located above descending buttress and stabilization fills.</li> </ul>
<p>PDF-GEO-5</p>	<p><b>Grading Control.</b> Grading control activities shall comply with the following:</p> <ul style="list-style-type: none"> <li>• <b>Grading Inspection:</b> Earthwork monitoring and field density testing shall be performed by the Geotechnical Engineer during grading to provide a basis for opinions concerning the degree of soil compaction attained. The Contractor shall receive a copy of the geotechnical engineer's Daily Field Engineering Report, which shall indicate the results of field density tests for that day. Where failing tests occur or other field problems arise, the contractor shall be notified of such conditions by written communication from the geotechnical engineer in the form of a conference memorandum, to avoid any misunderstanding arising from oral communication.</li> <li>• <b>Subgrade Inspection:</b> All processed ground to receive fill and overexcavations should be inspected and approved by the Geotechnical Engineer prior to placing any fill. The contractor should be responsible for notifying the geotechnical engineer when such areas are ready for inspection. Inspection of the subgrade may also be required by the controlling governmental agency within the respective jurisdictions.</li> <li>• <b>Subgrade Testing:</b> Density tests shall also be made on the prepared subgrade to receive fill, as required by the Geotechnical Engineer.</li> <li>• <b>Density Testing Intervals:</b> In general, density tests shall be conducted at minimum intervals of 2 feet of fill height or every 500 cubic yards. Due to the variability that can occur in fill placement and different fill material characteristics, a higher number of density tests may be warranted to verify that the required compaction is being achieved</li> </ul>
<p>PDF-GEO-6</p>	<p><b>Cut Slopes.</b> Cut slope activities shall comply with the following:</p> <ul style="list-style-type: none"> <li>• <b>Gradient:</b> All cut slopes shall be designed at a gradient of 2:1 or less.</li> <li>• <b>Observation:</b> The Engineering Geologist shall observe all cut slopes excavated in rock, lithified or formation material at vertical intervals not exceeding ten feet.</li> <li>• <b>Change of Conditions:</b> If any conditions not anticipated in the preliminary report such as perched water, seepage, lenticular or confined strata of a potentially adverse nature,</li> </ul>

Table 3-2. Project Design Features

	<p>unfavorably inclined bedding, joints or faults planes, or areas of unstable material are encountered during grading, these conditions shall be analyzed by the engineering geologist and geotechnical engineer, and recommendations shall be made to treat these problems.</p> <ul style="list-style-type: none"> <li>• <u>Protection</u>: Cut slopes that face in the same direction as the prevailing drainage shall be protected from slopewash by a non-erosive interceptor swale placed at the top of the slope.</li> <li>• <u>Criteria</u>: Unless otherwise specified in the geotechnical and geological report, no cut slopes shall be excavated higher or steeper than that allowed by the ordinances of controlling governmental agencies.</li> <li>• <u>Drainage Devices</u>: Drainage terraces shall be constructed in compliance with the ordinances of controlling governmental agencies, or with the recommendations of the geotechnical engineer or engineering geologist.</li> </ul>
<p>PDF-GEO-7</p>	<p><b>Fill Slopes.</b> Fill slopes activities shall comply with the following:</p> <ul style="list-style-type: none"> <li>• <u>Gradient</u>: All fill slopes shall be designed at a gradient of 2:1 or less.</li> <li>• <u>Slope Face - Compaction Criteria</u>: The contractor shall be required to obtain a minimum relative compaction of 90 percent out to the finish slope face of fill slopes, buttresses and stabilization fills. This may be achieved by overbuilding the slope a minimum of five feet, and cutting back to the compacted core, or by direct compaction of the slope face with suitable equipment, or by any other procedure which produces the required compaction. If the method of achieving the required slope compaction selected by the contractor fails to produce the necessary results, the contractor should rework or rebuild such slopes until the required degree of compaction is obtained. Slope testing shall include testing the outer six inches to three feet of the slope face during and after placement of the fill. In addition, during grading, density tests will be taken periodically on the flat surface of the fill three to five feet horizontally from the face of the slope.</li> <li>• <u>Slope Face - Vegetation</u>: All fill slopes shall be planted or protected from erosion by methods specified in the geotechnical report, or required by the controlling governmental agency.</li> </ul>
<p>PDF-GEO-8</p>	<p><b>Utility Trenching and Backfill.</b> Utility trenching and backfill activities shall comply with the following:</p> <ul style="list-style-type: none"> <li>• <u>Utility Trenching</u>: Open excavations and excavations that are shored shall conform to all applicable Federal, State and local regulations.</li> <li>• <u>Backfill Placement</u>: Approved on-site or imported fill material shall be evenly placed, watered, processed, and compacted in controlled horizontal layers not exceeding eight inches in loose thickness, and each layer should be thoroughly compacted with approved equipment. All fill material shall be moisture conditioned, as required to obtain at least optimum moisture, but not greater than 120 percent of optimum moisture content. The fill shall be placed and compacted on a horizontal plane, unless otherwise recommended by the geotechnical engineer.</li> <li>• <u>Backfill Compaction Criteria</u>: Each layer of utility trench backfill shall be compacted to at least 90 percent of the maximum laboratory density determined by ASTM D- 1557-12. The field density shall be determined by the ASTM D-1556-07 method or equivalent. Where moisture content of the fill or density testing yields compaction results less than 90 percent, additional compaction effort and/or moisture conditioning, as necessary, shall be performed, until the compaction criteria is reached.</li> <li>• <u>Exterior Trenches Adjacent to Footings</u>: Exterior trenches, paralleling a footing and extending below a 1H:1V plane projected from the outside bottom edge of the footing, shall be compacted to 90 percent of the laboratory standard. Sand backfill, unless it is similar to the in-place fill, shall not be allowed in these trench backfill areas. Density testing, along with probing, should be accomplished to verify the desired results.</li> </ul>

Table 3-2. Project Design Features

	<ul style="list-style-type: none"> <li>• <b>Pipe Bedding:</b> We recommend that a minimum of 6 inches of bedding material shall be placed in the bottom of the utility trench. All bedding materials shall extend at least 4 inches above the top of utilities which require protection during subsequent trench backfilling. All trenches shall be wide enough to allow for compaction around the haunches of the pipe.</li> <li>• <b>Groundwater Migration:</b> Backfilled utility trenches may act as French drains to some extent, and considerable groundwater flow along utility bedding and backfill shall be expected. Wherever buried utilities, or structures which they may intersect, could be adversely affected by such drainage, provisions shall be made to collect groundwater migrating along the trench lines. These situations include where buried utilities enter buildings, particularly where they enter below grade mechanical rooms, and where buried utilities enter junction boxes or switching stations that are intended to remain dry. Measures that remedy this include, but are not limited to, placement of perforated drain pipes below and continuous with bedding materials, and placement of seepage barriers such as lean mix concrete or controlled density fill (CDF).</li> </ul>
PDF-GEO-9	<p><b>Construction Considerations.</b> Construction activities shall comply with the following:</p> <ul style="list-style-type: none"> <li>• <b>Erosion Control:</b> Erosion control measures, when necessary, shall be provided by the contractor during grading and prior to the completion and construction of permanent drainage controls.</li> <li>• <b>Compaction Equipment:</b> It is also the contractor's responsibility to have suitable and sufficient compaction equipment on the project site to handle the amount of fill being placed and the type of fill material to be compacted. If necessary, excavation equipment shall be shut down to permit completion of compaction in accordance with the recommendations contained herein. Sufficient watering devices/equipment shall also be provided by the contractor to achieve optimum moisture content in the fill material.</li> <li>• <b>Final Grading Considerations:</b> Care shall be taken by the contractor during final grading to preserve any berms, drainage terraces, interceptor swales, or other devices of a permanent nature on or adjacent to the property.</li> </ul>
PDF-GEO-10	<p><b>Temporary Excavations.</b> Where the necessary space is available, temporary unsurcharged embankments may be slope back without shoring. The slope should not be cut steeper than 5 feet and below at near vertical temporary gradient, and above 5 feet at a 1:1 temporary gradient. In areas where soils with little or no binder are encountered, shoring or flatter excavation slopes shall be made. The recommended temporary excavation slopes do not preclude local ravelling or sloughing. Where sloped embankments are used, the top of the slope should be barricaded to prevent equipment and heavy storage loads within five feet of the top of the slope. If the temporary construction embankments are to be maintained for long periods, berms should be constructed along the top of the slope to prevent runoff water from eroding the slope faces. The soils exposed in the temporary backcut slopes during excavation shall be observed by qualified personnel so that modifications of the slopes can be made if variations in the soil conditions occur. On-site grading should not undermine support of existing off-site improvements.</p>
PDF-GEO-11	<p><b>Drainage/Landscape Maintenance.</b> The southern area of the site, where the proposed park would be located, may be used for stormwater infiltration. The site is underlain by mostly sandy soil, which have acceptable infiltration rates. However, additional subsurface exploration and infiltration testing shall be required in this area to determine the actual soil infiltration rates for design purposes of the system used. Any infiltration systems shall be setback a sufficient distance from proposed structures and adjacent properties to avoid adverse impacts. These distances shall be determined with future studies.</p> <p>In areas of residential development, water shall not be allowed to pond or seep into the ground, or flow over slopes in a concentrated manner. Roof gutters and yard drains shall be</p>

Table 3-2. Project Design Features

	<p>provided. Pad drainage shall be directed toward the street or any approved watercourse area swale via non-erosive channel, pipe and/or dispersion devices.</p> <p>In addition to control of landscape watering, pad drainage shall slope away from structures.</p>
<p>PDF-GEO-12</p>	<p><b>Conventional Foundation Recommendations.</b> Appendix E includes recommendations for foundation design, including bearing subgrades, subgrade verification, footing depth and width, and bearing pressures, provided for preliminary design purposes and the final expansion index shall be determined following grading. Conventional or post-tensioned foundations shall be used to support the proposed structures. All footings should meet current slope setback requirements. Foundations shall be designed for low expansive soil conditions. The proposed project shall comply with conventional foundation design, as outlined in the final design of the project.</p>
<p>PDF-GEO-13</p>	<p><b>General Recommendations.</b> The project shall comply with the following general recommendations:</p> <ol style="list-style-type: none"> <li>1. <b>Drainage and Site Maintenance:</b> All slab foundation areas shall be moisture conditioned to at least optimum moisture, but no more than 5 percent above optimum moisture for a depth of at least 12 inches below subgrade for low expansion index soil. The post-tensioned slab designer shall determine if the moisture penetration is sufficient for this design. The subgrade soil moisture shall be observed by a soil engineer or his/her representative prior to pouring concrete. It is suggested the above stated moisture be obtained and maintained at least a suggested 2 days prior to pouring concrete.</li> <li>2. A 10-mil Visqueen vapor barrier shall be placed underneath habitable area slabs and/or slabs with floor coverings. This barrier can be placed directly on the subgrade soils, but should be overlain by a two-inch layer of imported sand. This vapor barrier shall be lapped and sealed (especially around the utility perforations) adequately to provide a continuous waterproof barrier under the entire slab.</li> <li>3. Surface water shall be kept from infiltrating into the subgrade adjacent to the house foundation system. This may include, but not be limited to rain water, roof water, landscape water and/or leaky plumbing. The lots are to be fine graded at the completion of construction to include positive drainage away from the structure and roof water will be collected via gutters, downspouts, and transported to the street in buried drain pipes. Homebuyers should be cautioned against constructing open draining planters adjacent to the houses, or obstructing the yard drainage in any way.</li> <li>4. Utility trenches beneath the slabs shall be backfilled with compacted native soil materials, free of rocks.</li> <li>5. Subgrade soil beneath footings and slabs should be premoistened prior to placement of concrete.</li> <li>6. Standard County of Los Angeles structural setback guidelines are applicable, except where superseded by specific recommendations by the project geologist and geotechnical engineer.</li> <li>7. Building or structure footings shall be set back a horizontal distance, consistent with the requirements of Appendix E.</li> <li>8. Prior to placing concrete in the footing excavations, an inspection shall be made by our representative to ensure that the footings are free of loose and disturbed soils and are embedded in the recommended material.</li> </ol>
<p>PDF-GEO-14</p>	<p><b>Retaining Walls.</b> Retaining wall footings should be founded into compacted fill or dense terrace deposits. The near surface on site soils have a low expansion index and should be confirmed prior to foundation construction. The equivalent fluid pressures recommended are based on the assumption of a uniform backfill and no build-up of hydrostatic pressure behind the wall. To prevent the build-up of lateral soil pressures in excess of the recommended design pressures, over compaction of the fill behind the wall should be avoided. This can be accomplished by placement of the backfill above a 45-degree plane</p>

Table 3-2. Project Design Features

	<p>projected upward from the base of the wall, in lifts not exceeding eight inches in loose depth, and compacting with a hand-operated or small, self-propelled vibrating plates.</p> <ol style="list-style-type: none"> <li>1. <b>Conventional (Yielding) Retaining Walls.</b> All recommendations for active lateral earth pressures contained herein assume that the anticipated retaining structures are in tight contact with the fill soil (or dense alluvium) that they are supposed to support. The earth support system must be sufficiently stiff to hold horizontal movements in the soil to less than one percent of the height of the vertical face, but should be free-standing to the point that they yield at the top at least 0.1 percent of the height of the wall.</li> <li>2. <b>Earth Pressures on Conventional (Yielding) Retaining Walls.</b> The earth pressures on walls retaining permeable material, compacted fill, or natural soil shall be assumed equal to that exerted by an equivalent fluid with densities consistent with those listed in Appendix E.</li> <li>3. <b>Restrained (Non-Yielding) Walls.</b> Restrained (Non-Yielding) Walls shall be constructed consistent with ASTM D-1557-12, and the requirements of Appendix E.</li> <li>4. <b>Seismic Pressures for Retaining Walls.</b> Seismic Pressures for Retaining Walls shall be constructed consistent with the requirements of Appendix E.</li> </ol>
<p>PDF-GEO-15</p>	<p><b>General Recommendations for Retaining Walls.</b> The following general recommendations shall be implemented for construction of retaining walls:</p> <ul style="list-style-type: none"> <li>• Any anticipated superimposed loading, such as upper retaining walls, other structures, within a 45-degree projection upward from the wall bottom, except retained earth, shall be considered as surcharge and provided in the design.</li> <li>• A vertical component equal to one-third of the horizontal force so obtained may be assumed at the application of force.</li> <li>• The depth of the retained earth shall be the vertical distance below the ground surface, measured at the wall face for stem design or measured at the heel of the footing for overturning and sliding.</li> <li>• The walls shall be constructed with weep holes near the bottom, on five-foot centers or with perforated drainpipe in a gravel envelope at the bottom and behind the wall. A one-foot thick zone of clean granular, free-draining material should be placed behind the wall to within three feet of the surface. On-site soil may be used for the remainder of the backfill and should be compacted to 90 percent relative compaction as determined by ASTM Test Designation D-1557-12.</li> <li>• A concrete-lined swale is recommended behind retaining walls that can intercept surface runoff from upslope areas. The surface runoff shall be transferred to an approved drainage channel via non-erosive drainage devices.</li> </ul>
<p><b>Utilities and Service Systems</b></p>	
<p>PDF-UTL-1</p>	<p>Prior to issuance of a building unit, the project applicant will provide funds to the City to <u>achieve one of the following</u>:</p> <ol style="list-style-type: none"> <li>1. <u>Purchase supplemental water from the San Gabriel Valley Municipal Water District (SGVMWD) in an amount equal to the anticipated total indoor and outdoor water demand of each residential unit over a 50-year period. This purchase would be in addition to the City’s existing agreement with SGVMWD providing for the purchase of supplemental imported water.</u></li> <li>2. <u>Creation of a lawn retrofit program, which would provide homeowners with a grant provided to replace their lawn with turf.</u></li> <li><del>3. Improvements to existing water infrastructure, such as pipe leakage fixes.</del></li> </ol>

Table 3-2. Project Design Features

Wildfire	
PDF-WF-1	The proposed project shall comply with the requirements outlined in the Fire Protection Plan (FPP) (Appendix F2) during construction and operations.

## 3.4 Discretionary Actions

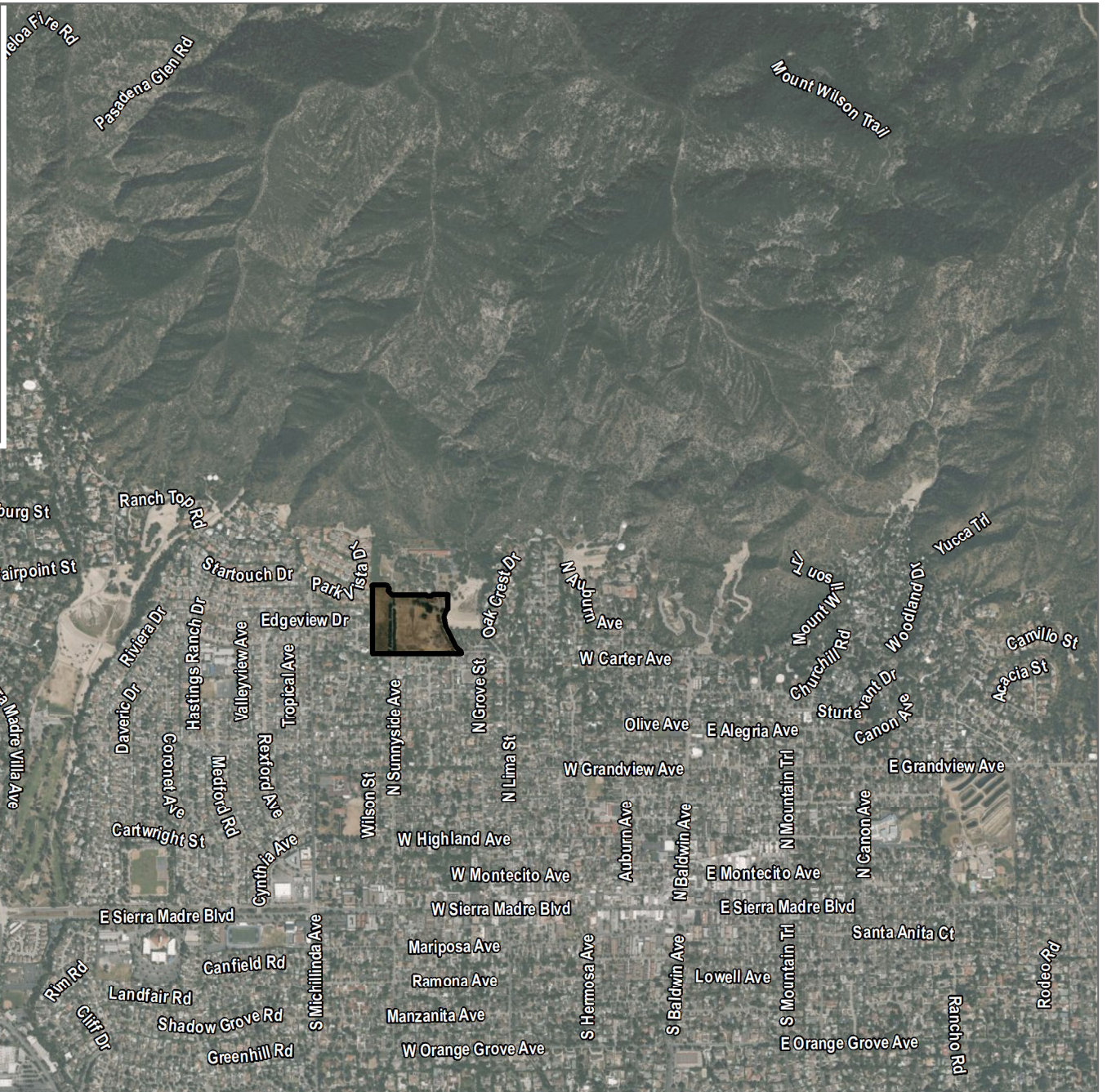
A discretionary action is an action taken by an agency that calls for the exercise of judgment in deciding whether to approve or how to carry out a project. The following discretionary actions are associated with the proposed project and would be considered by the City:

- Certification of a Final EIR and adoption of a Mitigation Monitoring and Reporting Program pursuant to CEQA
- Approval of amendments to the City of Sierra Madre General Plan to change the land use designation for the project site from Institutional to Specific Plan
- Approval of amendments to the Zoning Code to change the zoning designation for the project site from Institutional to Specific Plan
- Approval of amendments to update the City's Zoning and Land Use maps
- Approval of The Meadow at Bailey Canyon Specific Plan
- Approval of the Development Agreement between the Applicant and the City
- Approval of a landscape maintenance district or similar public maintenance entity, for long-term maintenance of the proposed public park

## 3.5 Responsible Agencies

The following are responsible agencies, whose approval would be required for project implementation:

- Los Angeles Regional Water Quality Control Board
- Los Angeles County Department of Public Works
- California Department of Transportation



SOURCE: County of Los Angeles 2020; Bing Maps



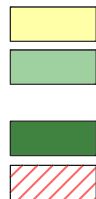
**FIGURE 3-1**  
**Project Location**  
 The Meadows at Bailey Canyon EIR

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**LEGEND**



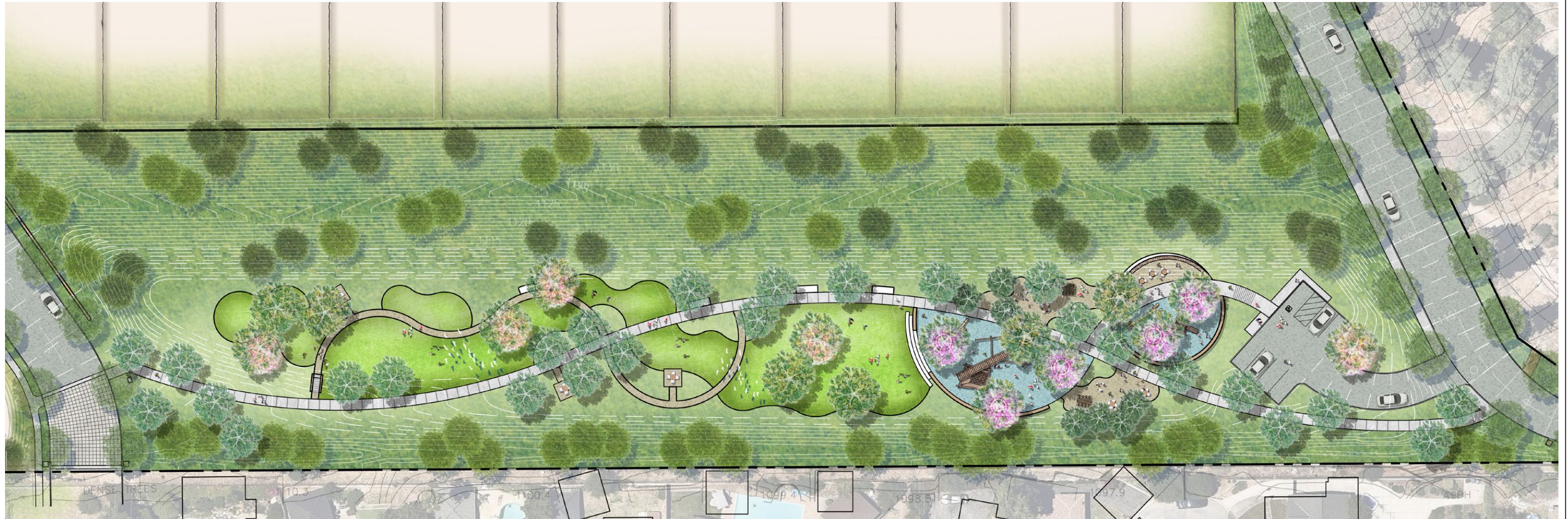
- PROJECT BOUNDARY (17.30 AC)
- LOW DENSITY RESIDENTIAL (9.19 AC)
- OPEN SPACE (0.35 AC) - NOTE: LANDSCAPE AT LOT A TO BE MAINTAINED BY MDRC
- PARK SPACE (3.04 AC)
- GRADING AND LANDSCAPE BUFFER (1.04 AC)

SOURCE: Fuscoe, 2021

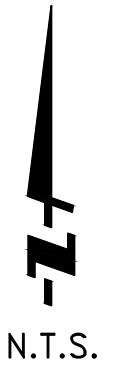
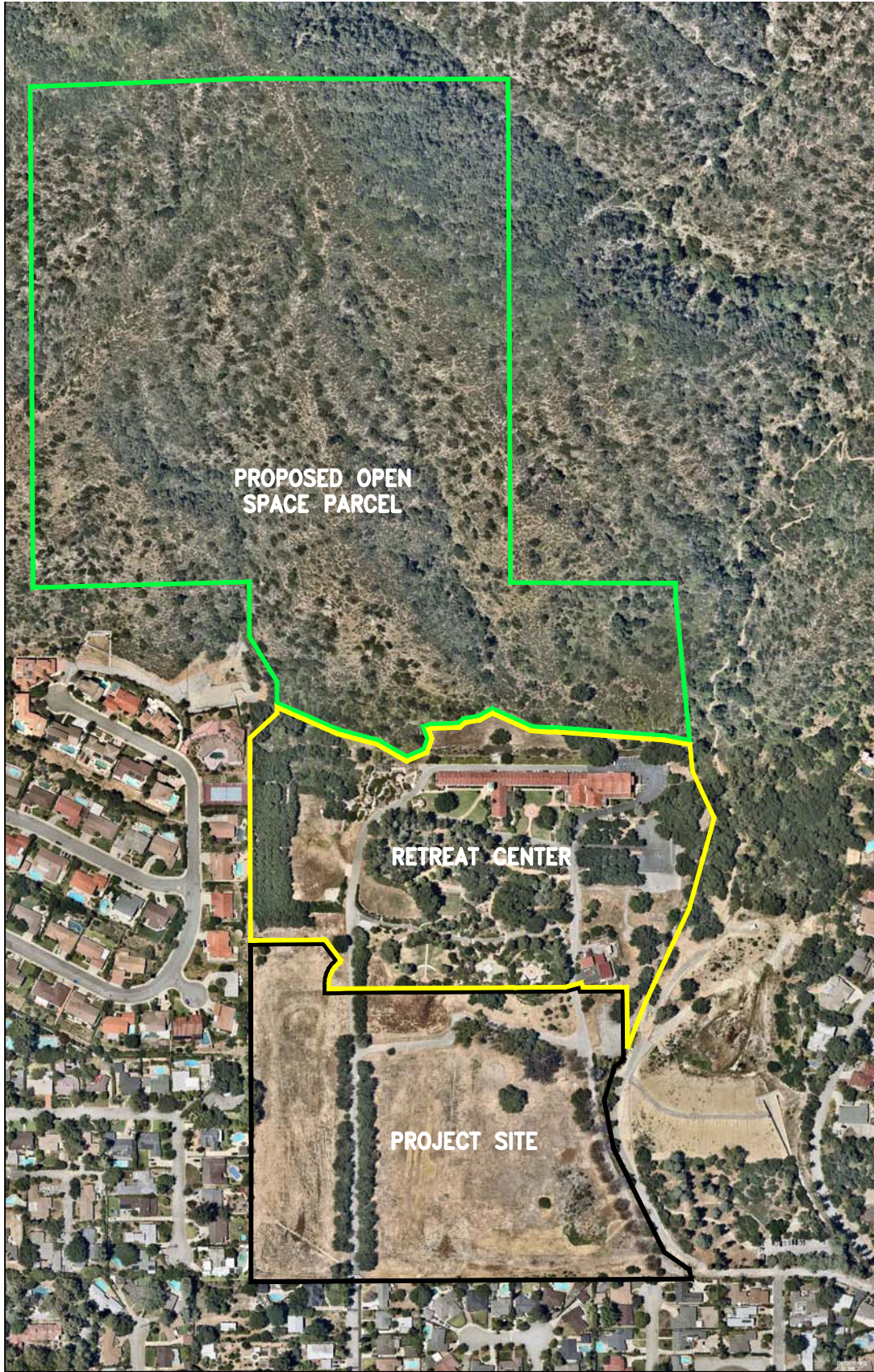
FIGURE 3-2

Conceptual Site Plan  
The Meadows at Bailey Canyon EIR

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SOURCE: Fuscoe, 2021

FIGURE 3-4  
Open Space Conservation Easement  
The Meadows at Bailey Canyon EIR

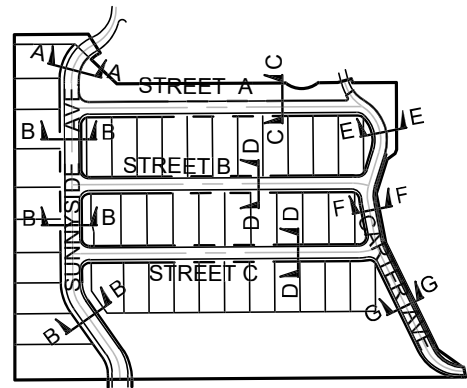
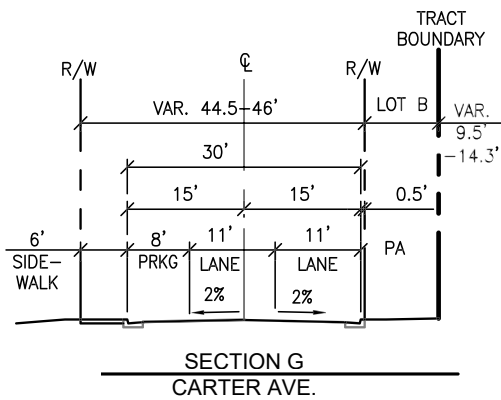
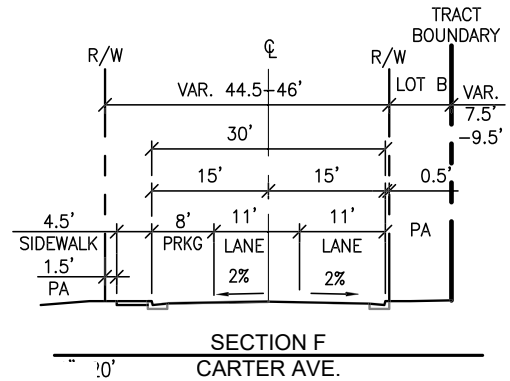
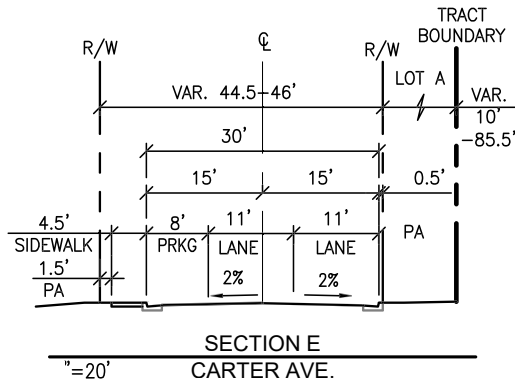
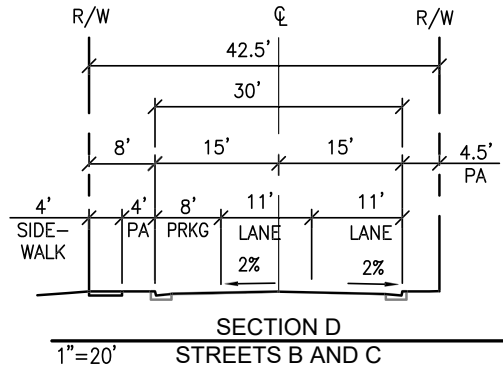
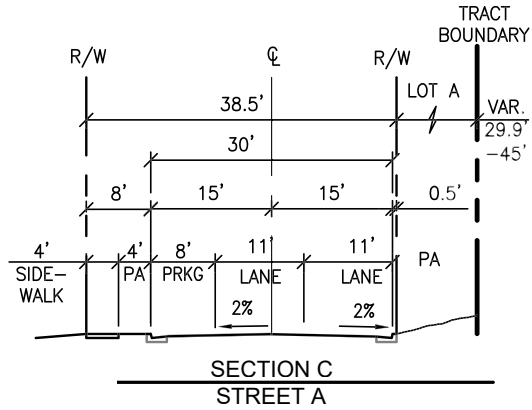
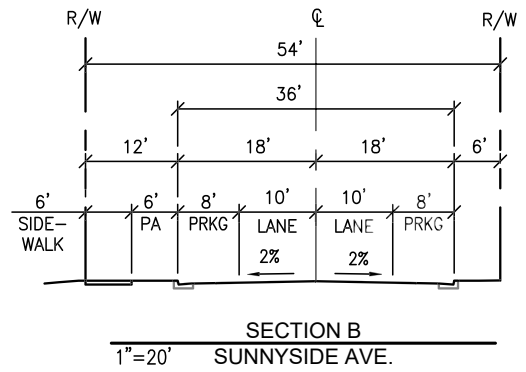
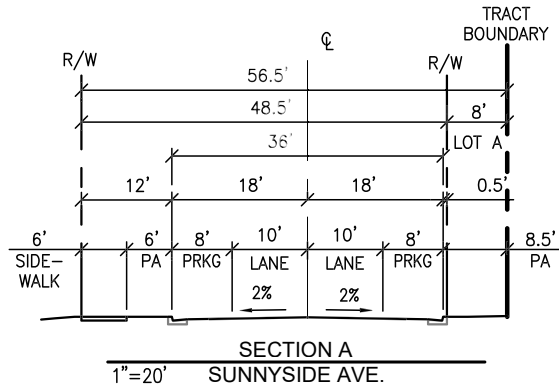
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SOURCE: Fuscoe, 2021

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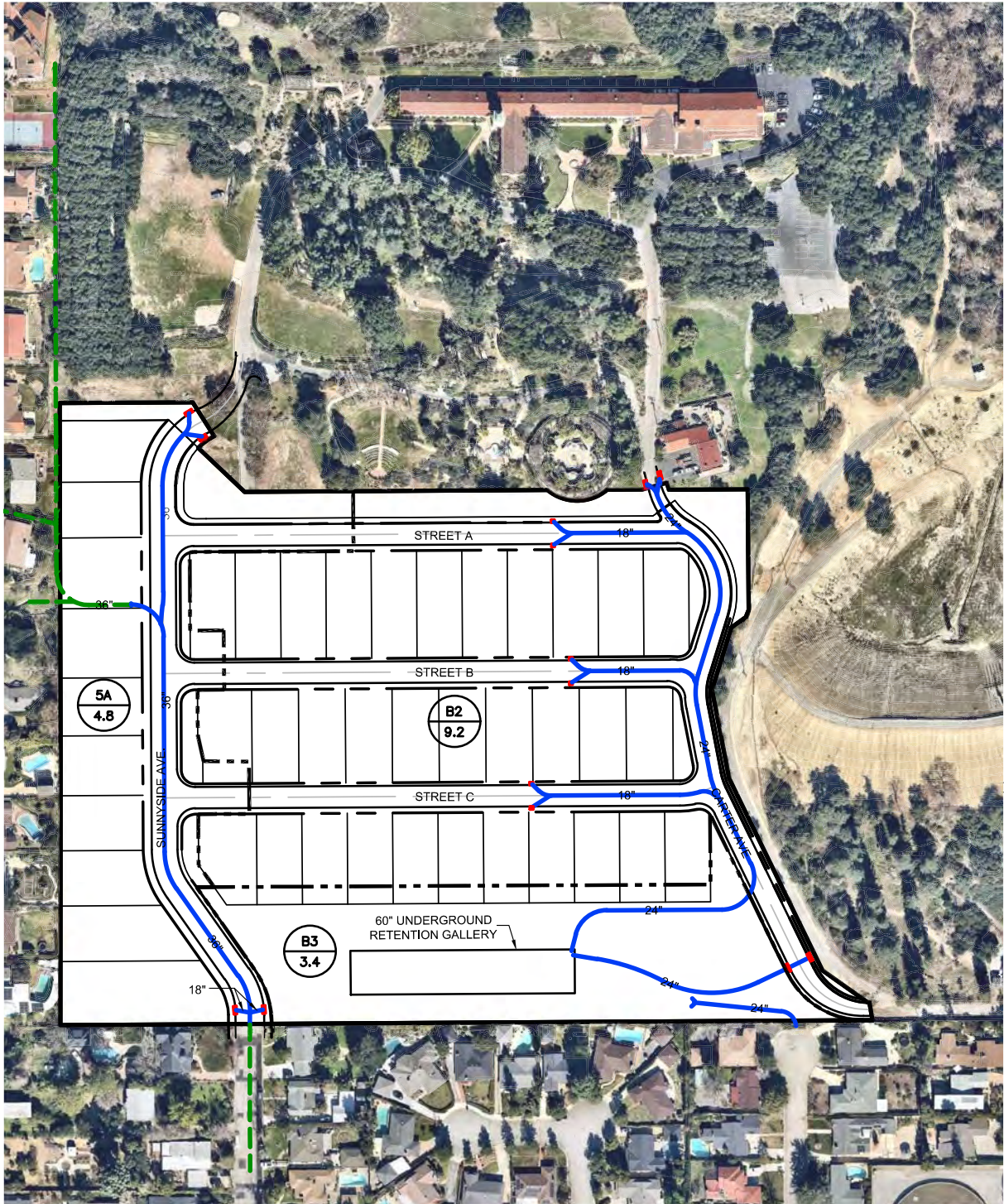


SOURCE: Fuscoe, 2021

FIGURE 3-6

Proposed Street Sections  
The Meadows at Bailey Canyon EIR

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**LEGEND**

- PROJECT BOUNDARY
 DRAINAGE BOUNDARY
- EXISTING STORM DRAIN
- PROPOSED STORM DRAIN
- PROPOSED CATCH BASIN

SOURCE: Fuscoe, 2021




FIGURE 3-7

Proposed Drainage Plan  
The Meadows at Bailey Canyon EIR

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**LEGEND**

-  PROJECT BOUNDARY
-  PROPOSED WATER SYSTEM
-  EXISTING WATER SYSTEM

SOURCE: Fuscoe, 2021

**FIGURE 3-8**

Proposed Water System  
The Meadows at Bailey Canyon EIR

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**LEGEND**

- PROJECT BOUNDARY
- PROPOSED WASTEWATER SYSTEM
- - - EXISTING WASTEWATER SYSTEM

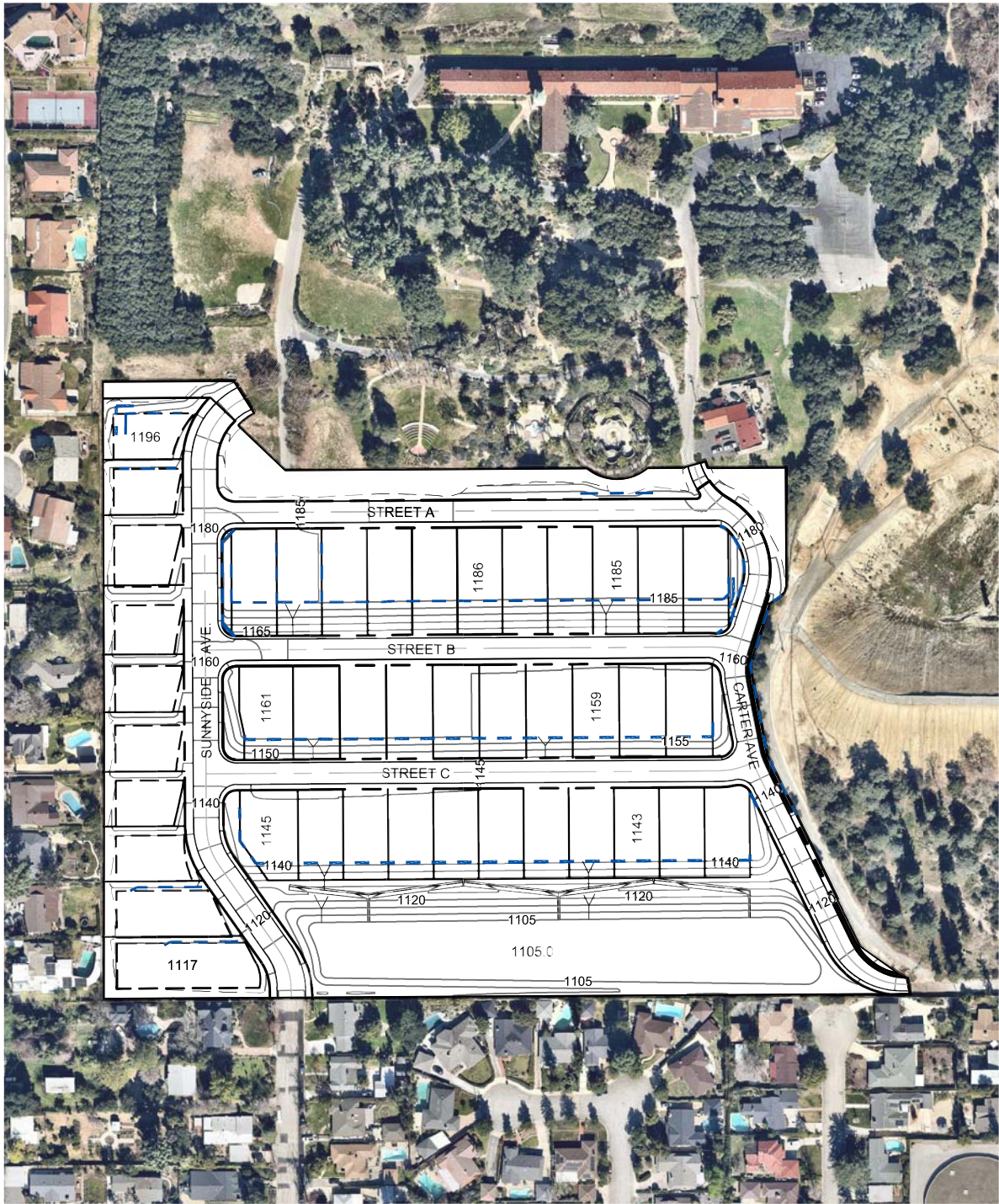
SOURCE: Fuscoe, 2021

**FIGURE 3-9**

Proposed Wastewater System  
The Meadows at Bailey Canyon EIR

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**LEGEND**



**PROJECT BOUNDARY**

**PROPOSED RETAINING WALL**

- 1) POTENTIAL LANDSCAPE/RETAINING WALLS ALONG FRONT OF LOTS 1-10 TO BE FINALIZED DURING FINAL DESIGN
- 2) WALL LOCATIONS SUBJECT TO CHANGE PROVIDED THEY MEET HEIGHT GUIDELINE WITHIN THE SPECIFIC PLAN

NOTE: ELEVATIONS SHOWN FOR ILLUSTRATIVE PURPOSES ONLY. FINAL ELEVATIONS SUBJECT TO CHANGE DURING FINAL DESIGN.

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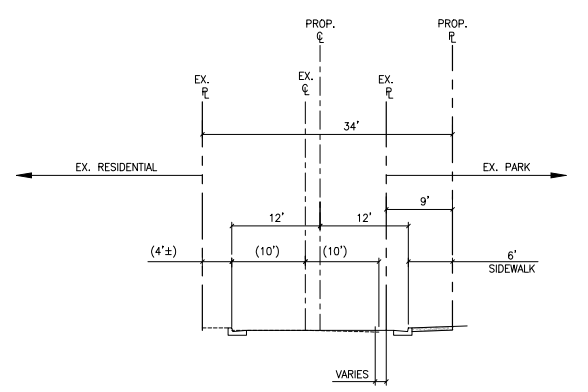
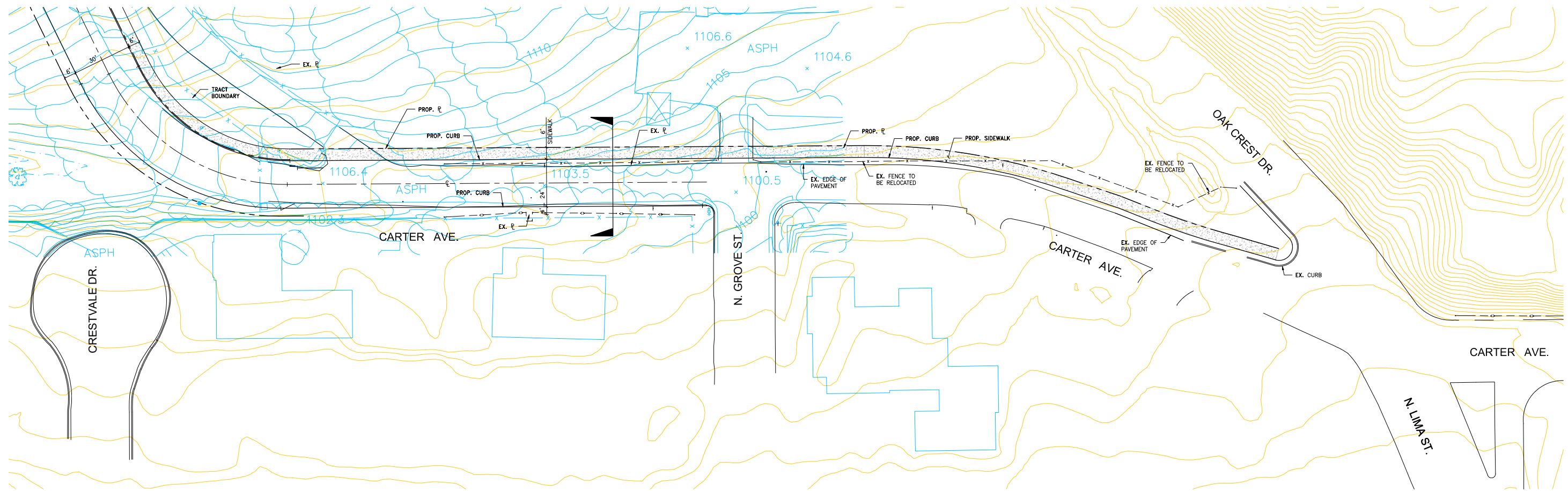
- Project Site
- Proposed Off-Site Improvement Area

SOURCE: Fuscoe 2021; County of Los Angeles; Bing Maps

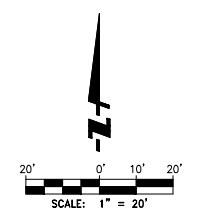


**FIGURE 3-11**  
**Proposed Off-Site Improvement Area**  
 The Meadows at Bailey Canyon EIR

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SECTION - CARTER AVE.  
 24' CURB TO CURB WITH NO PARKING  
 AND 6' SIDEWALK ON NORTH SIDE



SOURCE: Fuscoe Engineering 12/2021

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# 4 Environmental Analysis

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The following sections analyze the potential environmental impacts that may occur as a result of implementation of The Meadows at Bailey Canyon Specific Plan (Specific Plan, project, or proposed project). Each issue analysis section includes a description of existing conditions, the criteria for the determination of impact significance; evaluation of potential project impacts, including mitigation measures (if applicable); identification of project design features that are components of the project, including the Specific Plan, that help avoid or reduce potential impacts; and a conclusion of significance after mitigation for impacts identified as requiring mitigation (if applicable). Separately considered, but part of the required environmental analysis, is a consideration of cumulative impacts that considers the impacts of the project with other past, present, and reasonably foreseeable future related projects. Cumulative impacts are addressed in Chapter 5.

The environmental issues addressed in this chapter are as follows:

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

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## 4.1 Aesthetics

This section describes the existing visual conditions of The Meadows at Bailey Canyon Specific Plan Project (project or proposed project) site and vicinity, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures or any applicable project design features related to implementation of the proposed project.

### 4.1.1 Existing Conditions

#### **Project Site**

Currently, the project site consists of largely undeveloped land with existing roads and infrastructure associated with the Mater Dolorosa Retreat Center. The project currently shares a legal parcel with the Mater Dolorosa Retreat Center, located to the north of the project site. North Sunnyside Avenue runs north/south across the western portion of the project site and Carter Avenue runs north/south adjacent to the eastern project site boundary. There is also an access road running east/west, connecting these two roads. Within the City of Sierra Madre (City) General Plan, the project site is designated as Institutional (City of Sierra Madre 2015). The project site is also zoned Institutional. The aesthetic character of the project site is currently defined by the gently sloping and undeveloped landscape rising from the southern boundary of the project site toward the landscaped and built portion of the Mater Dolorosa Retreat Center.

Topography of the project site includes a downhill grade generally in the north to south direction. Elevations of the site range from a high of 1,210 feet above sea level (AMSL) at the northwestern portion of the site, to a low of 1,107 feet AMSL in the southeastern portion of the site.

#### **Surrounding Land Uses**

The project site is surrounded by existing development, including residential land uses to the south and west, the Mater Dolorosa Retreat Center to the north, and Bailey Canyon and the Bailey Canyon Wilderness Park to the east. The foothills of the San Gabriel Mountains begin just north of the Mater Dolorosa Retreat Center, providing scenic background views beyond the project site when oriented north.

#### **Scenic Resources**

According to the City's General Plan, the City is known for its scenic backdrop of the southern foothills of the rugged San Gabriel Mountains. The foothills possess a high degree of aesthetic value, with the hillsides and ridgelines being the most prominent visual features. Additionally, other significant features of the natural vegetation and topography, such as swales, knolls, and rock outcroppings, contribute to the aesthetic quality of the foothills. Views of these features are afforded from various viewpoints throughout the City and outside the City's boundaries (City of Sierra Madre 2015). The project site is located approximately 460 feet south of the base of the San Gabriel Mountains.

#### **Scenic Highways**

According to the California Department of Transportation (Caltrans) Scenic Highway Mapping System (Caltrans 2020), there are no officially designated scenic highways that pass by the project site. The following are the closest designated scenic highways:

- California State Route (SR) 2 from La Cañada Flintridge to San Bernardino County, located approximately 6.75 miles north of the project site.

The following are the closest eligible scenic highways:

- Interstate (I) 210 from I-5 to SR-134, located approximately 5.5 miles west of the project site.
- California SR-39 from I-210 in Azusa to SR-2, located approximately 8.75 miles east of the project site.

There are no locally designated scenic roadways in the City.

### **Light and Glare**

Currently, the project site is undeveloped and not lit at night, aside from two light posts, which are currently present in the southern portion of the site, at the gate where public access along North Sunnyside Avenue terminates. Additionally, the project site does not contain expanses of material that would result in glare. The City is urbanized and primarily generates lighting typical of residential land uses, such as exterior night lighting and street lighting. Surrounding residential land uses contain lighting typical of an urban setting, including but not limited to street lighting and security lighting. The Mater Dolorosa Retreat Center also generates similar lighting as the surrounding residential uses. These surrounding land uses also include windows and other glass or metal expanses that may result in minimal localized glare.

### **Viewers**

Viewer exposure varies depending on several factors including the angle of view (i.e., normal, inferior, or superior viewing angles); view distance (foreground, middle ground, and background); relationship to sun angle (backlighting versus front or side lighting); the extent of visibility (i.e., whether views are panoramic or limited by vegetation, topography, or other land uses); and viewer screening conditions (e.g., whether the project facilities will be skylined on ridgelines, backscreened by topography and/or vegetation, or screened by structures or vegetation in the foreground). Viewer exposure also considers the duration of view based on viewer activity (e.g., travel route, residential, recreation) and often relates to speed of travel (pedestrian, vehicular, or stationary).

The project site is located in the northwestern portion of the City and just south of the Mater Dolorosa Retreat Center. Public viewpoints of the project site are limited due to the location of the site. Public roadways adjacent to the project site include Crestvale Drive, which terminates at a cul-de-sac adjacent to the southern boundary of the project site. North Sunnyside Avenue and Carter Avenue also run through the western and eastern portions of the project site, respectively. However, public access along North Sunnyside Avenue and Carter Avenue currently terminates at gates along the project site boundary. Viewers along these roadways would primarily consist of motorists, bicyclists, and pedestrians associated with the existing residential neighborhood south of the project site.

The Bailey Canyon Wilderness Park is located directly east of the project site and provides public access for recreationists who may be afforded some views of the project site. However, Bailey Canyon Wilderness Park is concentrated with many existing, mature trees which obstruct significant, widespread views of the project site from this area. Existing ornamental trees also line either side of Carter Avenue between Bailey Canyon Wilderness Park and the majority of the project site. Various hiking trails are also located north of the project site within the San Gabriel Mountains. Viewers from these trails would be afforded expansive views overlooking the project site, the City, and the adjacent communities.

## 4.1.2 Relevant Plans, Policies, and Ordinances

### Federal

There are no federal plans, policies, or ordinances related to aesthetics relevant to the proposed project.

### State

#### *California Scenic Highway Program*

The California Scenic Highway Program was created in 1963 with the intent “to protect and enhance the natural scenic beauty of California highways and adjacent corridors, through special conservation treatment.” The state laws that govern the Scenic Highway Program are Sections 260 through 263 of the Streets and Highways Code. A highway may be designated scenic based on the natural landscape visible by travelers, the scenic quality of the landscape, and the extent to which development intrudes upon the views of the highway. The Scenic Highway Program includes both officially designated scenic highways and highways that are eligible for designation. It is the responsibility of local jurisdictions to apply for scenic highway approval, which requires the adoption of a Corridor Protection Program (Caltrans 2020). In addition, once a scenic highway is designated, the local jurisdiction is responsible for regulating development within the scenic highway corridor. There is no designated or eligible state Scenic Highway within the project site.

### Local

#### *City of Sierra Madre General Plan*

The General Plan includes the following objectives and policies relevant to the proposed project with regard to aesthetics (City of Sierra Madre 2015). The proposed project’s consistency with these policies is provided in Table 4.11-1 in Section 4.11, Land Use and Planning.

#### *Chapter One: Land Use*

- Policy L6.2:** Ensure that any new or expanded structures in residential neighborhoods do not unreasonably obstruct significant mountain or basin views.
- Objective L17:** Protecting views to and from hillside areas in order to maintain the image and identity of the City as a village of the foothills.
- Policy L17.1:** Require the use of natural materials where allowed and earth tone colors for all structures to blend in with the natural landscape and natural chaparral vegetative growth.
- Policy L17.2:** Require that all development be designed to reflect the contours of the existing land form using techniques such as split pads, detached secondary structures (such as garages), and avoiding the use of excessive cantilevers.
- Policy L17.3:** Require that all development preserves, to the maximum extent possible, significant features of the natural topography, including swales, canyons, knolls, ridge lines, and rock outcrops.
- Policy L17.5:** Require that exterior lighting be directed away from adjacent properties and the night sky.

**Objective L20:** Maintaining the massing and scale of the existing block and existing structures on sites.

**Policy L20.1:** Require that new residential development be compatible with and complement existing structures on the block:

- a. Maintain existing front yard setbacks on the block;
- b. Use compatible building materials, colors, and forms;
- c. Minimize front yard paving and prohibit front yard parking.

**Chapter Two, Section Three: Dark Sky**

The City recognizes the preservation of the night sky to perpetuate the view of the stars as a valuable community resource. Therefore, the General Plan includes the City’s Dark Sky program, which includes the following goals, objectives, and policies:

**Goal 1.** Protection of the starlit sky to avoid deterioration of the viewing of dark sky as it is a valuable resource.

**Goal 3.** Consideration of neighboring properties and the community as a whole with regard to exterior lighting through the reduction of negative light impacts in the design of new exterior lighting schemes.

**Objective R6:** Reducing light pollution, trespass, and unnecessary glare through the use of light shielding methods, and elimination of lighting that is misdirected, excessive, or unnecessary.

**Policy R6.1:** Require that all new development projects utilize light fixtures that shield the light source so that light is cast downward to avoid light spillage off site or upward into the sky.

**Policy R6.2:** Discourage continuous all-night exterior lighting and encourage motion-sensored lighting.

**Policy R6.3:** Encourage the use of fixtures like the "shoe box" design that are capable of providing accurate light patterns, and can often be used for lighting without spilling onto the neighboring property and upward into the sky.

**Objective R7:** Minimizing lighting use and intensity, utilizing the most efficient lighting technology.

**Policy R7.2:** The City shall, whenever possible, turn off the lights or use motion sensor controlled lighting and encourage the public to do the same.

**Objective R8:** The reasonable use of outdoor lighting for nighttime safety, utility, security, and enjoyment while preserving the ambiance of the night.

**Policy R8.1:** Encourage outdoor lighting to be designed and installed in a manner that confines the direct lighting rays to the property upon which the lighting is installed so as to protect adjacent and nearby residential districts and public rights-of- way, and reduce “skyglow.”

**Policy R8.2:** Lighting in and near residential areas shall be minimal and shielded to prevent nuisance glare.

**Policy R8.3:** Lighting attached to single-family home structures should not exceed the height of the eave, and residential lighting pole height restrictions can be considered to control light trespass on adjacent properties and upward into the sky.

**Policy R8.4:** Provide adequate illumination of all streets, alleys, and public areas.

### 4.1.3 Thresholds of Significance

The significance criteria used to evaluate the project impacts to aesthetics are based on Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to aesthetics would occur if the project would:

1. Have a substantial adverse effect on a scenic vista.
2. Substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.
3. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings. (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, conflict with applicable zoning and other regulations governing scenic quality.
4. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

### 4.1.4 Project Design Features

The following project design features (PDFs) would be implemented as part of the proposed project and would be applicable to aesthetics:

**PDF-AES-1** Lighting at the project site shall comply with Section 3.8.6(A.xii) of the Specific Plan, which includes the following development standards:

- All lighting of the building, landscaping, parking area, or similar facilities shall be in compliance with the City’s Dark Sky Program.
- Lighting shall be hooded and directed downward to reflect away from adjoining properties.
- Lighting shall be confined to the lot boundaries and not be oriented towards neighboring properties to protect privacy.
- Pedestrian-scaled street lighting shall be provided within the proposed park areas pedestrian routes of travel to enable visibility and safety.

In addition, skylights proposed at the project site shall comply with Section 5.5.6 of the Specific Plan, which includes the following architectural design requirements:

- Skylight materials and elements should be consistent with the selected architectural style and be fully integrated into the roof design.
- Skylights shall employ the following strategies:
  - Glazing should be clear, flat, or non-reflective.
  - Tubular, domed, or “bubble” skylights shall not be used.
  - Skylights should be mounted on the same plan and angle as the roof.
- To eliminate skyward glare, interior lights should not be oriented upward through skylights.

**PDF-AES-2** Solar panels shall comply with requirements outlined in Section 5.5.6 of the Specific Plan which includes the following, to reduce potential for glare:

- Solar panels shall include materials and elements that are consistent with the selected architectural style and shall be fully integrated into the roof design.
- Solar panels shall be oriented to the south to maximize efficiency and establish visual consistency across buildings.
- Flashing, sheet metal, and framing should be colored to match the roof material.

## 4.1.5 Impacts Analysis

### 1. *Would the project have a substantial adverse effect on a scenic vista?*

As discussed in Section 4.1.1, Existing Conditions, the General Plan identifies the San Gabriel Mountains as contributing to the overall aesthetic quality of the City. Views of the San Gabriel Mountains are afforded throughout the City. Additionally, various hiking trails exist within the southern foothills of the San Gabriel Mountains which provide expansive views of the City and surrounding cities. The project site is located approximately 460 feet south of the San Gabriel Mountains and the foothills begin just north of the Mater Dolorosa Retreat Center. As such, views of the San Gabriel Mountains are afforded from the project site and surrounding public vantage points, including surrounding roadways North Sunnyside Avenue, Crestvale Drive, and Carter Avenue. North Sunnyside Avenue and Carter Avenue also run through the project site; however, public access on these two roadways currently terminates at gates along the southern end of the project site boundary. Public access along Crestvale Avenue terminates at a cul-de-sac adjacent to the southern boundary of the project site. Viewers along these roadways would primarily consist of motorists, bicyclists, and pedestrians associated with the existing residential neighborhood south of the project site. However, public access along all of these roadways currently terminates at the project site, which limits the number of potential viewers as less traffic occurs on these roadways and they are not through streets. With implementation of the proposed project, public access along North Sunnyside Avenue would be extended into the project site, and Carter Avenue would be publicly accessible from within the project site and would serve as secondary access to the project site. Viewers along the publicly accessible extended portions of North Sunnyside Avenue would be associated with the proposed project, including the neighborhood park and residential development.

The proposed project would include a neighborhood park at the southernmost portion of the project site, where public access along these three roadways currently terminates. Viewers located along these roadways would be afforded views of the neighborhood park in the foreground and the San Gabriel Mountains in the background. Views of the proposed residential development would be visible beyond the neighborhood park from these roadways. However, once developed, the project site would have an elevation ranging from 1,200 feet AMSL in the north to 1,110 feet AMSL in the south, and the proposed project would limit residential units to one to two stories in height. For contrast, the closest foothills of the San Gabriel Mountains to the project site range from 1,500 to 2,000 feet above mean sea level and continue rising in elevation farther north. Therefore, due to the dramatic elevation rise of the San Gabriel Mountains beyond the Mater Dolorosa Retreat Center, the residential development would not obstruct views of the mountain range from these roadways.

The Bailey Canyon Wilderness Park is also located directly east of the project site. Viewers at the Bailey Canyon Wilderness Park would consist of recreationists who would be afforded views of the San Gabriel Mountains to the north. The proposed project would not obstruct views of the San Gabriel Mountains from the Bailey Canyon Wilderness Park as the project site is located west of the wilderness park and the San Gabriel Mountains are located to the north.

Views of the project site may also be afforded to recreationists within the Bailey Canyon Wilderness Park. However, Bailey Canyon Wilderness Park is concentrated with many existing, mature trees that obstruct significant, widespread views of the project site from this area. In addition, the proposed neighborhood park would be adjacent to the Bailey Canyon Wilderness Park across Carter Avenue, which would include trees and landscaping as shown in Figure 3-3, Proposed Park Conceptual Plan, in Chapter 3, Project Description. Proposed trees and landscaping within the eastern portion of the neighborhood park would help to buffer views of the proposed residential uses from Bailey Canyon Wilderness Park. While new residences may still be partially visible from Bailey Canyon Wilderness Park, neither the project site nor Bailey Canyon Wilderness Park are identified as protected hillside areas or scenic vistas within the City's General Plan. In addition, the design guidelines of the Specific Plan outline site planning and design, architectural design, and landscape design standards that would be implemented as a design of the project in order to ensure that development is consistent with surrounding development and that the proposed project would not significantly degrade views of the project site from Bailey Canyon Wilderness Park. Therefore, views of the project site from Bailey Canyon Wilderness Park would not be considered changes to or from a scenic vista.

Various hiking trails exist within the southern foothills of the San Gabriel Mountains which provide expansive views of the project site, the City, and the surrounding cities. The closest trails are located approximately 1 mile northeast of the project site. From this distance and elevation, the project site and much of the City would be visible for recreationists along portions of these trails. Development of the proposed project would introduce residential uses and a neighborhood park to a largely undeveloped site. As such, the visual character of the project site would change on the project site and this change would be visible from these trails. However, the proposed uses are congruent with the surrounding land uses, which are largely composed of residential developments similar to the proposed project. While the proposed project would be visible from these trails, a substantial adverse effect would not occur on views from the San Gabriel Mountains because the proposed project would appear to be consistent with the surrounding visual environment. Therefore, the proposed project would not result in a substantial adverse effect on a scenic vista, including views of and from the San Gabriel Mountains, and impacts would be **less than significant**.

**2. *Would the project substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?***

As discussed in Section 4.1.1, there are no officially designated scenic highways that pass by the project site according to the Caltrans Scenic Highway Mapping System (Caltrans 2020). The following is the closest designated scenic highway:

- California SR-2 from La Cañada Flintridge to San Bernardino County, located approximately 6.75 miles north of the project site.

The following are the closest eligible scenic highways:

- I-210 from I-5 to SR-134, located approximately 5.5 miles west of the project site.
- California SR-39 from I-210 in Azusa to SR-2, located approximately 8.75 miles east of the project site.

The project site is not located within the vicinity of an officially designated or eligible state scenic highway. Additionally, there are no locally designated scenic roadways in the City. Therefore, implementation of the proposed project would not substantially damage scenic resources within a state scenic highway. **No impact** would occur.

3. *In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?*

CEQA Section 21071 defines an “urbanized area” as “(a) an incorporated city that meets either of the following criteria: (1) has a population of at least 100,000 persons, or (2) has a population of less than 100,000 persons if the population of that City and not more than two contiguous incorporated cities combined equals at least 100,000 persons.” As of July 1, 2019, the US Census Bureau estimated the population of the City to be 10,743 persons (US Census Bureau 2019). However, the City is contiguous with the City of Pasadena, which the US Census Bureau estimated the population to be 141,029 persons as of July 1, 2019 (US Census Bureau 2019). Thus, the City would be considered an urbanized area per CEQA and the first portion of Threshold 3, related to changes in the visual character or quality of public views of the site and its surroundings, would not apply to the proposed project aesthetics analysis. As such, this analysis focuses on the second portion of Threshold 3, regarding whether the project would conflict with applicable zoning and other regulations governing scenic quality, for projects in urbanized areas. It should be noted that, although private views are not protected by CEQA, the design guidelines of the Specific Plan outline site planning and design, architectural design, and landscape design standards that would be implemented as a design of the project to ensure that visual character and quality of public and private views are not degraded. This includes provision of a landscape buffer between the Mater Dolorosa Retreat Center’s existing amphitheater and lookout point and the proposed homes on the northern end of the project site.

### Zoning

The project site is currently zoned Institutional, and the existing General Plan land use designation is also Institutional. The proposed project would amend the City’s zoning code and City’s General Plan to change the project site zoning to Specific Plan and the General Plan land use designation to Specific Plan. These zoning and land use designation changes would allow for the development of the proposed residential development and neighborhood park. If approved, the proposed project would not conflict with the applicable zoning and land use designation, as the amendments to the General Plan and zoning code would be approved concurrently with the proposed project.

### General Plan

As discussed in Section 4.1.1, the General Plan identifies the San Gabriel Mountains as contributing to the overall aesthetic quality of the City. Section 4.1.2, Relevant Plans, Policies, and Ordinances, includes General Plan objectives and policies as they relate to aesthetics. Objectives and policies specifically related to scenic quality are as follows (City of Sierra Madre 2015):

**Policy L6.2:** Ensure that any new or expanded structures in residential neighborhoods do not unreasonably obstruct significant mountain or basin views.

Although the project site does not contain any identified important public viewpoints, it is located approximately 460 feet south of the San Gabriel Mountains. As discussed under Threshold 1 above, implementation of the proposed project would not result in a substantial adverse effect on a scenic vista, including views of and from the San Gabriel Mountains, in compliance with General Plan Policy L6.2. In addition, the ~~dedication-conservation~~ of open space ~~to~~ for the City would preserve this hillside area in perpetuity, therefore preserving undeveloped views of the hillside from the City. Therefore, the proposed project would not conflict with General Plan objectives and policies governing scenic quality. Therefore, impacts would be **less than significant**.



#### 4. *Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?*

The project site is currently largely undeveloped, and the only sources of existing on-site lighting include light posts in the southern portion of the site, at the gate where public access along North Sunnyside Avenue terminates at the project site. Therefore, development of the proposed project would introduce new sources of lighting and glare on the project site. Lighting within the project site would be typical of a residential land use, including street lighting, lighting for the neighborhood park, and exterior lighting on residences. New sources of glare within the project site would include windows on residences.

The Specific Plan contains design guidelines for implementation of the proposed project, which includes rules for lighting on the project site. In compliance with the General Plan objectives and policies related to lighting as discussed in Section 4.1.2, the Specific Plan for proposed project regulates lighting to preserve dark skies while maintaining adequate lighting for safety. These guidelines shall be implemented into the design of the project, consistent with **PDF-AES-1** (see Section 4.1.4, Project Design Features). More specifically, as discussed in the Specific Plan, lighting at the project site shall be in compliance with the City's Dark Sky Program; hooded and directed downward to reflect away from adjoining properties; and confined to the lot boundaries and not be oriented towards neighboring properties. In addition, pedestrian-scaled street lighting shall be provided within the proposed park areas pedestrian routes of travel to enable visibility and safety. This would result in shielding to avoid light spillage, consistent with General Plan Objective R6, Policy R6.1, and Policy R8.2. In addition, per Section 5.5.3 of the Specific Plan, to preserve dark skies, lighting at the project site should only be used when needed; only light the area that needs it; be no brighter than necessary; minimize blue light emissions; and be fully shielded and pointing downward. This would be consistent with General Plan Objective R6; Policy R8.2, which requires that lighting in and near residential areas shall be minimal and shielded to prevent nuisance glare; and Policy R6.2, which discourages continuous all-night exterior lighting and encourage motion-sensored lighting (please see Table 4.11-1 for a consistency analysis with all applicable General Plan policies). Therefore, lighting on the project site, including new street lighting, would be shielded and aimed downward to avoid light spillage and glare, and would not adversely affect day or nighttime views in the area.

Additionally, sources of glare introduced on the project site would primarily include windows associated with the residential development. However, the project site would not contain large expanses of material, such as glass or metal, that would result in glare. Thus, glare from windows would be minimal and localized to the areas surrounding each residential unit. The proposed project may also include solar panels on residential rooftops. The design and orientation of the proposed solar panels are not known at this time. However, as outlined in **PDF-AES-2**, solar panels shall comply with requirements outlined in the Specific Plan, and shall be oriented to the south to maximize efficiency and establish visual consistency across buildings (see Section 4.1.4). Modern solar panels are designed to be highly absorbing of incoming light to both maximum energy generation potential and to minimize potential for reflective light (i.e., glare). Typically, the potential for glare associated with solar panels is reduced by the use of anti-reflective coatings (a standard component of modern panel technology) and by the mounting angle of installed panels. Under most circumstances, rooftops panels are installed at a pre-specified and specific tilt/angle in order to maximize exposure to the sun. With typical mounting angles/tilt, the angle of reflective light is similar to the angle of inbound light and as such, any reflective light associated with the panel surface is reflected at an angle and height that is located "higher" in elevation than surrounding land uses. At the project site, the potential installation of solar panels atop detached single-family residences is not anticipated to generate substantial glare that would be received by single-family residences to the south and west due to mounting heights and angles, the greater elevation of the project site (and future single-family residences) in relation to existing residential development to the south, and due to screening associated with the installation

of landscaping along the southern and western boundaries of the project site as depicted in the Conceptual Landscape Plan (see Figure 3-5). These requirements would also ensure potential impacts associated with glare would not occur. The City and adjacent cities including Pasadena are urbanized and currently generate substantial night lighting. The housing and buildings in the surrounding area include windows and other glass or metal expanses that can result in localized glare. Surrounding residential land uses contain lighting typical of an urban setting, including but not limited to, street lighting and security lighting. While the proposed project would result in new sources of light and glare, these would be similar to the surrounding land uses. Furthermore, with compliance with the guidelines of the Specific Plan, these new sources of light and glare would not result in adverse day or nighttime views in the area. Impacts would be **less than significant**.

### 4.1.6 Mitigation Measures

No mitigation measures would be required.

### 4.1.7 Level of Significance After Mitigation

No mitigation measures would be required. Impacts related to aesthetics would be less than significant.

## 4.2 Agriculture and Forestry Resources

This section describes the existing agriculture and forestry conditions of The Meadows at Bailey Canyon Specific Plan Project (project or proposed project) site and vicinity, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures related to implementation of the proposed project.

### 4.2.1 Existing Conditions

#### **Project Site**

The project site currently contains vacant and undeveloped land with existing roads and infrastructure associated with the Mater Dolorosa Retreat Center, located to the north of the project site. North Sunnyside Avenue runs across the western portion of the project site and Carter Avenue runs adjacent to the eastern project site boundary. Surrounding land uses include the Bailey Canyon and Bailey Canyon Wilderness Park to the east, existing single-family residential developments to the south and west, and the Mater Dolorosa Retreat Center to the north. The project site contains a variety of trees, shrubs, and grasses.

According to the California Department of Conservation (DOC) California Important Farmland Finder, the entire City of Sierra Madre (City), as well as most of Los Angeles County (County), is not in an area mapped by the Farmland Mapping and Monitoring Program (FMMP) (DOC 2016). This is due to the built up and highly urbanized character of the City and surrounding communities. As such, there are no important farmlands on the project site or within the City. Additionally, the City does not have any lands designated or zoned as agriculture, forest land, timber land, or timber production (City of Sierra Madre 2015).

### 4.2.2 Relevant Plans, Policies, and Ordinances

#### **Federal**

There are no federal plans, policies, or ordinances related to agriculture and forestry resources relevant to the proposed project.

#### **State**

##### ***Department of Conservation Farmland Mapping and Monitoring Program***

In response to the need to assess the location, quality, and quantity of agricultural lands and conversion of such lands over time, in 1982, the California Department of Conservation established the FMMP. The goal of the FMMP is to provide consistent and impartial data to decision makers to assess the suitability of agricultural lands in California. The FMMP categories are based on local soil characteristics and irrigation status, with the best quality land identified as Prime Farmland or Farmland of Statewide Importance. The FMMP classifies land into five mapping categories based on soil and climatic conditions: Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, and Grazing Land. In addition, the FMMP identifies non-agricultural lands as either Urban and Built-Up Land or Other Land. Important Farmland Maps are updated every 2 years.

### **Williamson Act**

The California Land Conservation Act of 1965, commonly known as the Williamson Act (Government Code Section 51200 et seq.), enables local governments to enter into contracts with private landowners for the purpose of restricting specific parcels of land to agricultural or related open space use. In return, landowners receive property tax assessments that are much lower than normal because they are based on farming and open space uses as opposed to the full potential market value of the land. The goal of the Williamson Act program is to encourage preservation of agricultural land and prevent its premature conversion to urban uses.

### **California Public Resources Code**

The California Public Resources Code defines “forest land” and “timberland” as follows:

‘Forest land’ is land that can support 10% native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits (California Public Resources Code Section 12200[g]).

‘Timberland’ means land, other than land owned by the federal government and land designated by the board [State Board of Forestry and Fire Protection] as experimental forest land, which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees. Commercial species shall be determined by the board on a district basis after consultation with the district committees and others (California Public Resources Code Section 4526).

### **California Government Code**

The California Government Code defines “timberland” zoned “timberland production” as follows (California Government Code Section 51100 et seq.):

‘Timberland production zone’ or ‘TPZ’ means an area which has been zoned pursuant to Section 51112 or 51113 and is devoted to and used for growing and harvesting timber, or for growing and harvesting timber and compatible uses, as defined in subdivision (h). With respect to the general plans of cities and counties, ‘timberland preserve zone’ means ‘timberland production zone.’

### **Local**

There are no local plans, policies, or ordinances related to agriculture and forestry resources relevant to the proposed project.

## 4.2.3 Thresholds of Significance

The significance criteria used to evaluate the project impacts to agriculture and forestry resources are based on Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to agriculture and forestry resources would occur if the project would:

1. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.
2. Conflict with existing zoning for agricultural use, or a Williamson Act contract.

3. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g)).
4. Result in the loss of forest land or conversion of forest land to non-forest use.
5. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.

### 4.2.4 Project Design Features

There are no project design features that apply to agriculture and forestry resources.

### 4.2.5 Impacts Analysis

1. ***Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?***

As described in Section 4.2.1, Existing Conditions, according to the DOC California Important Farmland Finder, the entire City, including the project site, is in an area not mapped by the FMMP. This is largely due to the built up and highly urbanized character of the City and surrounding communities. As such, there is no Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) within the project site (DOC 2016). Thus, no important farmland would be converted to a non-agricultural use. **No impact** would occur.

2. ***Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?***

The project site is not designated or zoned for agricultural use and is not subject to a Williamson Act contract. As such, the proposed project would not conflict with a Williamson Act contract. **No impact** would occur.

3. ***Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?***

The project site is both zoned and contains a General Plan land use designation of Institutional. There is no land within the City zoned or designated as forest land, timber land, or timber production (City of Sierra Madre 2015). As such, the proposed project would not conflict with zoning for forest land or timberland production. **No impact** would occur.

4. ***Would the project result in the loss of forest land or conversion of forest land to non-forest use?***

There is no land designated as forest land on the project site or within the City. As such, the proposed project would not result in the loss of forest land or conversion of forest land to a non-forest use. **No impact** would occur.

5. ***Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?***

As described under the above thresholds, the project site is zoned as Institutional and there are no agricultural or forest lands on the project site or within the City. The proposed project would authorize development of a residential

development and neighborhood park in an urbanized area surrounded by existing residential development to the south and west, the Mater Dolorosa Retreat Center to the north, and Bailey Canyon Wilderness Park to the east. The proposed project would not involve changes to the existing environment which, due to their location or nature, could result in the conversion of farmland to a non-agricultural use or forest land to a non-forest use. **No impact** would occur.

### 4.2.6 Mitigation Measures

No impacts to agriculture and forestry resources would occur; therefore, no mitigation is required.

### 4.2.7 Level of Significance After Mitigation

No impacts to agriculture and forestry resources would occur; therefore, no mitigation is required.

## 4.3 Air Quality

This section describes the existing air quality conditions of The Meadows at Bailey Canyon Specific Plan Project (project or proposed project) site and vicinity, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures related to implementation of the proposed project. An Air Quality and Greenhouse Gas Emissions Analysis Technical Report that evaluated and identified potential air quality impacts associated with the project was prepared by Dudek in November 2020 and is included as Appendix B of this Environmental Impact Report (EIR).

### 4.3.1 Existing Conditions

The project site is located within the South Coast Air Basin (SCAB). The SCAB is a 6,745-square-mile area bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east.

#### 4.3.1.1 Meteorological and Topographical Conditions

The primary factors that determine air quality are the locations of air pollutant sources and the amount of pollutants emitted. Meteorological and topographical conditions, however, are also important. Factors such as wind speed and direction, air temperature gradients and sunlight, and precipitation and humidity interact with physical landscape features to determine the movement and dispersal of air pollutants. The SCAB's air pollution problems are a consequence of the combination of emissions from the nation's second largest urban area, meteorological conditions adverse to the dispersion of those emissions, and mountainous terrain surrounding the SCAB that traps pollutants as they are pushed inland with the sea breeze (SCAQMD 2017). Meteorological and topographical factors that affect air quality in the SCAB are described below.<sup>1</sup>

#### Climate

The SCAB is characterized as having a Mediterranean climate (typified as semiarid with mild winters, warm summers, and moderate rainfall). The general region lies in the semi-permanent high-pressure zone of the eastern Pacific; as a result, the climate is mild and tempered by cool sea breezes. The usually mild climatological pattern is interrupted infrequently by periods of extremely hot weather, winter storms, or Santa Ana winds. The extent and severity of the air pollution problem in the SCAB is a function of the area's natural physical characteristics (e.g., weather and topography) and of manufactured influences (e.g., development patterns and lifestyle). Moderate temperatures, comfortable humidity, and limited precipitation characterize the climate in the SCAB. The average annual temperature varies little throughout the SCAB, averaging 75°F. However, with a less-pronounced oceanic influence, the eastern inland portions of the SCAB show greater variability in annual minimum and maximum temperatures. All portions of the SCAB have recorded temperatures over 100°F in recent years. Although the SCAB has a semiarid climate, the air near the surface is moist because of the presence of a shallow marine layer. Except for infrequent periods when dry air is brought into the SCAB by offshore winds, the ocean effect is dominant. Periods with heavy fog are frequent, and low stratus clouds, occasionally referred to as "high fog," are a characteristic climate feature. Annual average relative humidity is 70% at the coast and 57% in the eastern part of the

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<sup>1</sup> The discussion of meteorological and topographical conditions of the SCAB is based on information provided in the *Final 2016 Air Quality Management Plan* (SCAQMD 2017).

SCAB. Precipitation in the SCAB is typically 9–14 inches annually and is rarely in the form of snow or hail because of typically warm weather. The frequency and amount of rainfall is greater in the coastal areas of the SCAB.

In the City, the climate is typically warm during summer when temperatures tend to be in the 80s and cool during winter when temperatures tend to be in the 50s. The warmest month of the year is August with an average maximum temperature of 88.5°F, whereas, the coldest month of the year is January with an average minimum temperature of 45.1°F. The wettest month of the year is January with an average rainfall of 4.93 inches (WRCC 2020).

### Sunlight

The presence and intensity of sunlight are necessary prerequisites for the formation of photochemical smog. Under the influence of the ultraviolet radiation of sunlight, certain “primary” pollutants (mainly reactive hydrocarbons and oxides of nitrogen [NO<sub>x</sub>]<sup>2</sup>) react to form “secondary” pollutants (primarily oxidants). Since this process is time dependent, secondary pollutants can be formed many miles downwind of the emission sources. Southern California also has abundant sunshine, which drives the photochemical reactions that form pollutants such as ozone (O<sub>3</sub>) and a substantial portion of fine particulate matter (PM<sub>2.5</sub>, particles less than 2.5 microns in diameter). In the SCAB, high concentrations of O<sub>3</sub> are normally recorded during the late spring, summer, and early autumn months, when more intense sunlight drives enhanced photochemical reactions. Due to the prevailing daytime winds and time-delayed nature of photochemical smog, oxidant concentrations are highest in the inland areas of Southern California.

### Temperature Inversions

Under ideal meteorological conditions and irrespective of topography, pollutants emitted into the air mix and disperse into the upper atmosphere. However, the Southern California region frequently experiences temperature inversions in which pollutants are trapped and accumulate close to the ground. The inversion (a layer of warm, dry air overlaying cool, moist marine air) is a normal condition in coastal Southern California. The cool, damp, and hazy sea air capped by coastal clouds is heavier than the warm, clear air, which acts as a lid through which the cooler marine layer cannot rise. The height of the inversion is important in determining pollutant concentration. When the inversion is approximately 2,500 feet above mean sea level (amsl), the sea breezes carry the pollutants inland to escape over the mountain slopes or through the passes. At a height of 1,200 feet amsl, the terrain prevents the pollutants from entering the upper atmosphere, resulting in the pollutants settling in the foothill communities. Below 1,200 feet amsl, the inversion puts a tight lid on pollutants, concentrating them in a shallow layer over the entire coastal basin. Usually, inversions are lower before sunrise than during the daylight hours.

Mixing heights for inversions are lower in the summer and inversions are more persistent, being partly responsible for the high levels of O<sub>3</sub> observed during summer months in the SCAB. Smog in Southern California is generally the result of these temperature inversions combining with coastal day winds and local mountains to contain the pollutants for long periods, allowing them to form secondary pollutants by reacting in the presence of sunlight. The SCAB has a limited ability to disperse these pollutants due to typically low wind speeds and the surrounding mountain ranges.

As with other cities within the SCAB, the City is susceptible to air inversions, which trap a layer of stagnant air near the ground where pollutants are further concentrated. These inversions produce haziness, which is caused by moisture, suspended dust, and a variety of chemical aerosols emitted by trucks, automobiles, furnaces, and other sources. Elevated particles less than 10 microns in diameter (PM<sub>10</sub>) and PM<sub>2.5</sub> concentrations can occur in the SCAB throughout the year but occur most frequently in fall and winter. Although there are some changes in

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<sup>2</sup> NO<sub>x</sub> is a general term pertaining to compounds of nitric oxide (NO), nitrogen dioxide (NO<sub>2</sub>), and other oxides of nitrogen.



emissions by day of the week and season, the observed variations in pollutant concentrations are primarily the result of seasonal differences in weather conditions.

#### 4.3.1.2 Pollutants and Effects

##### 4.3.1.2.1 Criteria Air Pollutants

Criteria air pollutants are defined as pollutants for which the federal and state governments have established ambient air quality standards, or criteria, for outdoor concentrations to protect public health. The federal and state standards have been set, with an adequate margin of safety, at levels above which concentrations could be harmful to human health and welfare. These standards are designed to protect the most sensitive persons from illness or discomfort. Pollutants of concern include O<sub>3</sub>, nitrogen dioxide (NO<sub>2</sub>), carbon monoxide (CO), sulfur dioxide (SO<sub>2</sub>), PM<sub>10</sub>, PM<sub>2.5</sub>, and lead. These pollutants, as well as toxic air contaminants (TACs), are discussed in the following paragraphs.<sup>3</sup> In California, sulfates, vinyl chloride, hydrogen sulfide, and visibility-reducing particles are also regulated as criteria air pollutants.

**Ozone.** O<sub>3</sub> is a strong-smelling, pale blue, reactive, toxic chemical gas consisting of three oxygen atoms. It is a secondary pollutant formed in the atmosphere by a photochemical process involving the sun's energy and O<sub>3</sub> precursors. These precursors are mainly NO<sub>x</sub> and VOCs. The maximum effects of precursor emissions on O<sub>3</sub> concentrations usually occur several hours after they are emitted and many miles from the source. Meteorology and terrain play major roles in O<sub>3</sub> formation, and ideal conditions occur during summer and early autumn on days with low wind speeds or stagnant air, warm temperatures, and cloudless skies. O<sub>3</sub> exists in the upper atmosphere O<sub>3</sub> layer (stratospheric O<sub>3</sub>) and at the Earth's surface in the troposphere (ground-level O<sub>3</sub>).<sup>4</sup> The O<sub>3</sub> that the U.S. Environmental Protection Agency (EPA) and the California Air Resources Board (CARB) regulate as a criteria air pollutant is produced close to the ground level, where people live, exercise, and breathe. Ground-level O<sub>3</sub> is a harmful air pollutant that causes numerous adverse health effects and is thus considered "bad" O<sub>3</sub>. Stratospheric, or "good," O<sub>3</sub> occurs naturally in the upper atmosphere, where it reduces the amount of ultraviolet light (i.e., solar radiation) entering the Earth's atmosphere. Without the protection of the beneficial stratospheric O<sub>3</sub> layer, plant and animal life would be seriously harmed.

O<sub>3</sub> in the troposphere causes numerous adverse health effects; short-term exposures (lasting for a few hours) to O<sub>3</sub> at levels typically observed in Southern California can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes (EPA 2013). These health problems are particularly acute in sensitive receptors such as the sick, the elderly, and young children.

**Nitrogen Dioxide.** NO<sub>2</sub> is a brownish, highly reactive gas that is present in all urban atmospheres. The major mechanism for the formation of NO<sub>2</sub> in the atmosphere is the oxidation of the primary air pollutant nitric oxide, which is a colorless, odorless gas. NO<sub>x</sub> plays a major role, together with VOCs, in the atmospheric reactions that produce O<sub>3</sub>. NO<sub>x</sub> is formed from fuel combustion under high temperature or pressure. In addition, NO<sub>x</sub> is an important precursor to acid rain and may affect both terrestrial and aquatic ecosystems. The two major emissions sources are transportation and stationary fuel combustion sources such as electric utility and industrial boilers.

<sup>3</sup> The descriptions of each of the criteria air pollutants and associated health effects are based on the EPA's Criteria Air Pollutants (EPA 2016a) and the CARB Glossary of Air Pollutant Terms (CARB 2016a).

<sup>4</sup> The troposphere is the layer of the Earth's atmosphere nearest to the surface of the Earth. The troposphere extends outward about 5 miles at the poles and about 10 miles at the equator.

NO<sub>2</sub> can irritate the lungs, cause bronchitis and pneumonia, and lower resistance to respiratory infections (EPA 2016b).

**Carbon Monoxide.** CO is a colorless, odorless gas formed by the incomplete combustion of hydrocarbon, or fossil fuels. CO is emitted almost exclusively from motor vehicles, power plants, refineries, industrial boilers, ships, aircraft, and trains. In urban areas such as the project location, automobile exhaust accounts for the majority of CO emissions. CO is a nonreactive air pollutant that dissipates relatively quickly; therefore, ambient CO concentrations generally follow the spatial and temporal distributions of vehicular traffic. CO concentrations are influenced by local meteorological conditions—primarily wind speed, topography, and atmospheric stability. CO from motor vehicle exhaust can become locally concentrated when surface-based temperature inversions are combined with calm atmospheric conditions, which is a typical situation at dusk in urban areas from November to February. The highest levels of CO typically occur during the colder months of the year, when inversion conditions are more frequent.

In terms of adverse health effects, CO competes with oxygen, often replacing it in the blood, reducing the blood's ability to transport oxygen to vital organs. The results of excess CO exposure can include dizziness, fatigue, and impairment of central nervous system functions.

**Sulfur Dioxide.** SO<sub>2</sub> is a colorless, pungent gas formed primarily from incomplete combustion of sulfur-containing fossil fuels. The main sources of SO<sub>2</sub> are coal and oil used in power plants and industries; as such, the highest levels of SO<sub>2</sub> are generally found near large industrial complexes. In recent years, SO<sub>2</sub> concentrations have been reduced by the increasingly stringent controls placed on stationary source emissions of SO<sub>2</sub> and limits on the sulfur content of fuels.

SO<sub>2</sub> is an irritant gas that attacks the throat and lungs and can cause acute respiratory symptoms and diminished ventilator function in children. When combined with particulate matter, SO<sub>2</sub> can injure lung tissue and reduce visibility and the level of sunlight. SO<sub>2</sub> can also yellow plant leaves and erode iron and steel.

**Particulate Matter.** Particulate matter pollution consists of very small liquid and solid particles floating in the air, which can include smoke, soot, dust, salts, acids, and metals. Particulate matter can form when gases emitted from industries and motor vehicles undergo chemical reactions in the atmosphere. PM<sub>2.5</sub> and PM<sub>10</sub> represent fractions of particulate matter. Coarse particulate matter (PM<sub>10</sub>) consists of particulate matter that is 10 microns or less in diameter and is about 1/7 the thickness of a human hair. Major sources of PM<sub>10</sub> include crushing or grinding operations; dust stirred up by vehicles traveling on roads; wood-burning stoves and fireplaces; dust from construction, landfills, and agriculture; wildfires and brush/waste burning; industrial sources; windblown dust from open lands; and atmospheric chemical and photochemical reactions. Fine particulate matter (PM<sub>2.5</sub>) consists of particulate matter that is 2.5 microns or less in diameter and is roughly 1/28 the diameter of a human hair. PM<sub>2.5</sub> results from fuel combustion (e.g., from motor vehicles and power generation and industrial facilities), residential fireplaces, and woodstoves. In addition, PM<sub>2.5</sub> can be formed in the atmosphere from gases such as sulfur oxides (SO<sub>x</sub>), NO<sub>x</sub>, and VOCs.

PM<sub>2.5</sub> and PM<sub>10</sub> pose a greater health risk than larger-size particles. When inhaled, these tiny particles can penetrate the human respiratory system's natural defenses and damage the respiratory tract. PM<sub>2.5</sub> and PM<sub>10</sub> can increase the number and severity of asthma attacks, cause or aggravate bronchitis and other lung diseases, and reduce the body's ability to fight infections. Very small particles of substances such as lead, sulfates, and nitrates can cause lung damage directly or be absorbed into the blood stream, causing damage elsewhere in the body. Additionally, these substances can transport adsorbed gases such as chlorides or ammonium into the lungs, also causing injury. PM<sub>10</sub> tends to collect in the upper portion of the respiratory system, whereas PM<sub>2.5</sub> is so tiny that it can penetrate

deeper into the lungs and damage lung tissue. Suspended particulates also damage and discolor surfaces on which they settle and produce haze and reduce regional visibility.

People with influenza, people with chronic respiratory and cardiovascular diseases, and older adults may suffer worsening illness and premature death as a result of breathing particulate matter. People with bronchitis can expect aggravated symptoms from breathing in particulate matter. Children may experience a decline in lung function due to breathing in PM<sub>10</sub> and PM<sub>2.5</sub> (EPA 2009).

**Lead.** Lead in the atmosphere occurs as particulate matter. Sources of lead include leaded gasoline; the manufacturing of batteries, paints, ink, ceramics, and ammunition; and secondary lead smelters. Prior to 1978, mobile emissions were the primary source of atmospheric lead. Between 1978 and 1987, the phaseout of leaded gasoline reduced the overall inventory of airborne lead by nearly 95%. With the phaseout of leaded gasoline, secondary lead smelters, battery recycling, and manufacturing facilities are becoming lead-emissions sources of greater concern.

Prolonged exposure to atmospheric lead poses a serious threat to human health. Health effects associated with exposure to lead include gastrointestinal disturbances, anemia, kidney disease, and, in severe cases, neuromuscular and neurological dysfunction. Of particular concern are low-level lead exposures during infancy and childhood. Such exposures are associated with decrements in neurobehavioral performance, including intelligence quotient performance, psychomotor performance, reaction time, and growth. Children are highly susceptible to the effects of lead.

**Volatile Organic Compounds.** Hydrocarbons are organic gases that are formed from hydrogen and carbon and sometimes other elements. Hydrocarbons that contribute to formation of O<sub>3</sub> are referred to and regulated as VOCs (also referred to as reactive organic gases). Combustion engine exhaust, oil refineries, and fossil-fueled power plants are the sources of hydrocarbons. Other sources of hydrocarbons include evaporation from petroleum fuels, solvents, dry cleaning solutions, and paint.

The primary health effects of VOCs result from the formation of O<sub>3</sub> and its related health effects. High levels of VOCs in the atmosphere can interfere with oxygen intake by reducing the amount of available oxygen through displacement. Carcinogenic forms of hydrocarbons, such as benzene, are considered TACs. There are no separate health standards for VOCs as a group.

### 4.3.1.2.2 Non-Criteria Air Pollutants

**Toxic Air Contaminants.** A substance is considered toxic if it has the potential to cause adverse health effects in humans, including increasing the risk of cancer upon exposure, or acute and/or chronic noncancerous health effects. A toxic substance released into the air is considered a TAC. TACs are identified by federal and state agencies based on a review of available scientific evidence. In California, TACs are identified through a two-step process that was established in 1983 under the Toxic Air Contaminant Identification and Control Act. This two-step process of risk identification and risk management and reduction was designed to protect residents from the health effects of toxic substances in the air. In addition, the California Air Toxics “Hot Spots” Information and Assessment Act, Assembly Bill (AB) 2588, was enacted by the legislature in 1987 to address public concern over the release of TACs into the atmosphere. The law requires facilities emitting toxic substances to provide local air pollution control districts with information that will allow an assessment of the air toxics problem, identification of air toxics emissions sources, location of resulting hotspots, notification of the public exposed to significant risk, and development of effective strategies to reduce potential risks to the public over 5 years.

Examples include certain aromatic and chlorinated hydrocarbons, certain metals, and asbestos. TACs are generated by a number of sources, including stationary sources such as dry cleaners, gas stations, combustion sources, and laboratories; mobile sources such as automobiles; and area sources such as landfills. Adverse health effects associated with exposure to TACs may include carcinogenic (i.e., cancer-causing) and noncarcinogenic effects. Noncarcinogenic effects typically affect one or more target organ systems and may be experienced on either short-term (acute) or long-term (chronic) exposure to a given TAC.

**Diesel Particulate Matter.** Diesel particulate matter (DPM) is part of a complex mixture that makes up diesel exhaust. Diesel exhaust is composed of two phases, gas and particle, both of which contribute to health risks. More than 90% of DPM is less than 1 micrometer in diameter (about 1/70th the diameter of a human hair), and thus is a subset of PM<sub>2.5</sub> (CARB 2016b). DPM is typically composed of carbon particles (“soot,” also called black carbon or BC) and numerous organic compounds, including over 40 known cancer-causing organic substances. Examples of these chemicals include polycyclic aromatic hydrocarbons, benzene, formaldehyde, acetaldehyde, acrolein, and 1,3-butadiene (CARB 2016b). The CARB classified “particulate emissions from diesel-fueled engines” (i.e., DPM; 17 CCR 93000) as a TAC in August 1998. DPM is emitted from a broad range of diesel engines: on-road diesel engines of trucks, buses, and cars and off-road diesel engines, including locomotives, marine vessels, and heavy-duty construction equipment, among others. Approximately 70% of all airborne cancer risk in California is associated with DPM (CARB 2000). To reduce the cancer risk associated with DPM, CARB adopted a diesel risk reduction plan in 2000 (CARB 2000). Because it is part of PM<sub>2.5</sub>, DPM also contributes to the same noncancerous health effects as PM<sub>2.5</sub> exposure. These effects include premature death; hospitalizations and emergency department visits for exacerbated chronic heart and lung disease, including asthma; increased respiratory symptoms; and decreased lung function in children. Several studies suggest that exposure to DPM may also facilitate development of new allergies (CARB 2016b). Those most vulnerable to noncancerous health effects are children whose lungs are still developing and the elderly who often have chronic health problems.

**Odorous Compounds.** Odors are generally regarded as an annoyance rather than a health hazard. Manifestations of a person’s reaction to odors can range from psychological (e.g., irritation, anger, or anxiety) to physiological (e.g., circulatory and respiratory effects, nausea, vomiting, and headache). The ability to detect odors varies considerably among the population and overall is subjective. People may have different reactions to the same odor. An odor that is offensive to one person may be perfectly acceptable to another (e.g., coffee roaster). An unfamiliar odor is more easily detected and is more likely to cause complaints than a familiar one. Known as odor fatigue, a person can become desensitized to almost any odor, and recognition may only occur with an alteration in the intensity. The occurrence and severity of odor impacts depend on the nature, frequency, and intensity of the source; wind speed and direction; and the sensitivity of receptors.

**Valley Fever.** Coccidioidomycosis, more commonly known as “valley fever,” is an infection caused by inhalation of the spores of the *Coccidioides immitis* fungus, which grows in the soils of the southwestern United States. When fungal spores are present, any activity that disturbs the soil, such as digging, grading, or other earth-moving operations, can cause the spores to become airborne and thereby increase the risk of exposure. The ecologic factors that appear to be most conducive to survival and replication of the spores are high summer temperatures, mild winters, sparse rainfall, and alkaline sandy soils.

Valley fever is not considered highly endemic to Los Angeles County. Per the County of Los Angeles Department of Public Health, the total number of cases in the City for coccidioidomycosis cases is 43 in 2017, or 9.2 cases per 100,000 people per year (Los Angeles County Department of Public Health 2017). Statewide incidences in 2017 were 22.5 per 100,000 people (CDPH 2019).

Even if present at a site, earth-moving activities may not result in increased incidence of valley fever. Propagation of *Coccidioides immitis* is dependent on climatic conditions, with the potential for growth and surface exposure highest following early seasonal rains and long dry spells. *Coccidioides immitis* spores can be released when filaments are disturbed by earth-moving activities, although receptors must be exposed to and inhale the spores to be at increased risk of developing valley fever. Moreover, exposure to *Coccidioides immitis* does not guarantee that an individual will become ill—approximately 60% of people exposed to the fungal spores are asymptomatic and show no signs of an infection (USGS 2000).

### 4.3.1.3 Sensitive Receptors

Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. People most likely to be affected by air pollution include children, the elderly, athletes, and people with cardiovascular and chronic respiratory diseases. Facilities and structures where these air pollution-sensitive people live or spend considerable amounts of time are known as sensitive receptors. Land uses where air pollution-sensitive individuals are most likely to spend time include schools and schoolyards, parks and playgrounds, daycare centers, nursing homes, hospitals, and residential communities (sensitive sites or sensitive land uses) (CARB 2005). The SCAQMD identifies sensitive receptors as residences, schools, playgrounds, childcare centers, long-term healthcare facilities, rehabilitation centers, convalescent centers, and retirement homes (SCAQMD 1993). The closest off-site sensitive receptors to the project site include residences located adjacent to the south and western boundaries of the project site.

### 4.3.1.4 Regional and Local Air Quality Conditions

#### 4.3.1.4.1 South Coast Air Basin Attainment Designation

Pursuant to the 1990 federal Clean Air Act amendments, the EPA classifies air basins (or portions thereof) as “attainment” or “nonattainment” for each criteria air pollutant, based on whether the NAAQS have been achieved. Generally, if the recorded concentrations of a pollutant are lower than the standard, the area is classified as “attainment” for that pollutant. If an area exceeds the standard, the area is classified as “nonattainment” for that pollutant. If there is not enough data available to determine whether the standard is exceeded in an area, the area is designated as “unclassified” or “unclassifiable.” The designation of “unclassifiable/attainment” means that the area meets the standard or is expected to meet the standard despite a lack of monitoring data. Areas that achieve the standards after a nonattainment designation are re-designated as maintenance areas and must have approved Maintenance Plans to ensure continued attainment of the standards. The California Clean Air Act, like its federal counterpart, called for the designation of areas as “attainment” or “nonattainment,” but based on CAAQS rather than the NAAQS. Table 4.3-1 depicts the current attainment status of the project site with respect to the NAAQS and CAAQS, as well as the attainment classifications for the criteria pollutants are outlined in Table 4.3-1.

**Table 4.3-1. South Coast Air Basin Attainment Classification**

Pollutant	Designation/Classification	
	National Standards	California Standards
Ozone (O <sub>3</sub> ) – 1-hour	No National Standard	Nonattainment
Ozone (O <sub>3</sub> ) – 8-hour	Extreme Nonattainment	Nonattainment
Nitrogen Dioxide (NO <sub>2</sub> )	Unclassifiable/Attainment	Attainment

Table 4.3-1. South Coast Air Basin Attainment Classification

Pollutant	Designation/Classification	
	National Standards	California Standards
Carbon Monoxide (CO)	Attainment/Maintenance	Attainment
Sulfur Dioxide (SO <sub>2</sub> )	Unclassifiable/Attainment	Attainment
Coarse Particulate Matter (PM <sub>10</sub> )	Attainment/Maintenance	<b>Nonattainment</b>
Fine Particulate Matter (PM <sub>2.5</sub> )	<b>Serious Nonattainment</b>	<b>Nonattainment</b>
Lead (Pb)	<b>Nonattainment</b>	Attainment
Hydrogen Sulfide	No National Standard	Unclassified
Sulfates	No National Standard	Attainment
Visibility-Reducing Particles	No National Standard	Unclassified
Vinyl Chloride	No National Standard	No designation

**Sources:** EPA 2016c (national); CARB 2016c (California).

**Notes:** Bold text = not in attainment; Attainment = meets the standards; Attainment/Maintenance = achieve the standards after a nonattainment designation; Nonattainment = does not meet the standards; Unclassified or Unclassifiable = insufficient data to classify; Unclassifiable/Attainment = meets the standard or is expected to be meet the standard despite a lack of monitoring data.

In summary, the SCAB is designated as a nonattainment area for federal and state O<sub>3</sub> standards and federal and state PM<sub>2.5</sub> standards. The SCAB is designated as a nonattainment area for state PM<sub>10</sub> standards; however, it is designated as an attainment area for federal PM<sub>10</sub> standards. The SCAB is designated as an attainment area for federal and state CO standards, federal and state NO<sub>2</sub> standards, and federal and state SO<sub>2</sub> standards. While the SCAB has been designated as nonattainment for the federal rolling 3-month average lead standard, it is designated attainment for the state lead standard (EPA 2016c; CARB 2016c).

Despite the current nonattainment status, air quality within the SCAB has generally improved since the inception of air pollutant monitoring in 1976. This improvement is mainly due to lower-polluting on-road motor vehicles, more stringent regulation of industrial sources, and the implementation of emission reduction strategies by the SCAQMD. This trend toward cleaner air has occurred in spite of continued population growth. Despite this growth, air quality has improved significantly over the years, primarily due to the impacts of the region's air quality control program. PM<sub>10</sub> levels have declined almost 50% since 1990, and PM<sub>2.5</sub> levels have also declined 50% since measurements began in 1999 (SCAQMD 2013). Similar improvements are observed with O<sub>3</sub>, although the rate of O<sub>3</sub> decline has slowed in recent years.

#### 4.3.1.4.2 Local Ambient Air Quality

CARB, air districts, and other agencies monitor ambient air quality at approximately 250 air quality monitoring stations across the state. The SCAQMD monitors local ambient air quality at the project site. Air quality monitoring stations usually measure pollutant concentrations 10 feet above ground level; therefore, air quality is often referred to in terms of ground-level concentrations. The most recent background ambient air quality data from 2017 to 2019 are presented in Table 4.3-2. The Pasadena monitoring station, located at 752 S. Wilson Avenue, Pasadena, California 91106, is the nearest air quality monitoring station to the project site, located approximately 4.5 miles southwest from the project site. The data collected at this station are considered representative of the air quality experienced in the project vicinity. Air quality data for CO, O<sub>3</sub>, NO<sub>2</sub>, and PM<sub>2.5</sub> from the Pasadena monitoring station are provided in Table 4.3-2. Because SO<sub>2</sub> and PM<sub>10</sub> are not monitored at the Pasadena monitoring station, SO<sub>2</sub> and PM<sub>10</sub> measurements were taken from the Los Angeles – North Main Street monitoring station (1630 N. Main Street, Los Angeles, California 90012, approximately 11.9 miles southwest from the project site). The number of days exceeding the ambient air quality standards are also shown in Table 4.3-2.

Table 4.3-2. Local Ambient Air Quality Data

Monitoring Station	Unit	Averaging Time	Agency/ Method	Ambient Air Quality Standard	Measured Concentration by Year			Exceedances by Year		
					2017	2018	2019	2017	2018	2019
<b>Ozone (O<sub>3</sub>)</b>										
Pasadena	ppm	Maximum 1-hour concentration	California	0.09	0.139	0.112	0.120	18	8	11
	ppm	Maximum 8-hour concentration	California	0.070	0.100	0.091	0.098	38	20	29
			National	0.070	0.100	0.090	0.098	36	19	24
<b>Nitrogen Dioxide (NO<sub>2</sub>)</b>										
Pasadena	ppm	Maximum 1-hour concentration	California	0.18	0.072	0.068	0.059	0	0	0
			National	0.100	0.072	0.068	0.059	0	0	0
	ppm	Annual concentration	California	0.030	0.015	0.014	0.013	0	0	0
			National	0.053	0.015	0.014	0.013	0	0	0
<b>Carbon Monoxide (CO)</b>										
Pasadena	ppm	Maximum 1-hour concentration	California	20	2.2	2.0	1.5	0	0	0
			National	35	2.2	2.0	1.5	0	0	0
	ppm	Maximum 8-hour concentration	California	9.0	1.7	1.4	1.2	0	0	0
			National	9	1.7	1.4	1.2	0	0	0
<b>Sulfur Dioxide (SO<sub>2</sub>)</b>										
Los Angeles – North Main Street	ppm	Maximum 1-hour concentration	National	0.075	0.006	0.018	0.010	0	0	0
	ppm	Maximum 24-hour concentration	National	0.14	0.002	0.001	0.001	0	0	0
	ppm	Annual concentration	National	0.030	0.0004	0.0003	0.0003	0	0	0

Table 4.3-2. Local Ambient Air Quality Data

Monitoring Station	Unit	Averaging Time	Agency/ Method	Ambient Air Quality Standard	Measured Concentration by Year			Exceedances by Year		
					2017	2018	2019	2017	2018	2019
<b>Coarse Particulate Matter (PM<sub>10</sub>)<sup>a</sup></b>										
Los Angeles – North Main Street	µg/m <sup>3</sup>	Maximum 24-hour concentration	California	50	96.2	81.2	93.9	(ND) 40	(31.8) 31	(ND) 15
			National	150	64.6	68.2	62.4	(0.0) 0	(0.0) 0	(0.0) 0
	µg/m <sup>3</sup>	Annual concentration	California	20	ND	34.0	ND	(0.0) 0	(0.0) 0	(0.0) 0
<b>Fine Particulate Matter (PM<sub>2.5</sub>)<sup>a</sup></b>										
Pasadena	µg/m <sup>3</sup>	Maximum 24-hour concentration	National	35	22.8	32.5	41.8	(0.0) 0	(0.0) 0	(3.1) 1
			California	12	9.6	10.2	9.1	(0.0) 0	(0.0) 0	(0.0) 0
	National	12.0								

Sources: CARB 2020; EPA 2020.

Notes: – = not available; µg/m<sup>3</sup> = micrograms per cubic meter; ND = insufficient data available to determine the value; ppm = parts per million

Data taken from CARB iADAM (<http://www.arb.ca.gov/adam>) and EPA AirData (<https://www.epa.gov/outdoor-air-quality-data>) represent the highest concentrations experienced over a given year.

Exceedances of national and California standards are only shown for O<sub>3</sub> and particulate matter. Daily exceedances for particulate matter are estimated days because PM<sub>10</sub> and PM<sub>2.5</sub> are not monitored daily. All other criteria pollutants did not exceed national or California standards during the years shown. There is no national standard for 1-hour O<sub>3</sub>, annual PM<sub>10</sub>, or 24-hour SO<sub>2</sub>, nor is there a California 24-hour standard for PM<sub>2.5</sub>.

Pasadena Monitoring Station is located at 752 S. Wilson Avenue, Pasadena, California 91106.

Los Angeles – North Main Street Monitoring Station is located 1630 N. Main Street, Los Angeles, California 90012.

<sup>a</sup> Measurements of PM<sub>10</sub> and PM<sub>2.5</sub> are usually collected every 6 days and every 1 to 3 days, respectively. Number of days exceeding the standards is a mathematical estimate of the number of days concentrations would have been greater than the level of the standard had each day been monitored. The numbers in parentheses are the measured number of samples that exceeded the standard.



## 4.3.2 Relevant Plans, Policies, and Ordinances

### Federal

#### *Criteria Air Pollutants*

The federal Clean Air Act, passed in 1970 and last amended in 1990, forms the basis for the national air pollution control effort. The EPA is responsible for implementing most aspects of the Clean Air Act, including setting National Ambient Air Quality Standards (NAAQS) for major air pollutants; setting hazardous air pollutant (HAP) standards; approving state attainment plans; setting motor vehicle emission standards; issuing stationary source emission standards and permits; and establishing acid rain control measures, stratospheric O<sub>3</sub> protection measures, and enforcement provisions. Under the Clean Air Act, NAAQS are established for the following criteria pollutants: O<sub>3</sub>, CO, NO<sub>2</sub>, SO<sub>2</sub>, PM<sub>10</sub>, PM<sub>2.5</sub>, and lead.

The NAAQS describe acceptable air quality conditions designed to protect the health and welfare of the citizens of the nation. The NAAQS (other than for O<sub>3</sub>, NO<sub>2</sub>, SO<sub>2</sub>, PM<sub>10</sub>, PM<sub>2.5</sub>, and those based on annual averages or arithmetic mean) are not to be exceeded more than once per year. NAAQS for O<sub>3</sub>, NO<sub>2</sub>, SO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> are based on statistical calculations over 1- to 3-year periods, depending on the pollutant. The Clean Air Act requires the EPA to reassess the NAAQS at least every 5 years to determine whether adopted standards are adequate to protect public health based on current scientific evidence. States with areas that exceed the NAAQS must prepare a state implementation plan that demonstrates how those areas will attain the NAAQS within mandated time frames.

#### *Hazardous Air Pollutants*

The 1977 federal Clean Air Act amendments required the EPA to identify National Emission Standards for Hazardous Air Pollutants to protect public health and welfare. HAPs include certain volatile organic chemicals, pesticides, herbicides, and radionuclides that present a tangible hazard, based on scientific studies of exposure to humans and other mammals. Under the 1990 federal Clean Air Act Amendments, which expanded the control program for HAPs, 189 substances and chemical families were identified as HAPs.

### State

#### *Criteria Air Pollutants*

The federal Clean Air Act delegates the regulation of air pollution control and the enforcement of the NAAQS to the states. In California, the task of air quality management and regulation has been legislatively granted to CARB, with subsidiary responsibilities assigned to air quality management districts and air pollution control districts at the regional and county levels. CARB, which became part of the California Environmental Protection Agency in 1991, is responsible for ensuring implementation of the California Clean Air Act of 1988, responding to the federal Clean Air Act, and regulating emissions from motor vehicles and consumer products.

CARB has established California Ambient Air Quality Standards (CAAQS), which are generally more restrictive than the NAAQS. As stated previously, an ambient air quality standard defines the maximum amount of a pollutant averaged over a specified period of time that can be present in outdoor air without harm to the public's health. For each pollutant, concentrations must be below the relevant CAAQS before a basin can attain the corresponding CAAQS. Air quality is considered "in attainment" if pollutant levels are continuously below the CAAQS and violate the standards no more than once each year. The CAAQS for O<sub>3</sub>, CO, SO<sub>2</sub> (1-hour and 24-hour), NO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> and visibility-reducing particles are values that are not to be exceeded.

California air districts have based their thresholds of significance for CEQA purposes on the levels that scientific and factual data demonstrate that the air basin can accommodate without affecting the attainment date for the NAAQS or CAAQS. Since an ambient air quality standard is based on maximum pollutant levels in outdoor air that would not harm the public's health, and air district thresholds pertain to attainment of the ambient air quality standard, this means that the thresholds established by air districts are also protective of human health.

All others are not to be equaled or exceeded. The NAAQS and CAAQS are presented in Table 4.3-3.

**Table 4.3-3. Ambient Air Quality Standards**

Pollutant	Averaging Time	California Standards <sup>a</sup>	National Standards <sup>b</sup>	
		Concentration <sup>c</sup>	Primary <sup>c,d</sup>	Secondary <sup>c,e</sup>
O <sub>3</sub>	1 hour	0.09 ppm (180 µg/m <sup>3</sup> )	–	Same as Primary Standard <sup>f</sup>
	8 hours	0.070 ppm (137 µg/m <sup>3</sup> )	0.070 ppm (137 µg/m <sup>3</sup> ) <sup>f</sup>	
NO <sub>2</sub> <sup>g</sup>	1 hour	0.18 ppm (339 µg/m <sup>3</sup> )	0.100 ppm (188 µg/m <sup>3</sup> )	Same as Primary Standard
	Annual Arithmetic Mean	0.030 ppm (57 µg/m <sup>3</sup> )	0.053 ppm (100 µg/m <sup>3</sup> )	
CO	1 hour	20 ppm (23 mg/m <sup>3</sup> )	35 ppm (40 mg/m <sup>3</sup> )	None
	8 hours	9.0 ppm (10 mg/m <sup>3</sup> )	9 ppm (10 mg/m <sup>3</sup> )	
SO <sub>2</sub> <sup>h</sup>	1 hour	0.25 ppm (655 µg/m <sup>3</sup> )	0.075 ppm (196 µg/m <sup>3</sup> )	–
	3 hours	–	–	0.5 ppm (1,300 µg/m <sup>3</sup> )
	24 hours	0.04 ppm (105 µg/m <sup>3</sup> )	0.14 ppm (for certain areas) <sup>g</sup>	–
	Annual	–	0.030 ppm (for certain areas) <sup>g</sup>	–
PM <sub>10</sub> <sup>i</sup>	24 hours	50 µg/m <sup>3</sup>	150 µg/m <sup>3</sup>	Same as Primary Standard
	Annual Arithmetic Mean	20 µg/m <sup>3</sup>	–	
PM <sub>2.5</sub> <sup>i</sup>	24 hours	–	35 µg/m <sup>3</sup>	Same as Primary Standard
	Annual Arithmetic Mean	12 µg/m <sup>3</sup>	12.0 µg/m <sup>3</sup>	15.0 µg/m <sup>3</sup>
Lead <sup>j,k</sup>	30-day Average	1.5 µg/m <sup>3</sup>	–	–
	Calendar Quarter	–	1.5 µg/m <sup>3</sup> (for certain areas) <sup>k</sup>	Same as Primary Standard
	Rolling 3-Month Average	–	0.15 µg/m <sup>3</sup>	
Hydrogen sulfide	1 hour	0.03 ppm (42 µg/m <sup>3</sup> )	–	–
Vinyl chloride <sup>l</sup>	24 hours	0.01 ppm (26 µg/m <sup>3</sup> )	–	–
Sulfates	24- hours	25 µg/m <sup>3</sup>	–	–

Table 4.3-3. Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards <sup>a</sup>	National Standards <sup>b</sup>	
		Concentration <sup>c</sup>	Primary <sup>c,d</sup>	Secondary <sup>c,e</sup>
Visibility reducing particles	8 hour (10:00 a.m. to 6:00 p.m. PST)	Insufficient amount to produce an extinction coefficient of 0.23 per kilometer due to the number of particles when the relative humidity is less than 70%	—	—

Source: CARB 2016d.

Notes:  $\mu\text{g}/\text{m}^3$  = micrograms per cubic meter;  $\text{mg}/\text{m}^3$  = milligrams per cubic meter; ppm = parts per million by volume;  $\text{O}_3$  = ozone;  $\text{NO}_2$  = nitrogen dioxide; CO = carbon monoxide;  $\text{SO}_2$  = sulfur dioxide;  $\text{PM}_{10}$  = particulate matter with an aerodynamic diameter less than or equal to 10 microns;  $\text{PM}_{2.5}$  = particulate matter with an aerodynamic diameter less than or equal to 2.5 microns.

- <sup>a</sup> California standards for  $\text{O}_3$ , CO,  $\text{SO}_2$  (1-hour and 24-hour),  $\text{NO}_2$ , suspended particulate matter ( $\text{PM}_{10}$ ,  $\text{PM}_{2.5}$ ), and visibility-reducing particles are values that are not to be exceeded. All others are not to be equaled or exceeded. CAAQS are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.
- <sup>b</sup> National standards (other than  $\text{O}_3$ ,  $\text{NO}_2$ ,  $\text{SO}_2$ , particulate matter, and those based on annual averages or annual arithmetic mean) are not to be exceeded more than once per year. The  $\text{O}_3$  standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over 3 years, is equal to or less than the standard. For  $\text{PM}_{10}$ , the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above  $150 \mu\text{g}/\text{m}^3$  is equal to or less than 1. For  $\text{PM}_{2.5}$ , the 24-hour standard is attained when 98% of the daily concentrations, averaged over 3 years, are equal to or less than the standard.
- <sup>c</sup> Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based on a reference temperature of  $25^\circ\text{C}$  and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of  $25^\circ\text{C}$  and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.
- <sup>d</sup> National Primary Standards: The levels of air quality necessary, with an adequate margin of safety, to protect the public health.
- <sup>e</sup> National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.
- <sup>f</sup> On October 1, 2015, the national 8-hour  $\text{O}_3$  primary and secondary standards were lowered from 0.075 to 0.070 ppm.
- <sup>g</sup> To attain the national 1-hour standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 parts per billion (ppb). Note that the national 1-hour standard is in units of ppb. California standards are in units of ppm. To directly compare the national 1-hour standard to the California standards, the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.
- <sup>h</sup> On June 2, 2010, a new 1-hour  $\text{SO}_2$  standard was established, and the existing 24-hour and annual primary standards were revoked. To attain the national 1-hour standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971  $\text{SO}_2$  national standards (24-hour and annual) remain in effect until 1 year after an area is designated for the 2010 standard, except that in areas designated nonattainment of the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.
- <sup>i</sup> On December 14, 2012, the national annual  $\text{PM}_{2.5}$  primary standard was lowered from  $15 \mu\text{g}/\text{m}^3$  to  $12.0 \mu\text{g}/\text{m}^3$ . The existing national 24-hour  $\text{PM}_{2.5}$  standards (primary and secondary) were retained at  $35 \mu\text{g}/\text{m}^3$ , as was the annual secondary standard of  $15 \mu\text{g}/\text{m}^3$ . The existing 24-hour  $\text{PM}_{10}$  standards (primary and secondary) of  $150 \mu\text{g}/\text{m}^3$  were also retained. The form of the annual primary and secondary standards is the annual mean averaged over 3 years.
- <sup>j</sup> CARB has identified lead and vinyl chloride as TACs with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.
- <sup>k</sup> The national standard for lead was revised on October 15, 2008, to a rolling 3-month average. The 1978 lead standard ( $1.5 \mu\text{g}/\text{m}^3$  as a quarterly average) remains in effect until 1 year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.

### Toxic Air Contaminants

The state Air Toxics Program was established in 1983 under Assembly Bill (AB) 1807 (Tanner). The California TAC list identifies more than 700 pollutants, of which carcinogenic and noncarcinogenic toxicity criteria have been established for a subset of these pollutants pursuant to the California Health and Safety Code. In accordance with

AB 2728, the state list includes the (federal) HAPs. In 1987, the Legislature enacted the Air Toxics “Hot Spots” Information and Assessment Act of 1987 (AB 2588) to address public concern over the release of TACs into the atmosphere. AB 2588 law requires facilities emitting toxic substances to provide local air pollution control districts with information that will allow an assessment of the air toxics problem, identification of air toxics emissions sources, location of resulting hotspots, notification of the public exposed to significant risk, and development of effective strategies to reduce potential risks to the public over 5 years. TAC emissions from individual facilities are quantified and prioritized. “High-priority” facilities are required to perform a health risk assessment (HRA), and if specific thresholds are exceeded, the facility operator is required to communicate the results to the public in the form of notices and public meetings.

In 2000, CARB approved a comprehensive Diesel Risk Reduction Plan to reduce diesel emissions from both new and existing diesel-fueled vehicles and engines (CARB 2000). The regulation is anticipated to result in an 80% decrease in statewide diesel health risk in 2020 compared with the diesel risk in 2000. Additional regulations apply to new trucks and diesel fuel, including the On-Road Heavy Duty Diesel Vehicle (In-Use) Regulation, the On-Road Heavy Duty (New) Vehicle Program, the In-Use Off-Road Diesel Vehicle Regulation, and the New Off-Road Compression-Ignition (Diesel) Engines and Equipment program. These regulations and programs have timetables by which manufacturers must comply and existing operators must upgrade their diesel-powered equipment. There are several Airborne Toxic Control Measures that reduce diesel emissions, including In-Use Off-Road Diesel-Fueled Fleets (13 CCR 2449 et seq.) and In-Use On-Road Diesel-Fueled Vehicles (13 CCR 2025).

Section 41700 of the Health and Safety Code states that a person shall not discharge from any source whatsoever quantities of air contaminants or other material that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public; or that endanger the comfort, repose, health, or safety of any of those persons or the public; or that cause, or have a natural tendency to cause, injury or damage to business or property. This section also applies to sources of objectionable odors.

### **Local**

#### ***South Coast Air Quality Management District***

The SCAQMD is the regional agency responsible for the regulation and enforcement of federal, state, and local air pollution control regulations in the SCAB, where the project is located. The SCAQMD operates monitoring stations in the SCAB, develops rules and regulations for stationary sources and equipment, prepares emissions inventory and air quality management planning documents, and conducts source testing and inspections. The SCAQMD’s Air Quality Management Plans (AQMPs) include control measures and strategies to be implemented to attain state and federal ambient air quality standards in the SCAB. The SCAQMD then implements these control measures as regulations to control or reduce criteria pollutant emissions from stationary sources or equipment.

The most recent adopted AQMP is the 2016 AQMP (SCAQMD 2017), which was adopted by the SCAQMD governing board on March 3, 2017. The 2016 AQMP is a regional blueprint for achieving air quality standards and healthful air. The 2016 AQMP represents a new approach, focusing on available, proven, and cost effective alternatives to traditional strategies, while seeking to achieve multiple goals in partnership with other entities promoting reductions in GHGs and toxic risk, as well as efficiencies in energy use, transportation, and goods movement (SCAQMD 2017). Because mobile sources are the principal contributor to the SCAB’s air quality challenges, the SCAQMD has been and will continue to be closely engaged with CARB and the EPA, who have primary responsibility for these sources. The 2016 AQMP recognizes the critical importance of working with other agencies to develop funding and other incentives that encourage the accelerated transition of vehicles, buildings,

and industrial facilities to cleaner technologies in a manner that benefits not only air quality but also local businesses and the regional economy. These “win-win” scenarios are key to implementation of this 2016 AQMP with broad support from a wide range of stakeholders.

### **Applicable Rules**

Emissions that would result from mobile, area, and stationary sources during construction and operation of the project are subject to the rules and regulations of the SCAQMD. The SCAQMD rules applicable to the project may include the following:

- **Rule 401 – Visible Emissions:** This rule establishes the limit for visible emissions from stationary sources.
- **Rule 402 – Nuisance:** This rule prohibits the discharge of air pollutants from a facility that cause injury, detriment, nuisance, or annoyance to the public or damage to business or property.
- **Rule 403 – Fugitive Dust:** This rule requires fugitive dust sources to implement best available control measures for all sources and prohibits all forms of visible particulate matter from crossing any property line. SCAQMD Rule 403 is intended to reduce PM<sub>10</sub> emissions from any transportation, handling, construction, or storage activity that has the potential to generate fugitive dust.
- **Rule 431.2 – Sulfur Content of Liquid Fuels:** The purpose of this rule is to limit the sulfur content in diesel and other liquid fuels for the purpose of reducing the formation of SO<sub>x</sub> and particulates during combustion and of enabling the use of add-on control devices for diesel-fueled internal combustion engines. The rule applies to all refiners, importers, and other fuel suppliers such as distributors, marketers, and retailers, as well as to users of diesel, low-sulfur diesel, and other liquid fuels for stationary-source applications in the SCAQMD. The rule also affects diesel fuel supplied for mobile sources.
- **Rule 461 – Gasoline Transfer and Dispensing:** This rule requires testing of vapor recovery systems for gasoline dispensing facilities from certified vapor recovery testing companies and contractors. This rule applies to the transfer of gasoline from any tank truck, trailer, or railroad tank car into any stationary storage tank or mobile fueler, and from any stationary storage tank or mobile fueler into any mobile fueler or motor fuel tank.
- **Rule 1110.2 – Emissions from Gaseous- and Liquid-Fueled Engines:** This rule applies to stationary and portable engines rated at greater than 50 horsepower. The purpose of Rule 1110.2 is to reduce NO<sub>x</sub>, VOCs, and CO emissions from engines. Emergency engines, including those powering standby generators, are generally exempt from the emissions and monitoring requirements of this rule because they have permit conditions that limit operation to 200 hours or less per year as determined by an elapsed operating time meter.
- **Rule 1113 – Architectural Coatings:** This rule requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce VOC emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories.

### ***Southern California Association of Governments***

The Southern California Association of Governments (SCAG) is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties and serves as a forum for regional issues relating to transportation, the economy, community development, and the environment. SCAG serves as the federally designated metropolitan planning organization for the Southern California region and is the largest metropolitan planning organization in the United States.

With respect to air quality planning and other regional issues, SCAG has prepared the 2008 Regional Comprehensive Plan: Helping Communities Achieve a Sustainable Future (2008 RCP) for the region (SCAG 2008). The 2008 RCP sets the policy context in which SCAG participates in and responds to the SCAQMD air quality plans and builds off the SCAQMD AQMP processes that are designed to meet health-based criteria pollutant standards in several ways (SCAG 2008). First, it complements AQMPs by providing guidance and incentives for public agencies to consider best practices that support the technology-based control measures in AQMPs. Second, the 2008 RCP emphasizes the need for local initiatives that can reduce the region's GHG emissions that contribute to climate change, an issue that is largely outside the focus of local attainment plans. Third, the 2008 RCP emphasizes the need for better coordination of land use and transportation planning, which heavily influences the emissions inventory from the transportation sectors of the economy. This also minimizes land use conflicts, such as residential development near freeways, industrial areas, or other sources of air pollution.

On April 7, 2016, SCAG's Regional Council adopted the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS). The 2016 RTP/SCS is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals. The 2016 RTP/SCS charts a course for closely integrating land use and transportation so that the region can grow smartly and sustainably. The 2016 RTP/SCS was prepared through a collaborative, continuous, and comprehensive process with input from local governments, county transportation commissions, tribal governments, nonprofit organizations, businesses, and local stakeholders within Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties. In June 2016, SCAG received its conformity determination from the Federal Highway Administration and the Federal Transit Administration indicating that all air quality conformity requirements for the 2016 RTP/SCS and associated 2015 Federal Transportation Improvement Program Consistency Amendment through Amendment 15-12 have been met (SCAG 2016). The SCAQMD 2016 AQMP applies the updated SCAG growth forecasts assumed in the 2016 RTP/SCS.

SCAG has developed Connect SoCal, the 2020–2045 RTP/SCS, which is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals (SCAG 2020). Connect SoCal charts a path toward a more mobile, sustainable, and prosperous region by making connections between transportation networks, planning strategies, and the people whose collaboration can improve the quality of life for Southern Californians. Connect SoCal embodies a collective vision for the region's future and is developed with input from local governments, county transportation commissions, tribal governments, non-profit organizations, businesses, and local stakeholders within the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura. On May 7, 2020, SCAG's Regional Council adopted Connect SoCal for federal transportation conformity purposes only. The SCAG 2020–2045 RTP/SCS was adopted on September 3, 2020.

### ***City of Sierra Madre***

The Air Quality Element of the City's General Plan (City of Sierra Madre 2015) includes issues and policies that would be applied to the project related to air quality. These applicable policies are listed below. The proposed project's consistency with these policies is provided in Table 4.11-1 in Section 4.11, Land Use and Planning.

- Policy 22.1:** Cooperate with the SCAQMD and incorporate the provisions of the AQMP.
- Policy 22.2:** Prohibit the development of land uses and land use practices which would contribute significantly to poor air quality.
- Policy 22.3:** Establish controls and monitor uses in the City which contain operations or materials characterized by air pollutants which individually or cumulatively could significantly add to the air basin's

degradation (e.g., furniture manufacturers using paints and finishes, automobile repair, printing, and reproduction, and dry cleaners).

**Policy 22.4:** Encourage and participate in regional initiatives and programs to improve the South Coast Air Basin’s air quality.

**Policy 23.5:** Provide opportunities through appropriate zoning for the development of residential units in concert with commercial uses.

**Policy 24.2:** Require dust abatement measures during grading and construction operations. This may include use of reclaimed water or other methods to control fugitive dust.

**Policy 24.3:** Develop and enforce a fugitive dust control ordinance that regulates the following: visible dust emissions, soil stabilization, the carrying and tracking of dirt off site, unpaved access and haul roads, storage piles and bulk materials, demolition, and dust control plans; the ordinance should include penalties to encourage compliance.

### 4.3.3 Thresholds of Significance

The significance criteria used to evaluate the project impacts to air quality is based on the recommendations provided in Appendix G of the CEQA Guidelines. For the purposes of this air quality analysis, a significant impact would occur if the project would (14 CCR 15000 et seq.):

1. Conflict with or obstruct implementation of the applicable air quality plan.
2. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.
3. Expose sensitive receptors to substantial pollutant concentrations.
4. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

Appendix G of the CEQA Guidelines (14 CCR 15000 et seq.) indicates that, where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to determine whether the project would have a significant impact on air quality.

The SCAQMD has established Air Quality Significance Thresholds, as revised in March 2015, which set forth quantitative emission significance thresholds below which a project would not have a significant impact on ambient air quality under project-level and cumulative conditions. The quantitative air quality analysis provided herein applies the SCAQMD thresholds identified in Table 4.3-4 to determine the potential for the project to result in a significant impact under CEQA.

**Table 4.3-4. South Coast Air Quality Management District Air Quality Significance Thresholds**

<b>Criteria Pollutants Mass Daily Thresholds</b>		
<b><i>Pollutant</i></b>	<b><i>Construction (pounds per day)</i></b>	<b><i>Operation (pounds per day)</i></b>
VOCs	75	55
NO <sub>x</sub>	100	55
CO	550	550
SO <sub>x</sub>	150	150

Table 4.3-4. South Coast Air Quality Management District Air Quality Significance Thresholds

Criteria Pollutants Mass Daily Thresholds		
PM <sub>10</sub>	150	150
PM <sub>2.5</sub>	55	55
Lead <sup>a</sup>	3	3
TACs and Odor Thresholds		
TACs <sup>b</sup>	Maximum incremental cancer risk $\geq 10$ in 1 million Cancer Burden $> 0.5$ excess cancer cases (in areas $\geq 1$ in 1 million) Chronic and acute hazard index $\geq 1.0$ (project increment)	
Odor	Project creates an odor nuisance pursuant to SCAQMD Rule 402	
Ambient Air Quality Standards for Criteria Pollutants <sup>c</sup>		
NO <sub>2</sub> 1-hour average NO <sub>2</sub> annual arithmetic mean	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 0.18 ppm (state) 0.030 ppm (state) and 0.0534 ppm (federal)	
CO 1-hour average CO 8-hour average	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 20 ppm (state) and 35 ppm (federal) 9.0 ppm (state/federal)	
PM <sub>10</sub> 24-hour average PM <sub>10</sub> annual average	10.4 $\mu\text{g}/\text{m}^3$ (construction) <sup>d</sup> 2.5 $\mu\text{g}/\text{m}^3$ (operation) 1.0 $\mu\text{g}/\text{m}^3$	
PM <sub>2.5</sub> 24-hour average	10.4 $\mu\text{g}/\text{m}^3$ (construction) <sup>d</sup> 2.5 $\mu\text{g}/\text{m}^3$ (operation)	

Source: SCAQMD 2019.

Notes: VOC = volatile organic compounds; NO<sub>x</sub> = oxides of nitrogen; CO = carbon monoxide; SO<sub>x</sub> = sulfur oxides; PM<sub>10</sub> = coarse particulate matter; PM<sub>2.5</sub> = fine particulate matter; TAC = toxic air contaminant; SCAQMD = South Coast Air Quality Management District; NO<sub>2</sub> = nitrogen dioxide; ppm = parts per million;  $\mu\text{g}/\text{m}^3$  = micrograms per cubic meter.

Greenhouse gas emissions thresholds for industrial projects, as added in the March 2015 revision to the SCAQMD Air Quality Significance Thresholds, were not included in Table 4.3-4 as they are addressed within the greenhouse gas emissions analysis and not the air quality study.

- <sup>a</sup> The phaseout of leaded gasoline started in 1976. Since gasoline no longer contains lead, the project is not anticipated to result in impacts related to lead; therefore, it is not discussed in this analysis.
- <sup>b</sup> TACs include carcinogens and noncarcinogens.
- <sup>c</sup> Ambient air quality standards for criteria pollutants are based on SCAQMD Rule 1303, Table A-2, unless otherwise stated.
- <sup>d</sup> Ambient air quality threshold are based on SCAQMD Rule 403.

The evaluation of whether the project would conflict with or obstruct implementation of the applicable air quality plan is based on the SCAQMD CEQA Air Quality Handbook (SCAQMD 1993), Chapter 12, Sections 12.2 and 12.3. The first criterion assesses if the project would result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay the timely attainment of air quality standards of the interim emissions reductions specified in the AQMP, which is addressed in detail under in Section 4.3.5, Impacts Analysis. The second criterion is if the project would exceed the assumptions in the AQMP or increments based on the year of project buildout and phase, as discussed further in Section 4.3.5.

To evaluate the potential for the project to result in a cumulatively considerable net increase of any criteria pollutant this analysis applies the SCAQMD's construction and operational criteria pollutants mass daily thresholds, as shown in Table 4.3-4. A project would result in a substantial contribution to an existing air quality violation of the NAAQS or CAAQS for O<sub>3</sub>, which is a nonattainment pollutant, if the project's construction or operational emissions would



exceed the SCAQMD VOC or NO<sub>x</sub> thresholds shown in Table 4.3-4. These emissions-based thresholds for O<sub>3</sub> precursors are intended to serve as a surrogate for an “ozone significance threshold” (i.e., the potential for adverse O<sub>3</sub> impacts to occur). This approach is used because O<sub>3</sub> is not emitted directly (see the discussion of O<sub>3</sub> and its sources in Section 4.3.1.2, Pollutants and Effects), and the effects of emissions of O<sub>3</sub> precursors (VOC and NO<sub>x</sub>) on O<sub>3</sub> levels in ambient air cannot be determined through air quality models or other quantitative methods for projects of the size of the proposed Project.

The assessment of the project’s potential to expose sensitive receptors to substantial pollutant concentrations includes a localized significance threshold (LST) analysis, as recommended by the SCAQMD, to evaluate the potential of localized air quality impacts to sensitive receptors in the immediate vicinity of the project from construction. For project sites of 5 acres or less, the SCAQMD LST Methodology (2009) includes lookup tables that can be used to determine the maximum allowable daily emissions that would satisfy the localized significance criteria (i.e., the emissions would not cause an exceedance of the applicable concentration limits for NO<sub>2</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub>) without performing project-specific dispersion modeling. Although the proposed development area of the site is greater than 5 acres (estimated to be 18 acres, which has been conservatively assumed as this disturbance would occur within 17.30 acres), the project would disturb less than 5 acres in one day, as discussed in detail in the following text, so it is appropriate to use the lookup tables for the LST evaluation.

The LST significance thresholds for NO<sub>2</sub> and CO represent the allowable increase in concentrations above background levels in the vicinity of a project that would not cause or contribute to an exceedance of the relevant ambient air quality standards, while the threshold for PM<sub>10</sub> represents compliance with Rule 403 (Fugitive Dust). The LST significance threshold for PM<sub>2.5</sub> is intended to ensure that construction emissions do not contribute substantially to existing exceedances of the PM<sub>2.5</sub> ambient air quality standards. The allowable emission rates depend on the following parameters:

- Source-receptor area (SRA) in which the project is located
- Size of the project site
- Distance between the project site and the nearest sensitive receptor (e.g., residences, schools, hospitals)

The project site is located in SRA 9 (East San Gabriel Valley). The SCAQMD provides guidance for applying the California Emissions Estimator Model (CalEEMod) to the LSTs. LST pollutant screening level concentration data is currently published for 1-, 2-, and 5-acre sites for varying distances. Although the total disturbed acreage would be 17.30 acres over approximately 12 days, less than 2 acres will be disturbed during any construction phase; thus, project emissions are conservatively compared to the SCAQMD 1-acre thresholds.

The nearest sensitive-receptor land use (a residence) is located adjacent to the western and southern boundary of the project site. As such, the LST receptor distance was assumed to be 82 feet (25 meters), which is the shortest distance provided by the SCAQMD lookup tables. The LST values from the SCAQMD lookup tables for SRA 9 (East San Gabriel Valley) for a 1-acre project site and a receptor distance of 25 meters are shown in Table 4.3-5.

**Table 4.3-5. Construction Localized Significance Thresholds for Source Receptor Area 9 (East San Gabriel Valley)**

Pollutant	Threshold (pounds per day)
<i>Construction</i>	
NO <sub>2</sub>	89
CO	623

**Table 4.3-5. Construction Localized Significance Thresholds for Source Receptor Area 9 (East San Gabriel Valley)**

Pollutant	Threshold (pounds per day)
<i>Construction</i>	
PM <sub>10</sub>	5
PM <sub>2.5</sub>	3

**Source:** SCAQMD 2009.

**Notes:** NO<sub>2</sub> = nitrogen dioxide; CO = carbon monoxide; PM<sub>10</sub> = coarse particulate matter; PM<sub>2.5</sub> = fine particulate matter.

Localized significance thresholds (LSTs) were determined based on the values for an interpolated 1-acre site at a distance of 25 meters from the nearest sensitive receptor.

The construction HRA methodology and assumptions are presented in Section 4.3.3.1.3, Construction Health Risk Assessment. The construction HRA applies the SCAQMD risk thresholds presented in Table 4.3-4, which are a maximum incremental cancer risk greater than or equal to 10 in 1 million and a chronic hazard index greater than or equal to 1.0 (project increment). The CO hotspot assessment and construction HRA are evaluated under the potential for the project to expose sensitive receptors to substantial pollutant concentrations (Section 4.3.5), along with the LST analysis.

The potential for the project to result in other emissions, specifically an odor impact (Section 4.3.5) is based on the project's land use type and anticipated construction activity, and the potential for the project to create an odor nuisance pursuant to SCAQMD Rule 402.

### 4.3.3.1 Approach and Methodology

#### 4.3.3.1.1 Construction Emissions

Emissions from the construction phase of the project were estimated using CalEEMod Version 2016.3.2. Construction scenario assumptions, including phasing, equipment mix, and vehicle trips, were based on information provided by the project applicant and CalEEMod default values when project specifics were not known. Other assumptions made for the purposes of modeling, including construction equipment mix and vehicle trips used for estimating the project-generated construction emissions, are included in Appendix B. The project would implement dust control strategies as a project design feature in compliance with SCAQMD Rule 403. To reflect implementation of proposed dust control strategies in compliance with SCAQMD Rule 403, the following was assumed in CalEEMod:

- Water exposed area two times per day (55% reduction in PM<sub>10</sub> and PM<sub>2.5</sub>).
- Limit vehicle travel on unpaved roads to 15 miles per hour.

#### 4.3.3.1.2 Operational Emissions

Emissions from the operational phase of the project were estimated using CalEEMod Version 2016.3.2. Operational year 2026 was assumed consistent with completion of project construction. CalEEMod was used to estimate operational emissions from area sources, including emissions from consumer product use, architectural coatings, and landscape maintenance equipment; energy sources, including include emissions associated with building electricity and natural gas usage (non-hearth); and mobile sources, primarily associated with motor vehicles (automobiles, light-duty trucks, and heavy-duty delivery trucks) traveling to and from the project site. Assumptions made for the purposes of modeling operational emissions, are included in Appendix B.

#### 4.3.3.1.3 Construction Health Risk Assessment

An HRA was performed to evaluate potential health risk associated with construction of the project. For risk assessment purposes, PM<sub>10</sub> in diesel exhaust is considered DPM, originating mainly from off-road equipment operating at a defined location for a given length of time at a given distance from sensitive receptors. Less-intensive, more-dispersed emissions result from on road vehicle exhaust (e.g., heavy-duty diesel trucks). For the construction HRA, the CalEEMod scenario for the project was adjusted to reduce diesel truck one-way trip distances to 1,000 feet to estimate emissions from truck pass-by at proximate receptors. The cancer and non-cancer health risk from construction of the project was conducted in accordance with the assumptions presented in Appendix B.

#### 4.3.4 Project Design Features

There are no project design features that apply to air quality.

#### 4.3.5 Impacts Analysis

##### **1. *Would the project conflict with or obstruct implementation of the applicable air quality plan?***

As previously discussed, the project site is located within the SCAB under the jurisdiction of the SCAQMD, which is the local agency responsible for administration and enforcement of air quality regulations for the area. The SCAQMD has established criteria for determining consistency with the AQMP, currently the 2016 AQMP, in Chapter 12, Sections 12.2 and 12.3, in the SCAQMD CEQA Air Quality Handbook (SCAQMD 1993). The criteria are as follows (SCAQMD 1993):

- **Consistency Criterion No. 1:** The proposed project will not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay the timely attainment of air quality standards of the interim emissions reductions specified in the AQMP.
- **Consistency Criterion No. 2:** The proposed project will not exceed the assumptions in the AQMP or increments based on the year of project buildout and phase.

##### **Consistency Criterion No. 1**

As discussed in the following section, the project would not exceed the SCAQMD significance thresholds for any criteria air pollutants. Therefore, the project would not result in an increase in the frequency or severity of existing air quality violations. Therefore, the project would not conflict with Consistency Criterion No. 1 of the SCAQMD CEQA Air Quality Handbook.

##### **Consistency Criterion No. 2**

While striving to achieve the NAAQS for O<sub>3</sub> and PM<sub>2.5</sub> and the CAAQS for O<sub>3</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> through a variety of air quality control measures, the 2016 AQMP also accommodates planned growth in the SCAB. Projects are considered consistent with, and would not conflict with or obstruct implementation of, the AQMP if the growth in socioeconomic factors (e.g., population, employment) is consistent with the underlying regional plans used to develop the AQMP (per Consistency Criterion No. 2 of the SCAQMD CEQA Air Quality Handbook).

The SCAQMD primarily uses demographic growth forecasts for various socioeconomic categories (e.g., population, housing, employment by industry) developed by the SCAG for its RTP/SCS (SCAG 2016), which is based on general

plans for cities and counties in the SCAB, for the development of the AQMP emissions inventory (SCAQMD 2017).<sup>5</sup> The SCAG 2016 RTP/SCS, and associated Regional Growth Forecast, are generally consistent with the local plans; therefore, the 2016 AQMP is generally consistent with local government plans. The project site currently has a zoning and land use designation of Institutional Land (City of Sierra Madre 2015, 2017). The General Plan and Zoning Code amendments would primarily change this land use designation to Specific Plan to allow for low-density residential and open space uses on the project site. The approval of the Specific Plan would provide zoning and development standards that allow for greater gross floor area, lot coverage, reduced parking requirements and setback standards for the new residential development parcels. As such, the project would not be consistent with the existing zoning and general plan.

It was determined the proposed project would generate a residential population of 95 persons and 42 residences. According to SCAG's 2016 RTP/SCS, the City is expected to have a population of 11,000 in 2012 and 11,200 in 2040. The number of households is anticipated to grow by 200 between 2012 and 2040. Therefore, the project would not exceed the projected growth assumed for the City for residential population. The City's Regional Housing Needs Allocation (RHNA) 2013–2021 allocation from SCAG showed that the allocation was 55 and the City still needed 18 units (City of Sierra Madre 2021). For the RHNA for 2021–2029 the allocation from SCAG is 204 units (SCAG 2021). As the project would bring 42 units to the City in 2026 it would be within the current RHNA allocation and help meet the City's backlog of 18 units from the previous allocation. Therefore, the project would be within the projected growth of the City's RHNA as defined by SCAG.

As the proposed project would not contribute to local population and household growth and associated VMT that is not already anticipated for the project Site in the existing General Plan, the proposed project is accounted for in the SIP and RAQS, and the proposed project would be consistent with local air quality plans. Therefore, the impact is considered less than significant.

### Summary

As described previously, the project would not result in an increase in the frequency and severity of existing air quality violations and would not conflict with Consistency Criterion No. 1. The project would be consistent with the General Plan and growth projections of the RTP/SCS. Therefore, impacts related to the project's potential to conflict with or obstruct implementation of the applicable air quality plan would be **less than significant**.

### ***2. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?***

#### Construction Emissions

Construction of the project would result in the temporary addition of pollutants to the local airshed caused by on-site sources (i.e., off-road construction equipment, soil disturbance, and VOC off-gassing) and off-site sources (i.e., on-road haul trucks, vendor trucks, and worker vehicle trips). Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation, and for dust, the prevailing weather

<sup>5</sup> Information necessary to produce the emission inventory for the SCAB is obtained from the SCAQMD and other governmental agencies, including CARB, Caltrans, and SCAG. Each of these agencies is responsible for collecting data (e.g., industry growth factors, socioeconomic projections, travel activity levels, emission factors, emission speciation profile, and emissions) and developing methodologies (e.g., model and demographic forecast improvements) required to generate a comprehensive emissions inventory. SCAG incorporates these data into their Travel Demand Model for estimating/projecting vehicle miles traveled (VMT) and driving speeds. SCAG's socioeconomic and transportation activities projections in their 2016 RTP/SCS are integrated in the 2016 AQMP (SCAQMD 2017a).

conditions. Therefore, such emission levels can only be approximately estimated with a corresponding uncertainty in precise ambient air quality impacts.

As discussed in Section 4.3.3.1.1, Construction Emissions, criteria air pollutant emissions associated with temporary construction activity were quantified using CalEEMod. Construction emissions were calculated for the estimated worst-case day over the construction period associated with each phase and reported as the maximum daily emissions estimated during each year of construction (2024 through 2025). Construction schedule assumptions, including phase type, duration, and sequencing, were based on information provided by the project applicant and is intended to represent a reasonable scenario based on the best information available. Default values provided in CalEEMod were used where detailed project information was not available.

Implementation of the project would generate air pollutant emissions from entrained dust, off-road equipment, vehicle emissions, architectural coatings, and asphalt pavement application. Entrained dust results from the exposure of earth surfaces to wind from the direct disturbance and movement of soil, resulting in PM<sub>10</sub> and PM<sub>2.5</sub> emissions. The project would implement various dust control strategies and would be required to comply with SCAQMD Rule 403 to control dust emissions generated during the grading activities. Proposed construction practices that would be employed to reduce fugitive dust emissions include watering of the active sites and unpaved roads two times per day depending on weather conditions and restricting vehicle speed on unpaved roads to 15 miles per hour. Internal combustion engines used by construction equipment, vendor trucks (i.e., delivery trucks), and worker vehicles would result in emissions of VOCs, NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub>. The application of architectural coatings, such as exterior application/interior paint and other finishes, and application of asphalt pavement would also produce VOC emissions; however, the contractor is required to procure architectural coatings from a supplier in compliance with the requirements of SCAQMD's Rule 1113 (Architectural Coatings).

Table 4.3-6 presents the estimated maximum daily construction emissions generated during construction of the project. The values shown are the maximum summer or winter daily emissions results from CalEEMod. Details of the emission calculations are provided in Appendix B.

**Table 4.3-6. Estimated Maximum Daily Construction Criteria Air Pollutant Emissions - Unmitigated**

Year	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
	<i>pounds per day</i>					
2024	8.22	86.46	59.87	0.18	63.45	8.46
2025	54.63	19.01	25.32	0.06	41.90	5.10
<b>Maximum Daily Emissions</b>	<b>54.63</b>	<b>86.46</b>	<b>59.87</b>	<b>0.18</b>	<b>63.45</b>	<b>8.46</b>
<i>SCAQMD Threshold</i>	<i>75</i>	<i>100</i>	<i>550</i>	<i>150</i>	<i>150</i>	<i>55</i>
<b>Threshold Exceeded?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

**Notes:** VOC = volatile organic compound; NO<sub>x</sub> = oxides of nitrogen; CO = carbon monoxide; SO<sub>x</sub> = sulfur oxides; PM<sub>10</sub> = coarse particulate matter; PM<sub>2.5</sub> = fine particulate matter; SCAQMD = South Coast Air Quality Management District.

See Appendix B for complete results.

The values shown are the maximum summer or winter daily emissions results from CalEEMod. These emissions reflect CalEEMod "mitigated" output, which accounts for implementation of the project's fugitive dust control strategies, including watering of the project site and unpaved roads two times per day, and restricting vehicle speed on unpaved roads to 15 miles per hour.

As shown in Table 4.3-6, maximum daily construction emissions would not exceed the SCAQMD significance thresholds for VOC, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>10</sub>, or PM<sub>2.5</sub> during construction. Impacts would be less than significant.

## Operational Emissions

Operation of the proposed project would generate VOC, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions from mobile sources (vehicle trips), area sources (consumer products, landscape maintenance equipment), and energy sources. As discussed in Section 4.3.3.1.2, Operational Emissions, pollutant emissions associated with long-term operations were quantified using CalEEMod. Project-generated mobile source emissions were estimated in CalEEMod based on project-specific trip rates. CalEEMod default values were used to estimate emissions from the proposed project area and energy sources.

Table 4.3-7 presents the maximum daily area, energy, and mobile source emissions associated with operation (year 2026) of the project. The values shown are the maximum summer or winter daily emissions results from CalEEMod. Details of the emission calculations are provided in Appendix B.

**Table 4.3-7. Estimated Maximum Daily Operational Criteria Air Pollutant Emissions - Unmitigated**

Emission Source	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
	<i>pounds per day</i>					
Area	14.62	0.91	24.84	0.05	3.23	3.23
Energy	0.03	0.29	0.12	0.00	0.02	0.02
Mobile	0.55	2.61	7.27	0.03	2.93	0.80
<b>Total</b>	<b>15.20</b>	<b>3.81</b>	<b>32.23</b>	<b>0.08</b>	<b>6.18</b>	<b>4.05</b>
<i>SCAQMD Threshold</i>	55	55	550	150	150	55
<b>Threshold Exceeded?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

**Notes:** VOC = volatile organic compound; NO<sub>x</sub> = oxides of nitrogen; CO = carbon monoxide; SO<sub>x</sub> = sulfur oxides; PM<sub>10</sub> = coarse particulate matter; PM<sub>2.5</sub> = fine particulate matter; SCAQMD = South Coast Air Quality Management District; PDF = project design feature.

See Appendix B for complete results.

Totals may not sum due to rounding.

The values shown are the maximum summer or winter daily emissions results from CalEEMod. These emissions reflect CalEEMod “mitigated” output and operational year 2026, which accounts for compliance with SCAQMD Rule 1113 (Architectural Coatings).

As shown in Table 4.3-7, the combined daily area, energy, and mobile source emissions would not exceed the SCAQMD operational thresholds for NO<sub>x</sub>, VOC, CO, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>.

Air pollution is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development, and the SCAQMD develops and implements plans for future attainment of ambient air quality standards. Based on these considerations, project-level thresholds of significance for criteria pollutants are relevant in the determination of whether a project’s individual emissions would have a cumulatively significant impact on air quality.

In considering cumulative impacts from the project, the analysis must specifically evaluate a project’s contribution to the cumulative increase in pollutants for which the SCAB is designated as nonattainment for the CAAQS and NAAQS. If a project’s emissions would exceed the SCAQMD significance thresholds, it would be considered to have a cumulatively considerable contribution to nonattainment status in the SCAB. The basis for analyzing the project’s cumulatively considerable contribution is if the project’s contribution accounts for a significant proportion of the cumulative total emissions (i.e., it represents a “cumulatively considerable contribution” to the cumulative air quality impact) and consistency with the SCAQMD 2016 AQMP, which addresses the cumulative emissions in the SCAB.

As discussed in Section 4.3.1.4.1, South Coast Air Basin Attainment Designation, the SCAB has been designated as a national nonattainment area for O<sub>3</sub> and PM<sub>2.5</sub> and a California nonattainment area for O<sub>3</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>. The

nonattainment status is the result of cumulative emissions from various sources of air pollutants and their precursors within the SCAB, including motor vehicles, off-road equipment, and commercial and industrial facilities. Construction and operation of the project would generate VOC and NO<sub>x</sub> emissions (which are precursors to O<sub>3</sub>) and emissions of PM<sub>10</sub> and PM<sub>2.5</sub>. As indicated in Tables 4.3-8 and 4.3-9, project-generated construction and operational emissions would not exceed the SCAQMD emission-based significance thresholds for all criteria air pollutants.

Cumulative localized impacts would potentially occur if a construction project were to occur concurrently with another off-site project. Construction schedules for potential future projects near the project site are currently unknown; therefore, potential construction impacts associated with two or more simultaneous projects would be considered speculative. However, future projects would be subject to CEQA and would require air quality analysis and, where necessary, mitigation if the project would exceed SCAQMD thresholds. Criteria air pollutant emissions associated with construction activity of future projects would be reduced through implementation of control measures required by the SCAQMD. Cumulative PM<sub>10</sub> and PM<sub>2.5</sub> emissions would be reduced because all future projects would be subject to SCAQMD Rule 403 (Fugitive Dust), which sets forth general and specific requirements for all construction sites in the SCAQMD.

Based on the project-generated construction emissions, the project would not result in a cumulatively considerable increase in emissions of nonattainment pollutants. Impacts would be **less than significant**.

### **3. *Would the project expose sensitive receptors to substantial pollutant concentrations?***

#### **Localized Significance Thresholds Analysis**

As discussed in Section 4.3.1.3, sensitive receptors are those individuals more susceptible to the effects of air pollution than the population at large. People most likely to be affected by air pollution include children, the elderly, and people with cardiovascular and chronic respiratory diseases. According to the SCAQMD, sensitive receptors include residences, schools, playgrounds, childcare centers, long-term healthcare facilities, rehabilitation centers, convalescent centers, and retirement homes (SCAQMD 1993). The closest off-site sensitive receptors to the project site include residences adjacent to the southern and western project site boundary.

An LST analysis has been prepared to determine potential impacts to nearby sensitive receptors during construction of the project. As indicated in Section 4.3.3, Thresholds of Significance, the SCAQMD also recommends the evaluation of localized NO<sub>2</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> impacts as a result of construction activities to sensitive receptors in the immediate vicinity of the project site. The impacts were analyzed using methods consistent with those in the SCAQMD's Final Localized Significance Threshold Methodology (2009). According to the Final Localized Significance Threshold Methodology, "off-site mobile emissions from the project should not be included in the emissions compared to the LSTs" (SCAQMD 2009). Hauling of soils and construction materials associated with the project construction are not expected to cause substantial air quality impacts to sensitive receptors along off-site roadways. Localized emissions from the trucks would be relatively brief in nature and would cease once the trucks pass through the main streets.

Construction activities associated with the project would result in temporary sources of on-site fugitive dust and construction equipment emissions. As discussed above, off-site emissions from vendor trucks, haul trucks, and worker vehicle trips are not included in the LST analysis. The maximum allowable daily emissions that would satisfy the SCAQMD localized significance criteria for SRA 9 are presented in Table 4.3-8 and compared to the maximum daily on-site construction emissions generated during the project.

Table 4.3-8. Localized Significance Thresholds Analysis for Project Construction - Unmitigated

Maximum On-Site Emissions	NO <sub>2</sub>	CO	PM <sub>10</sub>	PM <sub>2.5</sub>
	<i>Pounds per Day</i>			
Construction Emissions	80.52	56.77	7.42	4.12
SCAQMD LST	89	623	5	3
LST Exceeded?	No	No	Yes	Yes

Source: SCAQMD 2009.

Notes: NO<sub>2</sub> = nitrogen dioxide; CO = carbon monoxide; PM<sub>10</sub> = coarse particulate matter; PM<sub>2.5</sub> = fine particulate matter; SCAQMD = South Coast Air Quality Management District; LST = localized significance threshold.

See Appendix B for complete results.

Localized significance thresholds are shown for a 1-acre project sites corresponding to a distance to a sensitive receptor of 25 meters.

These estimates implementation of the project's fugitive dust control strategies, including watering of the project site and unpaved roads twice times per day, and restricting vehicle speed on unpaved roads to 15 miles per hour.

As shown in Table 4.3-8, construction activities would generate emissions in excess of site-specific LSTs for PM<sub>10</sub> and PM<sub>2.5</sub>; therefore, localized construction impacts during construction of the project would be **potentially significant (Impact AQ-1)** and mitigation is required.

### Valley Fever

As discussed in Section 4.3.1.2.2, Non-Criteria Air Pollutants, valley fever is not highly endemic to the County, and within the County, the incidence rate in the project site is below the County average and the statewide average. Construction of the project would comply with SCAQMD Rule 403 (Fugitive Dust), which requires fugitive dust sources to implement best available control measures for all sources and prohibits all forms of visible particulate matter from crossing any property line. SCAQMD Rule 403 is intended to reduce PM<sub>10</sub> emissions from any transportation, handling, construction, or storage activity that has the potential to generate fugitive dust. In addition, the project would implement various dust control strategies. The nearest sensitive-receptor land use (existing residence) is located adjacent to the southern and western project boundary. Based on the low incidence rate of coccidioidomycosis on the project site and in the County, and with the project's implementation of dust control strategies, it is not anticipated that earth-moving activities during project construction would result in exposure of nearby sensitive receptors to valley fever. Therefore, the project would have a **less than significant** impact with respect to valley fever exposure for sensitive receptors.

### Health Impacts of Carbon Monoxide

Mobile source impacts occur on two scales of motion. Regionally, project-related travel would add to regional trip generation and increase the vehicle miles traveled within the local airshed and the SCAB. Locally, project generated traffic would be added to the City's roadway system near the project site. If such traffic occurs during periods of poor atmospheric ventilation, is composed of a large number of vehicles "cold-started" and operating at pollution-inefficient speeds, and is operating on roadways already crowded with non-project traffic, there is a potential for the formation of microscale CO hotspots in the area immediately around points of congested traffic. Because of continued improvement in vehicular emissions at a rate faster than the rate of vehicle growth and/or congestion, the potential for CO hotspots in the SCAB is steadily decreasing.

The project would have trip generation associated with construction worker vehicles and vendor trucks. Title 40 of the California Code of Regulations, Section 93.123(c)(5), Procedures for Determining Localized CO, PM<sub>10</sub>, and PM<sub>2.5</sub> Concentrations (hot-spot analysis), states that "CO, PM<sub>10</sub>, and PM<sub>2.5</sub> hot-spot analyses are not required to consider construction-related activities, which cause temporary increases in emissions. Each site which is affected by



construction-related activities shall be considered separately, using established ‘Guideline’ methods. Temporary increases are defined as those which occur only during the construction phase and last five years or less at any individual site” (40 CFR 93.123). While Project construction would involve on-road vehicle trips from trucks and workers during construction, construction activities would last approximately 16 months and would not require a project-level construction hotspot analysis.

The Office of Planning and Research (OPR) and the Natural Resources Agency have issued new CEQA Guidelines for analyzing transportation impacts. By July 1, 2020, all CEQA lead agencies must analyze a project’s transportation impacts using vehicle miles traveled (VMT). VMT measures the distances vehicles will travel to and from a project, rather than congestion levels at intersections (level of service or “LOS,” graded on a scale of A–F). To account for this shift from LOS to VMT, and evaluate the potential for CO hotspots for the project, analysis performed by South Coast Air Quality Management District SCAQMD is leveraged as follow.

The SCAQMD conducted CO modeling for the 2003 AQMP (see Appendix V: Modeling and Attainment Demonstrations, SCAQMD 2003 of Appendix B) for the four worst-case intersections in the SCAB: (1) Wilshire Boulevard and Veteran Avenue, (2) Sunset Boulevard and Highland Avenue, (3) La Cienega Boulevard and Century Boulevard, and (4) Long Beach Boulevard and Imperial Highway. At the time the 2003 AQMP was prepared, the intersection of Wilshire Boulevard and Veteran Avenue was the most congested intersection in Los Angeles County, with an average daily traffic volume of about 100,000 vehicles per day. Using CO emission factors for 2002, the peak modeled CO 1-hour concentration was estimated to be 4.6 ppm at the intersection of Wilshire Boulevard and Veteran Avenue.

For the proposed project the daily traffic volume of 100,000 vehicles would be conservative compared to the traffic volumes of nearby intersections. For comparison, the intersection with the highest hourly volume including the project would be at Michillinda Avenue and Foothill Boulevard with 2,960 in the PM (Appendix B). When added to the maximum 1-hour CO concentration from 2017 through 2019 at the Pasadena monitoring station (see Table 4.3-2, Local Ambient Air Quality Data) which was 2.2 ppm in 2017, the 1-hour CO would be 6.8 ppm, while the CAAQS is 20 ppm.

The 2003 AQMP also projected 8-hour CO concentrations at these four intersections for 1997 and from 2002 through 2005. From years 2002 through 2005, the maximum 8-hour CO hotspot was 3.8 ppm at the Sunset Boulevard and Highland Avenue intersection (SCAQMD 2002) (3.4 ppm at the Wilshire Boulevard and Veteran Avenue in 2002). Adding the 3.8 ppm to the maximum 8-hour CO concentration from 2017 through 2019 at the Pasadena monitoring station (see Table 4.3-2) which was 1.7 ppm in 2017, the 8-hour CO would be 5.5 ppm, while the CAAQS is 9.0 ppm.

Therefore, it is concluded that a quantitative CO hotspots analysis is not required. The construction-related traffic is not anticipated to create a CO hotspot as emissions would be dispersed rapidly and would not be concentrated. During operation, the project is not expected to generate a CO hotspots.

As such, impacts to sensitive receptors with regard to potential CO hotspots resulting from the project’s contribution to cumulative traffic-related air quality impacts would be **less than significant**.

## Health Impacts of Toxic Air Contaminants

### *Construction Health Risk*

As discussed in Section 4.3.3.1.3, Construction Health Risk Assessment, a construction HRA was performed to estimate the Maximum Individual Cancer Risk and the Chronic Hazard Index for residential receptors as a result of project construction. Results of the construction HRA are presented in Table 4.3-9.

**Table 4.3-9. Construction Health Risk Assessment Results – Unmitigated**

Impact Parameter	Units	Project Impact	CEQA Threshold	Level of Significance
Maximum Individual Cancer Risk – Residential <sup>1</sup>	Per Million	36.7	10	Potentially Significant
Chronic Hazard Index – Residential <sup>1</sup>	Index Value	0.03	1.0	Less than Significant

Source: SCAQMD 2019.

Note: CEQA = California Environmental Quality Act.

See Appendix B.

<sup>1</sup> The maximally exposed individual resident for annual cancer and chronic health risk impacts is located north of the project site at UTM coordinates 401768.88 meter Easting (m E)/ 3781728.78 meters Northing (m N).

As shown in Table 4.3-9, project construction activities would result in a Residential Maximum Individual Cancer Risk of 36.7 in 1 million, which is greater than the significance threshold of 10 in 1 million. Project construction would result in a Residential Chronic Hazard Index of 0.004, which is below the 1.0 significance threshold. The project construction TAC health risk impacts would be **potentially significant (Impact AQ-2)** and mitigation is required.

#### **Health Effects of Other Criteria Air Pollutants**

Project construction and operation would not exceed SCAQMD thresholds for VOC, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>10</sub>, or PM<sub>2.5</sub>. VOCs and NO<sub>x</sub> are precursors to O<sub>3</sub>, for which the SCAB is designated as nonattainment with respect to the NAAQS and CAAQS. The health effects associated with O<sub>3</sub> are generally associated with reduced lung function. The contribution of VOCs and NO<sub>x</sub> to regional ambient O<sub>3</sub> concentrations is the result of complex photochemistry. The increases in O<sub>3</sub> concentrations in the SCAB due to O<sub>3</sub> precursor emissions tend to be found downwind from the source location to allow time for the photochemical reactions to occur. However, the potential for exacerbating excessive O<sub>3</sub> concentrations would also depend on the time of year that the VOC emissions would occur because exceedances of the O<sub>3</sub> CAAQS/NAAQS tend to occur between April and October when solar radiation is highest. The holistic effect of a single project's emissions of O<sub>3</sub> precursors is speculative due to the lack of quantitative methods to assess this impact. Because operation of the project would not exceed SCAQMD threshold for NO<sub>x</sub> or VOC, implementation of the project could minimally contribute to regional O<sub>3</sub> concentrations and the associated health effects.

Construction and operation of the project would not contribute to exceedances of the NAAQS and CAAQS for NO<sub>2</sub>. Health effects that result from NO<sub>2</sub> and NO<sub>x</sub> include respiratory irritation, which could be experienced by nearby receptors during the periods of heaviest use of off-road construction equipment. However, project construction would be relatively short term, and off-road construction equipment would be operating at various portions of the site and would not be concentrated in one portion of the site at any one time. In addition, existing NO<sub>2</sub> concentrations in the area are well below the NAAQS and CAAQS standards. Operation of the project would not require use of any stationary sources (e.g., diesel generators and boilers) that would create substantial, localized NO<sub>x</sub> impacts.

CO tends to be a localized impact associated with congested intersections. The associated potential for CO hotspots were discussed previously and are determined to be a less-than-significant impact. Thus, the project's CO emissions would not contribute to significant health effects associated with this pollutant.

Construction and operation of the project would exceed localized thresholds for PM<sub>10</sub> or PM<sub>2.5</sub> and may contribute to exceedances of the NAAQS and CAAQS for particulate matter or may obstruct the SCAB from coming into attainment for these pollutants. However, the project would not result in substantial DPM emissions during construction and operation, and therefore, would not result in significant health effects related to DPM exposure. Additionally, the project would implement dust control strategies and be required to comply with SCAQMD Rule 403,

which limits the amount of fugitive dust generated during construction. Therefore, the project may result in health effects associated with PM<sub>10</sub> or PM<sub>2.5</sub>.

In summary, because construction of the proposed project would exceed the SCAQMD localized significance thresholds for PM<sub>10</sub> and PM<sub>2.5</sub>, the potential health effects associated with criteria air pollutants are considered **potentially significant (Impact AQ-1)** and mitigation is required.

**4. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?**

The occurrence and severity of potential odor impacts depends on numerous factors. The nature, frequency, and intensity of the source; the wind speeds and direction; and the sensitivity of receiving location each contribute to the intensity of the impact. Although offensive odors seldom cause physical harm, they can be annoying and cause distress among the public and generate citizen complaints.

**Construction**

Odors would be potentially generated from vehicles and equipment exhaust emissions during construction of the project. Potential odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment, architectural coatings, and asphalt pavement application. Such odors would disperse rapidly from the project site and generally occur at magnitudes that would not affect substantial numbers of people. Therefore, impacts associated with odors during construction would be **less than significant**.

**Operations**

Land uses and industrial operations associated with odor complaints include agricultural uses, wastewater treatment plants, food-processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding (SCAQMD 1993). The project would not include land uses that generate odors as discussed above during operation. Therefore, project operations would result in an odor impact that is **less than significant**.

### 4.3.6 Mitigation Measures

The following mitigation measure is required to reduce emissions of PM<sub>10</sub> and PM<sub>2.5</sub> (**Impact AQ-1**) and DPM (**Impact AQ-2**) during construction.

**MM-AQ-1** Prior to the City's issuance of the demolition and grading permits for the Project, the Applicant shall demonstrate to the satisfaction of the Planning Division that its construction contractor will use a construction fleet wherein all 50-horsepower or greater diesel-powered equipment is powered with California Air Resources Board (CARB)-certified Tier 4 Interim engines or equipment outfitted with CARB verified diesel particulate filters.

An exemption from this requirement may be granted if: (1) the Applicant documents equipment with Tier 4 Interim engines are not reasonably available, and (2) functionally equivalent diesel PM emission totals can be achieved for the project from other combinations of construction equipment (Tier 3 with level 3 diesel particulate filter, electric, compressed natural gas, hydrogen, etc.). For example, if a Tier 4 Interim piece of equipment is not reasonably available at the time of construction and a lower tier equipment is used instead (e.g., Tier 3), another piece of equipment could be upgraded to a Tier 4 Final or replaced with an alternative-fueled (not diesel-fueled)

equipment to offset the emissions associated with using a piece of equipment that does not meet Tier 4 Interim standards. Before an exemption may be granted, the Applicant's construction contractor shall: (1) demonstrate that at least two construction fleet owners/operators in Los Angeles County were contacted and that those owners/operators confirmed Tier 4 Interim equipment could not be located within Los Angeles County during the desired construction schedule; and (2) the proposed replacement equipment has been evaluated using the California Emissions Estimator Model (CalEEMod) or other industry standard emission estimation method, and documentation provided to the Planning Division confirms that necessary project-generated functional equivalencies in the diesel PM emissions level are achieved.

### 4.3.7 Level of Significance After Mitigation

#### Localized Significance Thresholds Analysis

Construction activities associated with the project would result in temporary sources of on-site fugitive dust and construction equipment emissions. As discussed above, off-site emissions from vendor trucks, haul trucks, and worker vehicle trips are not included in the LST analysis. The maximum allowable daily emissions that would satisfy the SCAQMD localized significance criteria for SRA 9 are presented in Table 4.3-10 and include mitigation measure **MM-AQ-1** and compared to the maximum daily on-site construction emissions generated during the project.

**Table 4.3-10. Localized Significance Thresholds Analysis for Project Construction - Mitigated**

Maximum On-Site Emissions	NO <sub>2</sub>	CO	PM <sub>10</sub>	PM <sub>2.5</sub>
	<i>Pounds per Day</i>			
Construction Emissions	40.12	80.87	4.46	1.42
SCAQMD LST	89	623	5	3
LST Exceeded?	No	No	No	No

**Source:** SCAQMD 2009.

**Notes:** NO<sub>2</sub> = nitrogen dioxide; CO = carbon monoxide; PM<sub>10</sub> = coarse particulate matter; PM<sub>2.5</sub> = fine particulate matter; SCAQMD = South Coast Air Quality Management District; LST = localized significance threshold.

See Appendix B for complete results.

Localized significance thresholds are shown for a 1-acre project sites corresponding to a distance to a sensitive receptor of 25 meters.

These estimates implementation of the project's fugitive dust control strategies, including watering of the project site and unpaved roads twice times per day, and restricting vehicle speed on unpaved roads to 15 miles per hour.

As shown in Table 4.3-10, mitigated construction activities would not generate emissions in excess of site-specific LSTs; therefore, localized construction impacts during construction of the project (**Impact AQ-1**) would be **less than significant** with mitigation.

#### Health Impacts of Toxic Air Contaminants

##### **Construction Health Risk**

As discussed in Section 4.3.3.1.3, Construction Health Risk Assessment, a construction HRA was performed to estimate the Maximum Individual Cancer Risk and the Chronic Hazard Index for residential receptors as a result of project construction. Results of the construction HRA including mitigation measure **MM-AQ-1** are presented in Table 4.3-11.

Table 4.3-11. Construction Health Risk Assessment Results – Mitigated

Impact Parameter	Units	Project Impact	CEQA Threshold	Level of Significance
Maximum Individual Cancer Risk – Residential <sup>1</sup>	Per Million	4.3	10	Less than Significant
Chronic Hazard Index – Residential <sup>1</sup>	Index Value	0.004	1.0	Less than Significant

Source: SCAQMD 2019.

Note: CEQA = California Environmental Quality Act.

See Appendix B.

<sup>1</sup> The maximally exposed individual resident for annual cancer and chronic health risk impacts is located north of the project site at UTM coordinates 401768.88 meter Easting (m E)/ 3781728.78 meters Northing (m N).

As shown in Table 4.3-11, mitigated project construction activities would result in a Residential Maximum Individual Cancer Risk of 4.3 in 1 million, which is less than the significance threshold of 10 in 1 million. Project construction would result in a Residential Chronic Hazard Index of 0.004, which is below the 1.0 significance threshold. The project construction TAC health risk impacts (**Impact AQ-2**) would be **less than significant** with mitigation.

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## 4.4 Biological Resources

This section describes the existing biological resources conditions of The Meadows Specific Plan Project (project or proposed project) site and vicinity, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures related to implementation of the proposed project. This analysis is based on a review of the Sensitive Resources Analysis for the Project Located at 700 North Sunnyside Avenue, Sierra Madre Memorandum (Sensitive Resources Analysis) prepared by Dudek in June 2020 (Appendix C1) and the Protected Tree Report prepared by Dudek in November 2020 (Appendix C2).

### 4.4.1 Existing Conditions

#### **Project Site**

The project site is located within the northwestern portion of the City of Sierra Madre (City). As described in Chapter 2, Environmental Setting, of this Draft Environmental Impact Report (EIR), the project site is located to the south of the Mater Dolorosa Retreat Center and is bound by single-family residential areas to the west and south, a large retention basin and Bailey Canyon Wilderness Park to the east, and the foothills of the San Gabriel Mountains to the north. The project site is located on the same parcel as the Mater Dolorosa Retreat Center, which is connected to the site by an access road; however, a lot line adjustment would be processed to adjust the boundaries of the three existing lots that make up the Mater Dolorosa Retreat Center and the project site. The lot line adjustment would consolidate the two southern lots that make up the project site as one and adjust the northern boundary of this new lot further to the north.

The City's General Plan defines the city as a Wildlife Sanctuary, citing presence of various wildlife species within the City limits. However, with human development over time, wildlife species and suitable habitat have been displaced, making the City an urban/wildlife interface (City of Sierra Madre 2015).

Under existing conditions, the project site is vacant and appears to be mowed and composed of almost entirely non-native grasslands and herbaceous annuals. As previously mentioned, one private access road runs through the western portion of the project site in addition to another road which creates the project site's eastern boundary.

#### ***Special-Status Species***

No federal or state-listed plant or wildlife species are expected to occur in the project site. The project site does not support any native vegetation communities and the area appears to be regularly maintained, which limits the potential for many native plant and wildlife species (Appendix C1). A collection of the wildlife species observed on the project site is included within Appendix C1. The biological study area included 101 inventoried trees that could provide nesting habitat for birds. In addition, 16 trees were inventoried within the off-site improvement area, for a total of 117 trees present on-site. These trees could also be used by raptors for foraging in the area; however, common prey for raptors, including California ground squirrel (*Otospermophilus beecheyi*) and desert cottontail (*Sylvilagus audubonii*) were not observed or not abundant enough to provide a unique resource for raptors.

### ***Sensitive Natural Communities and Riparian Habitats***

Figure 4.4-1, Vegetation and Land Cover Map, illustrates the project site's vegetation and land cover consists of ornamental vegetation lining paved roadways and non-native grassland. The project site consists of maintained areas of ornamental, non-native grassland and paved roadways. The non-native grasslands are mowed and composed of almost entirely non-native grasses and herbaceous annuals (Appendix C1). No sensitive communities or riparian habitat occur on the project site.

### ***Wetlands and Other Jurisdictional Waters***

No wetlands or other jurisdictional waters are observed on the project site. Additionally, no wetland or riparian features have been previously identified (Appendix C1). The project site is adjacent to wetlands and riparian features across the roadways which separates the project site from Bailey Canyon Wilderness Park (USFWS 2020).

### ***Wildlife Corridors and Native Wildlife Nursery Sites***

The project site is adjacent to the San Gabriel Mountains, which is a large undeveloped area that supports large terrestrial wildlife capable of movement over large distances. However, the project site is surrounded by residential development to the west and south, the Bailey Canyon Debris Basin to the east, and the Mater Dolorosa Retreat Center to the north. Some wildlife may have localized movement within and through the project site. Although mule deer (*Odocoileus hemionus*) were observed grazing within the project site and within the adjacent Mater Dolorosa Retreat Center, and, it is expected that the mule deer would also use the foothills to the north of the Mater Dolorosa Retreat Center (Appendix C1); however there is no wildlife corridor connection to other large undeveloped areas. In addition, the project has vegetation that could provide nesting habitat for birds protected under the Migratory Bird Treaty Act (16 USC Sections 703–712) and California Fish and Game Code Sections 3503, 3503.5, and 3513.

### ***Locally Protected Trees***

117 trees were inventoried within the biological study area and the off-site improvement area (The biological study area contained 101 inventoried trees while the off-site improvement area contains 16 trees). The biological study area includes, 10 of which were coast live oaks (*Quercus agrifolia*) that. All 10 of the oak trees meet the City's criteria for a protected oak tree. The eleventh tree is not protected under the Ordinance because it does not have a trunk that "exceeds a diameter of four inches as measured at four and one-half feet above natural or established grade," as required by the Tree Preservation Ordinance. Appendix B1 and B2 of the Protected Tree Report (Appendix C2) presents the location of the individual trees mapped and assessed for the proposed project. Overall, the trees exhibit growth and structural conditions that are typical of their location in an undeveloped urban landscape and park setting. The trees include various trunk and branch maladies and health and structural conditions. As presented in Appendix A of Appendix C2, 32.529% of the individually mapped trees (3829 trees) exhibit good health; 45.38% (4853 trees) are in fair health; and 22.24% (2426 trees) are in poor health. Structurally, 13.76% (16 trees) of the individually mapped trees are considered to exhibit good structure, and 70.17% (7782 trees) exhibit fair structure; and 16.28% (198 trees) have poor structure. The trees in good condition exhibit acceptable vigor, healthy foliage, and adequate structure, and lack any major maladies. Trees in fair condition are typical, with few maladies but declining vigor. Trees in poor condition exhibit declining vigor, unhealthy foliage, poor branch structure, and excessive lean. No pests or pathogens were observed on site.

Trees within the biological study area and off-site improvement area vary in size and stature according to species and available growing space. The site's trees are composed of single- and multi-stemmed trees, with single-stemmed trunk diameters that range from 2 to 44 inches, and multi-stemmed trunk diameters that range from 4 to 76 inches. Tree heights vary from 8 to 55-60 feet. Tree canopy extents range from 5 feet to approximately 70 feet.



## 4.4.2 Relevant Plans, Policies, and Ordinances

### Federal

#### ***Endangered Species Act***

The Federal Endangered Species Act (FESA) of 1973 (16 USC Section 1531 et seq.), as amended, is administered by the U.S. Fish and Wildlife Service (USFWS) for most plant and animal species and by the National Oceanic and Atmospheric Administration National Marine Fisheries Service (NOAA) for certain marine species. This legislation is intended to provide a means to conserve the ecosystems upon which endangered and threatened species depend and provide programs for the conservation of those species, thus preventing the extinction of plants and wildlife. The FESA defines an endangered species as “any species that is in danger of extinction throughout all or a significant portion of its range.” A threatened species is defined as “any species that is likely to become an endangered species within the foreseeable future throughout all or a significant portion of its range.” Under FESA, it is unlawful to “take” any listed species, and take is defined as “harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct.”

FESA allows for the approval of impacts to listed species under Section 7, through the issuance of a biological opinion which is prepared by either the USFWS or NOAA in connection with projects that also require other federal agency permits or other approvals, and issuance of incidental take permits for listed species under Section 10, which authorizes impacts to listed species pursuant to the approval of Habitat Conservation Plans on private property without any other federal agency involvement.

#### ***Migratory Bird Treaty Act***

The Migratory Bird Treaty Act (MBTA) was originally passed in 1918 as four bilateral treaties, or conventions, for the protection of a shared migratory bird resource. The primary motivation for the international negotiations was to stop the “indiscriminate slaughter” of migratory birds by market hunters and others. The MBTA protects over 800 species of birds (including their parts, eggs, and nests) from killing, hunting, pursuing, capturing, selling, and shipping unless expressly authorized or permitted.

#### ***Section 404 of the Clean Water Act***

The objective of the Clean Water Act (CWA) is to restore and maintain the chemical, physical, and biological integrity of the nation’s waters. Under Section 404 of the CWA, the U.S. Army Corps of Engineers (USACE) has the authority to regulate activities that could discharge fill or dredge material or otherwise adversely modify wetlands or other waters of the United States. The USACE implements the federal policy embodied in Executive Order 11990, which, when implemented, is intended to result in no net loss of wetland values or function.

On January 23, 2020, the USACE and Environmental Protection Agency (EPA) finalized the “Navigable Waters Protection Rule,” which establishes a new definition of “Waters of the U.S.” under the CWA. The new Navigable Waters Protection Rule (Rule) repeals the Obama-era 2015 Clean Water Rule and replaces it with a definition that drastically limits the scope of federal regulation to a much narrower collection of aquatic resource features. Among the greatest changes, the Rule eliminates “significant nexus” determinations to determine if potential tributaries have a significant effect on the “chemical, physical, and biological integrity of downstream traditional navigable waters.” The Rule also redefines the term “adjacent.” In order for an adjacent wetland to be jurisdictional, it must touch “at least one point or side of a jurisdictional water” or have a direct hydrological surface connection to a

traditional navigable waterway. Hydrological connections through groundwater, which have been suggested to maintain federal jurisdiction in the past, are now outside of the scope of federal purview. Most importantly, the Rule identifies four specific categories of aquatic resource features that will be regulated by the federal government under the CWA, leaving oversight for other “excluded” waterbodies to states and tribes. The four specific categories of aquatic resources regulated under the CWA are:

1. Territorial seas and traditional navigable waters
2. Perennial and intermittent tributaries
3. Certain lakes, ponds, and impoundments
4. Wetlands that are adjacent to jurisdictional waters

The revised Rule does not expand federal regulation to include new categories of aquatic features; however, it does provide a list of excluded features that would no longer be considered Waters of the U.S. under the final Rule. Most significantly, “ephemeral” streams and other features that only flow in direct response to precipitation, and are particularly prevalent in the western United States, would no longer be subject to CWA regulation. The revised Rule redefining Waters of the U.S. goes into effect within 60 days of its publication in the Federal Register, the date of which has not yet been determined.

### ***Section 401 of the Clean Water Act***

The State Water Resources Control Board acting through the Regional Water Quality Control Boards (RWQCBs), has authority over wetlands through Section 401 of the CWA. The CWA requires that an applicant for a Section 404 permit (to discharge dredge or fill material into waters of the United States) first obtain certification from the appropriate state agency stating that the fill is consistent with the state’s water quality standards and criteria. In California, the authority to either grant certification or waive the requirement for permits is delegated by the State Water Resources Control Board to the nine regional boards. The Los Angeles RWQCB has authority for Section 401 compliance in the project area. A request for certification is submitted to the regional board at the same time that an application is filed with the USACE.

### **State**

#### ***California Endangered Species Act***

The California Endangered Species Act (CESA) (California Fish and Game Code Section 2050 et seq.) provides protection and prohibits the take of plant, fish, and wildlife species listed by the State of California. Unlike FESA, state-listed plants have the same degree of protection as wildlife, but insects and other invertebrates may not be listed. Take is defined similarly to FESA and is prohibited for both listed and candidate species. Take authorization may be obtained by the project applicant from the California Department of Fish and Wildlife (CDFW) under CESA Section 2081, which allows take of a listed species for educational, scientific, or management purposes. In this case, private developers consult with CDFW to develop a set of measures and standards for managing the listed species, including full mitigation for impacts, funding of implementation, and monitoring of mitigation measures.

#### ***California Fully Protected Species***

Sections 3511, 4700, 5050, and 5515 of the California Fish and Game Code outline protection for fully protected species of mammals, birds, reptiles, amphibians, and fish. Species that are fully protected by these sections may not be taken or possessed at any time. CDFW cannot issue permits or licenses that authorize the take of any fully

protected species, except under certain circumstances, such as scientific research and live capture and relocation of such species pursuant to a permit for the protection of livestock. Furthermore, it is the responsibility of the CDFW to maintain viable populations of all native species. Toward that end, the CDFW has designated certain vertebrate species as California Species of Special Concern (SSC), because declining population levels, limited ranges, and/or continuing threats have made them vulnerable to extinction.

### ***California Native Plant Protection Act***

The Native Plant Protection Act of 1977 directed the CDFW to carry out the legislature's intent to “preserve, protect and enhance rare and endangered plants in this State.” The Native Plant Protection Act gave the California Fish and Game Commission the power to designate native plants as “endangered” or “rare” and protect endangered and rare plants from take. The CESA expanded on the original Native Plant Protection Act and enhanced legal protection for plants, but the Native Plant Protection Act remains part of the California Fish and Game Code. To align with federal regulations, the CESA created the categories of “threatened” and “endangered” species. It converted all rare animals into the act as threatened species, but did not do so for rare plants. Thus, there are three listing categories for plants in California: rare, threatened, and endangered. Because rare plants are not included in the CESA, mitigation measures for impacts to rare plants are specified in a formal agreement between CDFW and the project proponent.

### ***California Environmental Quality Act***

The California Environmental Quality Act (CEQA) requires identification of a project’s potentially significant impacts on biological resources and ways that such impacts can be avoided, minimized, or mitigated. The act also provides guidelines and thresholds for use by lead agencies for evaluating the significance of proposed impacts.

CEQA Guidelines Section 15380(b)(1) defines endangered animals or plants as species or subspecies whose “survival and reproduction in the wild are in immediate jeopardy from one or more causes, including loss of habitat, change in habitat, overexploitation, predation, competition, disease, or other factors.” A rare animal or plant is defined in Section 15380(b)(2) as a species that, although not presently threatened with extinction, exists “in such small numbers throughout all or a significant portion of its range that it may become endangered if its environment worsens; or ... [t]he species is likely to become endangered within the foreseeable future throughout all or a significant portion of its range and may be considered ‘threatened’ as that term is used in the federal Endangered Species Act.” Additionally, an animal or plant may be presumed to be endangered, rare, or threatened if it meets the criteria for listing, as defined further in CEQA Guidelines Section 15380(c).

CDFW has developed a list of “Special Species” as “a general term that refers to all of the taxa the CNDDB [California Natural Diversity Database] is interested in tracking, regardless of their legal or protection status.” This is a broader list than those species that are protected under the FESA, CESA, and other California Fish and Game Code provisions, and includes lists developed by other organizations, including for example the Audubon Watch List Species. Guidance documents prepared by other agencies, including the U.S. Fish and Wildlife Service Birds of Special Concern, are also included on this CDFW Special Species list. Additionally, CDFW has concluded that plant species included on the California Native Plant Society’s California Rare Plant Rank List 1 and 2, and potentially some List 3 plants, are covered by CEQA Guidelines Section 15380.

Section IV, Appendix G (Environmental Checklist Form), of the CEQA Guidelines requires an evaluation of impacts to “any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations, or by the California Department of Fish and Game or the U.S. Fish and Wildlife Service.”

### **California Fish and Game Code Section 1602**

Under these sections of the California Fish and Game Code, the project proponent or applicant is required to notify CDFW prior to any activity that would divert, obstruct, or change the natural flow, bed, channel, or bank of any river, stream, or lake. Pursuant to the code, a “stream” is defined as a body of water that flows at least periodically, or intermittently, through a bed or channel having banks and supporting fish or other aquatic life. Based on this definition, a watercourse with surface or subsurface flows that supports or has supported riparian vegetation is a stream and is subject to CDFW jurisdiction. Altered or artificial watercourses valuable to fish and wildlife are subject to CDFW jurisdiction. CDFW also has jurisdiction over dry washes that carry water during storm events.

Preliminary notification and project review generally occur during the environmental process. When an existing fish or wildlife resource may be substantially adversely affected, CDFW is required to propose reasonable project changes to protect the resource. These modifications are formalized in a Streambed Alteration Agreement, which becomes part of the plans, specifications, and bid documents for the project.

### **Porter-Cologne Water Quality Control Act**

Pursuant to provisions of the Porter-Cologne Act, the RWQCB regulates discharging waste, or proposing to discharge waste, within any region that could affect a water of the state (California Water Code, Section 13260[a]). The State Water Resources Control Board defines a waters of the state as “any surface water or groundwater, including saline waters, within the boundaries of the state” (California Water Code, Section 13050[e]).

As of April 2019, the State Water Resources Control Board has narrowed their definition of a waters of the state to include the following:

1. Natural wetlands,
2. Wetlands created by modification of a surface water of the state,
3. Artificial wetlands that meet any of the following criteria:
  - a. Approved by an agency as compensatory mitigation for impacts to other waters of the state, except where the approving agency explicitly identifies the mitigation as being of limited duration;
  - b. Specifically identified in a water quality control plan as a wetland or other water of the state;
  - c. Resulted from historic human activity, is not subject to ongoing operation and maintenance, and has become a relatively permanent part of the natural landscape; or
  - d. Greater than or equal to one acre in size unless the artificial wetland was constructed and is currently used and maintained, primarily for one or more of the following purposes: industrial or municipal wastewater treatment or disposal; settling of sediment; detention, retention, infiltration, or treatment of stormwater runoff and other pollutants or runoff subject to regulation under a municipal, construction, or industrial permitting program; treatment of surface waters; agricultural crop irrigation or stock watering; fire suppression; industrial processing or cooling water; active surface mining – even if the site is managed for interim wetlands functions and values; log storage; treatment, storage, or distribution of recycled water; maximizing groundwater recharge (this does not include wetlands that have incidental groundwater recharge benefits); or fields flooded for rice growing.

All waters of the United States are waters of the state. Wetlands, such as isolated seasonal wetlands, that are not generally considered waters of the United States are considered waters of the state if, “under normal circumstances, (1) the area has continuous or recurrent saturation of the upper substrate caused by groundwater, or shallow surface water, or both; (2) the duration of such saturation is sufficient to cause anaerobic conditions in the upper substrate; and (3) the area’s vegetation is dominated by hydrophytes or the area lacks vegetation.” (SWRCB 2019).

## Local

### ***City of Sierra Madre Tree Preservation and Protection Ordinance***

The City of Sierra Madre Tree Preservation and Protection Ordinance (Tree Preservation and Protection Ordinance) protects California scrub oak (*Quercus berberidifolia*), coast live oak (*Quercus agrifolia*), coastal scrub oak (*Quercus dumosa*), Engelmann oak (*Quercus engelmannii*), Southern California black walnut (*Juglans californica*), and western sycamore (*Platanus racemosa*). The Protected Tree Report (Appendix C2) identified ~~101~~117 trees within the project site, including ~~ten~~eleven coast live oak (*Quercus agrifolia*) (although only 10 are protected under the City's Tree Preservation and Protection Ordinance) and 4 additional protected trees within the off-site improvement area, and includes mitigation measures to comply with the City ordinance.

### ***Habitat Conservation Plan, Natural Community Conservation Plan, or Other Conservation Plans***

The project site is not located within any habitat conservation plan, natural community conservation plan, or other conservation plans (Appendix C1).

### ***City of Sierra Madre General Plan***

The General Plan is the primary planning document for the incorporated areas of the City. The General Plan outlines goals and policies that are intended to guide new planning and development efforts within the City in compliance with State requirements. The City's General Plan is divided into chapters which correlate with required elements mandated by the State. Chapter 2, Resource Management, contains goals and policies that are applicable to the potential biological resources impacts of the project. Section 2, Co-Existence with Wildlife; Section 3, Tree Preservation; and Section 5, Water Resources are sections within the General Plan which manage development's impact on natural resources (City of Sierra Madre 2015).

As the City develops, wildlife species and suitable habitat is displaced into surrounding areas. This results in the City as an urban/wildlife interface. According to the General Plan, the City adopted Resolution 72-62 in 1972, designating Sierra Madre as a Wildlife Sanctuary. "The city, its officers and employees and the residents of the city of Sierra Madre are hereby encouraged to protect the birds, wildlife, natural habitats, food sources and other wildlife resources located within the city limits." In 2000, the City adopted Ordinances 1177 and 1197 into the Municipal Code Development Standards, Section 17.48.130.H ("Prohibited Fencing. Spiked fencing shall be prohibited in all zones") (City of Sierra Madre 2015).

The General Plan includes the following goals, objectives, and policies relevant to the proposed project with regard to biological resources, which are listed below (City of Sierra Madre 2015). The proposed project's consistency with these policies is provided in Table 4.11-1 in Section 4.11, Land Use and Planning.

### **Chapter 1, Land Use**

**Goal 8:** Preserve existing and provide additional constructed and natural open space.

**Objective L4:** Mitigating the impacts of new development on the City's open space, trees, infrastructure, water, transit services, the character of existing development, and other public needs.

**Chapter 2, Section 2: Tree Preservation**

**Goal 1:** Continued preservation and protection of existing trees.

**Goal 2:** Increase of the City’s community forest.

**Objective R10:** Maintaining and enhancing the City’s significant tree resources.

**Policy R10.2:** Continue to develop tree preservation and protection measures.

**Policy R10.8:** Continue to monitor construction projects with regard to grading and construction effects on trees, tree removal and replacement.

**City of Sierra Madre Municipal Code**

The Sierra Madre Municipal Code contains existing standards and regulations that help mitigate potential impacts on biological resources. The following is a description of the provisions of the Sierra Madre Municipal Code that are applicable to the proposed project.

**Chapter 12.20 (Tree Preservation)**

Trees subject to City permit requirements include those defined by Title 12.20.020, as follows:

- “Protected tree” means any Southern California Black Walnut (*Juglans californica*), Engelmann Oak (*Quercus engelmannii*), Coast Live Oak (*Quercus agrifolia*), or Western Sycamore (*Platanus racemosa*) tree whose trunk (or collective trunks) exceed a diameter of four inches measured four feet above natural ground level.

The City adopted the ordinance to, “contribute to a better public understanding of the value of the city’s trees and to prohibit indiscriminate damage and destruction of this significant resource.” Under the City Ordinance:

- A. It is unlawful for any person, firm or corporation to either "remove" (as defined herein) or “substantially trim” (as that term is defined herein), without a permit from the city having been issued therefor:
  - a. Any “street tree” (as defined herein); or,
  - b. Any “protected tree” (as defined herein) in connection with an application for a subdivision, a parcel map, or a lot line adjustment, or a development project (or proposed development project) to construct any pad, parking lot, grading, or other construction exempt from the city’s environmental regulations;
  - c. Any “protected tree” (as defined herein) on any “undeveloped property” (as that term is defined herein).
- B. It is unlawful for any person, firm or corporation, to accept payment for removal or trimming of any tree within the city unless that person, firm or corporation is in possession of a valid business license from the city and a valid C27 or C61/D49 State Contractor’s Licenses, liability and workers compensation insurance policies.

**Chapter 17.52 (Hillside Management Zone)**

Section 17.52.180 (Biotic Resources Management Plan) of this chapter requires the preparation of a Biotic Resources Management Plan for an Application for Land Division in the Hillside Management zone. A Biotic Resources Management Plan is required to contain an assessment of existing flora and fauna on and near the site; an assessment of project impacts to biological resources; mitigation measures including no net loss of wetlands and other sensitive habitats; and identify regulatory permits needed for project approval.

### ***Community Forest Management Plan***

The Community Forest Management Plan ensures the continuation and enhancement of the tree canopy for the beauty, wellbeing, livability, and long-term environmental health of the community of Sierra Madre. The City of Sierra Madre's mission to grow and perpetuate the community forest is embodied in the Community Forest Master Plan. This mission is expressed through these overarching goals (City of Sierra Madre 2014):

- Conserve and expand tree canopy cover equal to no net loss, with a gradual increase over time.
- Foster increased public awareness and education regarding the environmental value of trees as green infrastructure.
- Promote increased shade-tree canopy for energy conservation, storm water capture, and improved air quality.
- Encourage species selection appropriate for local environmental conditions and sustainability
- Preserve and enhance community aesthetics and property values through increased canopy cover and diversity
- Apply best management practices for planting, maintaining, and responding to changed environmental conditions in the community forest

### 4.4.3 Thresholds of Significance

The significance criteria used to evaluate the project impacts to biological resources are based on Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to biological resources would occur if the project would:

1. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.
2. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.
3. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.
4. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.
5. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.
6. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

### 4.4.4 Project Design Features

There are no project design features that apply to biological resources.

## 4.4.5 Impacts Analysis

1. *Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?*

### **Special-Status Species**

The Sensitive Resources Analysis prepared for the proposed project (Appendix C1) included a literature review, a field visit, and a special-status species habitat assessment for endangered, rare, or threatened plant and wildlife species (also referred to as “special-status” species). A review of existing information and a field visit was conducted to determine the sensitive biological resources that are present or have potential to occur on and adjacent to the project site. As described in Appendix C1, the literature review conducted prior to the field visit utilized the CDFW CNDDDB, the California Native Plant Society’s Online Inventory of Rare and Endangered Vascular Plants, the U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consultation, the USFWS Wetland Mapper online viewer, the Consortium of California Herbaria, iNaturalist, and eBird.

The evaluation of each special-status plant and wildlife species’ potential to occur within the construction site was based on an analysis of elevation, soils, vegetation communities, and level of disturbance of the site in conjunction with the known distribution of special-status species in the vicinity of the project site (Appendix C1).

### **Special-Status Plant Species**

Endangered, rare, or threatened plant species, as defined in Section 15380(b) of the CEQA Guidelines (14 CCR Section 15000 et seq.), are referred to as “special-status plant species”, and include endangered or threatened plant species recognized in the context of the California Endangered Species Act (CESA) and federal Endangered Species Act (FESA) and plant species with a California Rare Plant Rank 1 through 2 (Appendix C1).

There are 41 special-status plant species with recorded occurrences in the project site. Four species are listed under the federal and/or California endangered species acts. However, these special-status plant species are either not expected to occur, or have a low potential to occur. The project site lacks suitable habitat and are outside of various species’ known elevation range. In addition, the field visit did not record the presence of these species on the project site. Special-status plant species which had a low potential of occurrence were recorded as such due to marginal grassland found on site consisting of non-native and ruderal species. Furthermore, the project site is not within any designated critical habitat (Appendix C1). Lastly, the project site appears to be regularly maintained, which limits the potential for many native plant species. As such, the project site does not support any special-status plant species. Therefore, impacts to special-status plant species would be **less than significant**.

### **Special-Status Wildlife Species**

Endangered, rare, or threatened wildlife species, as defined in CEQA Guidelines, Section 15380(b) (14 CCR Section 15380[b]), are referred to as “special-status wildlife species” and, as used in this report, include (1) endangered or threatened wildlife species recognized in the context of CESA and FESA; (2) California SSC; and (3) mammals and birds that are fully protected species, as described in the California Fish and Game Code, Sections 4700 and 3511 (Appendix C1).



According to Appendix C1, there are 43 special-status wildlife species with recorded occurrences in the project site. 37 species are listed under the federal and/or California endangered species acts. However, these special-status plant species are either not expected to occur or have a low potential to occur. The project site lacks suitable habitat, contains no water resources for suitable habitats, and is disturbed with compact soils. Special-status wildlife species which had a low potential of occurrence include Cooper’s hawk (*Accipiter cooperii*), which require dense stands of live oak and riparian woodlands suitable for this species to nest. In addition, 11 bat species came up in the CNDDDB search provided in Appendix C-1. However, none of the species have a moderate or high potential to occur during roosting due to the lack of associated suitable habitat. One bat species, pallid bat (*Antrozous pallidus*), has a low potential to occur because it roosts in trees; however, wintering and maternity roosts are not expected and individuals would be expected to leave if the tree is disturbed. Per the CNDDDB search (Appendix C1), listed species with recorded occurrences in the project region include Crotch bumble bee (*Bombus crotchii*), least Bell’s vireo (*Vireo bellii pusillus*), and mountain lion (*Puma concolor*). Plant species that Crotch bumble bee (*Bombus crotchii*) forage on do not appear on site and least Bell vireo (*Vireo bellii pusillus*) is not expected to occur as the project site and adjacent areas lack the dense riparian habitat suitable for this species to occur. Mountain lion may move through the project site, but it is not expected to have natal dens there or in the vicinity due to the existing development and human activity. Furthermore, the project site is not within any designated critical habitat (USFWS 2020). In addition, the project site does not support any native vegetation communities and the area appears to be regularly maintained, which limits the potential for many native and special-status wildlife species. Therefore, impacts to special-status wildlife species would be **less than significant**.

### Nesting Birds

Ground- and vegetation-disturbing activities, if conducted during the nesting bird season (typically February 1 through August 31), would have the potential to result in removal of or disturbance to trees and shrubs that could contain active bird nests. In addition, these activities would also affect herbaceous vegetation that could support and conceal ground-nesting species. Project activities that result in the loss of bird nests, eggs, and young would be in violation of one or more of California Fish and Game Code Sections 3503 (any bird nest), 3503.5 (birds of prey), or 3511 (Fully Protected birds). In addition, removal or destruction of one or more active nests of any other birds listed by the federal MBTA, whether nest damage was due to vegetation removal or to other construction activities, would be considered a violation of the MBTA and California Fish and Game Code Section 3511. The loss of protected bird nests, eggs, or young due to project activities would be a potentially significant impact.

The project site does have ornamental trees and shrubs that could provide nesting habitat for common birds protected under the MBTA (16 USC Sections 703–712) and California Fish and Game Code Sections 3503, 3503.5, and 3513. The nests of the species with eggs or hatched young that do not have the mobility to safely leave the nest could be directly impacted by the removal of vegetation or indirectly impacted if the adults abandon an active nest. According to the MBTA, no construction or other disturbing activities can occur within 300 feet of an active bird nest (500 feet for listed species) from February to September each year. Thus, absent mitigation, **potentially significant impacts (Impact BIO-1)** could occur if vegetation clearing is undertaken during the breeding season. Implementation of Mitigation Measure (MM-)BIO-1, Nesting Bird Avoidance, would reduce impacts to nesting birds.

### 2. *Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?*

The project site consists of ornamental, non-native grassland, and paved roadways. As discussed previously, the project site does not support any native vegetation communities and the area appears to be regularly maintained,

which limits the potential for many native plant species. No sensitive communities or riparian habitat occur on the project site (Appendix C1) and the project would not impact these habitats. The loss of non-native grassland on the project site would not be significant impact either locally or regionally. The USFWS identifies a few areas to the north and east of the project site which could support riparian habitat, notably associated with Bailey Canyon (USFWS 2020), but development would be limited to the project site. Figure 3-9 of the DEIR indicates the fuel modification would not impact any adjacent natural habitats. Although fuel modification areas (FMA) proposed may extend slightly beyond the project site, as shown in Figure 3-9, the FMAs would not impact any adjacent natural habitats. However, due to the presence of riparian habitat north and east of the project site, associated with Bailey Canyon, impacts to riparian habitat associated with the proposed project could occur if invasive species are placed onsite. Therefore, impacts would be **potentially significant (Impact BIO-2)**. Mitigation measure **MM-BIO-2**, which prohibits the use of invasive species in the project's landscaping plan, would be implemented reduce impacts to nearby riparian habitat.

**3. *Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?***

The project site consists of maintained areas of ornamental, non-native grassland, and paved roadways. No wetlands or other jurisdictional waters were observed on the project site (USFWS 2020). Additionally, no wetland or riparian features have been previously identified (Appendix C1). As such, no direct impacts would occur to jurisdictional wetlands or non-wetland waters due to the implementation of the proposed project. However, the project site is adjacent to wetlands and riparian features across the roadways which separate the project site from Bailey Canyon Wilderness Park (USFWS 2020). Due to the proximity of jurisdictional wetlands and waters, potential temporary indirect significant impacts could occur from construction activities resulting from accidental incursion into the areas, generation of fugitive dust, and introduction of chemical pollutants (including herbicides). Excessive dust can decrease the vigor and productivity of vegetation through effects on light, penetration, photosynthesis, respiration, transpiration, increased penetration of phytotoxic gaseous pollutants, and increased incidence of pests and diseases. Erosion and chemical pollution (releases of fuel, oil, lubricants, paints, release agents, and other construction materials) may affect wetlands/jurisdictional waters. The release of chemical pollutants can reduce the water quality downstream and degrade adjacent habitats. As discussed further in Section 4.10, Hydrology and Water Quality, of this EIR, erosion-control measures would be implemented during construction as part of the Storm Water Pollution Prevention Plan for the project. Prior to the start of construction activities, the contractor is required to file a Notice of Intent with the State Water Resources Control Board to obtain coverage under the National Pollutant Discharge Elimination System General Permit for Storm Water Discharges Associated with the Construction and Land Disturbance Activities (Order No 2009-009-DWQ, NPDES No. CAS000002) or the latest approved general permit. This permit is required for earthwork that result in the disturbance of 1 acre or more of total land area, unless it is part of a larger plan of development. The required Storm Water Pollution Prevention Plan will mandate the implementation of best management practices to reduce or eliminate construction-related pollutants in the runoff, including sediment. With compliance with existing regulations, temporary indirect impacts to wetlands would be reduced. However, due to the presence of jurisdictional waters north and east of the project site, associated with Bailey Canyon, impacts to riparian habitat associated with the proposed project could occur if invasive species are placed onsite. Therefore, impacts would be **potentially significant (Impact BIO-3)**. Mitigation measure **MM-BIO-2**, which prohibits the use of invasive species in the project's landscaping plan, would be implemented reduce impacts to nearby wetlands/jurisdictional waters~~riparian habitat~~.

**4. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?**

The project site is located within 460 feet of the base of the San Gabriel Mountains, which is a large undeveloped area that supports large terrestrial wildlife capable of movement over large distances. However, the project site is surrounded by residential development to the west and south, the fenced retention basin to the west, and the Mater Dolorosa Retreat Center to the north. Wildlife that may have localized movement within and through the project site, such as mule deer, were observed grazing within the northern portion of the site and within the adjacent Mater Dolorosa Retreat Center, and, it is expected that the mule deer would also use the foothills to the north of the Mater Dolorosa Retreat Center. However, there is no wildlife corridor connection or habitat linkage to other large undeveloped areas to the south of the project site. Wildlife, such as black bear (*Ursus americanus*) and mountain lion, entering the existing residential areas would be at a higher risk of negative interactions with humans (Appendix C1). However, as discussed under Threshold 1, above, since the project is not expected to support natal dens and it is not a part of a wildlife corridor, impacts to bear and mountain lion interactions would not occur. In addition, as discussed under Threshold 2, above, the project site has vegetation that could provide nesting habitat for birds protected under the MBTA (16 USC 703–712) and California Fish and Game Code Sections 3503, 3503.5, and 3513. Thus, **potentially significant impacts (Impact BIO-1)** to nesting birds could occur if vegetation clearing is undertaken during the breeding season. Implementation of **MM-BIO-1**, Nesting Bird Avoidance, would be implemented to reduce the impacts to nesting birds.

**5. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?**

The project is in compliance with the City's General Plan since it will not remove high quality wildlife habitat, thus it will have a limited impact on resident wildlife, consistent with Goals 1 of Chapter 2, Section 2 of the General Plan. Additionally, the project will not impact any wildlife corridors; therefore, no wildlife passages would be affected, consistent with Policy R5.2. The use of spiked iron fencing is not part of the project design, consistent with Policy R5.2. As such, the project would be consistent with these policies in the City's General Plan. In addition, the City's Community Forest Management Plan incorporates goals including the continuation and enhancement of the tree canopy within the City; promoting increased shade-tree canopy for energy conservation, storm water capture, and improved air quality; and applying best management practices for planting, maintaining, and responding to changed environmental conditions in the community forest. Although various trees would be removed under the proposed project, the project would introduce new trees throughout the site, within the proposed public park, along proposed streets, and within the open space located in the northern portion of the project (see Figure 3-5, Conceptual Landscape Plan). Therefore, with implementation of the project's landscape plan, the project would be consistent with the goals outlined in the Community Forest Management Plan. Per **MM-BIO-3**, Protected Tree Replacement, the project would be required to replace existing protected trees on-site on a 1:1 ratio.

The City's Tree Preservation and Protection Ordinance protects California scrub oak (*Quercus berberidifolia*), coast live oak (*Quercus agrifolia*), coastal scrub oak (*Quercus dumosa*), Engelmann oak (*Quercus engelmannii*), Southern California black walnut (*Juglans californica*), and western sycamore (*Platanus racemosa*) as well as any tree on City-owned property. The City's Tree Preservation and Protection Ordinance provides a permitting process for the removal of these protected trees that includes mitigation in the form of replacement trees in accordance with the guidelines described in Section 4.4.2, Relevant Plans, Policies, and Ordinances.

~~Ten-Eleven~~ coast live oak trees, of which ten are protected under the Tree Preservation and Protection Ordinance, were observed during the survey and a tree inventory report was conducted for the project site. In addition, the 16 trees inventoried in the off-site improvement area meet the City's criteria for a protected tree as they are located on City-owned property within Bailey Canyon Wilderness park (Appendix C2). As mentioned in Section 4.4.2, ~~101~~ 117 trees were inventoried within the project site, including 10 protected coast live oak (*Quercus agrifolia*) trees. It is possible that some trees would be preserved at the project site. However, to provide a conservative analysis, it has been assumed that all ~~101-105~~ trees, ~~10-14~~ of which are protected trees by the City Tree Preservation and Protection Ordinance, would be removed as part of the project. ~~All 10~~ protected trees meet the City's criteria for a protected oak tree while 4 trees are protected trees on City-owned property, based on the City's Tree Preservation and Protection Ordinance. In addition, 10 trees located within the off-site improvement area will have direct impacts associated with the proposed widening of Carter Avenue, as construction is anticipated within the tree protection zone. According to the Ordinance, any protected tree located on the project site that requires removal must be replaced on a one-to-one basis with a like species. The City's Tree Preservation and Protection Ordinance identifies tree replacement requirements for tree removal associated with a development project, such as the proposed project. Thus, due to removal of ~~10-14~~ protected trees on-site and direct impacts 10 additional trees, the project would result in **potentially significant impacts (Impact BIO-34)**. Implementation of **MM-BIO-3**, Protected Tree Replacement, would be implemented to reduce the impacts to the City's protected trees to less than significant by requiring the 1:1 replacement of those protected trees impacted by development and conducting a 5 year monitoring program to ensure their continued viability as well as requiring an arborist to be present on-site during the proposed widening of Carter Avenue.

**6. *Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?***

The project site is not located within any habitat conservation plan, natural community conservation plan, or other conservation plans (Appendix C1). As such, the project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. **No impact** would occur.

#### 4.4.6 Mitigation Measures

The following mitigation measures shall be implemented during and prior to project construction in order to reduce potential project-related impacts to biological resources to a less-than-significant level.

**MM-BIO-1 Nesting Bird Avoidance.** Initiation of construction activities (i.e., initial vegetation clearing) should avoid the migratory bird nesting season (~~February-January 1~~ through ~~August-September 31~~), to reduce any potential significant impact to birds that may be nesting on the project site. If construction activities must be initiated during the migratory bird-nesting season, an avian nesting survey of the project site and contiguous habitat within 500 feet of all impact areas must be conducted for protected migratory birds and active nests. The avian nesting survey shall be performed by a qualified wildlife biologist within 72 hours prior to the start of construction in accordance with the Migratory Bird Treaty Act and California Fish and Game Code.

If an active bird nest is found, the nest shall be flagged and mapped on the construction plans along with an appropriate no disturbance buffer, which shall be determined by the biologist based on the species' sensitivity to disturbance (typically 50 feet for common, urban-adapted species,

300 feet for other passerine species, and 500 feet for raptors and special-status species). The nest area shall be avoided until the nest is vacated and the juveniles have fledged. The nest area shall be demarcated in the field with flagging and stakes or construction fencing. A qualified biologist (with the ability to stop work) shall serve as a construction monitor during those periods when construction activities will occur near active nest areas to ensure that no inadvertent impacts on these nests occur.

**MM-BIO-2** **Invasive Species.** The use of invasive plant species listed in the California Invasive Plant Council's Inventory as having a rating of Limited, Moderate, or High shall not be allowed for landscaping purposes.

**MM-BIO-3** **Protected Tree Replacement.** The City's Tree Preservation and Protection Ordinance (Chapter 12.20) identifies tree replacement requirements for tree removal associated with a development project. In total, ten protected trees may be removed. As such, they shall be replaced at a minimum with a 24-inch box tree, on a 1:1 basis with a like species. The specific location of individual mitigation tree plantings on site would be addressed in the mitigation planting plan or landscape design plan prepared for the site.

In addition, all mitigation tree plantings shall be subject to a 5-year monitoring effort by an independent third-party certified arborist. The monitoring effort shall consider growth, health, and condition of the subject trees to evaluate success. The monitoring effort may result in a recommendation of remedial actions, such as replacing trees that are not thriving, should any of the tree plantings exhibit poor or declining health. In addition, because the project will have direct impacts to trees, an arborist would be required to be present on-site during the proposed widening of Carter Avenue, per the City's Tree Preservation and Protection Ordinance.

### 4.4.7 Level of Significance After Mitigation

All impacts (**Impact BIO-1, Impact BIO-2, and Impact BIO-3, and Impact BIO-4**) were determined to be **less than significant** after the incorporation of **MM-BIO-1** through **MM-BIO-3**.

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SOURCE: County of Los Angeles 2020; Bing Maps

**FIGURE 4.4-1**  
**Vegetation and Land Cover Map**  
 The Meadows at Bailey Canyon EIR

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## 4.5 Cultural Resources

This section describes the existing cultural resources conditions of The Meadows at Bailey Canyon Specific Plan Project (project or proposed project) site and vicinity, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures related to implementation of the proposed project. A Historical Resources Technical Report and an Archaeological Resources Assessment were prepared for the proposed project by Dudek in November 2020. These reports are included as Appendices D1 and D2 of this EIR, respectively.

### 4.5.1 Existing Conditions

#### 4.5.1.1 Project Site and Surrounding Area

The proposed project site is currently undeveloped and no structures are present on site. However, the Mater Dolorosa Retreat Center borders the project site to the north and the project site is being acquired from the Mater Dolorosa Retreat Center. Therefore, because of the project's proximity to the Mater Dolorosa Retreat Center and its association with the adjacent institutional use, a historical evaluation of the Mater Dolorosa Retreat Center is provided.

#### 4.5.1.2 Historical Resources

##### 4.5.1.2.1 Background Research

##### **CHRIS Records Search**

A California Historical Resources Information System (CHRIS) records search was completed by South Central Coastal Information Center (SCCIC) staff for the project site and a 1-mile records search buffer on June 9, 2020. This search included the SCCIC's collections of mapped prehistoric, historic, and built environment resources, Department of Parks and Recreation Site Records, technical reports, and ethnographic references. Additional consulted sources included historical maps of the project Site, the California Register of Historical Resources (CRHR), the California Historic Property Data File, the lists of California State Historical Landmarks, California Points of Historical Interest, and the Archaeological Determinations of Eligibility. Dudek reviewed the SCCIC records to determine whether implementation of the proposed project would have the potential to impact known and unknown cultural resources (Appendix D1).

No previously conducted cultural resources studies or previously recorded resources were identified within the project site. A total of 17 previously conducted cultural resources studies and 56 previously recorded resources were identified within 1 mile of the project site. None of these studies or resources are relevant to the built environment within the current project site. Full records search results are included in Appendix D2.

##### **Previous Evaluations of the Mater Dolorosa Retreat Center Property**

In 1992, the Mater Dolorosa Monastery building, located directly to the north of the site, was nominated by the Sierra Madre Historic Preservation Society and concerned neighbor group "Friends of the Monastery" as a City of Sierra Madre Cultural Landmark. However, this nomination was rejected by the City Council in July 1992 (Appendix D1). Dudek reached out to the Sierra Madre Historic Preservation Society and to an archivist at the City of Sierra

Madre Library. However, neither repository retained a copy of the original nomination. A Public Records Act request was sent to the City of Sierra Madre on November 12, 2020, to obtain this document or the City Council meeting report regarding the decision of eligibility, but no response has been received to-date.

According to newspapers, the justification for nomination was “The building (monastery) is at least 50 years old having been built in 1931 and dedicated a year later. It was constructed by a former mayor William J. Schiltz who also built St. Rita’s Church. The Monastery was built at the height of the depression and served as employment for Sierra Madreans. During World War II, in 1943, the building was used as a U.S. Army Recuperation hospital. It is one of the ultimate landmarks of Sierra Madre and can be seen from four freeways. It was designed by a priest, Father Edmund Walsh and can be retrofitted at much less cost” (Appendix D1). It should be noted that the Mater Dolorosa Retreat Center is on the same parcel as the project site, which is currently split within three different lots; however, a lot line adjustment would be processed to consolidate the two lots that make up the project site into one and adjust the site’s northern boundary further to the north. The Mater Dolorosa Retreat Center is not a part of the project site and no changes in use are proposed.

### **Building Development and Archival Research**

Building development and archival research were conducted for the project site and the adjacent Mater Dolorosa Retreat Center in an effort to establish a thorough and accurate historic context for the significance evaluations, and to confirm the building development history of the project site, the adjacent Mater Dolorosa Retreat Center, and associated parcels.

#### ***Mater Dolorosa Retreat Center***

On October 20, 2020, Dudek met with Michael Cunningham, Janet Salinsky, and Brother John Rockenbach (one of the Passionist brothers) for a brief docent tour and to share research materials and historical photographs. Mater Dolorosa staff reviewed building construction dates, interior and exterior alterations, building uses, and daily operations for the visiting Dudek staff. After the visit, Michael Cunningham emailed additional photographs, newspaper articles, and historical documentation of the Mater Dolorosa Retreat Center property.

#### ***Los Angeles County Office of the Assessor***

On November 3, 2020, Dudek researched property records for the Mater Dolorosa Retreat Center property to establish dates of construction.

#### ***Historical Newspaper Search***

Dudek reviewed historical newspapers covering the City and overall County of Los Angeles in an effort to understand the development of the project site. All information obtained from the historical newspaper search was incorporated into the historic context.

#### ***Sanborn Fire Insurance Maps***

Sanborn Fire Insurance Maps were reviewed for the City for the years 1887, 1888, 1889, 1890, 1908, 1927, and the 1941 update. However, the Mater Dolorosa Retreat Center, which includes the project site, is excluded from all maps.

### Historical Aerial Photographs

A review of historical aerial photographs was conducted as part of the archival research effort from the following years: 1928, 1933, 1938, 1944, 1953, 1954, 1956, 1960, 1964, 1972, 1976, 1977, 1978, 1980, 1981, 1982, 1983, 1994, 2002, 2003, 2005, 2009, 2010, 2012, 2014, and 2016. Table 4.5-1 discusses the development of the areas surrounding the project site (Appendix D1).

**Table 4.5-1. Historical Aerial Photograph Review of Project Site and Surrounding Area**

Photograph Year	Observations and Findings
1928	In the oldest available aerial photograph, the outline and general layout of the Mater Dolorosa Passionist Retreat Center property, which includes the project site, is visible. A large orchard dominates the northeast and northwest corners of the property, which abut the foothills to the north. Two intertwined entry roads provide access to the property from the southeast corner. There are multiple buildings present at the property, but the church and monastery building in the upper center portion of the property have not yet been constructed.
1933	By 1933, the Monastery building (1931), a distinctive, slightly curving C-plan building appears in the center of the property. A small lawn and fountain area appear just south of the new building. Two other small buildings appear on the property, just north of the new building, as well as a rectangular water feature/pond northwest of the building. Orchard groves are still present in the northeast and northwest corners of the property, and the site access is still from the southeast corner of the property.
1938	By 1938, the road and oval drive on the south side of the Monastery building appears to have been paved. One small L-plan building appears just east and across the access road from the Monastery building. The orchards and pond in the northern portion of the parcel are still present. Additionally, the southern portion of the parcel also appears under cultivation, with several different fields and unpaved roads leading to the southern edge of the parcel. A large firebreak is also visible north of the parcel.
1944	By 1944, the oval drive has been removed and replaced with a large lawn and footpaths. A square formal garden with a fountain appears southeast of the Monastery building. The cultivated fields in the southern portion of the property appear to have consolidated into fewer, larger fields and a single road leading south from the Monastery building. The orchards in the northern part of the parcel appear more mature and expand inward toward the center of the property. The firebreak north of the parcel appears much wider and several earthen terraces are visible above that, likely for soil erosion control. West of the property is a large, graded area.
1953	By 1953, the biggest change to the Mater Dolorosa Retreat Center is the construction of the large, T-plan Retreat Center building (which is a part of the Mater Dolorosa Retreat Center) north of the Monastery building. This involved the demolition of a portion of the northeastern orchards, of which only a small square plot remained. The southern portion of the property appears to no longer be under cultivation and appears to be either a lawn or fallow. The Hastings Ranch housing subdivision north of Alegria Avenue appears to be nearly complete. East of the Mater Dolorosa Retreat Center the earthen Bailey Canyon Dam appears for the first time.
1954	By 1954, a second access road (North Sunnyside Avenue) in the southwest portion of the property now leads to the Monastery building. More tree plantings appear just south of the Monastery building.

Table 4.5-1. Historical Aerial Photograph Review of Project Site and Surrounding Area

Photograph Year	Observations and Findings
1956	Two new buildings appear: one small building east of the Mater Dolorosa Retreat Center building in the northeast corner of the property, and a second larger rectangular plan building appears southeast of the Monastery building, along the southeast access drive. The area between the Monastery building and Mater Dolorosa Retreat Center building appears to be planted with lawns, trees, and some paths through the area appear to be formalized. Some tree plantings appear along the new southwest access drive. The northeastern edge of the Hastings Ranch housing development, previously only located north of Alegria Avenue and south of the project site, appears to now encroach along the western edge of the property. Similarly, to the south, several smaller scale housing developments appear to encroach at the southern parcel boundary between Fairview Avenue and Carter Avenue.
1960	No discernable changes.
1964	The small building east of the Mater Dolorosa Retreat Center building appears to have been demolished and the area converted to a wide lawn.
1972	No discernable changes at the Mater Dolorosa Retreat Center. South of the Mater Dolorosa Retreat Center the last remaining undeveloped property appears to have been converted to a single-family housing subdivision (Kinneloa Terrace).
1976	No discernable changes.
1977	No discernable changes.
1978	No discernable changes.
1980	No discernable changes.
1981	No discernable changes.
1982	No discernable changes.
1983	No discernable changes.
1994	The Monastery building appears to have been demolished and removed from the property. The features surrounding the demolished building remain: the driveway, square plan garden and fountain, and plantings. A large, L-plan addition has been made to the eastern portion of the Mater Dolorosa Retreat Center building, extending into the lawn on that side of the property, and removing the remaining orchard and replacing it with a parking lot. North Sunnyside Avenue, the western drive, appears to be the main access road for the property.
2002	Three new gardens appear in the former building footprint for the Monastery building, one amphitheater with plantings, one cross-shaped garden, and one round garden. The original square plan garden has been removed.
2003	The rectangular building on the eastern entrance drive appears to have been removed.
2005	A new asphalt parking lot appears near the northwestern orchard, along the Sunnyside Avenue access road.
2009	No discernable changes.
2010	The 2005 parking lot has been removed and now appears to be a large lawn. A small terraced garden appears just east of it with a pergola shelter.
2012	No discernable changes.
2014	No discernable changes.
2016	The Stations of the Cross garden appears to be under construction

Source: Appendix D1

## 4.5.1.2.2 Cultural Setting

**Historic Period Overview**

Post-Contact history for the State of California is generally divided into three periods: the Spanish Period (1769–1821), Mexican Period (1821–1848), and American Period (1846–present). Although Spanish, Russian, and British explorers visited the area for brief periods between 1529 and 1769, the Spanish Period in California begins with the establishment in 1769 of a settlement in San Diego and the founding of Mission San Diego de Alcalá, the first of 21 missions constructed between 1769 and 1823. Independence from Spain in 1821 marks the beginning of the Mexican Period, and the signing of the Treaty of Guadalupe Hidalgo in 1848, ending the Mexican–American War, signals the beginning of the American Period when California became a territory of the United States. Additional information about the Spanish Period, Mexican Period, and American Period is provided in Appendix D1. Appendix D1 also provides a historical overview of the City.

**Passionist Order and Development History of Mater Dolorosa**

The Mater Dolorosa Retreat Center is operated by the Passionist Order of the Roman Catholic Church. Additional information about the Passionist Order and their religious symbolism is provided in Appendix D1.

In 1923, Bishop John Joseph Cantwell of Los Angeles invited the Passionist order to Southern California. They were placed at St. Rita’s in Sierra Madre in September of the same year and began seeking a permanent home for a monastery and retreat center. In 1924, the Passionists at St. Rita’s purchased the Mater Dolorosa property and began plans to build a monastery there. At the time the property was acquired, there was a single farmhouse, a pair of natural springs, and several large olive orchards. At this time, the property was temporarily called “Mount Olive” due in part to the olive groves that dominated the site historically (Appendix D1).

It was not until 1931 that construction of the Monastery building began. The Monastery building was a traditional-style monastery with belltower, outdoor pulpit, a private chapel, a public chapel, 35 dormitory cells for priests, brothers, and novitiates, kitchens, a walled cloister, and patio. The designer of the building was Father Edmund Walsh who used a traditional “monastic floor plan” and “imposing Spanish design” (Appendix D1), and the general contractor was William J. Schlitz, a Sierra Madre local and active participant in the church. In addition to building the monastery, Schlitz donated materials, sculptures, and built several of the original stations of the cross near the monastery. In 1933, Schlitz also razed the old farmhouse building on the property, which the priests and brothers had been living in before the monastery was completed (Appendix D1).

The monastery officially opened in 1932 and the first services were held that spring, followed closely by the first retreat in May. In 1934, as the property continued to expand, a “service quarters” building was added to the property. The building included a two-story house with a garage, tool shed, gas and oil pumps, apartments for the four employees, and a lath house for growing plants used at the property. Other small art pieces that were incorporated into the Mater Dolorosa Retreat Center Chapel and Monastery grounds included paintings, triptychs, and statutes that were received over time. A walled garden adorned with Stations of the Cross plaques was eventually added by 1936 (Appendix D1).

During the early 1940s, the Passionists offered recuperative retreats for returning military service members as their popularity grew. By 1947, the Passionists decided the 1932 monastery was no longer sufficient for their needs and a new building was needed. To raise funds, the Passionists at Mater Dolorosa and the Mater Dolorosa Laymen’s League held their first, annual Family Fiesta. To support the annual Family Fiesta, several large flat terraces were

erected south of the Monastery building for rides and food tents. Though originally started to fund construction, the Family Fiesta tradition continue for more than 70 years. Construction on the Mater Dolorosa Retreat Center building began in 1949. The new building featured individual bathrooms for 78 private rooms, a new dining room and kitchen, a library, new public chapel, and several conference room/meeting halls. The new Mater Dolorosa Retreat Center was completed in May 1950 (Appendix D1).

To further honor the new Mater Dolorosa Retreat Center building and the Mater Dolorosa property, in 1950 William J. Schlitz, the original general contractor who built the Monastery building, began an ambitious stone masonry project creating 14 shrines for the Stations of the Cross using local and foreign stones, concrete, wood, cement block, petrified wood, marble, and other materials. The shrines would create homes for the bas relief panels and statues depicting the 14 Stations of the Cross and was located in the olive grove between the Monastery and new Mater Dolorosa Retreat Center buildings. Schlitz completed each station individually, completing the final station of his project in 1962 (Appendix D1).

In 1983, the Mater Dolorosa Advisory Committee was formed and agreed to expand the Mater Dolorosa Retreat Center. This group raised the money and in 1985, the Father Isadore O'Reilly Wing addition to the Mater Dolorosa Retreat Center building was dedicated. The new addition on the east end of the Mater Dolorosa Retreat Center added several conference rooms, offices, and for the first time, double rooms for couples' retreats. However, instead of alleviating pressure from demand, the expansion prompted more schools, parish groups, and others requested to use the facility more often (Appendix D1).

The 1987 Whittier Earthquake and more acutely the 1991 Sierra Madre Earthquake, 5.8 magnitude, drastically damaged the Monastery building. The 15 brothers and priests living in the Monastery building had to leave and took up residences in a nearby Assumption Church convent in Pasadena. Initially, the Sierra Madre community was divided about demolishing the damaged Monastery. In 1992, the Mater Dolorosa Advisory Committee and remaining brothers and priests applied for permits to raze the Monastery, citing dwindling Passionist enrollment and the high cost of restoration and earthquake retrofitting. Proponents of preserving and retrofitting the building, including the City's Cultural Heritage Commission, argued it could be reused as a school or retirement home, and attempted to add it to the City of Sierra Madre's Cultural Landmark Register, but this was ultimately rejected by the City Council in July 1992, and a demolition permit was awarded, and the Monastery building was razed in April 1993. Followed by the removal of the original walled garden south of the Monastery building in 1995 (Appendix D1).

New gardens including the Garden of Seven Sorrows, Sacred Heart Plaza, and the amphitheater were built on the old Monastery foundations by 1999. Construction of these three gardens not only added new contemplative spaces and landscaping elements to the Mater Dolorosa Retreat Center, but also reused existing circulation and paths meant for accessing the Monastery building. The redesigned landscape allowed contemplative spaces and trails to move from the area south of the Mater Dolorosa Retreat Center and north of the now-demolished Monastery, to anywhere south of the Mater Dolorosa Retreat Center (Appendix D1).

In 2002, more renovations to the Mater Dolorosa Retreat Center introduced another conference room as well as major renovations to the chapel interior. Chapel changes included the reversal of the room orientation 180 degrees, to move the entrance to the north side and the sacristy to the south side. More recently the Stations of the Cross sculptures and grottos were refurbished for their 40<sup>th</sup> anniversary in 2016. Just a year later, a new garden space in the old olive grove was added, called the Garden of Gethsemane, situated among the shrines for the Stations of the Cross (Appendix D1).

### 4.5.1.2.3 Field Survey

#### Methods

Dudek Senior Architectural Historian Sarah Corder, MFA, and Architectural Historian Kate Kaiser, MSHP, conducted a pedestrian survey of the Mater Dolorosa Retreat Center property (which includes the project site) for historic built environment resources on October 20, 2020. The survey entailed walking the exteriors and interiors of the Mater Dolorosa Retreat Center buildings, documenting each building and landscape structure with notes and photographs, specifically noting character-defining features, spatial relationships, paths of circulation, historic landscape features, and observed alterations. Dudek documented the fieldwork using field notes, digital photography, close-scale field maps, and aerial photographs. Photographs of the Mater Dolorosa Retreat Center, which includes the project site, were taken with a digital camera. All field notes, photographs, and records related to the current study are on file at Dudek’s Pasadena, California, office (Appendix D1).

#### Results

One property over 45 years old, the Mater Dolorosa Retreat Center, was identified as a result of the pedestrian survey. The property contains four buildings and seventeen structures over 45 years old requiring recordation and evaluation for historical significance: the Mater Dolorosa Retreat Center (1951), Staff House (1934), Fiesta Terrace restrooms (circa 1947), Fiesta Terrace kitchen and freezers (circa 1947), the Mater Dolorosa Grotto (circa 1930), stone stairwells and stone-lined paths (circa 1930–1950), the Sunnyside Avenue gate (circa 1947), and the 14 Stations of the Cross shrines (1950–1962). Five modern structures are less than 45 years old, but are included as well, as they are large components of the property. Each of these buildings and structures are depicted in Figure 4.5-1, Site Map. Appendix D1 provides a detailed physical description of the property and its major features.

### 4.5.1.3 Archaeological Resources

#### 4.5.1.3.1 Background Research

##### CHRIS Records Search

As discussed in Section 4.5.1.2.1, Background Research, a CHRIS records search was completed by SCCIC staff for the project site and a 1-mile records search buffer on June 9, 2020. This search included a review of archaeological resources in addition to the historical resources previously discussed. Dudek reviewed the SCCIC records to determine whether implementation of the proposed project would have the potential to impact known and unknown cultural resources (Appendix D2).

##### Previously Recorded Cultural Resources

As discussed in Section 4.5.1.2.1, the SCCIC records indicate that 17 previous cultural resource studies have been conducted within the records search area between 1993 and 2016. However, none of these studies are mapped as overlapping/intersecting the Mater Dolorosa Retreat Center, which includes the project site. Additionally, the SCCIC records indicate that 56 previously recorded cultural resources are located within the records search area. Of these, two resources are historic-period sites and the remaining 54 are historic built environment resources. None of the resources are located within the project site. A list of these previous technical studies is included in Appendix D2. Table 4.5-2 summarizes the two historic-period sites identified within the records search area (Appendix D2).

**Table 4.5-2. Previously Recorded Cultural Resources Within a 1-Mile Radius of the Proposed Project Site – Archaeological Resources**

Primary Number (P-19-)	Trinomial (CA-LAN-)	Description	Recording Events	NRHP Status Code	Proximity to Proposed Project Site
186535	—	Historic Site: The Angeles National Forest	1982 (Gray Reynolds); 1979 (Jim Arbuckle); 1974 (G. Smith and T. Suss); 1959 (E. Fraisher)	1: Listed on the CR	Approximately 2460 feet north of proposed project site
187821	—	Historic Site: Historic Mount Wilson Trail; 7.5 miles in length.	2006 (K. Brasket and D. Peebles)	7: Not evaluated	Approximately 3940 feet east of proposed project site

Source: Appendix D2

### Review of Historical Topographical Maps and Aerial Photographs

Dudek consulted historical topographic maps and aerial photographs through the Nationwide Environmental Title Research LLC (NETR) and the University of California, Santa Barbara’s Map and Imagery Laboratory (UCSB MIL) to better understand any modern human-made changes to the project site and surrounding properties over time. Additional aerial photographic information for the years not available through NETR or UCSB MIL were gleaned from the Phase I and II Environmental Site Assessment Report prepared by Stantec Consulting Services Inc. (Stantec) for the proposed project (Appendix F1). The review of aerial photographs was previously discussed in Section 4.5.1.2.1 and Table 4.5-1. Historical topographic maps reviewed are available for the years 1894 through 2018. A discussion of the topographical map review is provided in Appendix D2.

### NAHC Sacred Lands File Search

As part of the process of identifying cultural resources within or near the proposed project, Dudek contacted the Native American Heritage Commission (NAHC) on October 6, 2020, to request a review of the Sacred Lands File (SLF). The NAHC replied via email on October 8, 2020, stating that the SLF search was completed with negative results. Because the SLF search does not include an exhaustive list of Native American cultural resources, the NAHC provided a list of eight Native American individuals that should be contacted for more information on potential tribal sensitivities regarding the proposed project. In compliance with Assembly Bill (AB) 52 and Senate Bill (SB) 18, the City has contacted all NAHC-listed traditionally geographically affiliated tribal representatives that have requested project notification. Documents related to the NAHC SLF search are included in Appendix D2 and an analysis of potential impacts to tribal cultural resources is provided in Section 4.18, Tribal Cultural Resources, in this EIR.

#### 4.5.1.3.2 Field Survey

##### Methods

The intensive-level survey methods consisted of a pedestrian survey conducted in parallel transects, spaced no more than 15 meters apart (approximately 50 feet), over the entire proposed project site, from east to west. Deviations from transects only occurred in areas containing steep slopes, dense vegetation, or impassible natural features. The ground surface was inspected for prehistoric artifacts (e.g., flaked stone tools, tool-making debris, groundstone tools, ceramics, fire-affected rock), soil discoloration that might indicate the presence of a cultural



midden, soil depressions, features indicative of structures and/or buildings (e.g., standing exterior walls, post holes, foundations), and historical artifacts (e.g., metal, glass, ceramics, building materials). Ground disturbances such as burrows, cut banks, and drainages were also visually inspected for exposed subsurface materials. No artifacts were collected during the survey (Appendix D2).

All fieldwork was documented using field notes and an Apple Generation 6 iPad (iPad) equipped with ESRI Collector and Avenza PDF Maps software with close-scale georeferenced field maps of the proposed project site, and aerial photographs. Location-specific photographs were taken using the iPad's 8-mega-pixel resolution camera. All field notes, photographs, and records related to the current study are on file at Dudek's Pasadena, California office. All field practices met the Secretary of Interior's standards and guidelines for a cultural resources inventory (Appendix D2).

### Results

The intensive-level archaeological survey of the project site was conducted October 30, 2020, by Dudek archaeologist, Linda Kry. Ground visibility throughout the proposed project site was generally good (80%–90%). The site generally slopes south and includes terraces immediately south of the Mater Dolorosa Retreat Center. Soils within the project site are consistent with soils defined by the United States Department of Agriculture. The project site is generally undeveloped with ornamental trees (approximately 10%) and landscaped areas, concrete retaining walls along the northern perimeter of the site, including access roads through the site lined with rocks. A portion of the northeast area of the project site, immediately south of the staff house and garage associated with the Mater Dolorosa Retreat Center, was partially covered on the surface with gravel. Visible disturbances to the project site include site maintenance activities and activities associated with the Mater Dolorosa Retreat Center. Additionally, the landscape has an undulating terrain, with bioturbation activities throughout (Appendix D2). Photographs taken during the archaeological field survey are provided in Appendix D2.

The intensive-level archaeological survey resulted in the identification of widely dispersed cultural material on the surface of the site. The materials observed included both historic-period and modern items within a disturbed context, in other words, displaced from the original deposited location, which may be attributed to previous uses of the site for agricultural purposes, retreat activities, as well as site maintenance activities. Moreover, the northern portion of the project site included remnants of structural debris comprised of red brick and may represent the structural remains of the former Monastery. The archaeological survey did not identify in situ archaeological resources or features; however, the identification of surficial evidence of historic-period cultural material indicates that the project site has potential to support the presence of subsurface archaeological deposits (Appendix D2).

### 4.5.2 Relevant Plans, Policies, and Ordinances

#### Federal

There are no applicable federal regulations related to cultural resources.

#### State

##### *California Register of Historical Resources*

In California, the term "historical resource" includes but is not limited to "any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California"

(California Public Resources Code Section 5020.1[j]). In 1992, the California legislature established the CRHR “to be used by state and local agencies, private groups, and citizens to identify the state’s historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change” (California Public Resources Code Section 5024.1[a]). The criteria for listing resources on the CRHR were expressly developed to be in accordance with previously established criteria developed for listing in the National Register of Historic Places (NRHP), enumerated below. According to California Public Resources Code (PRC) Section 5024.1(c)(1–4), a resource is considered historically significant if it (i) retains “substantial integrity,” and (ii) meets at least one of the following criteria:

- (1) Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage.
- (2) Is associated with the lives of persons important in our past.
- (3) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
- (4) Has yielded, or may be likely to yield, information important in prehistory or history.

In order to understand the historic importance of a resource, sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource. A resource less than 50 years old may be considered for listing in the CRHR if it can be demonstrated that sufficient time has passed to understand its historical importance (see 14 CCR 4852[d][2]).

The CRHR protects cultural resources by requiring evaluations of the significance of prehistoric and historic resources. The criteria for the CRHR are nearly identical to those for the NRHP, and properties listed or formally designated as eligible for listing in the NRHP are automatically listed in the CRHR, as are the state landmarks and points of interest. The CRHR also includes properties designated under local ordinances or identified through local historical resource surveys.

### ***California Environmental Quality Act***

As described further below, the following CEQA statutes and CEQA Guidelines are of relevance to the analysis of archaeological, historic, and tribal cultural resources:

- California Public Resources Code Section 21083.2(g) defines “unique archaeological resource.”
- California Public Resources Code Section 21084.1 and CEQA Guidelines Section 15064.5(a) define “historical resources.” In addition, CEQA Guidelines Section 15064.5(b) defines the phrase “substantial adverse change in the significance of an historical resource.” It also defines the circumstances when a project would materially impair the significance of an historical resource.
- California Public Resources Code Section 21074(a) defines “tribal cultural resources.”
- California Public Resources Code Section 5097.98 and CEQA Guidelines Section 15064.5(e) set forth standards and steps to be employed following the accidental discovery of human remains in any location other than a dedicated ceremony.
- California Public Resources Code Sections 21083.2(b)-(c) and CEQA Guidelines Section 15126.4 provide information regarding the mitigation framework for archaeological and historic resources, including examples of preservation-in-place mitigation measures; preservation-in-place is the preferred manner of mitigating impacts to significant archaeological sites because it maintains the relationship between artifacts and the archaeological context and may also help avoid conflict with religious or cultural values of groups associated with the archaeological site(s).

More specifically, under CEQA, a project may have a significant effect on the environment if it may cause “a substantial adverse change in the significance of an historical resource” (PRC Section 21084.1; CEQA Guidelines Section 15064.5[b]). If a site is either listed or eligible for listing in the CRHR, or if it is included in a local register of historic resources or identified as significant in a historical resources survey (meeting the requirements of PRC Section 5024.1[q]), it is a “historical resource” and is presumed to be historically or culturally significant for purposes of CEQA (PRC Section 21084.1; CEQA Guidelines Section 15064.5[a]). The lead agency is not precluded from determining that a resource is a historical resource even if it does not fall within this presumption (PRC Section 21084.1; CEQA Guidelines Section 15064.5[a]).

A “substantial adverse change in the significance of an historical resource” reflecting a significant effect under CEQA means “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired” (CEQA Guidelines Section 15064.5[b][1]; PRC Section 5020.1[q]). In turn, CEQA Guidelines section 15064.5(b)(2) states the significance of an historical resource is materially impaired when a project:

1. Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or
2. Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
3. Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

Pursuant to these sections, the CEQA inquiry begins with evaluating whether a project site contains any “historical resources,” then evaluates whether that project will cause a substantial adverse change in the significance of a historical resource such that the resource’s historical significance is materially impaired.

If it can be demonstrated that a project will cause damage to a unique archaeological resource, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. To the extent that they cannot be left undisturbed, mitigation measures are required (PRC Section 21083.2[a], [b], and [c]).

PRC Section 21083.2(g) defines a unique archaeological resource as an archaeological artifact, object, or site about which it can be clearly demonstrated that without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
2. Has a special and particular quality such as being the oldest of its type or the best available example of its type.
3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Impacts to non-unique archaeological resources are generally not considered a significant environmental impact (PRC Section 21083.2[a]; CEQA Guidelines Section 15064.5[c][4]). However, if a non-unique archaeological resource qualifies as tribal cultural resource (PRC Sections 21074[c] and 21083.2[h]), further consideration of significant impacts is required. CEQA Guidelines Section 15064.5 assigns special importance to human remains and specifies procedures to be used when Native American remains are discovered. As described below, these procedures are detailed in PRC Section 5097.98.

***California Health and Safety Code Section 7050.5***

California law protects Native American burials, skeletal remains, and associated grave goods, regardless of their antiquity, and provides for the sensitive treatment and disposition of those remains. California Health and Safety Code Section 7050.5 requires that if human remains are discovered in any place other than a dedicated cemetery, no further disturbance or excavation of the site or nearby area reasonably suspected to contain human remains shall occur until the county coroner has examined the remains (Section 7050.5[b]). PRC Section 5097.98 also outlines the process to be followed in the event that remains are discovered. If the coroner determines or has reason to believe the remains are those of a Native American, the coroner must contact NAHC within 24 hours (Section 7050.5[c]). NAHC will notify the “most likely descendant.” With the permission of the landowner, the most likely descendant may inspect the site of discovery. The inspection must be completed within 48 hours of notification of the most likely descendant by NAHC. The most likely descendant may recommend means of treating or disposing of, with appropriate dignity, the human remains, and items associated with Native Americans.

**Local**

***City of Sierra Madre Historic Preservation Ordinance (Chapter 17.82)***

This analysis was completed in consideration of all sections of the City of Sierra Madre Historic Preservation Ordinance (Chapter 17.82). Sections most relevant to this analysis are provided in the following discussion.

**17.82.020 - Purpose and Intent.**

The purpose of this Chapter is to specify significance criteria for the designation of historic resources, procedures for designation, and review procedures. The City Council determined:

- A. That the character and history of the city are reflected in its cultural, historical and architectural heritage;
- B. That these historic foundations should be preserved as living parts of community life and development to build an understanding of the city's past so that future generations may have a genuine opportunity to appreciate, enjoy and understand the rich heritage of the city;
- C. That the city's total number of public, commercial and residential structures is fewer than three thousand five hundred units, and that without diligent efforts to minimize the demolition and loss of the city's historical landmarks, the rich heritage of the city will be eroded over time;
- D. That pursuant to the provisions of the National Historic Preservation Act of 1966, as amended, the city of Sierra Madre, the state of California, and the United States Congress, to develop preservation programs and activities to give maximum encouragement to agencies and individuals undertaking preservation of the city's unique architectural and historical heritage;
- E. Therefore, the purpose of this chapter is the protection, appreciation and preservation of the historic landmarks of the city through a partnership between the cultural heritage commission and the property

owners/residents, the business sector and the community at large to retain and protect those historic landmarks which preserve and enhance our small town atmosphere and:

1. To safeguard the city's unique historic heritage as embodied and reflected in the city's diverse architectural and cultural history,
2. To encourage and facilitate public knowledge, understanding and appreciation of the city's historic past and unique sense of place,
3. To foster civic and neighborhood pride and a sense of identity based on the recognition and use of historic resources,
4. To promote the enjoyment, celebration and use of historic resources appropriate for the education and recreation of the people of the city,
5. To preserve diverse architectural styles, patterns of development, and design preferences reflecting phases of the city's history and to encourage complementary contemporary design and construction and inspire a more livable environment,
6. To enhance property values and to increase economic and financial benefits to the city and its inhabitants through the exploration of creative financial incentives for preservation,
7. To protect and enhance the city's attraction to tourists and visitors thereby stimulating commerce,
8. To identify as early as possible and resolve conflicts between the preservation of historic landmarks and alternative land uses,
9. To integrate the preservation of historic landmarks into public and private land use management and development processes,
10. To conserve valuable material and energy resources by ongoing use and revitalization of the existing built environment,
11. To stabilize neighborhoods through the preservation of historic landmarks,
12. To encourage public awareness and participation in identifying and preserving historical and architectural landmarks, thereby increasing community pride in the city's historical heritage,
13. To identify and make available the economic benefits of preservation of historic resources to the city and its inhabitants,
14. To take all reasonable and necessary steps to safeguard the property rights of owners of properties which are subject to this chapter. (Ord. 1134 § 2 (part), 1997)

### **17.82.050 – Designation Criteria**

For the purposes of this chapter, an improvement, natural feature, or site may be designated a historic landmark by the city council upon a recommendation by the commission if it meets at least one of the following criteria (Ord. 1134 Section 2 (part), 1997):

- A. Historic. It was the site of, or is associated with local, state or national cultural, social, economic, political or natural history, events or persons significant to the history of Sierra Madre, or it reflects significant geographical patterns, including those associated with different eras of settlement and growth, particular transportation modes, or distinctive examples of park or community planning.
- B. Architectural. It is representative of the work or is one of a few remaining examples of a notable builder, designer or architect, or, it embodies distinctive characteristics of a style, type, period or method of construction, or, is a valuable example of architectural achievement or innovation such as the use of indigenous materials or craftsmanship..

***City of Sierra Madre General Plan***

The General Plan includes the following objectives and policies relevant to the proposed project with regard to cultural resources (City of Sierra Madre 2015). The proposed project’s consistency with these policies is provided in Table 4.11-1 in Section 4.11, Land Use and Planning.

**Chapter One: Land Use**

**Objective L46:** Identifying and encouraging the preservation of significant historic resources.

**Objective L47:** Preserving in the long-term significant architectural and historical landmarks and districts.

***Sierra Madre Municipal Code*****Chapter 17.82 – Historic Preservation**

Chapter 17.82 of the Sierra Madre Municipal Code contains the City’s Historic Preservation Ordinance. The purpose of this ordinance is to protect and preserve the historic landmarks of the City through a partnership between the cultural heritage commission and the property owners and residents, businesses, and community at large to retain and protect those historic landmarks which preserve and enhance the City. This ordinance contains designation criteria for identifying potential historic resources or historic landmarks within the City. Provisions for adaptive reuse of historic landmarks and de-designation are also provided in the City’s Historic Preservation Ordinance.

### 4.5.3 Thresholds of Significance

The significance criteria used to evaluate the project impacts to cultural resources are based on Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to cultural resources would occur if the project would:

1. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5.
2. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5.
3. Disturb any human remains, including those interred outside of dedicated cemeteries.

### 4.5.4 Project Design Features

There are no project design features that apply to cultural resources.

### 4.5.5 Impacts Analysis

**1. *Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?***

In order to determine if the proposed project would impact historical resources under CEQA, the Mater Dolorosa Retreat Center property, located at 700 North Sunnyside Avenue (APN 5761-002-008), was evaluated for historical significance and integrity in consideration of NRHP, CRHR, and City of Sierra Madre designation criteria and integrity requirements. The Mater Dolorosa Retreat Center contains four buildings, twenty structures, and multiple landscape elements including paths, trails, stairs, gardens, contemplative spaces, and historic aged trees. Each of these are described in detail in Appendix D1 and their locations are depicted in Figure 4.5-1, Site Map.

### CRHR Statement of Significance

The Mater Dolorosa Retreat Center does not meet any of the criteria for listing in the CRHR, either individually or as part of an existing historic district, based on the following evaluation of CRHR designation criteria and integrity requirements.

***Criterion 1: Is associated with events that have made a significant contribution to the broad patterns California's history and cultural heritage.***

Archival research found that the establishment of the Monastery, and later the Mater Dolorosa Retreat Center, were important to the Passionist Order as the first of several retreat centers established in the western United States. While the Mater Dolorosa Retreat Center property is representative of the expansion of the Order's growth in the west, since it was the first monastery built west of Kansas, it no longer retains the original design elements associated with this period of expansion. While the basic principles of the Passionist Order are still practiced at the Mater Dolorosa Retreat Center property, the original pre-1923 farm house where the priests and brothers first lived when they arrived in California, and the 1931 Monastery building have since been razed. The property is still used as a retreat center and living quarters for the remaining Passionist priests and brothers; however, the demolition of the original 1930s buildings on the property severed the link to the earlier period of Passionist development in the west.

The next major period of development on the property occurs in the 1950s. This period of development began with the construction of the current Mater Dolorosa Retreat Center (1950), thus representing a period of growth and expansion for the Mater Dolorosa. Other minor improvements throughout the property, including the construction of the Event Terraces, construction of the Stations of the Cross, and other landscape developments continued through the early 1960s. Despite this period being indicative of the growing popularity of the monastery's retreats to the Catholic community in Los Angeles County, no connection to broader periods of Passionist development at the state, national, or local level of significance were identified through archival research. Furthermore, a prominent, two-story addition was made to the Mater Dolorosa Retreat Center in 1985, diminishing its integrity of association to this period.

In summation, while the property was once historically significant to the history of the Passionist Order in the United States and in California, alterations to the existing buildings and structures and the demolition of the original 1931 Monastery building have diminished the integrity of this association such that it can no longer convey significance under these criteria. Therefore, the property does not appear eligible under Criterion 1 of the CRHR.

***Criterion 2: Is associated with the lives of persons significant in our past.***

Archival research did not indicate that any previous property owners, residents, retreat organizers, or people who have worked at this property are known to be historically significant figures at the national, state, or local level. As such, this property is not known to have any historical associations with people important to the nation's or state's past. Furthermore, to be found eligible under Criterion 2 the property has to be directly tied to an important person and the place where that individual conducted or produced the work for which he or she is known. This property does not appear to be associated with any individual's important historic work and does not appear eligible for the CRHR under Criterion 2.

***Criterion 3: Embodies the distinctive characteristics of a type, period, or method of construction, or represents the work of an important creative individual, or that possess high artistic values.***

The Mater Dolorosa Retreat Center, as a retreat center and monastery property type, is distinctive and unique for the City of Sierra Madre, but is one of many monasteries and Christian religious retreat centers in the Los Angeles basin. For example, the Mary and Joseph Retreat Center in Rancho Palos Verdes, the Sacred Heart Retreat House in Alhambra, St. Joseph's Salesian Youth Retreat Center in Rosemead, the Divine Word Seminary and Retreat House in Norco, and the Serra Retreat Center and Franciscan monastery in Malibu. Other convents and monasteries include Dominican and Franciscan convents in Los Angeles, Glendale, Malibu, Rancho Palos Verdes, and Alhambra. There are also several Buddhist monasteries and non-denominational retreat centers throughout the Los Angeles area. So, while this property type is somewhat uncommon, this resource is not unique.

From an architectural style standpoint, Spanish Colonial Revival is the dominate style seen throughout the property. The use of the Spanish Colonial Revival style began with the original 1931 Monastery building and continued to be used in more recent construction projects on the property. Despite the fact that the Spanish Colonial Revival Style was used throughout the property, demolition of the Monastery building and the addition to the Mater Dolorosa Retreat Center have impacted the property's ability to read as a good example of the style. Additionally, the only other Spanish Colonial Revival building on the property, the Staff House, meets the basic design and material requirements for the style but it does not serve as a good representation of the style. Furthermore, the remaining two buildings, the restroom and kitchen, are utilitarian in both style and material and do not embody the distinctive characteristics of any style or period of construction. In summary, the extant buildings at the Mater Dolorosa Retreat Center no longer serve as intact and good representations of the Spanish Colonial Revival style of architecture.

With regards to the original builder, the Mater Dolorosa Retreat Center building can be said to be the work of a master builder: J.A. McNeil Company. The building company was known for constructing religious and institutional buildings early in their history (1944–1966), before transitioning to campus buildings at the University of Southern California (USC) and commercial buildings throughout Southern California. From a typology standpoint, the Mater Dolorosa Retreat Center is not the only Los Angeles-area retreat center and religious building built by J.A. McNeil Company. Other examples of this building type included Mount Carmel Priory and Convent in 1949 and St. Vincent de Paul School and Convent in 1953. Additionally, the Spanish Colonial Revival style was a very popular style used by J.A. McNeil Company's and many other builders during this time period. Therefore, the Mater Dolorosa property is also not unique for its architectural style. While it could be argued that the Mater Dolorosa was one of the more notable properties designed by J.A. McNeil Company, the Mater Dolorosa Retreat Center building's 1985 addition and the 1966 and 2002 renovations to the Chapel's interior have significantly diminished the property's ability to serve as a good representation of J.A. McNeil Company's work.

In addition to the J.A. McNeil Company, buildings and structures on the property were also designed and built by local builder and stone mason William J. Schiltz. While the most notable element of the property constructed by Schiltz was the no longer extant Monastery building, the Stations of the Cross structures were also designed by Schiltz. Despite the incredible workmanship and material sourcing, Schiltz is not considered a master architect or builder. Schiltz is best known for his involvement with local Sierra Madre politics, serving two terms as mayor and as a city councilman. No other buildings on the property were built by master builders or architects.

In addition to the existing buildings and structures on the property, there are notable decorative elements on the property that were also researched and evaluated for significance. Specifically, the stained glass windows of the Chapel that utilize chipped glass from Judson Studios, master artisans. The windows were created after the death of William Lees Judson, but during the post-World War II church construction boom in Southern California that



allowed the studio to resume work. While these windows do possess high artistic value on their own, multiple alterations to the Chapel interior have altered the way they are viewed and experienced, diminishing the integrity of design, feeling, and association necessary to convey significance under this criteria. Similarly, the Stations of the Cross shrines may once have had high artistic value, but this has been diminished by alterations. The Stations of the Cross are incredible examples of fine stone working and material sourcing, but renovations in the 2010s altered the way they are experienced and their locations. These alterations diminish the level of design and location integrity necessary to convey significance under these criteria.

The Mater Dolorosa Retreat Center also lacks the integrity to convey significance as a representative of a significant and distinguishable entity whose components may lack individual distinction, and would likely not meet the threshold necessary to be a contributor to such a group or district.

In summary, while the Mater Dolorosa Retreat Center's components do possess architectural merit due to association with a master builder (J.A. McNeil Company) and master artisans (Judson Studios), as well as possessing high artistic value in the stained glass windows from Judson Studios, alterations have diminished the property's historical association, design, and location integrity to the point where they can no longer convey significance. The property components, both individually and as a whole lack the integrity necessary to convey significance under these criteria. For these reasons, Mater Dolorosa Retreat Center does not appear eligible for listing in the CRHR under Criterion 3.

***Criterion 4: Has yielded, or may be likely to yield, information important in prehistory or history.***

The property is not significant under Criterion 4 of the CRHR as a source, or likely source, of important historical information nor does it appear likely to yield important information about historic construction methods, materials, or technologies.

**City of Sierra Madre Statement of Significance**

The City of Sierra Madre's landmark designation criteria is based on the NRHP/CRHR designation criteria and integrity requirements and are outlined below. The Mater Dolorosa Retreat Center does not meet any of the criteria for listing as a City of Sierra Madre Landmark.

- A. Historic. It was the site of, or is associated with local, state or national cultural, social, economic, political or natural history, events or persons significant to the history of Sierra Madre, or it reflects significant geographical patterns, including those associated with different eras of settlement and growth, particular transportation modes, or distinctive examples of park or community planning.

As described in Criteria A/1 and B/2, the Monastery building, which was significant for its connection to the outreach of Passionists into the American West in the 1920s was razed after an earthquake in 1993. Without the Monastery building, the property no longer retains the original design elements that associated to this period of expansion. Further, the Mater Dolorosa Retreat Center has not had a measurable effect on the history of the City of Sierra Madre and is not associated with cultural, social, economic, political or natural history, events or persons significant to the history of Sierra Madre. Therefore, the Mater Dolorosa Retreat Center, which includes the project site, is not eligible as a City of Sierra Madre Landmark under Criterion A.

- B. Architectural. It is representative of the work or is one of a few remaining examples of a notable builder, designer or architect, or, it embodies distinctive characteristics of a style, type, period or method of construction, or, is a valuable example of architectural achievement or innovation such as the use of indigenous materials or craftsmanship.

As described in Criteria C/3, while the Mater Dolorosa Retreat Center building was built by master builder J.A. McNeil Company, it is not representative or unique among their body of work, and is one of several religious institutional buildings built by them during this period. Additionally, the Mater Dolorosa Retreat Center Chapel includes stained glass from master artisans Judson Studios. However, alterations to the chapel's interior and orientation have diminished the design integrity of these windows. Without the original 1931 Monastery building, now demolished, the Mater Dolorosa Retreat Center property does not embody the distinctive elements of the Spanish Colonial Revival style and is not a valuable or innovative architectural achievement. Overall, the property lacks the necessary integrity to convey significance under this criterion. Therefore, the Mater Dolorosa Retreat Center, which includes the project site, is not eligible as a City of Sierra Madre Landmark under Criterion B.

### Integrity Discussion

In addition to meeting one or more of the previous criteria, an eligible resource must retain integrity, which is expressed in seven aspects: location, setting, design, workmanship, materials, feeling, and association. All properties change over the course of time. Consequently, it is not necessary for a property to retain all its historic physical features or characteristics. The property must retain, however, the essential physical features that enable it to convey its historic identity. The essential physical features are those features that define both why a property is significant and when it was significant. The following sections discuss the integrity of the Mater Dolorosa Retreat Center property. Taken as a whole, the property's integrity does not rise to the level needed to convey significance under any CRHR or City of Sierra Madre Landmark designation criteria.

**Location:** Most buildings at the Mater Dolorosa Retreat Center property retain integrity of location. However, the Stations of the Cross shrines were moved from their historical locations during the remodeling in 2015. Other additions, such as the Garden of the Seven Sorrows, Sacred Heart Plaza, Amphitheater and Garden of Gethsemane replaced historical buildings or gardens, further diminishing the overall integrity of location at the property. The total property acreage has only been diminished a few times over its occupancy, so overall, the property is the same size and orientation relative to the City and the mountains.

**Setting:** Although the original 1931 Monastery building was razed and newer features have been added to the property in the recent past that have changed the original design and layout, the isolated nature of the Mater Dolorosa Retreat Center, separated from the surrounding neighborhood, outdoor garden walks, the mature olive groves, and backdrop of the San Gabriel Mountains have been retained and the building maintains a high level of integrity of setting.

**Design:** The Mater Dolorosa Retreat Center building does not retain integrity of design due to multiple renovations and a large and very visible addition in 1985. In addition to the highly visible addition, the Chapel interior was also altered and renovated several times, disregarding the original interior layout and orientation, and reversing vestibule and sacristy to its current orientation in 2002. Similarly, the Staff House has had multiple alterations and additions, diminishing its integrity of design. The remaining buildings at the site have also had additions or small changes to aspects of design. Therefore, the Mater Dolorosa Retreat Center property does not retain integrity of design.

**Materials:** The Mater Dolorosa Retreat Center and Staff house do not retain integrity of materials and workmanship due to significant alterations and additions, and the addition of modern materials. The Stations of the Cross retain integrity of materials since it appears as though original materials have been retained or are replaced with in-kind materials as needed.

**Workmanship:** For the most part, integrity of workmanship has been retained at all buildings, except where modern additions obscure and detract from the original workmanship. The Stations of the Cross structures still convey a high level of workmanship integrity, as the individually sourced stones and original bas-relief sculptures and designs have been retained. Similarly, the Judson Studios chipped glass-style stained glass windows in the Chapel convey a high level of workmanship, but alterations to the design of the chapel interior and multiple renovations diminish integrity of workmanship below the threshold necessary for significance.

**Feeling:** The buildings, with the exception of the Staff House, do not feel as though they were developed in the 1950s, as they were styled to match the Spanish Colonial Revival style architecture of the original 1931 Monastery building. Therefore, the property does not successfully convey a feeling of being developed in the 1950s. The whole property, however, with both its buildings and gardens, retains an environment conducive to silence and contemplation, so the original feeling of isolations intended by the founders is retained.

**Association:** The Mater Dolorosa Retreat Center building no longer retains its association with master builder J.A. McNeil Company and master artisan Judson Studios due to multiple interior and exterior alterations, but does retain association with its original occupants, the Passionists brothers and priests who ran the Mater Dolorosa Retreat Center. Archival research did not uncover historical associations for the remaining buildings and structures at the site.

While most elements of integrity are represented at the site, when taken as a whole, the property's overall integrity does not rise to the level needed to convey significance for NRHP, CRHR or a City of Sierra Madre Landmark designation.

### Conclusion

As discussed in Section 4.5.1, no historical resources were identified within the project site as a result of the CHRIS records search, extensive archival research, field survey, or property significance evaluation. Therefore, the project would not result in a substantial adverse change in the significance of a historical resource pursuant to §15064.5. Although the proposed project is located outside of the Mater Dolorosa Retreat Center boundary, it is located adjacent to the Retreat Center and located on the same parcel as the Retreat Center, which is currently split within three different lots (a lot line adjustment would be processed to consolidate the two southern lots that make up the project site into one and adjust the site's northern boundary further to the north) . Therefore, a historical evaluation of the Mater Dolorosa Retreat Center was conservatively provided as the project site is associated with the larger institutional property. As discussed previously, the Mater Dolorosa Retreat Center does not appear eligible for listing in the CRHR, or as a City of Sierra Madre Landmark under any designation criteria, due to significant alterations that have compromised the integrity of the property as a whole. As such, the Mater Dolorosa Retreat Center is not considered an historical resource for the purposes of CEQA. Implementation of the proposed project would have no physical impact on the adjacent Mater Dolorosa Retreat Center. In addition, development of the 17.30-acre project site directly adjacent to the Mater Dolorosa Retreat Center would have no impacts in terms of affecting its setting or cultural context. Therefore, the proposed project would not cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5. Impacts would be **less than significant**.

### **2. *Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?***

No archaeological resources were identified within the project site through the CHRIS records search, archival review, or NAHC SLF search. As discussed in Section 4.5.1.2.1, Background Research, two historic-period sites were identified within 1 mile of the project site. However, no previously recorded archaeological resources were identified on the project site.

The project site has been subject to consistent ground disturbance as a result of agricultural use of the site, site maintenance activities, and activities associated with the Mater Dolorosa Retreat Center and the former Monastery. Considering these factors, the potential for buried archaeological deposits, specifically historic-era deposits within the project site is considered to be relatively low, but possible. However, at depth, ground disturbing activities associated with construction of the proposed project could result in the unanticipated discovery of previously uncovered archaeological resources. As such, impacts to previously undiscovered archaeological resources would be **potentially significant (Impact CUL-1)**. In order to mitigate any potential impacts to cultural resources resulting from ground disturbing activities, three mitigation measures shall be implemented. **MM-CUL-1** would educate all personnel involved in ground disturbing activities to be sensitive to the potential presence and discovery of cultural resources, **MM-CUL-2** provides for a qualified archaeologist to be retained on call to respond to the inadvertent discovery of cultural resources and **MM-CUL-3** sets forth the measures that shall be implemented if archaeological resources are discovered (see Section 4.5.6). Implementation of these measures would reduce potential impacts to **less than significant**.

### **3. *Would the project disturb any human remains, including those interred outside of dedicated cemeteries?***

No evidence of human remains, including those interred outside of formal cemeteries, was discovered during the records search, background research, or field survey. Further, the site has been previously disturbed and never used as a formal cemetery. However, the possibility exists that human remains may be discovered during ground disturbing activities associated with project construction. Any disturbance of human remains that may occur during project construction would be potentially significant. Therefore, impacts to human remains would be **potentially significant (Impact CUL-2)**. Should human remains be discovered, implementation of **MM-CUL-4** (outlined in Section 4.5.6) would reduce impacts to **less than significant**.

## 4.5.6 Mitigation Measures

The following mitigation measures would be implemented to reduce **potentially significant** impacts to previously uncovered archaeological resources (**Impact CUL-1**) and previously unrecorded human remains (**Impact CUL-2**) on project site during ground disturbing activities associated with project construction.

**MM-CUL-1 Workers Environmental Awareness Program.** All construction personnel and monitors who are not trained archaeologists shall be briefed regarding unanticipated discoveries prior to the start of ground disturbing activities. A basic presentation shall be prepared and presented by a qualified archaeologist, in coordination with the Gabrieleño Band of Mission Indians-Kizh Nation, to inform all personnel working on the project about the archaeological sensitivity of the area. The purpose of the WEAP training is to provide specific details on the kinds of archaeological materials that may be identified during construction of the project and explain the importance of and legal basis for the protection of significant archaeological resources. Each worker shall also be instructed on the proper procedures to follow in the event that cultural resources or human remains are uncovered during ground-disturbing activities. These procedures include work curtailment or redirection, and the immediate contact of the on-call archaeologist and if appropriate, Tribal representative. Necessity of training attendance should be stated on all project site plans intended for use by those conducting the ground disturbing activities.

**MM-CUL-2 On-Call Archaeological Construction Monitoring.** A qualified archaeologist shall be retained and on-call to respond and address any inadvertent discoveries identified during ground disturbing activities. A qualified archaeological principal investigator, meeting the Secretary of the Interior's Professional Qualification Standards, shall oversee and adjust all monitoring efforts as needed (increase, decrease, or discontinue monitoring frequency) based on the observed potential for

construction activities to encounter cultural deposits or material as well as determine, for purposes of Native American monitoring, when initial ground disturbing activities are complete. The archaeological monitor shall be responsible for maintaining daily monitoring logs for those days monitoring is required. If monitoring is ultimately required, an archaeological monitoring report shall be prepared within 60 days following completion of ground disturbance. This report shall document compliance with approved mitigation and all monitoring efforts as well as include an appendix with copies of all daily monitoring logs. The final report shall be submitted to the South Central Coastal Information Center (SCCIC).

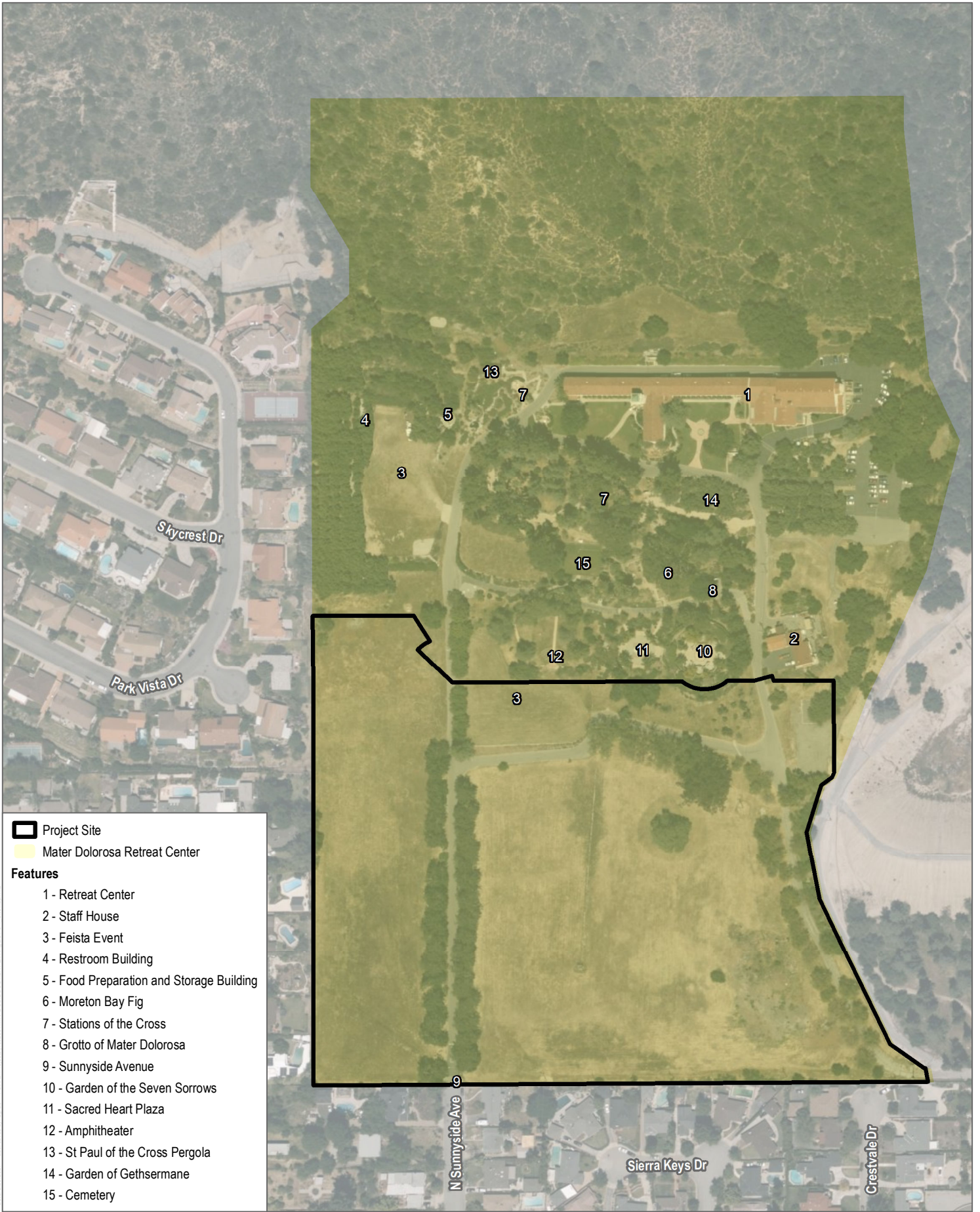
**MM-CUL-3 Unanticipated Discovery of Archaeological Resources.** In the event that potential archaeological resources (sites, features, or artifacts) are exposed during construction activities involving ground disturbance for the proposed project, all construction work occurring within ~~100~~50 feet of the find shall immediately stop until a qualified archaeologist can evaluate the significance of the find and determine whether additional study is warranted. This avoidance buffer may be adjusted following inspection of this area by the qualified archaeologist. Depending upon the significance of the find under CEQA (14 CCR 15064.5[f]; PRC Section 21082), the archaeologist may simply record the find and allow work to continue. If the discovery proves significant under CEQA, additional work, such as preparation of an archaeological treatment plan, testing, or data recovery may be warranted.

**MM-CUL-4 Unanticipated Discovery of Human Remains.** In accordance with Section 7050.5 of the California Health and Safety Code, if human remains are found, the county coroner shall be immediately notified of the discovery. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains, and no less than 100 feet from are of discovery, shall occur until the county coroner has determined, within 2 working days of notification of the discovery, the appropriate treatment and disposition of the human remains. If the county coroner determines that the remains are, or are believed to be, Native American, he or she shall notify the Native American Heritage Commission (NAHC) in Sacramento within 24 hours. In accordance with California Public Resources Code, Section 5097.98, the NAHC must immediately notify those persons it believes to be the most likely descendant from the deceased Native American. The most likely descendant shall complete his/her inspection within 48 hours of being granted access to the site. The designated Native American representative would then determine, in consultation with the property owner, the disposition of the human remains.

#### 4.5.7 Level of Significance After Mitigation

Implementation of **MM-CUL-1**, **MM-CUL-2**, and **MM-CUL-3** would reduce potentially significant impacts to previously undiscovered archaeological resources (**Impact CUL-1**) to a **less than significant** level through development of a WEAP and protocols for the unanticipated discovery of archaeological resources as well as a condition requiring a qualified archaeologist be on-call to respond in the case there is an unanticipated discovery of archaeological resources. Additionally, implementation of **MM-CUL-4** would reduce potentially significant impacts to human remains (**Impact CUL-2**) to a **less than significant** level through compliance with Section 7050.5 of the California Health and Safety Code regarding the handling of human remains. Finally, impacts to historical resources would be **less than significant** and no mitigation would be required.

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Project Site  
 Mater Dolorosa Retreat Center

**Features**

- 1 - Retreat Center
- 2 - Staff House
- 3 - Feista Event
- 4 - Restroom Building
- 5 - Food Preparation and Storage Building
- 6 - Moreton Bay Fig
- 7 - Stations of the Cross
- 8 - Grotto of Mater Dolorosa
- 9 - Sunnyside Avenue
- 10 - Garden of the Seven Sorrows
- 11 - Sacred Heart Plaza
- 12 - Amphitheater
- 13 - St Paul of the Cross Pergola
- 14 - Garden of Gethsemane
- 15 - Cemetery

SOURCE: Los Angeles County 2020; Bing Maps



**DUDEK**

**FIGURE 4.5-1**  
**Site Map**

The Meadows at Bailey Canyon EIR

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## 4.6 Energy

This section describes the existing energy conditions of The Meadows at Bailey Canyon Specific Plan Project (project or proposed project) site and vicinity, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures related to implementation of the proposed project.

### 4.6.1 Existing Conditions

#### **Project Site and Vicinity**

##### ***Electricity***

According to the U.S. Energy Information Administration (EIA), California used approximately 255,224 gigawatt hours of electricity in 2018 (EIA 2020a). Electricity usage in California for differing land uses varies substantially by the type of uses in a building, type of construction materials used in a building, and the efficiency of all electricity-consuming devices within a building. Because of the state's energy efficiency standards and efficiency and conservation programs, California's per-capita energy use has remained stable for more than 30 years, while the national average has steadily increased (CEC 2018a).

Electrical service in the City of Sierra Madre (City) is provided by the Clean Power Alliance. As of October 2020, Sierra Madre residents and businesses are receiving 100% Green Power (100% renewable energy) as their default rate product. The Sierra Madre City Council voted in February 2020 to adopt Clean Power Alliance's 100% Green Power as the default rate to meet the community's climate and environmental protection goals. Customers also have the option to purchase the Lean Power rate which is 36% renewable energy and Clean Power rate which is 50% renewable energy (Clean Power Alliance 2020).

##### ***Natural Gas***

One-third of energy commodities consumed in California is natural gas and mainly falls into four sectors: residential, commercial, industrial, and electric power generation. In addition, natural gas is a viable alternative to petroleum for use in cars, trucks, and buses (CEC 2017). According to the EIA, California used approximately 2,154,030 million cubic feet of natural gas in 2019 (EIA 2020c). The majority of California's natural gas customers are residential and small commercial customers (core customers), which accounted for approximately 35% of the natural gas delivered by California utilities in 2018 (CPUC 2020). Large consumers, such as electric generators and industrial customers (noncore customers), accounted for approximately 65% of the natural gas delivered by California utilities (CPUC 2020).

##### ***Petroleum***

According to the EIA, California used approximately 681 million barrels of petroleum in 2018, with the majority (584 million barrels) used for the transportation sector (EIA 2020d). This total annual consumption equates to a daily use of approximately 1.9 million barrels of petroleum. There are 42 U.S. gallons in a barrel, so California consumes approximately 78.4 million gallons of petroleum per day, adding up to an annual consumption of 28.7 billion gallons of petroleum. By sector, transportation uses utilize approximately 85.5% of the state's petroleum, followed by 11.1% from industrial, 2.5% from commercial, 0.9% from residential, and 0.01% from electric power uses (EIA 2020b). In California, petroleum fuels refined from crude oil are the dominant source of energy for transportation sources.

California has implemented policies to improve vehicle efficiency and to support use of alternative transportation, which are described in Section 4.6.2, Relevant Plans, Policies, and Ordinances.

## 4.6.2 Relevant Plans, Policies, and Ordinances

### Federal

#### ***Federal Energy Policy and Conservation Act***

In 1975, Congress enacted the Federal Energy Policy and Conservation Act, which established the first fuel economy standards for on-road motor vehicles in the United States. Pursuant to the act, the National Highway Traffic Safety Administration (NHTSA) is responsible for establishing additional vehicle standards. In 2010, fuel economy standards were set at 27.5 miles per gallon (mpg) for new passenger cars and 23.5 mpg for new light trucks. Fuel economy is determined based on each manufacturer's average fuel economy for the fleet of vehicles available for sale in the United States.

#### ***Energy Independence and Security Act***

The Energy Independence and Security Act of 2007 (December 2007), among other key measures, would do the following, which would aid in the reduction of national greenhouse gas (GHG) emissions:

1. Increase the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard requiring fuel producers to use at least 36 billion gallons of biofuel in 2022.
2. Set a target of 35 miles per gallon for the combined fleet of cars and light trucks by model year 2020 and direct National Highway Traffic Safety Administration (NHTSA) to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for work trucks.
3. Prescribe or revise standards affecting regional efficiency for heating and cooling products and procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances.

#### ***EPA and NHTSA Joint Rule for Vehicle Standards***

On April 1, 2010, the Environmental Protection Agency (EPA) and NHTSA announced a joint final rule to establish a national program consisting of new standards for light-duty vehicles model years 2012 through 2016. The joint rule is intended to reduce GHG emissions and improve fuel economy. The EPA promulgated the first-ever national GHG emissions standards under the Clean Air Act, and NHTSA promulgated Corporate Average Fuel Economy (CAFE) standards under the Energy Policy and Conservation Act (EPA 2010). This final rule follows the EPA and Department of Transportation's joint proposal on September 15, 2009, and is the result of the President Obama's May 2009 announcement of a national program to reduce GHGs and improve fuel economy. The final rule became effective on July 6, 2010 (EPA and NHTSA 2010).

The EPA GHG standards require new passenger cars, light-duty trucks, and medium-duty passenger vehicles to meet an estimated combined average emissions level of 250 grams of carbon dioxide (CO<sub>2</sub>) per mile in model year 2016, equivalent to 35.5 mpg if the automotive industry were to meet this CO<sub>2</sub> level through fuel economy improvements alone. CAFE standards for passenger cars and light trucks will be phased in between 2012 and 2016, with the final standards equivalent to 37.8 mpg for passenger cars and 28.8 mpg for light trucks, resulting in an estimated combined average of 34.1 mpg. Together, these standards will cut GHG emissions by an estimated 960 million metric

tons and 1.8 billion barrels of oil over the lifetime of the vehicles sold under the program. The rules will simultaneously reduce GHG emissions, improve energy security, increase fuel savings, and provide clarity and predictability for manufacturers (EPA and NHTSA 2010).

In August 2012, the EPA and NHTSA approved a second round of GHG and CAFE standards for model years 2017 and beyond (EPA and NHTSA 2012). These standards will reduce motor vehicle GHG emissions to 163 grams of CO<sub>2</sub> per mile, which is equivalent to 54.5 mpg if this level were achieved solely through improvements in fuel efficiency for cars and light-duty trucks by model year 2025. A portion of these improvements, however, will likely be made through improvements in air-conditioning leakage and through use of alternative refrigerants, which would not contribute to fuel economy. The first phase of the CAFE standards (for model years 2017 to 2021) are projected to require, on an average industry fleet-wide basis, a range from 40.3 to 41.0 mpg in model year 2021. The second phase of the CAFE program (for model years 2022 to 2025) is projected to require, on an average industry fleet-wide basis, a range from 48.7 to 49.7 mpg in model year 2025. The second phase of standards has not been finalized due to the statutory requirement that NHTSA set average fuel economy standards not more than 5 model years at a time. The regulations also include targeted incentives to encourage early adoption and introduction into the marketplace of advanced technologies to dramatically improve vehicle performance, including the following:

- Incentives for electric vehicles, plug-in hybrid electric vehicles, and fuel cell vehicles
- Incentives for hybrid technologies for large pickups and for other technologies that achieve high fuel economy levels on large pickups
- Incentives for natural gas vehicles
- Credits for technologies with potential to achieve real-world GHG reductions and fuel economy improvements that are not captured by the standards' test procedures

## State

### *California Environmental Quality Act*

Per Appendix F of the California Environmental Quality Act (CEQA), the goal of conserving energy implies the wise and efficient use of energy. The means of achieving this goal include: (1) decreasing overall per capita energy consumption, (2) decreasing reliance on fossil fuels such as coal, natural gas, and oil, and (3) increasing reliance on renewable energy sources. In order to assure that energy implications are considered in project decisions, the CEQA requires that EIRs include a discussion of the potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful and unnecessary consumption of energy (see Public Resources Code section 21100[b][3]). Energy conservation implies that a project's cost effectiveness be reviewed not only in dollars, but also in terms of energy requirements. For many projects, cost effectiveness may be determined more by energy efficiency than by initial dollar costs. A lead agency may consider the extent to which an energy source serving the project has already undergone environmental review that adequately analyzed and mitigated the effects of energy production.

### *Protection of Underground Infrastructure*

California Government Code Section 4216 et seq. requires any entity performing excavating to contact a regional notification center (e.g., Underground Service Alert or Dig Alert) at least 2 days prior to excavation of any subsurface installations. Any utility provider seeking to begin a project that could damage underground infrastructure can call Underground Service Alert Southern California, the regional notification center for Southern California. Underground

Service Alert will notify the utilities that may have buried lines within 1,000 feet of the project. Representatives of the utilities, once notified, are required to mark the specific locations of their facilities within the work area prior to the start of project activities.

### ***Title 24, Part 6***

Title 24 of the California Code of Regulations was established in 1978 and serves to enhance and regulate California's building standards. While not initially promulgated to reduce GHG emissions, Part 6 of Title 24 specifically establishes Building Energy Efficiency Standards that are designed to ensure new and existing buildings in California achieve energy efficiency and preserve outdoor and indoor environmental quality. The California Energy Commission (CEC) is required by law to adopt standards every three years that are cost effective for homeowners over the 30-year lifespan of a building. These standards are updated to consider and incorporate new energy efficient technologies and construction methods. As a result, these standards save energy, increase electricity supply reliability, increase indoor comfort, avoid the need to construct new power plants, and help preserve the environment.

The 2016 Title 24 building energy efficiency standards, which became effective January 1, 2017, will further reduce energy used and associated GHG emissions. In general, single-family homes built to the 2016 standards are anticipated to use about 28% less energy for lighting, heating, cooling, ventilation, and water heating than those built to the 2013 standards, and nonresidential buildings built to the 2016 standards will use an estimated 5% less energy than those built to the 2013 standards (CEC 2016).

The 2019 Title 24 standards are the currently applicable building energy efficiency standards, and became effective on January 1, 2020. The 2019 Title 24 Building Energy Efficiency Standards will further reduce energy used and associated GHG emissions compared to prior standards. In general, single-family residences built to the 2019 standards are anticipated to use approximately 7% less energy due to energy efficiency measures than those built to the 2016 standards; once rooftop solar electricity generation is factored in, single-family residences built under the 2019 standards will use approximately 53% less energy than those under the 2016 standards (CEC 2018b). Nonresidential buildings built to the 2019 standards are anticipated to use an estimated 30% less energy than those built to the 2016 standards (CEC 2018b).

### ***Title 24, Part 11***

In addition to the CEC's efforts, in 2008, the California Building Standards Commission adopted the nation's first green building standards. The California Green Building Standards Code (Part 11 of Title 24) is commonly referred to as CALGreen, and establishes minimum mandatory standards as well as voluntary standards pertaining to the planning and design of sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and interior air quality. The CALGreen standards took effect in January 2011 and instituted mandatory minimum environmental performance standards for all ground-up, new construction of commercial, low-rise residential, and state-owned buildings and schools and hospitals. The CALGreen 2016 standards will become effective January 1, 2017. The mandatory standards require the following (24 CCR Part 11):

- Mandatory reduction in indoor water use through compliance with specified flow rates for plumbing fixtures and fittings
- Mandatory reduction in outdoor water use through compliance with a local water efficient landscaping ordinance or the California Department of Water Resources' Model Water Efficient Landscape Ordinance

- 65% of construction and demolition waste must be diverted from landfills
- Mandatory inspections of energy systems to ensure optimal working efficiency
- Inclusion of electric vehicle charging stations or designated spaces capable of supporting future charging stations
- Low-pollutant-emitting exterior and interior finish materials, such as paints, carpets, vinyl flooring, and particle boards

The CALGreen standards also include voluntary efficiency measures that are provided at two separate tiers and implemented at the discretion of local agencies and applicants. CALGreen’s Tier 1 standards call for a 15% improvement in energy requirements; stricter water conservation, 65% diversion of construction and demolition waste, 10% recycled content in building materials, 20% permeable paving, 20% cement reduction, and cool/solar-reflective roofs. CALGreen’s more rigorous Tier 2 standards call for a 30% improvement in energy requirements, stricter water conservation, 75% diversion of construction and demolition waste, 15% recycled content in building materials, 30% permeable paving, 25% cement reduction, and cool/solar-reflective roofs.

The California Public Utilities Commission, CEC, and California Air Resources Board (CARB) also have a shared, established goal of achieving zero net energy (ZNE) for new construction in California. The key policy timelines include: (1) all new residential construction in California will be ZNE by 2020 and (2) all new commercial construction in California will be ZNE by 2030.<sup>1</sup>

### ***Assembly Bill 1493***

In a response to the transportation sector accounting for more than half of California’s CO<sub>2</sub> emissions, Assembly Bill (AB) 1493 (Pavley) was enacted in July 2002. AB 1493 required CARB to set GHG emission standards for passenger vehicles, light-duty trucks, and other vehicles determined by the state board to be vehicles that are primarily used for noncommercial personal transportation in the state. The bill required that CARB set GHG emission standards for motor vehicles manufactured in 2009 and all subsequent model years. CARB adopted the standards in September 2004. When fully phased in, the near-term (2009–2012) standards will result in a reduction of about 22% in GHG emissions compared to the emissions from the 2002 fleet, while the mid-term (2013–2016) standards will result in a reduction of about 30%.

### ***Renewable Energy Sources***

Established in 2002 under Senate Bill (SB) 1078, and accelerated by SB 107 (2006) and SB 2 (2011), California’s Renewables Portfolio Standard obligates investor-owned utilities, energy service providers, and community choice aggregators to procure 33% of their electricity from renewable energy sources by 2020. Eligible renewable resources are defined in the 2013 renewable portfolio standard (RPS) to include biodiesel; biomass; hydroelectric and small hydro (30 megawatts or less); Los Angeles Aqueduct hydro power plants; digester gas; fuel cells; geothermal, landfill gas; municipal solid waste; ocean thermal, ocean wave, and tidal current technologies; renewable derived biogas; multifuel facilities using renewable fuels; solar photovoltaic; solar thermal electric; wind; and other renewables that may be defined later. Governor Jerry Brown signed SB 350 on October 7, 2015, which expands the RPS by establishing a goal of 50% of the total electricity sold to retail customers in California per year by December 31, 2030. In addition, SB 350 includes the goal to double the energy efficiency savings in electricity and natural gas final end uses (such as heating, cooling, lighting, or class of energy uses upon which an energy

<sup>1</sup> See, e.g., CPUC, California’s Zero Net Energy Policies and Initiatives, September 18, 2013. <http://www.cpuc.ca.gov/NR/rdonlyres/C27FC108-A1FD-4D67-AA59-7EA82011B257/0/3.pdf>. It is expected that achievement of the zero net energy goal will occur via revisions to the Title 24 standards.

efficiency program is focused) of retail customers through energy conservation and efficiency. The bill also requires the CPUC, in consultation with the CEC, to establish efficiency targets for electrical and gas corporations consistent with this goal. SB 350 also provides for the transformation of the California Independent System Operator into a regional organization to promote the development of regional electricity transmission markets in the western states and to improve the access of consumers served by the California Independent System Operator to those markets, pursuant to a specified process.

## Local

### *Southern California Association of Governments*

The Southern California Association of Governments (SCAG) is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties and serves as a forum for regional issues relating to transportation, the economy, community development, and the environment. SCAG serves as the federally designated Metropolitan Planning Organization for the Southern California region and is the largest Metropolitan Planning Organization in the United States. With respect to air quality planning, GHG emissions, and other regional issues, SCAG has prepared the 2016 RTP/SCS (SCAG 2016). Specifically, the 2016 RTP/SCS links the goals of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging all residents affected by socioeconomic, geographic, and commercial limitations to be provided with fair access. See Section 4.3, Air Quality, for additional discussion on SCAG.

### *City of Sierra Madre General Plan*

The City's General Plan (City of Sierra Madre 2015) includes the goals and policies that result in co-benefits with reducing energy, result in benefits with reducing energy use, and that are related to sustainable construction techniques. These applicable issues and policies are outlined below. The proposed project's consistency with these policies is provided in Table 4.11-1 in Section 4.11, Land Use and Planning.

- Policy 5.2:** Promote the use of sustainable construction techniques and environmentally sensitive design for housing.
- Policy L51.5** Encourage and support the use of non-automotive travel throughout the City.
- Policy L51.7** Utilize non-automotive transportation solutions as a tool to further goals related to environmental sustainability and economic development.

## 4.6.3 Thresholds of Significance

The significance criteria used to evaluate the project impacts to energy are based on Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to energy would occur if the project would:

1. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.
2. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

## 4.6.4 Project Design Features

There are no project design features that apply to energy.

## 4.6.5 Impacts Analysis

### **1. *Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?***

The proposed project includes adoption of the Specific Plan that would establish the zoning and development standards to guide future development of single-family residential uses on approximately 9.19 acres of the 17.30 acre project site, and 3.39 acres of open space (including a 3.04-acre neighborhood public park). The impacts to energy associated with construction and operation of the future development under the Specific Plan are described below.

#### **Construction**

##### ***Electricity***

Temporary electric power for as-necessary construction lighting and electronic equipment such as computers inside temporary construction trailers would be provided by the Clean Power Alliance. The electricity used for such activities would be temporary and would be substantially less than that required for project operation and would have a negligible contribution to the project's overall energy consumption.

##### ***Natural Gas***

Natural gas is not anticipated to be required during construction of the proposed project. Fuels used for construction would primarily consist of diesel and gasoline, which are discussed below under the Petroleum subsection. Any minor amounts of natural gas that may be consumed as a result of project construction would be substantially less than that required for project operation and would have a negligible contribution to the project's overall energy consumption.

##### ***Petroleum***

Heavy-duty construction equipment associated with construction activities would rely on diesel fuel, as would haul trucks involved in removing the materials from demolition and excavation. Construction workers would travel to and from the project site throughout the duration of construction. It is assumed in this analysis that construction workers would travel to and from the site in gasoline-powered passenger vehicles.

Heavy-duty construction equipment of various types would be used during each phase of project construction. Appendix B lists the assumed equipment usage for each phase of construction.

Fuel consumption from construction equipment was estimated by converting the total CO<sub>2</sub> emissions from each construction phase to gallons using the conversion factors for CO<sub>2</sub> to gallons of gasoline or diesel. Construction is estimated to occur in the years 2024–2025 based on the construction phasing schedule. The conversion factor for gasoline is 8.78 kilograms per metric ton CO<sub>2</sub> per gallon, and the conversion factor for diesel is 10.21 kilograms per metric ton CO<sub>2</sub> per gallon (The Climate Registry 2020). The estimated diesel fuel usage from construction equipment is shown in Table 4.6-1.

Table 4.6-1. Construction Equipment Diesel Demand

Phase	Pieces of Equipment	Equipment CO <sub>2</sub> (MT)	kg/CO <sub>2</sub> /Gallon	Gallons
Clear and Grub	3	1.65	10.21	161.63
Remedial & Mass Excavation	11	127.89	10.21	12,525.60
Import Material to Balance Site	1	3.85	10.21	376.61
Finish Grading	3	16.64	10.21	1,629.68
Building Construction	9	372.71	10.21	36,504.87
Wet Utilities	7	90.23	10.21	8,837.35
Dry Utilities	4	24.69	10.21	2,418.42
Surface Improvements	9	62.85	10.21	6,156.04
Architectural Coating	1	3.40	10.21	333.43
<b>Total</b>				<b>60,035.73</b>

**Sources:** Pieces of equipment and equipment CO<sub>2</sub> (Appendix B); kg/CO<sub>2</sub>/Gallon (The Climate Registry 2020).

**Notes:** CO<sub>2</sub> = carbon dioxide; MT = metric ton; kg = kilogram.

Fuel consumption from worker and vendor trips are estimated by converting the total CO<sub>2</sub> emissions from each construction phase to gallons using the conversion factors for CO<sub>2</sub> to gallons of gasoline or diesel. Worker vehicles are assumed to be gasoline and vendor/hauling vehicles are assumed to be diesel.

Calculations for total worker, vendor, and haul truck fuel consumption are provided in Tables 4.6-2, 4.6-3, and 4.6-4.

Table 4.6-2. Construction Worker Gasoline Demand

Phase	Trips	Vehicle MT CO <sub>2</sub>	kg/CO <sub>2</sub> /Gallon	Gallons
Clear and Grub	28	0.12	8.78	13.68
Remedial & Mass Excavation	720	3.09	8.78	351.73
Import Material to Balance Site	84	0.36	8.78	41.04
Finish Grading	204	0.88	8.78	99.66
Building Construction	42,600	180.51	8.78	20,559.60
Wet Utilities	3,000	12.87	8.78	1,465.57
Dry Utilities	780	3.35	8.78	381.05
Surface Improvements	660	2.83	8.78	322.43
Architectural Coating	560	2.31	8.78	262.79
<b>Total</b>				<b>22,531.28</b>

**Sources:** Trips and vehicle CO<sub>2</sub> (Appendix B); kg/CO<sub>2</sub>/Gallon (The Climate Registry 2020).

**Notes:** MT = metric ton; CO<sub>2</sub> = carbon dioxide; kg = kilogram.

Table 4.6-3. Construction Vendor Diesel Demand

Phase	Trips	Vehicle MT CO <sub>2</sub>	kg/CO <sub>2</sub> /Gallon	Gallons
Clear and Grub	4	0.05	10.21	4.58
Remedial & Mass Excavation	80	0.94	10.21	91.63
Import Material to Balance Site	28	0.33	10.21	32.07
Finish Grading	34	0.40	10.21	38.94
Building Construction	16,200	189.11	10.21	18,522.16



Table 4.6-3. Construction Vendor Diesel Demand

Phase	Trips	Vehicle MT CO <sub>2</sub>	kg/CO <sub>2</sub> / Gallon	Gallons
Wet Utilities	240	2.81	10.21	274.88
Dry Utilities	120	1.40	10.21	137.43
Surface Improvements	2,700	31.57	10.21	3,092.35
Architectural Coating	40	0.47	10.21	45.55
<b>Total</b>				<b>18,964.26</b>

**Sources:** Trips and vehicle CO<sub>2</sub> (Appendix B); kg/CO<sub>2</sub>/Gallon (The Climate Registry 2020).

**Notes:** MT = metric ton; CO<sub>2</sub> = carbon dioxide; kg = kilogram.

Table 4.6-4. Construction Haul Truck Diesel Demand

Phase	Trips	Vehicle MT CO <sub>2</sub>	kg/CO <sub>2</sub> / Gallon	Gallons
Clear and Grub	0	0.00	10.21	0.00
Remedial & Mass Excavation	0	0.00	10.21	0.00
Import Material to Balance Site	504	17.79	10.21	1,742.68
Finish Grading	0	0.00	10.21	0.00
Building Construction	0	0.00	10.21	0.00
Wet Utilities	0	0.00	10.21	0.00
Dry Utilities	0	0.00	10.21	0.00
Surface Improvements	0	0.00	10.21	0.00
Architectural Coating	0	0.00	10.21	0.00
<b>Total</b>				<b>1,742.68</b>

**Sources:** Trips and vehicle CO<sub>2</sub> (Appendix B); kg/CO<sub>2</sub>/Gallon (The Climate Registry 2020).

**Notes:** MT = metric ton; CO<sub>2</sub> = carbon dioxide; kg = kilogram.

In summary, construction of the project is conservatively anticipated to consume 22,531 gallons of gasoline and 80,743 gallons of diesel, which would last approximately 16 months. Based on these assumptions, approximately 18.6 billion gallons of petroleum would be consumed in California over the course of the project's construction phase based on the California daily petroleum consumption estimate of approximately 78.4 million gallons per day (EIA 2020d). By comparison, Countywide total petroleum use by vehicles is expected to be 4 billion gallons per year by 2024 (CARB 2020).

The project will be subject to CARB's In-Use Off-Road Diesel Vehicle Regulation that applies to certain off-road diesel engines, vehicles, or equipment greater than 25 horsepower. The regulation: (1) imposes limits on idling, requires a written idling policy, and requires a disclosure when selling vehicles; (2) requires all vehicles to be reported to CARB (using the Diesel Off-Road Online Reporting System) and labeled; (3) restricts the adding of older vehicles into fleets starting on January 1, 2014; and 4) requires fleets to reduce their emissions by retiring, replacing, or repowering older engines, or installing Verified Diesel Emission Control Strategies (i.e., exhaust retrofits). The fleet must either show that its fleet average index was less than or equal to the calculated fleet average target rate, or that the fleet has met the Best Achievable Control Technology (BACT) requirements. The project is also located in an urban area and worker, vendor, and haul truck trip lengths would be shorter compared to a suburban project location, resulting in less energy use. Finally, as described in Section 4.3.3.1.1, the project will utilize construction equipment that meets or exceeds the EPA Tier 4 Interim emission standard in accordance with mitigation measure MM-AQ-1.

## **Summary**

The electricity and natural gas used for construction of the project would be temporary and would be substantially less than that required for project operation and would have a negligible contribution to the project's overall energy consumption. Construction is anticipated to consume 22,531 gallons of gasoline and 80,743 gallons of diesel. The project would be built in accordance with applicable green building standards (Title 24, CalGREEN) and make use of a clean construction fleet. Therefore, impacts to energy resources during construction would be **less than significant**.

## **Operation**

### **Electricity**

The operation of the project buildout would require electricity for multiple purposes, including cooling, lighting, appliances, and various equipment. Additionally, the supply, conveyance, treatment, and distribution of water would indirectly result in electricity usage. Electricity consumption associated with project operation is based on the California Emissions Estimator Model (CalEEMod) outputs presented in Appendix B.

CalEEMod default values for energy consumption for each land use were applied for the project analysis. The energy use from non-residential land uses is calculated in CalEEMod based on the California Commercial End-Use Survey database. Energy use in buildings (both natural gas and electricity) is divided by the program into end use categories subject to Title 24 requirements (end uses associated with the building envelope, such as the HVAC system, water heating system, and integrated lighting) and those not subject to Title 24 requirements (such as appliances, electronics, and miscellaneous “plug-in” uses).

Title 24 of the California Code of Regulations serves to enhance and regulate California's building standards. The most recent amendments to Title 24, Part 6, referred to as the 2019 standards, became effective on January 1, 2020. According to these estimations, the proposed project would consume approximately 344,748 kWh per year during operation (Appendix B). The residential electricity demand in 2019 was 19,562,554,839 kWh (9,563 GWh) for the County (CEC 2020a). As such, the project would have a negligible impact on demand for the County and the Clean Power Alliance.

### **Natural Gas**

The operation would require natural gas for various purposes, including water heating and natural gas appliances. Natural gas consumption associated with operation is based on the CalEEMod outputs presented in Appendix B.

CalEEMod default values for energy consumption for each land use were applied for the project analysis. The energy use from non-residential land uses is calculated in CalEEMod based on the California Commercial End-Use Survey database. The program uses data collected during the Residential Appliance Saturation Survey to develop energy intensity values (electricity and natural gas usage per square foot per year) for residential buildings. Energy use in buildings (both natural gas and electricity) is divided by the program into end use categories subject to Title 24 requirements (end uses associated with the building envelope, such as the HVAC system, water heating system, and integrated lighting) and those not subject to Title 24 requirements (such as appliances, electronics, and miscellaneous “plug-in” uses).

Title 24 of the California Code of Regulations serves to enhance and regulate California's building standards. The most recent amendments to Title 24, Part 6, referred to as the 2019 standards, became effective on January 1, 2020. According to these estimations, the proposed project would consume approximately 1,153,930 kilo-British Thermal Units (kBtu) per year. The residential natural gas consumption in 2019 was 123,572,924,500 kBtu for the County (CEC 2020b).

## Petroleum

During operations, the majority of fuel consumption resulting from the project would involve the use of motor vehicles traveling to and from the project site, as well as fuels used for alternative modes of transportation that may be used by residents.

Petroleum fuel consumption associated with motor vehicles traveling to and from the project site is a function of the vehicle miles traveled (VMT) as a result of project operation. As shown in Appendix B (CalEEMod outputs are discussed in Section 4.3, Air Quality, and Section 4.8, Greenhouse Gas Emissions), the annual VMT attributable to the proposed project is expected to be 1,358,074 VMT. Countywide, the annual VMT is estimated to be 101,174,849,833 per year in 2026 (CARB 2020). Similar to the construction worker and vendor trips, fuel consumption from worker and vendor trips are estimated by converting the total CO<sub>2</sub> emissions from operation of the project to gallons using the conversion factors for CO<sub>2</sub> to gallons of gasoline or diesel. Based on the annual fleet mix provided in CalEEMod, 93.3% of the fleet range from light-duty to medium-duty vehicles and motorcycles are assumed to run on gasoline. The remaining 6.6% of vehicles represent medium-heavy duty to heavy-duty vehicles and buses and are assumed to run on diesel. Calculations for annual mobile source fuel consumption are provided in Table 4.6-5.

**Table 4.6-5. Annual Mobile Source Petroleum Demand**

Fuel	Vehicle MT CO <sub>2</sub>	kg/CO <sub>2</sub> /Gallon	Gallons
Gasoline	468.98	8.78	53,415.14
Diesel	38.13	10.21	3,734.40
		<b>Total</b>	<b>57,149.54</b>

**Sources:** Trips and vehicle CO<sub>2</sub> (Appendix B); kg/CO<sub>2</sub>/Gallon (The Climate Registry 2020).

**Notes:** MT = metric ton; CO<sub>2</sub> = carbon dioxide; kg = kilogram

As shown in Table 4.6-5, the annual petroleum consumption for the project is estimated to be 57,150 gallons per year. By comparison, California as a whole consumes approximately 28.7 billion gallons of petroleum per year (EIA 2020d). Countywide total petroleum use by vehicles is expected to be 3.8 billion gallons per year by 2026 (CARB 2020).

## Summary

Statewide emission reduction measures proposed in the CARB-adopted amendments to the Pavley regulations include measures aimed at reducing GHG emissions associated with transportation. These amendments are part of California's commitment to a nationwide program to reduce new passenger vehicle GHGs from 2012 through 2016. Pavley regulations reduced GHG emissions from California passenger vehicles by about 22% in 2012, compared to the baseline without the regulations. It is expected that Pavley regulations will reduce GHG emissions from California passenger vehicles by about 30% in 2016, all the while improving fuel efficiency and reducing motorists' costs. As such, vehicle trips associated with the project are expected to use less petroleum due to advances in fuel economy over time.

CARB has adopted a new approach to passenger vehicles (cars and light trucks) by combining the control of smog-causing pollutants and GHG emissions into a single coordinated package of standards. The new approach also includes efforts to support and accelerate the numbers of plug-in hybrids and zero-emission vehicles in California (CARB 2017).

The proposed project would create additional electricity and natural gas demand by constructing new residences. New facilities associated with the proposed project would be subject to the State Building Energy Efficiency Standards, embodied in Title 24 of the California Code of Regulations. The efficiency standards apply to new construction of nonresidential buildings and regulate energy consumed for heating, cooling, ventilation, water heating, and lighting.

Although the project would see an increase in petroleum use during construction and operation, vehicles would use less petroleum due to advances in fuel economy and potential reduction in VMT over time. Therefore, impacts to energy resources during operation would be **less than significant**.

**2. *Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?***

Title 24 of the California Code of Regulations contains energy efficiency standards for residential and non-residential buildings based on a state mandate to reduce California’s energy demand. Specifically, Title 24 addresses a number of energy efficiency measures that impact energy used for lighting, water heating, heating, and air conditioning, including the energy impact of the building envelope such as windows, doors, skylights, wall/floor/ceiling assemblies, attics, and roofs.

Part 6 of Title 24 specifically establishes energy efficiency standards for residential and non-residential buildings constructed in the State of California in order to reduce energy demand and consumption. The proposed project would comply with Title 24, Part 6, per state regulations. In accordance with Title 24 Part 6, the proposed project would have: (a) sensor-based lighting controls—for fixtures located near windows, the lighting would be adjusted by taking advantage of available natural light; and, (b) efficient process equipment—improved technology offers significant savings through more efficient processing equipment.

Title 24, Part 11, contains voluntary and mandatory energy measures that are applicable to the proposed project under the CALGreen Code. As discussed under Threshold 1, the proposed project would result in an increased demand for electricity, natural gas, and petroleum. In accordance with Title 24, Part 11, mandatory compliance, the applicant would have: (a) 50% of its construction and demolition waste diverted from landfills; (b) mandatory inspections of energy systems to ensure optimal working efficiency; (c) low pollutant-emitting exterior and interior finish materials, such as paints, carpets, vinyl flooring, and particle boards; and, (d) a 20% reduction in indoor water use. Compliance with all of these mandatory measures would decrease the consumption of electricity, natural gas, and petroleum.

Because the proposed project would comply with Title 24, Part 6 and Part 11, no conflict with existing energy standards and regulations would occur. Therefore, impacts would be **less than significant**.

## 4.6.6 Mitigation Measures

No mitigation is required for the project.

## 4.6.7 Level of Significance After Mitigation

Impacts would be **less than significant** without mitigation.

## 4.7 Geology and Soils

This section describes the existing geological conditions of The Meadows at Bailey Canyon Specific Plan Project (project or proposed project) site and vicinity, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures related to implementation of the proposed project. A geotechnical investigation that evaluated and identified potential geology and soil impacts associated with the project was prepared by Geo Soils Consultants in November 2020 and is included as Appendix E of this Environmental Impact Report (EIR).

### 4.7.1 Existing Conditions

#### **Project Site and Vicinity**

The project is located in the City of Sierra Madre (City), which is on the alluvial plain in the northwestern portion of the San Gabriel Valley. An alluvial plain is a deposit of sediment that gathers over time as it is deposited by a river or stream. The City's topography is characterized by broad, gentle foothill slopes within the southern portions of the City and steep hillsides and ridgeline-canyon terrain in the northern portion adjacent to the San Gabriel Mountains of the Angeles National Forest. The northern portion of the City, where the site is located, is an area where the alluvial plain meets the southern foothills of the San Gabriel Mountains.

#### ***Geologic Units***

The geologic units within the City are of two distinct types. The southern portion of the City consists of Pleistocene deposits, which are deposits aged between 11,000 and 2.58 million years (Cohen et al. 2020). Geologic units mapped in the southern portion of the City include alluvial fan deposits, which are derived from the San Gabriel Mountains to the north. A majority of the developed areas within the City have been built atop these soils. Much of the alluvial sediment in the central and southern sections of the City is mapped as Quaternary young alluvial fan deposits consisting of gravel, sand, and silt, that are boulder characterized by Mesozoic plutonic rocks, which are igneous rocks and associated metamorphic rocks that formed at great depth. The Mesozoic era extends from approximately 66 to 252 million years ago (Cohen et al. 2020). These rocks are typically very hard and exhibit high amounts of fracturing in areas close to active faults (City of Sierra Madre 2015).

Within the project site, soils consist of Holocene alluvium soils, located within the northwestern portion of the site, as well as Pleistocene alluvial deposits, located in the eastern and southern portions of the site. Artificial fill and terrace deposits underlie the project site and can be located from 5 to 18 feet below ground surface (bgs). However, the upper 5 to 7 feet of soil are looser than the underlying soil. Artificial fill present on site consists of brown, silty, very fine sands and fine to coarse sands that are dry to damp, and loose to medium dense. Artificial fill is unsuitable for structural support. Terrace deposits present on site extend to a maximum depth of 30 feet, and consist of reddish brown, silty/clayey, fine to coarse sands with gravels that were damp to moist, and are medium to very dense. These deposits were derived from runoff of the San Gabriel Mountains, located to the north of the site (Appendix E).

#### ***Liquefaction***

Liquefaction refers to loose, saturated sand or silt deposits that behave as a liquid and lose their load-supporting capability when strongly shaken. Loose granular soils and silts that are saturated by relatively shallow groundwater are susceptible to liquefaction. The City has one liquefaction hazard zone in and near Little Santa Anita Canyon in the northeastern part of the City. The project site is located outside of this liquefaction zone (City of Sierra Madre

2015). Lastly, groundwater was identified on site at depths of 100 feet bgs; thus, potential for liquefaction at the project site is considered low (Appendix E)

### ***Landslides***

Landslides are another natural disaster risk relevant to the southern foothills of the San Gabriel Mountains that lie within the northern boundary of the City, approximately 460 feet north of the site. Landslides in the City typically occur at elevations of between 1,400 and 2,000 feet, well above the urban area of the City. Historically, two major landslides have occurred in the northern hillside areas of the City. The project site is located outside of any potential landslide zone (City of Sierra Madre 2015).

### ***Faulting and Seismicity***

Southern California has many earthquakes because it straddles the boundary between the North American and Pacific tectonic plates, and fault rupture often results from their motion. There are many active and potentially active faults within or in the vicinity of the City. The nearest fault is the Sierra Madre Fault, located approximately 700 feet north of the project site, which passes through the northern part of the City along the base of the San Gabriel Mountains in a west-northwesterly direction. In addition, the Raymond Fault is located approximately 2 miles south of the project site. This fault consists of several sub parallel branches found at the base of the mountains and within the 0.25 miles of slope above the mountain base (Appendix E).

Although the Sierra Madre and Raymond Faults are the primary faults that pose a hazard to the City, earthquakes occurring on other regional faults could also cause considerable damage. Other notable faults in the region include the San Andreas (approximately 27 miles northeast of the project site), Newport Inglewood (approximately 21 miles the southwest of the project site), Palos Verdes (approximately 30 miles southwest of the project site), and Malibu Coast Faults (approximately 43 miles west of the project site), all of which are considered to be active. An earthquake along any of these faults would represent a hazard on the region, potentially causing many deaths and injuries, along with extensive property damage (City of Sierra Madre 2015).

### ***Expansive Soils***

Expansive soils shrink or swell as the moisture content decreases or increases; the shrinking or swelling can shift, crack, or break structures built on such soils. As described in the geotechnical investigation, soils on the project site have a low expansion potential (Appendix E).

### ***Hydroconsolidation***

The results of the borings excavated on the project site and laboratory testing on samples retrieved from the borings indicated that the upper seven feet of terrace deposits on the site are subject to hydroconsolidation, most commonly referred to as soil collapse (Appendix E).

### ***Paleontological Resources***

According to the City's General Plan, no paleontological resources have been identified within the City (City of Sierra Madre 2015). In addition, a records search was completed for the proposed project by the Natural History Museum of Los Angeles County (LACM), on December 4, 2020. Per the records search, no fossils are recorded within the project site, although fossil localities are documented nearby from sedimentary deposits that are similar to those underlying the project site (LACM 2020).

## 4.7.2 Relevant Plans, Policies, and Ordinances

### Federal

#### *International Building Code*

The International Building Code (IBC) is a model building code developed by the International Code Council that provides the basis for the California Building Code (CBC). The purpose of the IBC is to provide minimum standards for building construction to ensure public safety, health, and welfare. Prior to the creation of the IBC, several different building codes were used; however, by 2000, the IBC had replaced these previous codes. The IBC is updated every 3 years.

#### *Occupational Safety and Health Administration Regulations*

Excavation and trenching are among the most hazardous construction activities. The Occupational Safety and Health Administration's Excavation and Trenching standard, Title 29 of the Code of Federal Regulations, Part 1926.650, covers requirements for excavation and trenching operations. The Occupational Safety and Health Administration requires that all excavations where employees could potentially be exposed to cave-ins be protected by sloping or benching the sides of the excavation, supporting the sides of the excavation, or placing a shield between the side of the excavation and the work area.

### State

#### *Alquist-Priolo Earthquake Fault Zoning Act*

The Alquist-Priolo Earthquake Fault Zoning Act of 1972 (California Public Resources Code Sections 2621–2630) regulates development and construction of buildings intended for human occupancy to avoid the hazard of surface fault rupture. The act helps define areas where fault rupture is most likely to occur. The act groups faults into categories of active, potentially active, and inactive. Historic and Holocene age faults are considered active. Late Quaternary and Quaternary age faults are considered potentially active and pre-Quaternary age faults are considered inactive. These classifications are qualified by the conditions that a fault must be shown to be sufficiently active and well defined by detailed site-specific geologic explorations to determine whether building setbacks should be established. Cities and counties affected by the zones must regulate certain development projects within the zones. They must withhold development permits for sites within the zones until geologic investigations demonstrate that the sites are not threatened by surface displacement from future faulting.

#### *California Building Code*

State regulations protecting structures from geo-seismic hazards are contained in the California Code of Regulations, Title 24, Part 2 (the California Building Code [CBC]). The purpose of the CBC is to establish minimum standards to safeguard the public health, safety, and general welfare through structural strength, means of egress facilities, and general stability by regulating and controlling the design, construction, quality of materials, use and occupancy, location, and maintenance of all building and structures within its jurisdiction. The CBC is based on the International Building Code published by the International Code Conference. The CBC contains California amendments based on the American Society of Civil Engineers Minimum Design Standards 7-05, which provides requirements for general structural design and includes means for determining earthquake loads and other loads (such as wind loads) for inclusion into building codes. The provisions of the CBC apply to the construction, alteration, movement, replacement, and demolition of every building or structure or any appurtenances connected or attached to such buildings or structures throughout California.

### ***California Environmental Quality Act***

Paleontological resources are limited, nonrenewable resources of scientific, cultural, and educational value and are afforded protection under state laws and regulations, notably, the California Environmental Quality Act (CEQA) (California Public Resources Code Section 21000 et seq.). The Society of Vertebrate Paleontology's (SPV) *Society of Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources* satisfies project requirements in accordance with CEQA and California Public Resources Code Section 5097.5 and also complies with guidelines and significance criteria specified by the Society of Vertebrate Paleontology (SVP 2010).

Paleontological resources are explicitly afforded protection by CEQA, specifically in Section VII(f) of CEQA Guidelines Appendix G, the Environmental Checklist Form, which addresses the potential for adverse impacts to “unique paleontological resource[s] or site[s] or unique geological feature[s]” (14 CCR §15000 et seq.). This provision covers fossils of signal importance—remains of species or genera new to science, for example, or fossils exhibiting features not previously recognized for a given animal group—as well as localities that yield fossils significant in their abundance, diversity, preservation, and so forth. Further, CEQA provides that, generally, a resource shall be considered “historically significant” if it has yielded or may be likely to yield information important in prehistory (14 CCR §15064.5 [a][3][D]). Paleontological resources would fall within this category.

### ***California Geologic Survey***

The California Geologic Survey (CGS) provides guidance with regard to seismic hazards. The CGS's Special Publication 117, *Guidelines for Evaluating and Mitigating Seismic Hazards in California* provides guidance for evaluation and mitigation of earthquake-related hazards for projects within designated zones of required investigation.

### ***State Earthquake Protection Law***

The State Earthquake Protection Law (California Health and Safety Code § 19100 et seq.) requires that structures be designed to resist stresses produced by lateral forces caused by wind and earthquakes. Specific minimum seismic safety and structural design requirements are set forth in the CBC. The CBC requires a site-specific geotechnical study to address seismic issues and identify seismic factors that must be considered in structural design. Because the project site is not located within an Alquist–Priolo Earthquake Fault Zone (Appendix E), no special provisions would be required for project development related to fault rupture.

### ***Seismic Hazards Mapping Act of 1990***

The Seismic Hazards Mapping Act of 1990 (SHMA) (California Public Resources Code § 2690 et seq.) directs the California Department of Conservation and CGS to identify and map areas prone to liquefaction, earthquake-induced landslides, and amplified ground shaking. The purpose of the SHMA is to minimize loss of life and property through the identification, evaluation, and mitigation of seismic hazards.

The SHMA provides a statewide seismic hazard mapping and technical advisory program to assist cities and counties in fulfilling their responsibilities for protecting public health and safety from the effects of strong ground shaking, liquefaction, landslides, other ground failure, and other seismic hazards caused by earthquakes. Mapping and other information generated pursuant to the SHMA is made available to local governments for planning and development purposes. The state requires local governments to incorporate site-specific geotechnical hazard investigations and associated hazard mitigation as part of the local construction permit approval process, and requires the agent for a property seller, or the seller if acting without an agent, to disclose to any prospective buyer if the property is located within a seismic hazard zone. The state geologist is responsible for compiling seismic hazard zone maps. The SHMA specifies that the lead agency for a project may withhold development permits until geologic or soils investigations are conducted for specific sites and mitigation measures are incorporated into plans to reduce hazards associated with seismicity and unstable soils.



## Local

### *City of Sierra Madre Local Hazard Mitigation Plan*

The City is in the process of preparing a Local Hazard Mitigation Plan (LHMP) and a draft was released for public review in February 2020. The LHMP includes a broad range of activities designed to protect homes, schools, public buildings, and critical facilities. The purpose of a LHMP is to reduce or eliminate long-term risk to people and property from natural hazards and their effects on the City. The LHMP includes risk assessment and mitigation strategies for hazards including earthquakes, flooding, windstorms, wildfires, landslides, and utility related events such as power outages.

### *City of Sierra Madre General Plan*

The Hazard Prevention Element of the City’s General Plan contains the following objectives potentially relevant to the project (City of Sierra Madre 2015). The proposed project’s consistency with these policies is provided in Table 4.11-1 in Section 4.11, Land Use and Planning.

**Objective Hz6:** Addressing potential flooding and landslide hazards on public and private property.

**Policy Hz6.2:** Require that the landscape of open space areas provide the maximum permeable surface area to reduce site runoff, and prohibit the paving of a majority of these areas.

**Objective Hz10:** Assessing the viability of development based on seismic safety considerations.

**Policy Hz10.2:** Investigate the limitations on the location of new or altered residences and critical, sensitive and high occupancy facilities in areas near active faults, and consider conducting a comprehensive geologic investigation to show where active faults pose a hazard to structures.

**Objective Hz11:** Minimizing to the extent possible the loss of life, serious injuries, and major social and economic disruption caused by the collapse of or severe damage to vulnerable buildings in an earthquake.

**Policy Hz 11.2:** Encourage seismic review of buildings.

**Objective Hz13.2:** Adopt and maintain high standards for seismic performance of buildings, through prompt adoption and careful enforcement of the best available standards for seismic design.

### *City of Sierra Madre Municipal Code*

The Sierra Madre Municipal Code has existing standards and regulations that mitigate potential seismic and geologic safety concerns related to new construction. The following is a description of the provisions of the Sierra Madre Municipal Code that are applicable to the General Plan Update and relevant to the project.

- Chapter 15.04 (Building Code and Permits). This Chapter adopts by reference the most recent (2019) California Building Code, with certain amendments.
- Chapter 15.06 (California Residential Code). This chapter adopts by reference the most recent (2019) California Residential Code, with certain amendments.

### 4.7.3 Thresholds of Significance

The significance criteria used to evaluate the project impacts to geology and soils are based on Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to geology and soils would occur if the project would:

1. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
  1. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area based on other substantial evidence of as known fault. Refer to Division of Mines and Geology Special Publication 42.
  2. Strong seismic ground shaking.
  3. Seismic-related ground failure, including liquefaction.
  4. Landslides.
2. Result in substantial soil erosion or the loss of topsoil.
3. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.
4. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property.
5. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water.
6. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

### 4.7.4 Project Design Features

The following project design features (PDFs) would be implemented as part of the proposed project and would be applicable to geology and soils:

**PDF-GEO-1 Ground Shaking and Seismic Design Criteria.** During the design phase of the proposed development on site, the project shall comply with the Earthquake Design Regulations of Chapter 16, Section 1613 of the California Building Code (CBC) 2019. Based on the mapped values, the coefficients and factors apply to the lateral-force design for the proposed structures at the site are outlined in Appendix E, Geotechnical Investigation. Terrace deposits are at grade and Class D is recommended.

**PDF-GEO-2 Grading.** Grading of the site will consist of cut and fill operations to create building pads and associated streets. Grading shall involve the removal and recompaction or artificial fill and loose terrace deposits (see **MM-GEO-1**) in addition of mass-excavation of the project site. The following shall be incorporated during grading activities:

Monitoring: All earthwork, including clearing, site preparation, and fill replacement, shall be conducted with engineering control, under observation and testing by the geotechnical engineer and in accordance with the requirements of a site-specific geologic and geotechnical engineering report.

**PDF-GEO-3 Site Preparation.** The following shall be incorporated during site preparation activities:

- **Existing Structure Location:** The general contractor shall locate all surface and subsurface structure on the site or on the approved grading plan prior to preparing the ground.
- **Existing Structural Removal:** Any underground structures, including septic tanks, wells, pipelines, foundations, utilities, that have not been located prior to grading shall be removed or treated in a manner recommended by the Geotechnical Engineer.
- **Clearing and Stripping:** The construction areas shall be cleared and stripped of all vegetation, trees, bushes, sod, topsoil, artificial fill, debris, asphalt, concrete and other deleterious material prior to fill placement.
- **Removals:** Removals of suitable soil shall be performed on the site in accordance with the soils report.
- **Subgrade Preparation:** Subgrade for foundations, pavement areas, overexcavations, and for those areas receiving any additional fill be prepared by scarifying the upper 12 inches and moisture conditioning, as required to obtain at least optimum moisture, but not greater than 120 percent of optimum. The scarified areas shall be compacted to at least 90 percent of the maximum laboratory density, as determined by ASTM D-1557-12 compaction method. All areas to receive fill should be observed by the Geotechnical Engineer prior to fill placement.
- **Subgrade Inspection:** Prior to placing fill, the ground surface to receive fill should be observed, tested, and approved by the Geotechnical Engineer.

**PDF-GEO-4 Fill Placement.**

- **Laboratory Testing:** Representative samples of materials to be utilized as compacted fill shall be analyzed in a laboratory to determine their physical properties. If any material other than that previously tested is encountered during grading, the appropriate analysis of this material should be conducted.
- **On-Site Fill Material:** The on-site soils are adequate for re-use in controlled fills provided the soils do not contain any organic matter, debris, or any individual particles greater than 12 inches in diameter.
- **Rock Fragments:** Rock fragments less than 12 inches in diameter may be utilized in the fill, provided they are not placed in concentrated pockets, surrounded with fine grained material, and the distribution of the rocks is supervised by the Geotechnical Engineer. Any rock fragments over 6 inches should be kept below a depth of 5 feet. Rocks greater than 12 inches in diameter should be taken off-site, placed in fill areas designated as suitable for rock disposal, or placed in accordance with the recommendations of the Geotechnical Engineer.
- **Subgrade Verification and Compaction Testing:** Regardless of material or location, all fill material should be placed over properly compacted subgrades in accordance with the Site Preparation section of Appendix E, Geotechnical Investigation, of this EIR. The condition of all subgrades shall be verified by the Geotechnical Engineer before fill placement or earthwork grading begins. Earthwork monitoring and field density testing shall be performed during grading to provide a basis for opinions concerning the degree of soil compaction attained.
- **Fill Placement:** Approved on-site material shall be evenly placed, watered, processed, and compacted in controlled horizontal layers not exceeding eight inches in loose thickness, and each layer should be thoroughly compacted with approved equipment. All fill material should be moisture conditioned, as required to obtain at least optimum moisture, but not greater than

120 percent of optimum moisture content. The fill shall be placed and compacted in horizontal layers, unless otherwise recommended by the geotechnical engineer.

- **Compaction Criteria - Shallow Fills:** For fills less than 40 feet in vertical thickness, each layer shall be compacted to at least 90 percent of the maximum laboratory density for material used as determined by ASTM D-1557-12. The field density shall be determined by the ASTM D-1556-07 method or equivalent. Where moisture content of the fill or density testing yields compaction results less than 90 percent, additional compaction effort and/or moisture conditioning, as necessary, shall be performed, until the fill material is in accordance with the requirements of the Geotechnical Engineer.
- **Fill Material - Moisture Content:** All fill material placed shall be moisture conditioned, as required to obtain at least optimum moisture, but not greater than 120 percent. If excessive moisture in the fill results in failing results or an unacceptable pumping condition, then the fill shall be allowed to dry until the moisture content is within the necessary range to meet the required compaction requirements or reworked until acceptable conditions are obtained.
- **Keying and Benching:** All fills should be keyed and benched through all topsoil, slopewash, alluvium or colluvium or creep material, into sound terrace deposits or firm material where the slope receiving fill is steeper than 5:1 (Horizontal: Vertical) or as determined by geotechnical engineer. The standard acceptable bench height is four feet into suitable material. The key for side hill fills shall be a minimum of 15 feet within firm materials, with a minimum toe embankment of 2 feet into firm material, unless otherwise specified by the geotechnical engineer.
- **Drainage Devices:** Drainage terraces and subdrainage devices shall be constructed in compliance with the ordinances of the controlling governmental agency, or with the recommendations of the Geotechnical Engineer and Engineering Geologist.
- **Cut-Fill Transition:** Where a cut-fill transition is present beneath planned structures, the cut area shall be overexcavated three feet below the bottom of proposed footings and the excavated material shall be replaced as compacted fill to reduce the transition condition. These guidelines shall also be followed in areas where lots are underlain by soils or rock with differential expansion potential and also for lots located above descending buttress and stabilization fills.

**PDF-GEO-5 Grading Control.** Grading control activities shall comply with the following:

- **Grading Inspection:** Earthwork monitoring and field density testing shall be performed by the Geotechnical Engineer during grading to provide a basis for opinions concerning the degree of soil compaction attained. The Contractor shall receive a copy of the geotechnical engineer's Daily Field Engineering Report, which shall indicate the results of field density tests for that day. Where failing tests occur or other field problems arise, the contractor shall be notified of such conditions by written communication from the geotechnical engineer in the form of a conference memorandum, to avoid any misunderstanding arising from oral communication.
- **Subgrade Inspection:** All processed ground to receive fill and overexcavations should be inspected and approved by the Geotechnical Engineer prior to placing any fill. The contractor should be responsible for notifying the geotechnical engineer when such areas are ready for inspection. Inspection of the subgrade may also be required by the controlling governmental agency within the respective jurisdictions.

- **Subgrade Testing:** Density tests shall also be made on the prepared subgrade to receive fill, as required by the Geotechnical Engineer.
- **Density Testing Intervals:** In general, density tests shall be conducted at minimum intervals of 2 feet of fill height or every 500 cubic yards. Due to the variability that can occur in fill placement and different fill material characteristics, a higher number of density tests may be warranted to verify that the required compaction is being achieved

**PDF-GEO-6** **Cut Slopes.** Cut slope activities shall comply with the following:

- **Gradient:** All cut slopes shall be designed at a gradient of 2:1 or less.
- **Observation:** The Engineering Geologist shall observe all cut slopes excavated in rock, lithified or formation material at vertical intervals not exceeding ten feet.
- **Change of Conditions:** If any conditions not anticipated in the preliminary report such as perched water, seepage, lenticular or confined strata of a potentially adverse nature, unfavorably inclined bedding, joints or faults planes, or areas of unstable material are encountered during grading, these conditions shall be analyzed by the engineering geologist and geotechnical engineer, and recommendations shall be made to treat these problems.
- **Protection:** Cut slopes that face in the same direction as the prevailing drainage shall be protected from slopewash by a non-erosive interceptor swale placed at the top of the slope.
- **Criteria:** Unless otherwise specified in the geotechnical and geological report, no cut slopes shall be excavated higher or steeper than that allowed by the ordinances of controlling governmental agencies.
- **Drainage Devices:** Drainage terraces shall be constructed in compliance with the ordinances of controlling governmental agencies, or with the recommendations of the geotechnical engineer or engineering geologist.

**PDF-GEO-7** **Fill Slopes.** Fill slopes activities shall comply with the following:

- **Gradient:** All fill slopes shall be designed at a gradient of 2:1 or less.
- **Slope Face - Compaction Criteria:** The contractor shall be required to obtain a minimum relative compaction of 90 percent out to the finish slope face of fill slopes, buttresses and stabilization fills. This may be achieved by overbuilding the slope a minimum of five feet, and cutting back to the compacted core, or by direct compaction of the slope face with suitable equipment, or by any other procedure which produces the required compaction. If the method of achieving the required slope compaction selected by the contractor fails to produce the necessary results, the contractor should rework or rebuild such slopes until the required degree of compaction is obtained. Slope testing shall include testing the outer six inches to three feet of the slope face during and after placement of the fill. In addition, during grading, density tests will be taken periodically on the flat surface of the fill three to five feet horizontally from the face of the slope.
- **Slope Face - Vegetation:** All fill slopes shall be planted or protected from erosion by methods specified in the geotechnical report, or required by the controlling governmental agency.

**PDF-GEO-8 Utility Trenching and Backfill.** Utility trenching and backfill activities shall comply with the following:

- **Utility Trenching:** Open excavations and excavations that are shored shall conform to all applicable Federal, State and local regulations.
- **Backfill Placement:** Approved on-site or imported fill material shall be evenly placed, watered, processed, and compacted in controlled horizontal layers not exceeding eight inches in loose thickness, and each layer should be thoroughly compacted with approved equipment. All fill material shall be moisture conditioned, as required to obtain at least optimum moisture, but not greater than 120 percent of optimum moisture content. The fill shall be placed and compacted on a horizontal plane, unless otherwise recommended by the geotechnical engineer.
- **Backfill Compaction Criteria:** Each layer of utility trench backfill shall be compacted to at least 90 percent of the maximum laboratory density determined by ASTM D- 1557-12. The field density shall be determined by the ASTM D-1556-07 method or equivalent. Where moisture content of the fill or density testing yields compaction results less than 90 percent, additional compaction effort and/or moisture conditioning, as necessary, shall be performed, until the compaction criteria is reached.
- **Exterior Trenches Adjacent to Footings:** Exterior trenches, paralleling a footing and extending below a 1H:1V plane projected from the outside bottom edge of the footing, shall be compacted to 90 percent of the laboratory standard. Sand backfill, unless it is similar to the in-place fill, shall not be allowed in these trench backfill areas. Density testing, along with probing, should be accomplished to verify the desired results.
- **Pipe Bedding:** We recommend that a minimum of 6 inches of bedding material shall be placed in the bottom of the utility trench. All bedding materials shall extend at least 4 inches above the top of utilities which require protection during subsequent trench backfilling. All trenches shall be wide enough to allow for compaction around the haunches of the pipe.
- **Groundwater Migration:** Backfilled utility trenches may act as French drains to some extent, and considerable groundwater flow along utility bedding and backfill shall be expected. Wherever buried utilities, or structures which they may intersect, could be adversely affected by such drainage, provisions shall be made to collect groundwater migrating along the trench lines. These situations include where buried utilities enter buildings, particularly where they enter below grade mechanical rooms, and where buried utilities enter junction boxes or switching stations that are intended to remain dry. Measures that remedy this include, but are not limited to, placement of perforated drain pipes below and continuous with bedding materials, and placement of seepage barriers such as lean mix concrete or controlled density fill (CDF).

**PDF-GEO-9 Construction Considerations.** Construction activities shall comply with the following:

- **Erosion Control:** Erosion control measures, when necessary, shall be provided by the contractor during grading and prior to the completion and construction of permanent drainage controls.
- **Compaction Equipment:** It is also the contractor's responsibility to have suitable and sufficient compaction equipment on the project site to handle the amount of fill being placed and the type of fill material to be compacted. If necessary, excavation equipment shall be shut down to permit completion of compaction in accordance with the recommendations contained herein. Sufficient watering devices/equipment shall also be provided by the contractor to achieve optimum moisture content in the fill material.
- **Final Grading Considerations:** Care shall be taken by the contractor during final grading to preserve any berms, drainage terraces, interceptor swales, or other devices of a permanent nature on or adjacent to the property.

**PDF-GEO-10 Temporary Excavations.** Where the necessary space is available, temporary unsurcharged embankments may be slope back without shoring. The slope should not be cut steeper than 5 feet and below at near vertical temporary gradient, and above 5 feet at a 1:1 temporary gradient. In areas where soils with little or no binder are encountered, shoring or flatter excavation slopes shall be made. The recommended temporary excavation slopes do not preclude local ravelling or sloughing. Where sloped embankments are used, the top of the slope should be barricaded to prevent equipment and heavy storage loads within five feet of the top of the slope. If the temporary construction embankments are to be maintained for long periods, berms should be constructed along the top of the slope to prevent runoff water from eroding the slope faces. The soils exposed in the temporary backcut slopes during excavation shall be observed by qualified personnel so that modifications of the slopes can be made if variations in the soil conditions occur. On-site grading should not undermine support of existing offsite improvements.

**PDF-GEO-11 Drainage/Landscape Maintenance.** The southern area of the site, where the proposed park would be located, may be used for stormwater infiltration. The site is underlain by mostly sandy soil, which have acceptable infiltration rates. However, additional subsurface exploration and infiltration testing shall be required in this area to determine the actual soil infiltration rates for design purposes of the system used. Any infiltration systems shall be setback a sufficient distance from proposed structures and adjacent properties to avoid adverse impacts. These distances shall be determined with future studies.

In areas of residential development, water shall not be allowed to pond or seep into the ground, or flow over slopes in a concentrated manner. Roof gutters and yard drains shall be provided. Pad drainage shall be directed toward the street or any approved watercourse area swale via non-erosive channel, pipe and/or dispersion devices.

In addition to control of landscape watering, pad drainage shall slope away from structures.

**PDF-GEO-12 Conventional Foundation Recommendations.** Appendix E includes recommendations for foundation design, including bearing subgrades, subgrade verification, footing depth and width, and bearing pressures, provided for preliminary design purposes and the final expansion index shall be determined following grading. Conventional or post-tensioned foundations shall be used to support the proposed structures. All footings should meet current slope setback requirements. Foundations shall be designed for low expansive soil conditions. The proposed project shall comply with conventional foundation design, as outlined in the final design of the project.

**PDF-GEO-13 General Recommendations.** The project shall comply with the following general recommendations:

1. **Drainage and Site Maintenance:** All slab foundation areas shall be moisture conditioned to at least optimum moisture, but no more than 5 percent above optimum moisture for a depth of at least 12 inches below subgrade for low expansion index soil. The post-tensioned slab designer shall determine if the moisture penetration is sufficient for this design. The subgrade soil moisture shall be observed by a soil engineer or his/her representative prior to pouring concrete. It is suggested the above stated moisture be obtained and maintained at least a suggested 2 days prior to pouring concrete.
2. A 10-mil Visqueen vapor barrier shall be placed underneath habitable area slabs and/or slabs with floor coverings. This barrier can be placed directly on the subgrade soils, but should be overlain by a two-inch layer of imported sand. This vapor barrier shall be lapped and sealed (especially around the utility perforations) adequately to provide a continuous waterproof barrier under the entire slab.

3. Surface water shall be kept from infiltrating into the subgrade adjacent to the house foundation system. This may include, but not be limited to rain water, roof water, landscape water and/or leaky plumbing. The lots are to be fine graded at the completion of construction to include positive drainage away from the structure and roof water will be collected via gutters, downspouts, and transported to the street in buried drain pipes. Homebuyers should be cautioned against constructing open draining planters adjacent to the houses, or obstructing the yard drainage in any way.
4. Utility trenches beneath the slabs shall be backfilled with compacted native soil materials, free of rocks.
5. Subgrade soil beneath footings and slabs should be premoistened prior to placement of concrete.
6. Standard County of Los Angeles structural setback guidelines are applicable, except where superseded by specific recommendations by the project geologist and geotechnical engineer.
7. Building or structure footings shall be set back a horizontal distance, consistent with the requirements of Appendix E.
8. Prior to placing concrete in the footing excavations, an inspection shall be made by our representative to ensure that the footings are free of loose and disturbed soils and are embedded in the recommended material.

**PDF-GEO-14 Retaining Walls.** Retaining wall footings should be founded into compacted fill or dense terrace deposits. The near surface on site soils have a low expansion index and should be confirmed prior to foundation construction. The equivalent fluid pressures recommended are based on the assumption of a uniform backfill and no build-up of hydrostatic pressure behind the wall. To prevent the build-up of lateral soil pressures in excess of the recommended design pressures, over compaction of the fill behind the wall should be avoided. This can be accomplished by placement of the backfill above a 45-degree plane projected upward from the base of the wall, in lifts not exceeding eight inches in loose depth, and compacting with a hand-operated or small, self-propelled vibrating plates.

1. **Conventional (Yielding) Retaining Walls.** All recommendations for active lateral earth pressures contained herein assume that the anticipated retaining structures are in tight contact with the fill soil (or dense alluvium) that they are supposed to support. The earth support system must be sufficiently stiff to hold horizontal movements in the soil to less than one percent of the height of the vertical face, but should be free-standing to the point that they yield at the top at least 0.1 percent of the height of the wall.
2. **Earth Pressures on Conventional (Yielding) Retaining Walls.** The earth pressures on walls retaining permeable material, compacted fill, or natural soil shall be assumed equal to that exerted by an equivalent fluid with densities consistent with those listed in Appendix E.
3. **Restrained (Non-Yielding) Walls.** Restrained (Non-Yielding) Walls shall be constructed consistent with ASTM D-1557-12, and the requirements of Appendix E.
4. **Seismic Pressures for Retaining Walls.** Seismic Pressures for Retaining Walls shall be constructed consistent with the requirements of Appendix E.



**PDF-GEO-15 General Recommendations for Retaining Walls.** The following general recommendations shall be implemented for construction of retaining walls:

- Any anticipated superimposed loading, such as upper retaining walls, other structures, within a 45-degree projection upward from the wall bottom, except retained earth, shall be considered as surcharge and provided in the design.
- A vertical component equal to one-third of the horizontal force so obtained may be assumed at the application of force.
- The depth of the retained earth shall be the vertical distance below the ground surface, measured at the wall face for stem design or measured at the heel of the footing for overturning and sliding.
- The walls shall be constructed with weep holes near the bottom, on five-foot centers or with perforated drainpipe in a gravel envelope at the bottom and behind the wall. A one-foot thick zone of clean granular, free-draining material should be placed behind the wall to within three feet of the surface. On-site soil may be used for the remainder of the backfill and should be compacted to 90 percent relative compaction as determined by ASTM Test Designation D-1557-12.
- A concrete-lined swale is recommended behind retaining walls that can intercept surface runoff from upslope areas. The surface runoff shall be transferred to an approved drainage channel via non-erosive drainage devices.

## 4.7.5 Impacts Analysis

**1. *Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:***

- a. *Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area based on other substantial evidence of as known fault. Refer to Division of Mines and Geology Special Publication 42?***

An active fault is defined by CGS as a fault showing evidence for activity within the last 11,000 years (CGS 2019). According to the geotechnical investigation prepared for the project (Appendix E), the project site is not located on any known active, potentially active, or inactive fault traces or within a State of California Earthquake Special Study Zone or Alquist-Priolo Zone. The closest earthquake fault to the project site is the Sierra Madre Fault, located approximately 700 feet to the north (Appendix E). However, as stated in the geotechnical investigation, the portion of the Sierra Madre Fault located closest to the project site is not located in the Earthquake Fault Zone; therefore, the potential for ground rupture on the project site is considered low.

Adoption of project would establish the zoning and development standards to guide future development on-site, which would consist of 42 detached single-family residential units and 3.39 acres of open space (including an approximately 3.04-acre dedicated neighborhood park), within the 17.30-acre project site. Future development under the project would adhere to the most current CBC standards. Appropriate measures to minimize the effects of earthquakes and other geotechnical hazards are included in the CBC, with specific provisions pertaining to seismic load and design. The CBC has been adopted by the City as the Building Code of the City of Sierra Madre, pursuant of Chapter 15.04 of the Sierra Madre Municipal Code. Design and construction of the project in accordance with the CBC would minimize the adverse effects of strong ground shaking to the greatest degree feasible. The proposed project would be required to comply with all existing regulations, including the CBC and the City's Municipal Code in order to ensure seismic safety. In addition, the project would comply with **PDF-GEO-**

1 through **PDF-GEO-15**, which include specific project recommendations from the geotechnical investigation. Therefore, the proposed project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, and impacts would be less than significant.

**b. Strong seismic ground shaking?**

As discussed in Section 4.7.1, Existing Conditions, the project site is located approximately 700 miles south of the Sierra Madre Fault and 2 miles north of the Raymond Fault. Although the Sierra Madre and Raymond Faults are the primary faults that pose a hazard to the City, earthquakes occurring on other regional faults could also cause considerable damage. Other notable faults in the region include the San Andreas (approximately 27 miles northeast of the project site), Newport Inglewood (approximately 21 miles the southwest of the project site), Palos Verdes (approximately 30 miles southwest of the project site), and Malibu Coast Faults (approximately 43 miles west of the project site), all of which are considered to be active. An earthquake along any of these faults would represent a hazard on the region, potentially causing many deaths and injuries, along with extensive property damage (City of Sierra Madre 2015). As discussed previously, adoption of the project would eventually result in development 42 detached single-family residential units and 3.39 acres of open space (including an approximately 3.04-acre dedicated neighborhood park), within the 17.30-acre project site. As mentioned under Threshold a, development of the project would adhere to the most current CBC standards. Design and construction of the project in accordance with the CBC would minimize the adverse effects of strong ground shaking to the greatest degree feasible. In addition, as discussed above, the project would be required to implement **PDF-GEO-1** through **PDF-GEO-15**, which include specific project recommendations from the geotechnical investigation. Therefore, the project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking. Impacts would be **less than significant**.

**c. Seismic-related ground failure, including liquefaction?**

As discussed in Section 4.7.1, the City has one liquefaction hazard zone, located near Little Santa Anita Canyon, in the northeastern part of the City. However, the City's General Plan designates the project site as being located outside of this liquefaction zone (City of Sierra Madre 2015). Additionally, the project site is underlain by older alluvium and has a groundwater level that is at least 100 feet below the ground surface; thus, potential for liquefaction is considered low (Appendix E). However, the geotechnical investigation indicated that artificial fill can be located from 5 to 18 feet bgs and concluded that the boring samples that were excavated and tested indicate that the upper 7 feet of terrace deposits on the project site are subject to hydroconsolidation, commonly referred to as soil collapse (Appendix E). Furthermore, previously placed artificial fill on the project site is not suitable for structural support and support of structural fill. Therefore, construction within the artificial fill area would create a **potentially significant impact (Impact GEO-1)** to seismic-related ground failure. Nonetheless, implementation of **MM-GEO-1**, discussed in Section 4.7.6, would be implemented to reduce potential for hydroconsolidation by removing and recompacting the existing artificial fill on-site, as deep as 18 feet bgs. The removal of the remedial fill and recompaction activities have been included in the construction schedule and assumptions of the project, including the 3,528 cubic yards of import that would be required for grading (see Section 3.3.9) and would not require additional import and export of soils outside of what has been analyzed throughout this EIR. Therefore, with incorporation of **MM-GEO-11** as well as **PDF-GEO-1** through **PDF-GEO-15**, impacts associated with seismic-related ground failure would be **less than significant**.

#### *d. Landslides?*

As discussed in Section 4.7.1, two major landslides have occurred in the northern hillside areas of the City. However, the City's General Plan designates the project site as being located outside of any potential landslide zone (City of Sierra Madre 2015). Additionally, the project site does not contain slopes susceptible to landslides and is not located within a seismic hazard zone; thus, the potential for earthquake-induced landslides is considered low (Appendix E). Therefore, impacts associated with landslides would be **less than significant**.

#### **2. Would the project result in substantial soil erosion or the loss of topsoil?**

##### **Construction Impacts**

Excavation and ground-disturbing activities during construction of the project could potentially leave loose soil exposed to the erosive forces of rainfall and high winds, which would increase the potential for soil erosion and loss of topsoil. As discussed in Section 4.10, Hydrology and Water Quality, of this EIR, construction of the project would result in more than 1 acre of land disturbance; therefore, the project would be required to prepare and implement a site-specific Stormwater Pollution Prevention Plan (SWPPP) in accordance with the State Water Resources Control Board (SWRCB). Conditions of these existing regulations would include adherence to sediment and stormwater pollutant control best management practices (BMPs), effluent monitoring and compliance, post-construction-period requirements, worker training, and various other measures designed to minimize potential for soil erosion and loss of top soil. In addition, the project would be required to implement **PDF-GEO-1** through **PDF-GEO-15**, which include specific project recommendations from the geotechnical investigation, to further reduce potential erosion or loss of topsoil associated with construction of the project.

##### **Operational Impacts**

After adoption of the project, which would establish the zoning and development standards to guide future development on-site, the site would be developed with 42 detached single-family residential units and 3.39 acres of open space (including an approximately 3.04-acre dedicated neighborhood park), within the 17.30-acre project site (see Figure 3-2, Conceptual Site Plan, in Chapter 3, Project Description, of this EIR) resulting in more impervious area to the site. As such, the proposed area to be developed would be graded and paved, reducing the possibility for soil erosion or loss of topsoil compared to current conditions. However, introducing more impervious area would result in more surface runoff, which could lead to more soil erosion and loss of topsoil. However, the project would include a new stormwater drainage system (see Figure 3-5, Proposed Drainage Plan, in Chapter 3 of this EIR) that would assist in reducing runoff velocities that contribute to downstream erosion and sediment transport. Additionally, the proposed park would remain pervious, allowing percolation of water into the underlying soils. Lastly, the project would include landscaped parkways, tree plantings, landscaping throughout the project site, providing pervious area that would reduce surface runoff that would potentially lead to soil erosion and loss of topsoil. In addition, the project would be required to implement **PDF-GEO-1** through **PDF-GEO-15**, which include specific project recommendations from the geotechnical investigation, to further reduce potential erosion or loss of topsoil associated with operations of the project.

##### **Conclusion**

As discussed previously, the project would be required to comply with existing regulations and implement **PDF-GEO-1** through **PDF-GEO-15**, which include specific project recommendations from the geotechnical investigation, including erosion measures during grading and prior to the completion and construction of permanent drainage controls. reduce potential erosion or loss of topsoil associated with operations of the project. With implementation of **PDF-GEO-1** through **PDF-GEO-2**, impacts would be **less than significant**.

**3. *Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?***

As stated in Section 4.7.1, the City's General Plan does not designate the project site as being located within a liquefaction zone or a landslide zone. The project site is comprised of Urban land-Soboba-Tujunga complex (72.2%) and Trigo family, granitic substratum (27.7%) (USDA 2020). As such, these on-site soils have a considerably low expansive potential. However, boring samples from the project site that were excavated and tested. The geotechnical investigation indicated that artificial fill can be located from 5 to 18 feet bgs and that the upper 7 feet of terrace deposits on the project site are subject to hydroconsolidation, commonly referred to as soil collapse. The project would reduce potential for hydroconsolidation by removing and recompacting the upper 7 feet of terrace deposits on the project site. Furthermore, previously placed artificial fill on the project site is not suitable for structural support and support of structural fill. Therefore, construction within the artificial fill area would create a **potentially significant impact (Impact GEO-2)** to unstable soils. Nonetheless, implementation of **MM-GEO-1**, discussed in Section 4.7.6, below, would be implemented to reduce potential for hydroconsolidation by removing and recompacting the existing artificial fill on-site, as deep as 18 feet bgs. The removal of the remedial fill and recompaction activities have been included in the construction schedule and assumptions of the project, including the 3,528 cubic yards of import that would be required for grading (see Section 3.3.9) and would not require additional import and export of soils outside of what has been analyzed throughout this EIR. Therefore, with incorporation of **MM-GEO-1**, as well as **PDF-GEO-1** through **PDF-GEO-15**, impacts associated with a geologic unit that or soil that is unstable, or that would become unstable as a result of the project would be **less than significant**.

**4. *Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?***

As discussed in Section 4.7.1, the project site is underlain by soil with low expansion potential (Appendix E). The project site is composed of Urban land-Soboba-Tujunga complex (72.2%) and Trigo family, granitic substratum (27.7%) (USDA 2020), which have a considerably low expansive potential. Adoption of the project would eventually result in development 42 detached single-family residential units and 3.39 acres of open space (including an approximately 3.04-acre dedicated neighborhood park), within the 17.30-acre project site. As mentioned previously, development under the project would adhere to the most current CBC standards. Design and construction of the project in accordance with the CBC would minimize the adverse effects of strong ground shaking to the greatest degree feasible. In addition, the Project would comply with **PDF-GEO-12**, which requires conventional foundation recommendations to be incorporated by the project that further reduce potential impacts associated with expansive soils. Therefore, impacts associated with risk to life or property associated with expansive soils would be **less than significant**.

**5. *Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?***

The project would not include septic tanks or other alternative wastewater treatment methods. Therefore, implementation of the proposed project would result in **no impact** associated with soils incapable of supporting septic systems or alternative wastewater treatment methods.

**6. *Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?***

As discussed in Section 4.7.1, according to the City's General Plan, no paleontological resources have been identified within the City (City of Sierra Madre 2015). A records search was completed for the proposed project by the LACM on December 4, 2020. Although no fossils are recorded from within the project site, fossil localities are documented nearby from sedimentary deposits that are similar to those underlying the project site. According to the records search

results received from LACM, older alluvial deposits in the greater Los Angeles area have yielded scientifically significant vertebrate fossil specimens. A locality in Highland Park of Los Angeles, LACM VPCIT 342, yielded Pleistocene megafaunal remains, including mammoth (*Mammuthus*) and bison (*Bison*) at approximately 14 feet bgs. A second locality in the Coyote Pass area of Monterey Park, LACM VP 3363, produced a specimen of horse (*Equus*) at an unknown depth. Their locality, LACM VP 1023, located along Workman Street was discovered during storm drain excavations, and produced specimens of bird (*Aves*). At locality LACM VP 2032, near the Interstate (I-) 5 and I-10 interchange and Mission Road, mastodon (*Mammut*) remains were recovered between 20 and 35 feet bgs. Locality LACM VP 7702, near Atlantic Boulevard, yielded an assemblage of microvertebrate remains, including the following taxa: fish (*Gasterosteus*), snake (*Colubridae*), rodent (*Thomomys*, *Microtus*), and rabbit (*Sylvilagus*) (LACM 2020).

Quaternary terrace deposits of Pleistocene age (approximately 200,000 to 11,000 years old) are mapped as underlying the eastern and southern portions of the project area according to the geotechnical investigation (Appendix E). These Pleistocene age deposits have the potential to yield scientifically significant paleontological resources. Therefore, impacts associated with paleontological resources would be **potentially significant (Impact GEO-3)**. However, implementation of **MM-GEO-2**, which requires paleontological monitoring and resource treatment, would be implemented and would reduce impacts to less than significant.

### 4.7.6 Mitigation Measures

The following mitigation measure (**MM-GEO-1**), would be required to reduce impacts to unstable soils or ground failure, including liquefaction, from hydroconsolidation (**Impact GEO-1**) and impacts to unstable soils (**Impact GEO-2**) to less than significant:

**MM-GEO-1 Removal and Recompaction of Artificial Soil.** Prior to the commencement of any construction activity on site, the project contractor shall remove and recompact all artificial soil present within the limits of proposed grading, as deep as 18 feet bgs.

The following mitigation measure (**MM-GEO-2**) would be required to reduce impacts to any unique paleontological resources (**Impact GEO-3**) to less than significant:

**MM-GEO-2 Paleontological Monitoring and Resource Treatment.** Prior to the commencement of any grading activity on site, the project applicant shall retain a Qualified Paleontologist meeting the Society of Vertebrate Paleontology (SVP) standards and guidelines, subject to the review and approval of the City of Sierra Madre's Planning Department. The paleontologist shall prepare a Paleontological Resources Impact Mitigation Program (PRIMP) for the proposed project. The PRIMP shall be consistent with the guidelines of the SVP. The Qualified Paleontologist shall attend the pre-construction meeting and their representative, the Qualified Monitor, shall be on site during all rough grading and other significant ground-disturbing activities at depths greater than 5 feet below the ground surface. In the event that paleontological resources (e.g., fossils) are unearthed during grading, the Qualified Monitor shall temporarily halt and/or divert grading activity to allow recovery of paleontological resources. The area of discovery shall be roped off with a 50-foot-radius buffer. Once documentation and collection of the find is completed, the Qualified Monitor shall remove the rope and allow grading to recommence in the area of the find.

### 4.7.7 Level of Significance After Mitigation

All impacts would be **less than significant** after the incorporation of **MM-GEO-1** and **MM-GEO-2**.

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## 4.8 Greenhouse Gas Emissions

This section describes the existing greenhouse gas (GHG) conditions of The Meadows at Bailey Canyon Specific Plan Project (project or proposed project) site and vicinity, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures related to implementation of the proposed project. An Air Quality and Greenhouse Gas Emissions Analysis Technical Report that evaluated and identified potential GHG emission impacts associated with the project was prepared for the project by Dudek in November 2020 and has been included as Appendix B of this Environmental Impact Report (EIR).

### 4.8.1 Existing Conditions

#### 4.8.1.1 Climate Change Overview

Climate change refers to any significant change in measures of climate, such as temperature, precipitation, or wind patterns, lasting for an extended period of time (i.e., decades or longer). The Earth's temperature depends on the balance between energy entering and leaving the planet's system. Many factors, both natural and human, can cause changes in Earth's energy balance, including variations in the sun's energy reaching Earth, changes in the reflectivity of Earth's atmosphere and surface, and changes in the greenhouse effect, which affects the amount of heat retained by Earth's atmosphere (EPA 2017a).

The greenhouse effect is the trapping and build-up of heat in the atmosphere (troposphere) near the Earth's surface. The greenhouse effect traps heat in the troposphere through a threefold process as follows: Short-wave radiation emitted by the Sun is absorbed by the Earth, the Earth emits a portion of this energy in the form of long-wave radiation, and GHGs in the upper atmosphere absorb this long-wave radiation and emit it into space and toward the Earth. The greenhouse effect is a natural process that contributes to regulating the Earth's temperature and creates a pleasant, livable environment on the Earth. Human activities that emit additional GHGs to the atmosphere increase the amount of infrared radiation that gets absorbed before escaping into space, thus enhancing the greenhouse effect and causing the Earth's surface temperature to rise.

The scientific record of the Earth's climate shows that the climate system varies naturally over a wide range of time scales and that, in general, climate changes prior to the Industrial Revolution in the 1700s can be explained by natural causes such as changes in solar energy, volcanic eruptions, and natural changes in GHG concentrations. Recent climate changes, in particular the warming observed over the past century, however, cannot be explained by natural causes alone. Rather, it is extremely likely that human activities have been the dominant cause of that warming since the mid-twentieth century and is the most significant driver of observed climate change (EPA 2017a; IPCC 2013). Human influence on the climate system is evident from the increasing GHG concentrations in the atmosphere, positive radiative forcing, observed warming, and improved understanding of the climate system (IPCC 2013). The atmospheric concentrations of GHGs have increased to levels unprecedented in the last 800,000 years, primarily from fossil fuel emissions and secondarily from emissions associated with land use changes (IPCC 2013). Continued emissions of GHGs will cause further warming and changes in all components of the climate system, which is discussed further in Appendix B.

4.8.1.2 Greenhouse Gases

A GHG is any gas that absorbs infrared radiation in the atmosphere; in other words, GHGs trap heat in the atmosphere. As defined in California Health and Safety Code, Section 38505(g), for purposes of administering many of the State’s primary GHG emissions reduction programs, GHGs include carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF<sub>6</sub>), and nitrogen trifluoride (NF<sub>3</sub>) (see also CEQA Guidelines, Section 15364.5). Some GHGs, such as CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O, occur naturally and are emitted into the atmosphere through natural processes and human activities. Of these gases, CO<sub>2</sub> and CH<sub>4</sub> are emitted in the greatest quantities from human activities. Manufactured GHGs, which have a much greater heat-absorption potential than CO<sub>2</sub>, include fluorinated gases, such as HFCs, PFCs, and SF<sub>6</sub>, which are associated with certain industrial products and processes. The following paragraphs provide a summary of the most common GHGs and their sources.<sup>1</sup>

**Carbon Dioxide.** CO<sub>2</sub> is a naturally occurring gas and a by-product of human activities and is the principal anthropogenic GHG that affects the Earth’s radiative balance. Natural sources of CO<sub>2</sub> include respiration of bacteria, plants, animals, and fungus; evaporation from oceans; volcanic out-gassing; and decomposition of dead organic matter. Human activities that generate CO<sub>2</sub> are from the combustion of fuels such as coal, oil, natural gas, and wood and changes in land use.

**Methane.** CH<sub>4</sub> is produced through both natural and human activities. CH<sub>4</sub> is a flammable gas and is the main component of natural gas. Methane is produced through anaerobic (without oxygen) decomposition of waste in landfills, flooded rice fields, animal digestion, decomposition of animal wastes, production and distribution of natural gas and petroleum, coal production, and incomplete fossil fuel combustion.

**Nitrous Oxide.** N<sub>2</sub>O is produced through natural and human activities, mainly through agricultural activities and natural biological processes, although fuel burning and other processes also create N<sub>2</sub>O. Sources of N<sub>2</sub>O include soil cultivation practices (microbial processes in soil and water), especially the use of commercial and organic fertilizers, manure management, industrial processes (such as in nitric acid production, nylon production, and fossil-fuel-fired power plants), vehicle emissions, and using N<sub>2</sub>O as a propellant (e.g., rockets, racecars, and aerosol sprays).

**Fluorinated Gases.** Fluorinated gases (also referred to as F-gases) are synthetic powerful GHGs emitted from many industrial processes. Fluorinated gases are commonly used as substitutes for stratospheric ozone-depleting substances (e.g., CFCs, HCFCs, and halons). The most prevalent fluorinated gases include the following:

- **Hydrofluorocarbons:** HFCs are compounds containing only hydrogen, fluorine, and carbon atoms. HFCs are synthetic chemicals used as alternatives to ozone-depleting substances in serving many industrial, commercial, and personal needs. HFCs are emitted as by-products of industrial processes and are used in manufacturing.
- **Perfluorocarbons:** PFCs are a group of human-made chemicals composed of carbon and fluorine only. These chemicals were introduced as alternatives, with HFCs, to the ozone depleting substances. The two main sources of PFCs are primary aluminum production and semiconductor manufacturing. Since PFCs have stable molecular structures and do not break down through the chemical processes in the lower atmosphere, these chemicals have long lifetimes, ranging between 10,000 and 50,000 years.

<sup>1</sup> The descriptions of GHGs are summarized from the Intergovernmental Panel on Climate Change (IPCC) Second Assessment Report (IPCC 1995), IPCC Fourth Assessment Report (IPCC 2007), CARB’s “Glossary of Terms Used in GHG Inventories” (CARB 2015), and EPA’s “Glossary of Climate Change Terms” (EPA 2016).



- **Sulfur Hexafluoride:** SF<sub>6</sub> is a colorless gas soluble in alcohol and ether and slightly soluble in water. SF<sub>6</sub> is used for insulation in electric power transmission and distribution equipment, semiconductor manufacturing, the magnesium industry, and as a tracer gas for leak detection.
- **Nitrogen Trifluoride:** NF<sub>3</sub> is used in the manufacture of a variety of electronics, including semiconductors and flat panel displays.

**Chlorofluorocarbons.** CFCs are synthetic chemicals that have been used as cleaning solvents, refrigerants, and aerosol propellants. CFCs are chemically unreactive in the lower atmosphere (troposphere) and the production of CFCs was prohibited in 1987 due to the chemical destruction of stratospheric O<sub>3</sub>.

**Hydrochlorofluorocarbons.** HCFCs are a large group of compounds, whose structure is very close to that of CFCs—containing hydrogen, fluorine, chlorine, and carbon atoms—but including one or more hydrogen atoms. Like HFCs, HCFCs are used in refrigerants and propellants. HCFCs were also used in place of CFCs for some applications; however, their use in general is being phased out.

**Black Carbon.** Black carbon is a component of fine particulate matter, which has been identified as a leading environmental risk factor for premature death. It is produced from the incomplete combustion of fossil fuels and biomass burning, particularly from older diesel engines and forest fires. Black carbon warms the atmosphere by absorbing solar radiation, influences cloud formation, and darkens the surface of snow and ice, which accelerates heat absorption and melting. Black carbon is a short-lived species that varies spatially, which makes it difficult to quantify the global warming potential. Diesel particulate matter emissions are a major source of black carbon and are TACs that have been regulated and controlled in California for several decades to protect public health. In relation to declining diesel particulate matter from the California Air Resources Board's (CARB) regulations pertaining to diesel engines, diesel fuels, and burning activities, CARB estimates that annual black carbon emissions in California have reduced by 70% between 1990 and 2010, with 95% control expected by 2020 (CARB 2014).

**Water Vapor.** The primary source of water vapor is evaporation from the ocean, with additional vapor generated by sublimation (change from solid to gas) from ice and snow, evaporation from other water bodies, and transpiration from plant leaves. Water vapor is the most important, abundant, and variable GHG in the atmosphere and maintains a climate necessary for life.

**Ozone.** Tropospheric O<sub>3</sub>, which is created by photochemical reactions involving gases from both natural sources and human activities, acts as a GHG. Stratospheric O<sub>3</sub>, which is created by the interaction between solar ultraviolet radiation and molecular oxygen (O<sub>2</sub>), plays a decisive role in the stratospheric radiative balance. Depletion of stratospheric O<sub>3</sub>, due to chemical reactions that may be enhanced by climate change, results in an increased ground-level flux of ultraviolet-B radiation.

**Aerosols.** Aerosols are suspensions of particulate matter in a gas emitted into the air through burning biomass (plant material) and fossil fuels. Aerosols can warm the atmosphere by absorbing and emitting heat and can cool the atmosphere by reflecting light.

### 4.8.1.3 Global Warming Potential

Gases in the atmosphere can contribute to climate change both directly and indirectly. Direct effects occur when the gas itself absorbs radiation. Indirect radiative forcing occurs when chemical transformations of the substance produce other GHGs, when a gas influences the atmospheric lifetimes of other gases, and/or when a gas affects

atmospheric processes that alter the radiative balance of the Earth (e.g., affect cloud formation or albedo) (EPA 2016). The Intergovernmental Panel on Climate Change (IPCC) developed the global warming potential (GWP) concept to compare the ability of each GHG to trap heat in the atmosphere relative to another gas. The GWP of a GHG is defined as the ratio of the time-integrated radiative forcing from the instantaneous release of 1 kilogram of a trace substance relative to that of 1 kilogram of a reference gas (IPCC 2014). The reference gas used is CO<sub>2</sub>; therefore, GWP-weighted emissions are measured in metric tons of CO<sub>2</sub> equivalent (MT CO<sub>2</sub>e).

The current version of the California Emissions Estimator Model (CalEEMod) (version 2016.3.2) assumes that the GWP for CH<sub>4</sub> is 25 (so emissions of 1 MT of CH<sub>4</sub> are equivalent to emissions of 25 MT of CO<sub>2</sub>) (CAPCOA 2017), and the GWP for N<sub>2</sub>O is 298, based on the IPCC Fourth Assessment Report (IPCC 2007). The GWP values identified in CalEEMod were applied to the project.

4.8.1.4 Sources of Greenhouse Gas Emissions

Per the EPA’s Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990–2018 (EPA 2020), total United States GHG emissions were approximately 6,677 million MT CO<sub>2</sub>e in 2018. The primary GHG emitted by human activities in the United States was CO<sub>2</sub>, which represented approximately 81% of total GHG emissions. The largest source of CO<sub>2</sub>, and of overall GHG emissions, was fossil-fuel combustion, which accounted for approximately 92.8% of CO<sub>2</sub> emissions in 2018. Relative to 1990, gross United States GHG emissions in 2018 are higher by 3.7%; down from a high of 15.5% above 1990 levels in 2007. GHG emissions increased from 2017 to 2018 by 3.1% and overall, net emissions in 2018 were 10.2% below 2005 levels (EPA 2020).

According to California’s 2000–2018 GHG emissions inventory (2020 edition), California emitted 425 MMT CO<sub>2</sub>e in 2018, including emissions resulting from out-of-state electrical generation (CARB 2020). The sources of GHG emissions in California include transportation, industry, electric power production from both in-state and out-of-state sources, residential and commercial activities, agriculture, high GWP substances, and recycling and waste. The California GHG emission source categories and their relative contributions in 2018 are presented in Table 4.8-1.

**Table 4.8-1. Greenhouse Gas Emissions Sources in California**

Source Category	Annual GHG Emissions (MMT CO <sub>2</sub> e)	Percent of Total <sup>a</sup>
Transportation	169.50	40%
Industrial	89.18	21%
Electric power <sup>b</sup>	63.11	15%
Commercial and residential	41.37	10%
Agriculture	32.57	8%
High global-warming potential substances	20.46	5%
Recycling and waste	9.09	2%
<b>Total</b>	<b>425.28</b>	<b>100%</b>

Source: CARB 2020.

GHG = greenhouse gas; MMT CO<sub>2</sub>e = million metric tons of carbon dioxide equivalent.

Emissions reflect the 2018 California GHG inventory.

<sup>a</sup> Percentage of total has been rounded, and total may not sum due to rounding.

<sup>b</sup> Includes emissions associated with imported electricity, which account for 24.57 MMT CO<sub>2</sub>e annually.

## 4.8.2 Relevant Plans, Policies, and Ordinances

### Federal

#### *Massachusetts v. EPA*

In *Massachusetts v. EPA* (April 2007), the U.S. Supreme Court directed the EPA administrator to determine whether GHG emissions from new motor vehicles cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare, or whether the science is too uncertain to make a reasoned decision. In December 2009, the administrator signed a final rule with the following two distinct findings regarding GHGs under Section 202(a) of the federal Clean Air Act:

- The Administrator found that elevated concentrations of GHGs—CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, HFCs, PFCs, and SF<sub>6</sub>—in the atmosphere threaten the public health and welfare of current and future generations. This is the “endangerment finding.”
- The Administrator further found the combined emissions of GHGs—CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, and HFCs—from new motor vehicles and new motor vehicle engines contribute to the GHG air pollution that endangers public health and welfare. This is the “cause or contribute finding.”

These two findings were necessary to establish the foundation for regulation of GHGs from new motor vehicles as air pollutants under the Clean Air Act.

#### *Energy Independence and Security Act of 2007*

The Energy Independence and Security Act of 2007 (December 2007), among other key measures, would do the following, which would aid in the reduction of national GHG emissions (EPA 2007):

- Increase the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard requiring fuel producers to use at least 36 billion gallons of biofuel in 2022.
- Set a target of 35 miles per gallon for the combined fleet of cars and light trucks by model year 2020, and directs National Highway Traffic Safety Administration (NHTSA) to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for work trucks.
- Prescribe or revise standards affecting regional efficiency for heating and cooling products and procedures for new or amended standards, energy conservation, energy-efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances.

#### *Federal Vehicle Standards*

In response to the U.S. Supreme Court ruling previously discussed, the Bush Administration issued Executive Order (EO) 13432 in 2007 directing the EPA, the Department of Transportation, and the Department of Energy to establish regulations that reduce GHG emissions from motor vehicles, non-road vehicles, and non-road engines by 2008. In 2009, the NHTSA issued a final rule regulating fuel efficiency and GHG emissions from cars and light-duty trucks for model year 2011, and in 2010, the EPA and NHTSA issued a final rule regulating cars and light-duty trucks for model years 2012–2016 (75 FR 25324–25728).

In 2010, President Barack Obama issued a memorandum directing the Department of Transportation, Department of Energy, EPA, and NHTSA to establish additional standards regarding fuel efficiency and GHG reduction, clean fuels, and advanced vehicle infrastructure. In response to this directive, EPA and NHTSA proposed stringent, coordinated federal GHG and fuel economy standards for model years 2017–2025 light-duty vehicles. The proposed standards projected to achieve 163 grams per mile of CO<sub>2</sub> in model year 2025, on an average industry fleet-wide basis, which is equivalent to 54.5 miles per gallon if this level were achieved solely through fuel efficiency. The final rule was adopted in 2012 for model years 2017–2021 (77 FR 62624–63200). On January 12, 2017, the EPA finalized its decision to maintain the current greenhouse (GHG) emissions standards for model years 2022–2025 cars and light trucks (EPA 2017b).

In addition to the regulations applicable to cars and light-duty trucks described above, in 2011, the EPA and NHTSA announced fuel economy and GHG standards for medium- and heavy-duty trucks for model years 2014–2018 (76 FR 57106–57513). The standards for CO<sub>2</sub> emissions and fuel consumption are tailored to three main vehicle categories: combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles. According to the EPA, this regulatory program will reduce GHG emissions and fuel consumption for the affected vehicles by 6%–23% over the 2010 baselines.

In August 2016, the EPA and NHTSA announced the adoption of the phase two program related to the fuel economy and GHG standards for medium- and heavy-duty trucks. The phase two program will apply to vehicles with model year 2018 through 2027 for certain trailers, and model years 2021 through 2027 for semi-trucks, large pickup trucks, vans, and all types and sizes of buses and work trucks. The final standards are expected to lower CO<sub>2</sub> emissions by approximately 1.1 billion MT and reduce oil consumption by up to 2 billion barrels over the lifetime of the vehicles sold under the program (EPA and NHTSA 2016).

In August 2018, EPA and NHTSA proposed to amend certain fuel economy and GHG standards for passenger cars and light trucks and establish new standards for model years 2021 through 2026. Compared to maintaining the post-2020 standards now in place, the 2018 proposal would increase U.S. fuel consumption by about half a million barrels per day (2%–3% of total daily consumption, according to the Energy Information Administration) and would impact the global climate by 3/1000th of 1°C by 2100 (EPA and NHTSA 2018). California and other states have stated their intent to challenge federal actions that would delay or eliminate GHG reduction measures and have committed to cooperating with other countries to implement global climate change initiatives.

On September 27, 2019, the EPA and NHTSA published the Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule Part One: One National Program (84 FR 51310), which became effective November 26, 2019. The Part One Rule revokes California’s authority to set its own GHG emissions standards and set zero-emission vehicle mandates in California. On March 31, 2020, the EPA and NHTSA issued the Part Two Rule, which will go into effect 60 days after being published in the Federal Register. The Part Two Rule sets CO<sub>2</sub> emissions standards and corporate average fuel economy standards for passenger vehicles and light-duty trucks for model years 2021 through 2026. This issue is evolving as California and 22 other states, as well as the District of Columbia and four cities, filed suit against the EPA and a petition for reconsideration of the rule on November 26, 2019. The litigation is not expected to be resolved for at least several months.

### ***Clean Power Plan and New Source Performance Standards for Electric Generating Units***

On October 23, 2015, EPA published a final rule (effective December 22, 2015) establishing the Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units (80 FR 64510–64660), also known as the Clean Power Plan. These guidelines prescribe how states must develop plans to reduce GHG

emissions from existing fossil-fuel-fired electric generating units. The guidelines establish CO<sub>2</sub> emission performance rates representing the best system of emission reduction for two subcategories of existing fossil-fuel-fired electric generating units: (1) fossil-fuel-fired electric utility steam-generating units, and (2) stationary combustion turbines. Concurrently, the EPA published a final rule (effective October 23, 2015) establishing Standards of Performance for Greenhouse Gas Emissions from New, Modified, and Reconstructed Stationary Sources: Electric Utility Generating Units (80 FR 64661–65120). The rule prescribes CO<sub>2</sub> emission standards for newly constructed, modified, and reconstructed affected fossil-fuel-fired electric utility generating units. The U.S. Supreme Court stayed implementation of the Clean Power Plan pending resolution of several lawsuits.

**State**

The statewide GHG emissions regulatory framework is summarized below by category: state climate change targets, building energy, renewable energy and energy procurement, mobile sources, solid waste, water, and other state regulations and goals. The following text describes EOs, legislation, regulations, and other plans and policies that would directly or indirectly reduce GHG emissions and/or address climate change issues.

***State Climate Change Targets***

The state has taken a number of actions to address climate change. These include EOs, legislation, and CARB plans and requirements. These are summarized below.

***Executive Order S-3-05***

EO S-3-05 (June 2005) established California’s GHG emissions reduction targets and laid out responsibilities among the state agencies for implementing the EO and for reporting on progress toward the targets. This EO established the following targets:

- By 2010, reduce GHG emissions to 2000 levels
- By 2020, reduce GHG emissions to 1990 levels
- By 2050, reduce GHG emissions to 80% below 1990 levels

EO S-3-05 also directed the California Environmental Protection Agency to report biannually on progress made toward meeting the GHG targets and the impacts to California due to global warming, including impacts to water supply, public health, agriculture, the coastline, and forestry. The Climate Action Team (CAT) was formed, which subsequently issued reports from 2006 to 2010 (CAT 2006, 2010, 2016).

***Assembly Bill 32***

In furtherance of the goals established in EO S-3-05, the Legislature enacted Assembly Bill (AB) 32 (Núñez and Pavley). The bill is referred to as the California Global Warming Solutions Act of 2006 (September 27, 2006). AB 32 provided initial direction on creating a comprehensive multiyear program to limit California’s GHG emissions at 1990 levels by 2020 and initiate the transformations required to achieve the state’s long-range climate objectives.

***State Bill 32 and Assembly Bill 197***

State Bill (SB) 32 and AB 197 (enacted in 2016) are companion bills. SB 32 codified the 2030 emissions reduction goal of EO B-30-15 by requiring CARB to ensure that statewide GHG emissions are reduced to 40%

below 1990 levels by 2030. AB 197 established the Joint Legislative Committee on Climate Change Policies, consisting of at least three members of the Senate and three members of the Assembly, in order to provide ongoing oversight over implementation of the state’s climate policies. AB 197 also added two members of the Legislature to the Board as nonvoting members; requires CARB to make available and update (at least annually via its website) emissions data for GHGs, criteria air pollutants, and TACs from reporting facilities; and, requires CARB to identify specific information for GHG emissions reduction measures when updating the scoping plan.

### ***CARB’s 2007 Statewide Limit***

In 2007, in accordance with California Health and Safety Code, Section 38550, CARB approved a statewide limit on the GHG emissions level for year 2020 consistent with the determined 1990 baseline (427 million metric tons [MMT] CO<sub>2</sub>e).

### ***CARB’s Climate Change Scoping Plan***

One specific requirement of AB 32 is for CARB to prepare a “scoping plan” for achieving the maximum technologically feasible and cost-effective GHG emission reductions by 2020 (Health and Safety Code, Section 38561[a]), and to update the plan at least once every 5 years. In 2008, CARB approved the first scoping plan. The Climate Change Scoping Plan: A Framework for Change (Scoping Plan) included a mix of recommended strategies that combined direct regulations, market-based approaches, voluntary measures, policies, and other emission reduction programs calculated to meet the 2020 statewide GHG emission limit and initiate the transformations needed to achieve the state’s long-range climate objectives. The key elements of the Scoping Plan include the following (CARB 2008):

1. Expanding and strengthening existing energy efficiency programs as well as building and appliance standards
2. Achieving a statewide renewable energy mix of 33%
3. Developing a California cap-and-trade program that links with other Western Climate Initiative partner programs to create a regional market system and caps sources contributing 85% of California’s GHG emissions
4. Establishing targets for transportation-related GHG emissions for regions throughout California, and pursuing policies and incentives to achieve those targets
5. Adopting and implementing measures pursuant to existing state laws and policies, including California’s clean car standards, goods movement measures, and the Low Carbon Fuel Standard (LCFS 17 CCR, Section 95480 et seq.)
6. Creating targeted fees, including a public goods charge on water use, fees on high GWP gases, and a fee to fund the administrative costs of the State of California’s long-term commitment to AB 32 implementation

The Scoping Plan also identified local governments as essential partners in achieving California’s goals to reduce GHG emissions because they have broad influence and, in some cases, exclusive authority over activities that contribute to significant direct and indirect GHG emissions through their planning and permitting processes, local ordinances, outreach and education efforts, and municipal operations. Specifically, the Scoping Plan encouraged local governments to adopt a reduction goal for municipal operations and for community emissions to reduce GHGs by approximately 15% from then levels (2008) by 2020. Many local governments developed community-scale local GHG reduction plans based on this Scoping Plan recommendation.

In 2014, CARB approved the first update to the Scoping Plan. The First Update to the Climate Change Scoping Plan: Building on the Framework (First Update) defined the state’s GHG emission reduction priorities for the next 5 years and laid the groundwork to start the transition to the post-2020 goals set forth in EOs S-3-05 and B-16-2012. The First Update concluded that California is on track to meet the 2020 target but recommended a 2030 mid-term GHG reduction target be established to ensure a continuum of action to reduce emissions. The First Update recommended a mix of technologies in key economic sectors to reduce emissions through 2050 including: energy demand reduction through efficiency and activity changes; large-scale electrification of on-road vehicles, buildings and industrial machinery; decarbonizing electricity and fuel supplies; and, the rapid market penetration of efficient and clean energy technologies. As part of the First Update, CARB recalculated the state’s 1990 emissions level, using more recent global warming potentials identified by the Intergovernmental Panel on Climate Change, from 427 MMT CO<sub>2e</sub> to 431 MMT CO<sub>2e</sub>.

In 2015, as directed by EO B-30-15, CARB began working on an update to the Scoping Plan to incorporate the 2030 target of 40% below 1990 levels by 2030 to keep California on its trajectory toward meeting or exceeding the long-term goal of reducing GHG emissions to 80% below 1990 levels by 2050 as set forth in S-3-05. The Governor called on California to pursue a new and ambitious set of strategies, in line with the five climate change pillars from his inaugural address, to reduce GHG emissions and prepare for the unavoidable impacts of climate change. In the summer of 2016, the Legislature affirmed the importance of addressing climate change through passage of Senate Bill (SB) 32 (Pavley, Chapter 249, Statutes of 2016).

In January 2017, CARB released the 2017 Climate Change Scoping Plan Update (2030 Scoping Plan) for public review and comment (CARB 2017). The 2030 Scoping Plan builds on the successful framework established in the initial Scoping Plan and First Update, while identifying new, technologically feasible and cost-effective strategies that will serve as the framework to achieve the 2030 GHG target and define the state’s climate change priorities to 2030 and beyond. The strategies’ “known commitments” include implementing renewable energy and energy efficiency (including the mandates of SB 350), increased stringency of the Low Carbon Fuel Standard, measures identified in the Mobile Source and Freight Strategies, measures identified in the proposed Short-Lived Climate Pollutant Plan, and increased stringency of SB 375 targets. To fill the gap in additional reductions needed to achieve the 2030 target, it recommends continuing the Cap-and-Trade Program and a measure to reduce GHGs from refineries by 20%.

For local governments, the 2030 Scoping Plan replaced the initial Scoping Plan’s 15% reduction goal with a recommendation to aim for a community-wide goal of no more than 6 MT CO<sub>2e</sub> per capita by 2030 and no more than 2 MT CO<sub>2e</sub> per capita by 2050, which are consistent with the state’s long-term goals. These goals are also consistent with the Under 2 MOU (Under 2 2016) and the Paris Agreement, which are developed around the scientifically based levels necessary to limit global warming below 2°C. The 2030 Scoping Plan recognized the benefits of local government GHG planning (e.g., through climate action plans [CAPs]) and provide more information regarding tools CARB is working on to support those efforts. It also recognizes the CEQA streamlining provisions for project level review where there is a legally adequate CAP.<sup>2</sup> The Second Update was approved by CARB’s Governing Board on December 14, 2017.

The Scoping Plan recommends strategies for implementation at the statewide level to meet the goals of AB 32, SB 32, and the EOs and establishes an overall framework for the measures that will be adopted to reduce California’s GHG emissions. A project is considered consistent with the statutes and EOs if it meets the general

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<sup>2</sup> *Sierra Club v. County of Napa* (2004) 121 Cal.App.4th 1490; *San Francisco Tomorrow et al. v. City and County of San Francisco* (2015) 229 Cal.App.4th 498; *San Franciscans Upholding the Downtown Specific Plan v. City and County of San Francisco* (2002) 102 Cal.App.4th 656; *Sequoiah Hills Homeowners Assn. V. City of Oakland* (1993) 23 Cal.App.4th 704, 719.

policies in reducing GHG emissions to facilitate the achievement of the state’s goals and does not impede attainment of those goals. As discussed in several cases, a given project need not be in perfect conformity with each and every planning policy or goals to be consistent. A project would be consistent if it will further the objectives and not obstruct their attainment.

### ***CARB’s Regulations for the Mandatory Reporting of Greenhouse Gas Emissions***

CARB’s Regulation for the Mandatory Reporting of Greenhouse Gas Emissions (17 CCR 95100–95157) incorporated by reference certain requirements that EPA promulgated in its Final Rule on Mandatory Reporting of Greenhouse Gases (Title 40, CFR, Part 98). Specifically, Section 95100(c) of the Mandatory Reporting Regulation incorporated those requirements that EPA promulgated in the Federal Register on October 30, 2009; July 12, 2010; September 22, 2010; October 28, 2010; November 30, 2010; December 17, 2010; and April 25, 2011. In general, entities subject to the Mandatory Reporting Regulation that emit over 10,000 MT CO<sub>2</sub>e per year are required to report annual GHGs through the California Electronic GHG Reporting Tool. Certain sectors, such as refineries and cement plants, are required to report regardless of emission levels. Entities that emit more than the 25,000 MT CO<sub>2</sub>e per year threshold are required to have their GHG emission report verified by a CARB-accredited third-party verified.

### ***Executive Order B-18-12.***

EO B-18-12 (April 2012) directed state agencies, departments, and other entities under the governor’s executive authority to take action to reduce entity-wide GHG emissions by at least 10% by 2015 and 20% by 2020, as measured against a 2010 baseline. EO B-18-12 also established goals for existing state buildings for reducing grid-based energy purchases and water use.

### ***Executive Order B-30-15***

EO B-30-15 (April 2015) identified an interim GHG reduction target in support of targets previously identified under S-3-05 and AB 32. EO B-30-15 set an interim target goal of reducing GHG emissions to 40% below 1990 levels by 2030 to keep California on its trajectory toward meeting or exceeding the long-term goal of reducing GHG emissions to 80% below 1990 levels by 2050 as set forth in S-3-05. To facilitate achieving this goal, EO B-30-15 called for CARB to update the Scoping Plan to express the 2030 target in terms of MMT CO<sub>2</sub>e. The EO also called for state agencies to continue to develop and implement GHG emission reduction programs in support of the reduction targets.

### ***State Bills 605 and 1383***

SB 605 (2014) requires CARB to complete a comprehensive strategy to reduce emissions of short-lived climate pollutants (SLCPs) in the state; and SB 1383 (2016) requires CARB to approve and implement that strategy by January 1, 2018. SB 1383 also establishes specific targets for the reduction of SLCPs (40% below 2013 levels by 2030 for methane and HFCs, and 50% below 2013 levels by 2030 for anthropogenic black carbon), and provides direction for reductions from dairy and livestock operations and landfills. Accordingly, and as mentioned above, CARB adopted its Short-Lived Climate Pollutant Reduction Strategy (SLCP Reduction Strategy) in March 2017. The SLCP Reduction Strategy establishes a framework for the statewide reduction of emissions of black carbon, methane, and fluorinated gases.



***Building Energy***

**Title 24, Part 6**

Title 24 of the California Code of Regulations was established in 1978 and serves to enhance and regulate California’s building standards. While not initially promulgated to reduce GHG emissions, Part 6 of Title 24 specifically established Building Energy Efficiency Standards that are designed to ensure new and existing buildings in California achieve energy efficiency and preserve outdoor and indoor environmental quality. These energy efficiency standards are reviewed every few years by the Building Standards Commission and the California Energy Commission (CEC) (and revised if necessary) (California Public Resources Code, Section 25402[b][1]). The regulations receive input from members of industry, as well as the public, with the goal of “reducing of wasteful, uneconomic, inefficient, or unnecessary consumption of energy” (California Public Resources Code, Section 25402). These regulations are carefully scrutinized and analyzed for technological and economic feasibility (California Public Resources Code, Section 25402[d]) and cost effectiveness (California Public Resources Code, Sections 25402[b][2] and [b][3]). As a result, these standards save energy, increase electricity supply reliability, increase indoor comfort, avoid the need to construct new power plants, and help preserve the environment.

The 2019 Title 24 standards are the currently applicable building energy efficiency standards, and became effective on January 1, 2020. The 2019 Title 24 Building Energy Efficiency Standards will further reduce energy used and associated GHG emissions compared to prior standards. In general, single-family residences built to the 2019 standards are anticipated to use approximately 7% less energy due to energy efficiency measures than those built to the 2016 standards; once rooftop solar electricity generation is factored in, single-family residences built under the 2019 standards will use approximately 53% less energy than those under the 2016 standards (CEC 2018). Nonresidential buildings built to the 2019 standards are anticipated to use an estimated 30% less energy than those built to the 2016 standards (CEC 2018).

**Title 24, Part 11**

In addition to the CEC’s efforts, in 2008, the California Building Standards Commission adopted the nation’s first green building standards. The California Green Building Standards Code (Part 11 of Title 24) is commonly referred to as California’s Green Building Standards (CALGreen), and establishes minimum mandatory standards as well as voluntary standards pertaining to the planning and design of sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and interior air quality. The CALGreen standards took effect in January 2011 and instituted mandatory minimum environmental performance standards for all ground-up, new construction of commercial, low-rise residential and state-owned buildings and schools and hospitals. The CALGreen 2019 standards, which are the current standards, became effective January 1, 2020.

The mandatory standards require the following (24 CCR Part 11):

- Mandatory reduction in indoor water use through compliance with specified flow rates for plumbing fixtures and fittings
- Mandatory reduction in outdoor water use through compliance with a local water efficient landscaping ordinance or the California Department of Water Resources’ Model Water Efficient Landscape Ordinance
- When available, recycled water systems are required for residential landscaping irrigation systems.
- 65% of construction and demolition waste must be diverted from landfills

- Mandatory inspections of energy systems to ensure optimal working efficiency
- Inclusion of electric vehicle charging stations or designated spaces capable of supporting future charging stations
- Low-pollutant emitting exterior and interior finish materials, such as paints, carpets, vinyl flooring, and particle boards

The CALGreen standards also include voluntary efficiency measures that are provided at two separate tiers and implemented at the discretion of local agencies and applicants. CALGreen's Tier 1 standards call for a 15% improvement in energy requirements; stricter water conservation, 65% diversion of construction and demolition waste, 10% recycled content in building materials, 20% permeable paving, and 20% cement reduction. CALGreen's more rigorous Tier 2 standards call for a 30% improvement in energy requirements, stricter water conservation, 80% diversion of construction and demolition waste, 15% recycled content in building materials, 30% permeable paving, and 25% cement reduction.

The California Building Standards Commission approved amendments to the voluntary measures of the CALGreen standards in December 2018. The 2019 CALGreen standards will become effective January 1, 2020. As with the 2019 Title 24 standards, the 2019 CALGreen standards focus on building energy efficiency. As previously discussed, current CALGreen Tier 1 and 2 structure relies on percentage targets of 15% and 30% above standard code. These percentages would be replaced by Energy Design Rating (EDR) scores; somewhere between 14 and 12 for Tier 1 and 0 for Tier 2, where an EDR score of 0 is the threshold for Zero Net Energy code building.

### **Title 20**

Title 20 of the California Code of Regulations requires manufacturers of appliances to meet state and federal standards for energy and water efficiency. The CEC certifies an appliance based on a manufacturer's demonstration that the appliance meets the standards. New appliances regulated under Title 20 include refrigerators, refrigerator-freezers, and freezers; room air conditioners and room air-conditioning heat pumps; central air conditioners; spot air conditioners; vented gas space heaters; gas pool heaters; plumbing fittings and plumbing fixtures; fluorescent lamp ballasts; lamps; emergency lighting; traffic signal modules; dishwashers; clothes washers and dryers; cooking products; electric motors; low-voltage dry-type distribution transformers; power supplies; televisions and consumer audio and video equipment; and battery charger systems. Title 20 presents protocols for testing each type of appliance covered under the regulations and appliances must meet the standards for energy performance, energy design, water performance and water design. Title 20 contains three types of standards for appliances: federal and state standards for federally regulated appliances, state standards for federally regulated appliances, and state standards for non-federally regulated appliances.

### **Senate Bill 1**

SB 1 (Murray) (August 2006) established a \$3 billion rebate program to support the goal of the state to install rooftop solar energy systems with a generation capacity of 3,000 megawatts through 2016. SB 1 added sections to the Public Resources Code, including Chapter 8.8 (California Solar Initiative), that require building projects applying for ratepayer-funded incentives for photovoltaic systems to meet minimum energy efficiency levels and performance requirements. Section 25780 established that it is a goal of the state to establish a self-sufficient solar industry. The goals included establishing solar energy systems as a viable mainstream option for both homes and businesses within 10 years of adoption, and placing solar energy systems on 50% of new homes within 13 years of adoption. SB 1, also termed "Go Solar California," was previously titled "Million Solar Roofs."

### **California AB 1470 (Solar Water Heating)**

This bill established the Solar Water Heating and Efficiency Act of 2007. The bill makes findings and declarations of the Legislature relating to the promotion of solar water heating systems and other technologies that reduce natural gas demand. The bill defines several terms for purposes of the act. The bill requires the commission to evaluate the data available from a specified pilot program, and, if it makes a specified determination, to design and implement a program of incentives for the installation of 200,000 solar water heating systems in homes and businesses throughout the state by 2017.

### ***Renewable Energy and Energy Procurement***

**SB 1078.** SB 1078 (Sher) (September 2002) established the Renewable Portfolio Standard (RPS) program, which required an annual increase in renewable generation by the utilities equivalent to at least 1% of sales, with an aggregate goal of 20% by 2017. This goal was subsequently accelerated, requiring utilities to obtain 20% of their power from renewable sources by 2010 (see SB 107, EO S-14-08, and S-21-09).

**SB 1368.** SB 1368 (September 2006), required the CEC to develop and adopt regulations for GHG emission performance standards for the long-term procurement of electricity by local publicly owned utilities. These standards must be consistent with the standards adopted by the California Public Utilities Commission (CPUC).

**AB 1109.** Enacted in 2007, AB 1109 required the CEC to adopt minimum energy efficiency standards for general-purpose lighting, to reduce electricity consumption 50% for indoor residential lighting and 25% for indoor commercial lighting.

**EO S-14-08.** EO S-14-08 (November 2008) focused on the contribution of renewable energy sources to meet the electrical needs of California while reducing the GHG emissions from the electrical sector. This EO required that all retail suppliers of electricity in California serve 33% of their load with renewable energy by 2020. Furthermore, the EO directed state agencies to take appropriate actions to facilitate reaching this target. The California Natural Resources Agency (CNRA), through collaboration with the CEC and California Department of Fish and Wildlife (formerly the California Department of Fish and Game), was directed to lead this effort.

**EO S-21-09 and SBX1-2.** EO S-21-09 (September 2009) directed CARB to adopt a regulation consistent with the goal of EO S-14-08 by July 31, 2010. CARB was further directed to work with the CPUC and CEC to ensure that the regulation builds upon the RPS program and was applicable to investor-owned utilities, publicly owned utilities, direct access providers, and community choice providers. Under this order, CARB was to give the highest priority to those renewable resources that provide the greatest environmental benefits with the least environmental costs and impacts on public health and can be developed the most quickly in support of reliable, efficient, cost-effective electricity system operations. On September 23, 2010, CARB initially approved regulations to implement a Renewable Electricity Standard. However, this regulation was not finalized because of subsequent legislation (SB X1-2, Simitian, statutes of 2011) signed by Governor Brown in April 2011.

SB X1 2 expanded the Renewables Portfolio Standard by establishing a renewable energy target of 20% of the total electricity sold to retail customers in California per year by December 31, 2013, and 33% by December 31, 2020, and in subsequent years. Under the bill, a renewable electrical generation facility is one that uses biomass, solar thermal, photovoltaic, wind, geothermal, fuel cells using renewable fuels, small hydroelectric generation (30 megawatts or less), digester gas, municipal solid waste conversion, landfill gas, ocean wave, ocean thermal, or tidal current, and that meets other specified requirements with respect to its location.

SB X1-2 applies to all electricity retailers in the state including publicly owned utilities, investor-owned utilities, electricity service providers, and community choice aggregators. All of these entities must meet the renewable energy goals previously listed.

**SB 350.** SB 350 (October 2015) further expanded the RPS by establishing a goal of 50% of the total electricity sold to retail customers in California per year by December 31, 2030. In addition, SB 350 included the goal to double the energy efficiency savings in electricity and natural gas final end uses (e.g., heating, cooling, lighting, or class of energy uses on which an energy-efficiency program is focused) of retail customers through energy conservation and efficiency. The bill also requires the CPUC, in consultation with the CEC, to establish efficiency targets for electrical and gas corporations consistent with this goal.

**SB 100.** SB 100 (2018) increased the standards set forth in SB 350 establishing that 44% of the total electricity sold to retail customers in California per year by December 31, 2024, 52% by December 31, 2027, and 60% by December 31, 2030, be secured from qualifying renewable energy sources. SB 100 states that it is the policy of the state that eligible renewable energy resources and zero-carbon resources supply 100% of the retail sales of electricity to California. This bill requires that the achievement of 100% zero-carbon electricity resources do not increase the carbon emissions elsewhere in the western grid and that the achievement not be achieved through resource shuffling.

### **Mobile Sources**

**AB 1493.** AB 1493 (Pavley) (July 2002) was enacted in a response to the transportation sector accounting for more than half of California's CO<sub>2</sub> emissions. AB 1493 required CARB to set GHG emission standards for passenger vehicles, light-duty trucks, and other vehicles determined by the state board to be vehicles that are primarily used for noncommercial personal transportation in the state. The bill required that CARB set GHG emission standards for motor vehicles manufactured in 2009 and all subsequent model years. CARB adopted the standards in September 2004. When fully phased in, the near-term (2009–2012) standards will result in a reduction of about 22% in GHG emissions compared to the emissions from the 2002 fleet, while the mid-term (2013–2016) standards will result in a reduction of about 30%.

**Heavy Duty Diesel.** CARB adopted the final Heavy Duty Truck and Bus Regulation, Title 13, Division 3, Chapter 1, Section 2025, on December 31, 2014, to reduce PM and NO<sub>x</sub> emissions from heavy-duty diesel vehicles. The rule requires PM filters be applied to newer heavier trucks and buses by January 1, 2012, with older vehicles required to comply by January 1, 2015. The rule will require nearly all diesel trucks and buses to be compliant with the 2010 model year engine requirement by January 1, 2023. CARB also adopted an Airborne Toxic Control Measure to limit idling of diesel-fueled commercial vehicles on December 12, 2013. This rule requires diesel-fueled vehicles with gross vehicle weights greater than 10,000 pounds to idle no more than 5 minutes at any location (13 CCR 2485).

**EO S-1-07.** EO S-1-07 (January 2007, implementing regulation adopted in April 2009) sets a declining LCFS for GHG emissions measured in CO<sub>2e</sub> grams per unit of fuel energy sold in California. The target of the LCFS is to reduce the carbon intensity of California passenger vehicle fuels by at least 10% by 2020 (17 CCR 95480 et seq.). The carbon intensity measures the amount of GHG emissions in the lifecycle of a fuel, including extraction/feedstock production, processing, transportation, and final consumption, per unit of energy delivered.

**SB 375.** SB 375 (Steinberg) (September 2008) addresses GHG emissions associated with the transportation sector through regional transportation and sustainability plans. SB 375 requires CARB to adopt regional GHG reduction

targets for the automobile and light-truck sector for 2020 and 2035 and to update those targets every 8 years. SB 375 requires the state's 18 regional metropolitan planning organizations (MPOs) to prepare a Sustainable Communities Strategy (SCS) as part of their Regional Transportation Plan (RTP) that will achieve the GHG reduction targets set by CARB. If a MPO is unable to devise an SCS to achieve the GHG reduction target, the MPO must prepare an Alternative Planning Strategy demonstrating how the GHG reduction target would be achieved through alternative development patterns, infrastructure, or additional transportation measures or policies.

Pursuant to Government Code, Section 65080(b)(2)(K), a SCS does not: (i) regulate the use of land; (ii) supersede the land use authority of cities and counties; or (iii) require that a city's or county's land use policies and regulations, including those in a general plan, be consistent with it. Nonetheless, SB 375 makes regional and local planning agencies responsible for developing those strategies as part of the federally required metropolitan transportation planning process and the state-mandated housing element process.

In September 2010, CARB adopted the first SB 375 targets for the regional metropolitan planning organizations. The targets for the Southern California Association of Governments (SCAG) are an 8% reduction in emissions per capita by 2020 and a 13% reduction by 2035. Achieving these goals through adoption of a SCS is the responsibility of the metropolitan planning organizations. SCAG adopted its first RTP/SCS in April 2012. The plan quantified a 9% reduction by 2020 and a 16% reduction by 2035 (SCAG 2012). In June 2012, CARB accepted SCAG's quantification of GHG reductions and its determination the SCS, if implemented, would achieve SCAG targets. On April 4, 2016, the SCAG Regional Council adopted the 2016 RTP/SCS, which builds upon the progress made in the 2012 RTP/SCS. The updated RTP/SCS quantified an 8% reduction by 2020 and an 18% reduction by 2030 (SCAG 2016). In June 2016, CARB accepted SCAG's quantification of GHG reductions and its determination the SCS, if implemented, would achieve SCAG targets. In March 2018, CARB approved SCAG's updated targets of an 8% reduction by 2020 and a 19% reduction by 2030, effective October 1, 2018, which are consistent with the reduction targets from the Connect SoCal (2020–2045 RTP/SCS), adopted May 2020 (SCAG 2020).

**Advanced Clean Cars Program and Zero-Emissions-Vehicle Program.** The Advanced Clean Cars program (January 2012) is a new emissions-control program for model years 2015 through 2025. The program combines the control of smog- and soot-causing pollutants and GHG emissions into a single coordinated package. The package includes elements to reduce smog-forming pollution, reduce GHG emissions, promote clean cars, and provide the fuels for clean cars (CARB 2012). To improve air quality, CARB has implemented new emission standards to reduce smog-forming emissions beginning with 2015 model year vehicles. It is estimated that in 2025 cars will emit 75% less smog-forming pollution than the average new car sold today. To reduce GHG emissions, CARB, in conjunction with the EPA and the NHTSA, adopted new GHG standards for model year 2017 to 2025 vehicles; the new standards are estimated to reduce GHG emissions by 34% in 2025. The zero-emissions-vehicle (ZEV) program will act as the focused technology of the Advanced Clean Cars program by requiring manufacturers to produce increasing numbers of ZEVs and plug-in hybrid electric vehicles in the 2018 to 2025 model years.

**EO B-16-12.** EO B-16-12 (March 2012) required that state entities under the governor's direction and control support and facilitate the rapid commercialization of ZEVs. It ordered CARB, CEC, CPUC, and other relevant agencies to work with the Plug-in Electric Vehicle Collaborative and the California Fuel Cell Partnership to establish benchmarks to help achieve benchmark goals by 2015, 2020, and 2025. On a statewide basis, EO B-16-12 established a target reduction of GHG emissions from the transportation sector equaling 80% less than 1990 levels by 2050. This directive did not apply to vehicles that have special performance requirements necessary for the protection of the public safety and welfare. As explained under the "Federal Vehicle Standards" description above, EPA and NHTSA approved the SAFE Vehicles Rule Part One and Two, which revoked California's authority to set its own GHG emissions standards and set zero-emission vehicle mandates in California. As the EPA rule is the subject

of pending legal challenges, and CARB has not issued GHG adjustment factors for EMFAC, this analysis continues to utilize the best available information at this time, as set forth in EMFAC.

**AB 1236.** AB 1236 (October 2015) (Chiu) required a city, county, or city and county to approve an application for the installation of electric vehicle charging stations, as defined, through the issuance of specified permits unless the city or county makes specified written findings based upon substantial evidence in the record that the proposed installation would have a specific, adverse impact upon the public health or safety, and there is no feasible method to satisfactorily mitigate or avoid the specific, adverse impact. The bill provided for appeal of that decision to the planning commission, as specified. The bill provided that the implementation of consistent statewide standards to achieve the timely and cost-effective installation of electric vehicle charging stations is a matter of statewide concern. The bill required electric vehicle charging stations to meet specified standards. The bill required a city, county, or city and county with a population of 200,000 or more residents to adopt an ordinance, by September 30, 2016, that created an expedited and streamlined permitting process for electric vehicle charging stations, as specified. The bill also required a city, county, or city and county with a population of less than 200,000 residents to adopt this ordinance by September 30, 2017.

### ***Water***

**EO B-29-15.** In response to the ongoing drought in California, EO B-29-15 (April 2015) set a goal of achieving a statewide reduction in potable urban water usage of 25% relative to water use in 2013. The term of the EO extended through February 28, 2016, although many of the directives have become permanent water-efficiency standards and requirements. The EO includes specific directives that set strict limits on water usage in the state. In response to EO B-29-15, the California Department of Water Resources has modified and adopted a revised version of the Model Water Efficient Landscape Ordinance that, among other changes, significantly increases the requirements for landscape water use efficiency and broadens its applicability to include new development projects with smaller landscape areas.

### ***Solid Waste***

**AB 939 and AB 341.** In 1989, AB 939, known as the Integrated Waste Management Act (California Public Resources Code, Sections 40000 et seq.), was passed because of the increase in waste stream and the decrease in landfill capacity. The statute established the California Integrated Waste Management Board, which oversees a disposal reporting system. AB 939 mandated a reduction of waste being disposed where jurisdictions were required to meet diversion goals of all solid waste through source reduction, recycling, and composting activities of 25% by 1995 and 50% by 2000.

AB 341 (Chapter 476, Statutes of 2011 [Chesbro]) amended the California Integrated Waste Management Act of 1989 to include a provision declaring that it is the policy goal of the state that not less than 75% of solid waste generated be source-reduced, recycled, or composted by the year 2020, and annually thereafter. In addition, AB 341 required the California Department of Resources Recycling and Recovery (CalRecycle) to develop strategies to achieve the state's policy goal. CalRecycle conducted several general stakeholder workshops and several focused workshops and in August 2015 published a discussion document titled AB 341 Report to the Legislature, which identifies five priority strategies that CalRecycle believes would assist the state in reaching the 75% goal by 2020, legislative and regulatory recommendations and an evaluation of program effectiveness (CalRecycle 2012).

### *Other State Actions*

**Senate Bill 97.** SB 97 (Dutton) (August 2007) directed the Governor’s Office of Planning and Research (OPR) to develop guidelines under CEQA for the mitigation of GHG emissions. In 2008, OPR issued a technical advisory as interim guidance regarding the analysis of GHG emissions in CEQA documents. The advisory indicated that the lead agency should identify and estimate a project’s GHG emissions, including those associated with vehicular traffic, energy consumption, water usage, and construction activities (OPR 2008). The advisory further recommended that the lead agency determine significance of the impacts and impose all mitigation measures necessary to reduce GHG emissions to a level that is less than significant. The CNRA adopted the CEQA Guidelines amendments in December 2009, which became effective in March 2010.

Under the amended Guidelines, a lead agency has the discretion to determine whether to use a quantitative or qualitative analysis or apply performance standards to determine the significance of GHG emissions resulting from a particular project (14 CCR 15064.4[a]). The Guidelines require a lead agency to consider the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions (14 CCR 15064.4[b]). The Guidelines also allow a lead agency to consider feasible means of mitigating the significant effects of GHG emissions, including reductions in emissions through the implementation of project features or off-site measures. The adopted amendments do not establish a GHG emission threshold, instead allowing a lead agency to develop, adopt, and apply its own thresholds of significance or those developed by other agencies or experts. The CNRA also acknowledges that a lead agency may consider compliance with regulations or requirements implementing AB 32 in determining the significance of a project’s GHG emissions (CNRA 2009).

With respect to GHG emissions, the CEQA Guidelines state in Section 15064.4(a) that lead agencies should “make a good faith effort, to the extent possible on scientific and factual data, to describe, calculate or estimate” GHG emissions. The CEQA Guidelines note that an agency may identify emissions by either selecting a “model or methodology” to quantify the emissions or by relying on “qualitative analysis or other performance based standards” (14 CCR 15064.4[a]). Section 15064.4(b) states that the lead agency should consider the following when assessing the significance of impacts from GHG emissions on the environment: (1) the extent a project may increase or reduce GHG emissions as compared to the existing environmental setting; (2) whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and (3) the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions (14 CCR 15064.4[b]).

**EO S-13-08.** EO S-13-08 (November 2008) is intended to hasten California’s response to the impacts of global climate change, particularly sea-level rise. Therefore, the EO directs state agencies to take specified actions to assess and plan for such impacts. The final 2009 California Climate Adaptation Strategy report was issued in December 2009 (CNRA 2009), and an update, *Safeguarding California: Reducing Climate Risk*, followed in July 2014 (CNRA 2014). To assess the state’s vulnerability, the report summarizes key climate change impacts to the state for the following areas: Agriculture, Biodiversity and Habitat, Emergency Management, Energy, Forestry, Ocean and Coastal Ecosystems and Resources, Public Health, Transportation, and Water. Issuance of the *Safeguarding California: Implementation Action Plans* followed in March 2016 (CNRA 2016). In January 2018, the CNRA released the *Safeguarding California Plan: 2018 Update*, which communicates current and needed actions that state government should take to build climate change resiliency (CNRA 2018).

**2015 State of the State Address.** In January 2015, Governor Brown in his inaugural address and annual report to the Legislature established supplementary goals, which would further reduce GHG emissions over the next 15 years. These goals include an increase in California’s renewable energy portfolio from 33% to 50%, a reduction in vehicle petroleum use for cars and trucks by up to 50%, measures to double the efficiency of existing buildings, and decreasing emissions associated with heating fuels.

**2016 State of the State Address.** In his January 2016 address, Governor Brown established a statewide goal to bring per capita GHG emission down to two tons per person, which reflects the goal of the Global Climate Leadership Memorandum of Understanding (Under 2 MOU) to limit global warming to less than two degrees Celsius by 2050. The Under 2 MOU agreement pursues emission reductions of 80% to 95% below 1990 levels by 2050 and/or reaching a per capita annual emissions goal of less than 2 metric tons by 2050. A total of 135 jurisdictions representing 32 countries and 6 continents, including California, have signed or endorsed the Under 2 MOU (Under 2 2016).

### Local

#### ***South Coast Air Quality Management District***

Air districts typically act in an advisory capacity to local governments in establishing the framework for environmental review of air pollution impacts under CEQA. This may include recommendations regarding significance thresholds, analytical tools to estimate emissions and assess impacts, and mitigations for potentially significant impacts. Although air districts will also address some of these issues on a project-specific basis as responsible agencies, they may provide general guidance to local governments on these issues (SCAQMD 2008). As discussed in Section 4.8.3, Thresholds of Significance, the South Coast Air Quality Management District (SCAQMD) has recommended numeric CEQA significance thresholds for GHG emissions for lead agencies to use in assessing GHG impacts of residential and commercial development projects; however, these thresholds were not adopted.

#### ***Southern California Association of Governments***

The SCAG implements the RTP/SCS for the region in accordance with the state goals for achieving SB 375 GHG reductions. Please see Section 4.11, Land Use and Planning, for additional discussion regarding the SCAG’s RTP/SCS.

#### ***City of Sierra Madre General Plan***

The Air Quality Element of the City of Sierra Madre’s (City) General Plan (City of Sierra Madre 2015) includes the goals and policies that result in co-benefits with reducing GHG emissions. The Air Quality Element of the City’s General Plan is discussed in Section 4.3, Air Quality, of this EIR. The Transportation Element includes issues and policies that result in benefits with reducing GHG emissions, these applicable issues and policies are listed below. Please refer to Section 4.8.5, Impact Analysis, and Table 4.11-1 in Section 4.11, Land Use and Planning, for a consistency analysis with these policies.

- Policy L51.5** Encourage and support the use of non-automotive travel throughout the City.
- Policy L51.6** Encourage City staff, employees, residents and visitors to walk and bicycle as often as possible.
- Policy L51.7** Utilize non-automotive transportation solutions as a tool to further goals related to environmental sustainability and economic development.



**Policy L51.8** Prioritize improvements for non-vehicular modes like bicycles, pedestrians, and transit to eliminate the need for new or expanded roadways and intersection improvements like traffic signals.

### 4.8.3 Thresholds of Significance

The significance criteria used to evaluate the project's GHG emissions impacts is based on the recommendations provided in Appendix G of the CEQA Guidelines. For the purposes of this GHG emissions analysis, the project would have a significant environmental impact if it would (14 CCR 15000 et seq.):

1. Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.
2. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

Global climate change is a cumulative impact; a project participates in this potential impact through its incremental contribution combined with the cumulative increase of all other sources of GHGs. There are currently no established thresholds for assessing whether the GHG emissions of a project, such as the proposed project, would be considered a cumulatively considerable contribution to global climate change; however, all reasonable efforts should be made to minimize a project's contribution to global climate change. In addition, while GHG impacts are recognized exclusively as cumulative impacts (CAPCOA 2008), GHG emissions impacts must also be evaluated on a project-level under CEQA.

The CEQA Guidelines do not prescribe specific methodologies for performing an assessment, do not establish specific thresholds of significance, and do not mandate specific mitigation measures. Rather, the CEQA Guidelines emphasize the lead agency's discretion to determine the appropriate methodologies and thresholds of significance consistent with the manner in which other impact areas are handled in CEQA (CNRA 2009). The State of California has not adopted emission-based thresholds for GHG emissions under CEQA. The Governor's Office of Planning and Research's Technical Advisory, titled "Discussion Draft CEQA and Climate Change Advisory," states the following (OPR 2018):

Neither the CEQA statute nor the CEQA Guidelines prescribe thresholds of significance or particular methodologies for performing an impact analysis. This is left to lead agency judgment and discretion, based upon factual data and guidance from regulatory agencies and other sources where available and applicable. Even in the absence of clearly defined thresholds for GHG emissions, such emissions must be disclosed and mitigated to the extent feasible whenever the lead agency determines that the project contributes to a significant, cumulative climate change impact.

Furthermore, the advisory document indicates that "in the absence of regulatory standards for GHG emissions or other scientific data to clearly define what constitutes a 'significant impact,' individual lead agencies may undertake a project-by-project analysis, consistent with available guidance and current CEQA practice." Section 15064.7(c) of the CEQA Guidelines specifies that "when adopting thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies, or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence."

The SCAQMD has not adopted recommended numeric CEQA significance thresholds for GHG emissions for lead agencies to use in assessing GHG impacts of residential and commercial development projects. In October 2008, SCAQMD presented to the Governing Board the Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG)

Significance Threshold (SCAQMD 2008). The guidance document was not adopted or approved by the Governing Board. This document, which builds on the previous guidance prepared by the California Air Pollution Control Officers Association, explored various approaches for establishing a significance threshold for GHG emissions.

The SCAQMD formed a GHG CEQA Significance Threshold Working Group to work with SCAQMD staff on developing GHG CEQA significance thresholds until statewide significance thresholds or guidelines are established. In December 2008, the SCAQMD adopted an interim 10,000 MT CO<sub>2e</sub> per year screening level threshold for stationary source/industrial projects for which the SCAQMD is the lead agency. From December 2008 to September 2010, the SCAQMD hosted working group meetings and revised the draft threshold proposal several times, although it did not officially provide these proposals in a subsequent document. The SCAQMD has continued to consider adoption of significance thresholds for residential and general land use development projects. The most recent proposal, issued in September 2010, uses the following tiered approach to evaluate potential GHG impacts from various uses (SCAQMD 2010):

- Tier 1** Determine if CEQA categorical exemptions are applicable. If not, move to Tier 2.
- Tier 2** Consider whether or not the proposed project is consistent with a locally adopted GHG reduction plan that has gone through public hearing and CEQA review, that has an approved inventory, includes monitoring, etc. If not, move to Tier 3.
- Tier 3** Consider whether the project generates GHG emissions in excess of screening thresholds for individual land uses. The 10,000 MT CO<sub>2e</sub> per year threshold for industrial uses would be recommended for use by all lead agencies. Under option 1, separate screening thresholds are proposed for residential projects (3,500 MT CO<sub>2e</sub> per year), commercial projects (1,400 MT CO<sub>2e</sub> per year), and mixed-use projects (3,000 MT CO<sub>2e</sub> per year). Under option 2, a single numerical screening threshold of 3,000 MT CO<sub>2e</sub> per year would be used for all non-industrial projects. If the project generates emissions in excess of the applicable screening threshold, move to Tier 4.
- Tier 4** Consider whether the project generates GHG emissions in excess of applicable performance standards for the project service population (population plus employment). The efficiency targets were established based on the goal of AB 32 to reduce statewide GHG emissions to 1990 levels by 2020. The 2020 efficiency targets are 4.8 MT CO<sub>2e</sub> per service population for project level analyses and 6.6 MT CO<sub>2e</sub> per service population for plan level analyses. If the project generates emissions in excess of the applicable efficiency targets, move to Tier 5.
- Tier 5** Consider the implementation of CEQA mitigation (including the purchase of GHG offsets) to reduce the project efficiency target to Tier 4 levels.

The City understands that the 3,000 MT CO<sub>2e</sub> per year threshold was proposed a decade ago and was never adopted. However, the 3,000 MT CO<sub>2e</sub> per year threshold was developed and recommended by SCAQMD, an expert agency, based on substantial evidence as provided in the Draft Guidance Document – Interim CEQA Greenhouse Gas Significance Threshold (SCAQMD 2008) document and subsequent Working Group meetings (latest in 2010). This threshold uses the Executive Order S-3-05 goal as the basis, so it is not tied to only the 2020 target year and is thus not outdated. This threshold is also based on the 90% capture rate methodology, which means that 90% of total emissions from all new or modified projects would be subject to some type of CEQA analysis, which was the approach taken by SCAQMD to establish the stationary/industrial source threshold, as well as by the California Air Resources Board (for interim threshold for stationary source projects) and one of

the options suggested by the California Air Pollution Control Officers Association (quantitative threshold based on market capture). Further, this threshold has been used for hundreds, if not thousands of GHG analyses performed for projects located within the SCAQMD jurisdiction.

Because the project consists of a residential development and a public park, the recommended SCAQMD threshold to apply to the project is the 3,000 MT CO<sub>2</sub>e per year for mixed-use projects. Per the SCAQMD guidance, construction emissions should be amortized over the operational life of the project, which is assumed to be 30 years (SCAQMD 2008). This impact analysis, therefore, adds amortized construction emissions to the estimated annual operational emissions and then compares operational emissions to the proposed SCAQMD threshold of 3,000 MT CO<sub>2</sub>e per year.

### 4.8.3.1 Approach and Methodology

#### 4.8.3.1.1 Construction

CalEEMod Version 2016.3.2 was used to estimate potential project-generated GHG emissions during construction. Construction of the project would result in GHG emissions primarily associated with use of off-road construction equipment, on-road hauling and vendor (material delivery) trucks, and worker vehicles. All details for construction criteria air pollutants discussed in Section 4.3 of this EIR are also applicable for the estimation of construction-related GHG emissions. See Appendix B for a discussion of construction emissions calculation methodology and assumptions.

#### 4.8.3.1.2 Operation

Emissions from the operational phase of the project were estimated using CalEEMod Version 2016.3.2. Operational year 2026 was assumed consistent with completion of project construction. CalEEMod Version 2016.3.2 was used to estimate potential project-generated operational GHG emissions from area sources (landscape maintenance), energy sources (natural gas and electricity), mobile sources, solid waste, and water supply and wastewater treatment. Emissions from each category are discussed in detail in Appendix B.

## 4.8.4 Project Design Features

There are no project design features that apply to greenhouse gas emissions.

## 4.8.5 Impacts Analysis

### **1. *Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?***

The proposed project would establish The Meadows at Bailey Canyon Specific Plan (Specific Plan), which would establish the zoning and development standards to guide future development of single-family residential uses on approximately 9.19 acres of the 17.30-acre project site, and 3.39 acres of open space (including a 3.04-acre neighborhood public park). Future development of the project site under the Specific Plan would result in the following GHG emissions.

**Construction Emissions**

Construction of the project would result in GHG emissions, which are primarily associated with the use of off-road construction equipment, haul trucks, on-road vendor trucks, and worker vehicles. The SCAQMD Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold (SCAQMD 2008) recommends that “construction emissions be amortized over a 30-year project lifetime, so that GHG reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies.” Thus, the total construction GHG emissions were calculated, amortized over 30 years, and added to the total operational emissions.

CalEEMod was used to calculate the annual GHG emissions based on the construction scenario described in Section 4.8.3.1.1, Construction. Construction of the project is anticipated to commence in February 2024 and would last approximately 16 months, ending in May 2025 (see Chapter 3, Project Description, of this EIR). On-site sources of GHG emissions include off-road equipment and off-site sources including haul trucks, vendor trucks, and worker vehicles. Table 4.8-2 presents construction emissions for the project in 2024 and 2025 from on-site and off-site emission sources.

**Table 4.8-2. Estimated Annual Construction Greenhouse Gas Emissions - Unmitigated**

Year	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	CO <sub>2</sub> e
	<i>Metric Tons per Year</i>			
2024	922.98	0.18	0.00	927.54
2025	232.10	0.03	0.00	232.90
<b>Total</b>				<b>1,160.44</b>
<b>Amortized emissions over 30 years (MT CO<sub>2</sub>e per year)</b>				<b>38.68</b>

**Notes:** CO<sub>2</sub> = carbon dioxide; CH<sub>4</sub> = methane; N<sub>2</sub>O = nitrous oxide; CO<sub>2</sub>e = carbon dioxide equivalent.

See Appendix B for complete results.

The values shown are the annual emissions reflect California Emissions Estimator Model “mitigated” output.

Totals may not add due to rounding.

As shown in Table 4.8-2, the estimated total GHG emissions during construction of would be approximately 1,160 MT CO<sub>2</sub>e over the construction period. Estimated project-generated construction emissions amortized over 30 years would be approximately 39 MT CO<sub>2</sub>e per year. As with project-generated construction criteria air pollutant emissions, GHG emissions generated during construction of the project would be short-term in nature, lasting only for the duration of the construction period, and would not represent a long-term source of GHG emissions.

**Operational Emissions**

Operation of the project would generate GHG emissions through motor vehicle and delivery truck trips to and from the project site; landscape maintenance equipment operation; energy use (natural gas and generation of electricity consumed by the project); solid waste disposal; and generation of electricity associated with water supply, treatment, and distribution and wastewater treatment. CalEEMod was used to calculate the annual GHG emissions based on the operational assumptions described in Appendix B.

The estimated operational project-generated GHG emissions from area sources, energy usage, motor vehicles, solid waste generation, and water usage and wastewater generation are shown in Table 4.8-3.

**Table 4.8-3. Estimated Annual Operational Greenhouse Gas Emissions**

Emission Source	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	CO <sub>2</sub> e
	<i>Metric Tons per Year</i>			
Area	13.75	0.01	0.00	14.19
Energy	171.42	0.01	0.00	172.18
Mobile	507.11	0.02	0.00	507.65
Solid waste	10.05	0.59	0.00	24.89
Water supply and wastewater	33.09	0.09	0.00	36.06
<i>Amortized 30-Year Construction Emissions</i>				38.68
<b>Operation plus Amortized Construction Total</b>				<b>793.65</b>

**Notes:** CO<sub>2</sub> = carbon dioxide; CH<sub>4</sub> = methane; N<sub>2</sub>O = nitrous oxide; CO<sub>2</sub>e = carbon dioxide equivalent; PDF = project design feature. See Appendix B for complete results. The values shown are the annual emissions reflect California Emissions Estimator Model “mitigated” output and operational year 2026. Totals may not add due to rounding.

As shown in Table 4.8-3, estimated annual project-generated GHG emissions would be approximately 794 MT CO<sub>2</sub>e per year as a result of project operations and amortized construction. This would be less than the significance threshold of 3,000 MT CO<sub>2</sub>e per year as discussed in Section 4.8.3, Thresholds of Significance. Therefore, project impacts would be **less than significant**.

**2. Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?**

**Consistency Evaluation with the Statewide GHG Reduction Strategies**

The project’s consistency with statewide GHG reduction strategies is summarized in detail in Table 4.8-4.

**Table 4.8-4. Applicable Greenhouse Gas-Related Laws and Regulations**

Project Component	Applicable Laws/Regulations	GHG Reduction Measures Required for Project
<b><i>Building Components/Facility Operations</i></b>		
Roofs/Ceilings/Insulation	CALGreen Code (Title 24, Part 11) California Energy Code (Title 24, Part 6)	The project must comply with mandatory efficiency standards regarding roofing, ceilings, and insulation. For example:  <u>Roofs/Ceilings:</u> New construction must reduce roof heat island effects per CALGreen Code Section 106.11.2, which requires use of roofing materials having a minimum aged solar reflectance, thermal emittance complying with Section A5.106.11.2.2 and A5.106.11.2.3 or a minimum aged Solar Reflectance Index as specified in Tables A5.106.11.2.2, or A5.106.11.2.3. Roofing materials must also meet solar reflectance and thermal emittance standards contained in Title 20 Standards.  <u>Roof/Ceiling Insulation:</u> There are also requirements for the installation of roofing and ceiling insulation (see Title 24, Part 6 Compliance Manual, Section 3.2.2).
Flooring	CALGreen Code	The project must comply with mandatory efficiency standards regarding flooring materials. For example, for 80% of floor area receiving “resilient flooring,” the flooring must meet applicable installation and material requirements contained in CALGreen Code Section 5.504.4.6.

Table 4.8-4. Applicable Greenhouse Gas-Related Laws and Regulations

Project Component	Applicable Laws/Regulations	GHG Reduction Measures Required for Project
Window and Doors (Fenestration)	California Energy Code	The project must comply with mandatory fenestration efficiency requirements. For example, the choice of windows, glazed doors, and any skylights for the project must conform to energy consumption requirements affecting size, orientation, and types of fenestration products used (see Title 24, Part 6 Compliance Manual, Section 3.3).
Building Walls/ Insulation	CALGreen Code California Energy Code	<p>The project must comply with mandatory efficiency requirements for building walls and insulation.</p> <p><u>Exterior Walls:</u> Must meet requirements in current edition of California Energy Code, and comply with Sections A5.106.7.1 or A5.106.7.2 of CALGreen Code for wall surfaces, as well as Section 5.407.1, which required weather-resistant exterior wall and foundation envelope as required by California Building Code Section 1403.2. Construction must also meet requirements contained in Title 24, Part 6, which vary by material of the exterior walls (see Title 24, Part 6 Compliance Manual, Part 3.2.3).</p> <p><u>Demising (Interior) Walls:</u> Mandatory insulation requirements for demising walls (which separate conditioned from non-conditioned space) differ by the type of wall material used (Id. at 3.2.4).</p> <p><u>Door Insulation:</u> There are mandatory requirements for air infiltration rates to improve insulation efficiency; they differ according to the type of door (Id. at 3.2.5).</p> <p><u>Flooring Insulation:</u> There are mandatory requirements for insulation that depend on the material and location of the flooring (Id. at 3.2.6).</p>
Finish Materials	CALGreen Code	The project must comply with mandatory pollutant control requirements for finish materials. For example, materials including adhesives, sealants, caulks, paints and coatings, carpet systems, and composite wood products must meet requirements in CALGreen Code to ensure pollutant control (CALGreen Code Section 5.504.4).
Wet Appliances (Toilets/Faucets/ Urinal, Dishwasher/ Clothes Washer, Spa and Pool/Water Heater)	CALGreen Code California Energy Code Appliance Efficiency Regulations (Title 20 Standards)	<p>Wet appliances associated with the project must meet various mandatory efficiency requirements. For example:</p> <p><u>Spa and Pool:</u> Use associated with the project is subject to appliance efficiency requirements for service water heating systems and equipment, spa and pool heating systems and equipment (Title 24, Part 6, Sections 110.3, 110.4, 110.5; Title 20 Standards, Sections 1605.1(g), 1605.3(g); see also California Energy Code).</p> <p><u>Toilets/Faucets/Urinals:</u> Use associated with the project is subject to new maximum rates for toilets, urinals, and faucets effective January 1, 2020 (Title 20 Standards, Sections 1605.1(h),(i) 1065.3(h),(i)):</p> <ul style="list-style-type: none"> <li>• Showerheads maximum flow rate 1.8 gallons per minute (gpm) at 80 psi</li> <li>• Wash fountains 2.2 x (rim space in inches/20) gpm at 60 psi</li> <li>• Metering faucets 0.2 gallons/cycle</li> <li>• Lavatory faucets and aerators 1.2 gpm at 60 psi</li> <li>• Kitchen faucets and aerators 1.8 gpm with optional temporary flow of 2.2 gpm at 60 psi</li> <li>• Public lavatory faucets 0.5 gpm at 60 psi</li> <li>• Trough-type urinals 16 inches length</li> </ul>

Table 4.8-4. Applicable Greenhouse Gas-Related Laws and Regulations

Project Component	Applicable Laws/Regulations	GHG Reduction Measures Required for Project
		<ul style="list-style-type: none"> <li>• Wall mounted urinals 0.125 gallons per flush</li> <li>• Other urinals 0.5 gallons per flush</li> </ul> <p><u>Water Heaters:</u> Use associated with the project is subject to appliance efficiency requirements for water heaters (Title 20 Standards, Sections 1605.1(f), 1605.3(f)).</p> <p><u>Dishwasher/Clothes Washer:</u> Use associated with the project is subject to appliance efficiency requirements for dishwashers and clothes washers (Title 20 Standards, Sections 1605.1(o),(p),(q), 1605.3(o),(p),(q)).</p>
Dry Appliances (Refrigerator/Freezer, Heater/Air Conditioner, Clothes Dryer)	Title 20 Standards CALGreen Code	Dry appliances associated with the project must meet various mandatory efficiency requirements. For example: <u>Refrigerator/Freezer:</u> Use associated with the project is subject to appliance efficiency requirements for refrigerators and freezers (Title 20 Standards, Sections 1605.1(a), 1605.3(a)). <u>Heater/Air Conditioner:</u> Use associated with the project is subject to appliance efficiency requirements for heaters and air conditioners (Title 20 Standards, Sections 1605.1(b),(c),(d),(e), 1605.3(b),(c),(d),(e) as applicable). <u>Clothes Dryer:</u> Use associated with the project is subject to appliance efficiency requirements for clothes dryers (Title 20 Standards, Section 1605.1(q)).
	CALGreen Code	Installations of HVAC, refrigeration and fire suppression equipment must comply with CALGreen Code Sections 5.508.1.1 and 508.1.2, which prohibits CFCs, halons, and certain HCFCs and HFCs.
Lighting	Title 20 Standards	Lighting associated with the project will be subject to mandatory energy efficiency requirements contained in Title 20 Standards. <u>General Lighting:</u> Indoor and outdoor lighting associated with the project must comply with applicable appliance efficiency regulations (Title 20 Standards, Sections 1605.1(j),(k),(n), 1605.3(j),(k),(n)). <u>Emergency lighting and self-contained lighting:</u> the project must also comply with applicable appliance efficiency regulations (Title 20 Standards, Sections 1605.1(l), 1605.3(l)). <u>Traffic Signal Lighting:</u> For any necessary project improvements involving traffic lighting, traffic signal modules and traffic signal lamps will need to comply with applicable appliance efficiency regulations (Title 20 Standards, Sections 1605.1(m), 1605.3(m)).
	California Energy Code	Lighting associated with the project will also be subject to mandatory energy efficiency requirements contained in Title 24, Part 6, which contains energy standards for non-residential indoor lighting and outdoor lighting (see Title 24 Part 6 Compliance Manual, at Sections 5, 6).  Mandatory lighting controls for indoor lighting include, for example, regulations for automatic shut-off, automatic daytime controls, demand responsive controls, and certificates of installation (Id. at Section 5). Regulations for outdoor lighting include, for example, creation of lighting zones, lighting power requirements, a hardscape

Table 4.8-4. Applicable Greenhouse Gas-Related Laws and Regulations

Project Component	Applicable Laws/Regulations	GHG Reduction Measures Required for Project
		lighting power allowance, requirements for outdoor incandescent and luminaire lighting, and lighting control functionality (Id. at Section 6).
	AB 1109	Lighting associated with the project will be subject to mandatory energy efficiency requirements adopted pursuant to AB 1109. Enacted in 2007, AB 1109 required the CEC to adopt minimum energy efficiency standards for general purpose lighting, to reduce electricity consumption 50% for indoor residential lighting and 25% for indoor commercial lighting.
Bicycle and Vehicle Parking	CALGreen Code	The project will be required to provide electric vehicle supply equipment (CALGreen Code Sections 4.106.4).
Landscaping	CALGreen Code	The CALGreen Code requires new residential developments to comply with a local water efficient landscape ordinance or the current California Department of Water Resources’ Model Water Efficient Landscape Ordinance (MWELO), whichever is more stringent.
	Model Water Efficient Landscaping Ordinance	The model ordinance promotes efficient landscaping in new developments and establishes an outdoor water budget for new and renovated landscaped areas that are 500 square feet or larger (CCR, Title 23, Division 2, Chapter 2.7).
	Cap-and-Trade Program	Transportation fuels used in landscape maintenance equipment (e.g., gasoline) would be subject to the Cap-and-Trade Program. (See “Energy Use,” below.)
Refrigerants	CARB Management of High GWP Refrigerants for Stationary Sources	Any refrigerants associated with the project will be subject to CARB standards. CARB’s Regulation for the Management of High GWP Refrigerants for Stationary Sources (1) reduces emissions of high-GWP refrigerants from leaky stationary, non-residential refrigeration equipment; (2) reduces emissions resulting from the installation and servicing of stationary refrigeration and air conditioning appliances using high-GWP refrigerants; and (3) requires verification GHG emission reductions (CCR, Title 17, Division 3, Chapter 1, Subchapter 10, Article 4, Subarticle 5.1, Section 95380 et seq.).
Consumer Products	CARB High GWP GHGs in Consumer Products	All consumer products associated with the project will be subject to CARB standards. CARB’s consumer products regulations set VOC limits for numerous categories of consumer products, and limits the reactivity of the ingredients used in numerous categories of aerosol coating products (CCR, Title 17, Division 3, Chapter 1, Subchapter 8.5).
<b>Construction</b>		
Use of Off-Road Diesel Engines, Vehicles, and Equipment	CARB In-Use Off-Road Diesel Vehicle Regulation	Any relevant vehicle or machine use associated with the project will be subject to CARB standards.  The CARB In-Use-Off-Road Diesel Vehicle Regulation applies to certain off-road diesel engines, vehicles, or equipment greater than 25 horsepower. The regulation: (1) imposes limits on idling, requires a written idling policy, and requires a disclosure when selling vehicles; (2) requires all vehicles to be reported to CARB (using the Diesel Off-Road Online Reporting System) and labeled; (3) restricts the adding of older vehicles into fleets starting on January 1, 2014;



Table 4.8-4. Applicable Greenhouse Gas-Related Laws and Regulations

Project Component	Applicable Laws/Regulations	GHG Reduction Measures Required for Project
		<p>and 4) requires fleets to reduce their emissions by retiring, replacing, or repowering older engines, or installing Verified Diesel Emission Control Strategies (i.e., exhaust retrofits).</p> <p>The requirements and compliance dates of the Off-Road regulation vary by fleet size, as defined by the regulation.</p>
	Cap-and-Trade Program	Transportation fuels (e.g., gasoline) used in equipment operation would be subject to the Cap-and-Trade Program. (See “Energy Use,” below.)
Greening New Construction	CALGreen Code	<p>All new construction, including the project, must comply with CALGreen Code, as discussed in more detail throughout this table.</p> <p>Adoption of the mandatory CALGreen Code standards for construction has been essential for improving the overall environmental performance of new buildings; it also sets voluntary targets for builders to exceed the mandatory requirements.</p>
Construction Waste	CALGreen Code	The project will be subject to CALGreen Code requirements for construction waste reduction, disposal, and recycling, such as a requirement to recycle and/or salvage for reuse a minimum of 50% of the non-hazardous construction waste in accordance with Section 5.408.1.1, 5.408.1.2, or 5.408.1.3; or meet a local construction and demolition waste management ordinance, whichever is more stringent.
Worker, vendor and truck vehicle trips (on-road vehicles)	Cap-and-Trade Program	Transportation fuels (e.g., gasoline) used in worker, vendor and truck vehicle trips would be subject to the Cap-and-Trade Program.
<b>Solid Waste</b>		
Solid Waste Management	Landfill Methane Control Measure	<p>Waste associated with the project will be disposed per state requirements for landfills, material recovery facilities, and transfer stations. Per the statewide GHG emissions inventory, the largest emissions from waste management sectors come from landfills, and are in the form of CH<sub>4</sub>.</p> <p>In 2010, CARB adopted a regulation that reduces emissions from methane in landfills, primarily by requiring owners and operators of certain uncontrolled municipal solid waste landfills to install gas collection and control systems, and requires existing and newly installed gas and control systems to operate in an optimal manner. The regulation allows local air districts to voluntarily enter into a memorandum of understanding with CARB to implement and enforce the regulation and to assess fees to cover costs of implementation.</p>
	Mandatory Commercial Recycling (AB 341)	<p>AB 341 will require the project, if it generates four cubic yards or more of commercial solid waste per week, to arrange for recycling services, using one of the following: self-haul; subscribe to a hauler(s); arranging for pickup of recyclable materials; subscribing to a recycling service that may include mixed waste processing that yields diversion results comparable to source separation.</p> <p>The project will also be subject to local commercial solid waste recycling program required to be implemented by each jurisdiction under AB 341.</p>

Table 4.8-4. Applicable Greenhouse Gas-Related Laws and Regulations

Project Component	Applicable Laws/Regulations	GHG Reduction Measures Required for Project
	CALGreen Code	The project will be subject to CALGreen Code requirement to provide areas that serve the entire building and are identified for the depositing, storage and collection of nonhazardous materials for recycling (CALGreen Code Section 5.410.1).
<b>Energy Use</b>		
Electricity/Natural Gas Generation	Cap-and-Trade Program	<p>Electricity and natural gas usage associated with the project will be subject to the Cap-and-Trade Program.</p> <p>The rules came into effect on January 1, 2013, applying to large electric power plants and large industrial plants. In 2015, importers and distributors of fossil fuels were added to the Cap-and-Trade Program in the second phase.</p> <p>Specifically, on January 1, 2015, cap-and-trade compliance obligations were phased in for suppliers of natural gas, reformulated gasoline blendstock for oxygenate blending (RBOB), distillate fuel oils, and liquefied petroleum gas that meet or exceed specified emissions thresholds. The threshold that triggers a cap-and-trade compliance obligation for a fuel supplier is 25,000 metric tons or more of CO<sub>2</sub>e annually from the GHG emissions that would result from full combustion or oxidation of quantities of fuels (including natural gas, RBOB, distillate fuel oil, liquefied petroleum gas, and blended fuels that contain these fuels) imported and/or delivered to California.</p>
Renewable Energy	California RPS (SB X1-2, SB 350, and SB 100)	<p>Energy providers associated with the project will be required to comply with RPS set by SB X1 2, SB 350, and SB 100.</p> <p>SB X1 2 requires investor-owned utilities, publicly-owned utilities, and electric service providers to increase purchases of renewable energy such that at least 33% of retail sales are procured from renewable energy resources by December 31, 2020. In the interim, each entity was required to procure an average of 20% of renewable energy for the period of January 1, 2011 through December 31, 2013; and will be required to procure an average of 25% by December 31, 2016, and 33% by 2020.</p> <p>SB 350 requires retail sellers and publicly owned utilities to procure 50% of their electricity from eligible renewable energy resources by 2030.</p> <p>SB 100 increased the standards set forth in SB 350 establishing that 44% of the total electricity sold to retail customers in California per year by December 31, 2024, 52% by December 31, 2027, and 60% by December 31, 2030, be secured from qualifying renewable energy sources. SB 100 states that it is the policy of the state that eligible renewable energy resources and zero-carbon resources supply 100% of the retail sales of electricity to California by 2045.</p>
	Million Solar Roofs Program (SB 1)	<p>The project will participate in California’s energy market, which is affected by implementation of the Million Solar Roofs Program. As part of Governor Schwarzenegger’s Million Solar Roofs Program, California has set a goal to install 3,000 megawatts of new, solar capacity through 2016. The Million Solar Roofs Program is a</p>

Table 4.8-4. Applicable Greenhouse Gas-Related Laws and Regulations

Project Component	Applicable Laws/Regulations	GHG Reduction Measures Required for Project
		ratepayer-financed incentive program aimed at transforming the market for rooftop solar systems by driving down costs over time.
	California Solar Initiative- Thermal Program	The project will participate in California’s energy market, which is affected by implementation of the California Solar Initiative -Thermal Program. The program offers cash rebates of up to \$4,366 on solar water heating systems for single-family residential customers. Multifamily and Commercial properties qualify for rebates of up to \$800,000 on solar water heating systems and eligible solar pool heating systems qualify for rebates of up to \$500,000. Funding for the California Solar Initiative-Thermal program comes from ratepayers of Pacific Gas & Electric, Southern California Edison, Southern California Gas Company, and San Diego Gas & Electric. The rebate program is overseen by the CPUC as part of the California Solar Initiative.
	Waste Heat and Carbon Emissions Reduction Act (AB 1613, AB 2791)	<p>The project will participate in California’s energy market, which is affected by implementation of the Waste Heat and Carbon Emissions Reduction Act.</p> <p>Originally enacted in 2007 and amended in 2008, this act directed the CEC, CPUC, and CARB to implement a program that would encourage the development of new combined heat and power systems in California with a generating capacity of not more than 20 megawatts, to increase combined heat and power use by 30,000 gigawatt-hour. The CPUC publicly owned electric utilities, and CEC duly established policies and procedures for the purchase of electricity from eligible combined heat and power systems.</p> <p>CEC guidelines require combined heat and power systems to be designed to reduce waste energy; have a minimum efficiency of 60%; have NOx emissions of no more than 0.07 pounds per megawatt-hour; be sized to meet eligible customer generation thermal load; operate continuously in a manner that meets expected thermal load and optimizes efficient use of waste heat; and be cost effective, technologically feasible, and environmentally beneficial.</p>
<b>Vehicular/Mobile Sources</b>		
General	SB 375 and SCAG RTP/SCS	The project complies with, and is subject to, SCAG adopted RTP/SCS (Connect SoCal), which CARB approved as meeting its regional GHG targets in 2020.
Fuel	Low Carbon Fuel Standard (LCFS)/ EO S-01-07	Auto trips associated with the project will be subject to LCFS (EO S-01-07), which requires a 20% or greater reduction in the average fuel carbon intensity by 2030 with a 2010 baseline for transportation fuels in California regulated by CARB. The program establishes a strong framework to promote the low carbon fuel adoption necessary to achieve the Governor's 2030 and 2050 GHG goals.
	Cap-and-Trade Program	<p>Use of gasoline associated with the project will be subject to the Cap-and-Trade Program.</p> <p>The rules came into effect on January 1, 2013, applying to large electric power plants and large industrial plants. In 2015, importers</p>

Table 4.8-4. Applicable Greenhouse Gas-Related Laws and Regulations

Project Component	Applicable Laws/Regulations	GHG Reduction Measures Required for Project
		<p>and distributors of fossil fuels were added to the Cap-and-Trade Program in the second phase.</p> <p>Specifically, on January 1, 2015, cap-and-trade compliance obligations were phased in for suppliers of natural gas, RBOB, distillate fuel oils, and liquefied petroleum gas that meet or exceed specified emissions thresholds. The threshold that triggers a cap-and-trade compliance obligation for a fuel supplier is 25,000 MT or more of CO<sub>2e</sub> annually from the GHG emissions that would result from full combustion or oxidation of quantities of fuels (including natural gas, RBOB, distillate fuel oil, liquefied petroleum gas, and blended fuels that contain these fuels) imported and/or delivered to California.</p>
Automotive Refrigerants	CARB Regulation for Small Containers of Automotive Refrigerant	<p>Vehicles associated with the project will be subject to CARB’s Regulation for Small Containers of Automotive Refrigerant (CCR, Title 17, Division 3, Chapter 1, Subchapter 10, Article 4, Subarticle 5, Section 95360 et seq.). The regulation applies to the sale, use, and disposal of small containers of automotive refrigerant with a GWP greater than 150. The regulation achieves emission reductions through implementation of four requirements: (1) use of a self-sealing valve on the container, (2) improved labeling instructions, (3) a deposit and recycling program for small containers, and (4) an education program that emphasizes best practices for vehicle recharging. This regulation went into effect on January 1, 2010, with a 1-year sell-through period for containers manufactured before January 1, 2010. The target recycle rate is initially set at 90%, and rises to 95% beginning January 1, 2012.</p>
Light-Duty Vehicles	AB 1493 (or the Pavley Standard)	<p>Cars that drive to and from the project will be subject to AB 1493, which directed CARB to adopt a regulation requiring the maximum feasible and cost-effective reduction of GHG emissions from new passenger vehicles.</p> <p>Pursuant to AB 1493, CARB adopted regulations that establish a declining fleet average standard for CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, and HFCs (air conditioner refrigerants) in new passenger vehicles and light-duty trucks beginning with the 2009 model year and phased-in through the 2016 model year. These standards are divided into those applicable to lighter and those applicable to heavier portions of the passenger vehicle fleet.</p> <p>The regulations will reduce “upstream” smog-forming emissions from refining, marketing, and distribution of fuel.</p>
	Advanced Clean Car and ZEV Programs	<p>Cars that drive to and from the project will be subject to the Advanced Clean Car and ZEV Programs.</p> <p>In January 2012, CARB approved a new emissions-control program for model years 2017 through 2025. The program combines the control of smog, soot and global warming gases and requirements for greater numbers of zero-emission vehicles into a single package of standards called Advanced Clean Cars. By 2025, new automobiles will emit 34% fewer global warming gases and 75% fewer smog-</p>

Table 4.8-4. Applicable Greenhouse Gas-Related Laws and Regulations

Project Component	Applicable Laws/Regulations	GHG Reduction Measures Required for Project
		<p>forming emissions.</p> <p>The ZEV program will act as the focused technology of the Advanced Clean Cars program by requiring manufacturers to produce increasing numbers of ZEVs and plug-in hybrid electric vehicles in the 2018–2025 model years.</p>
	Tire Inflation Regulation	<p>Cars that drive to and from the project will be subject to the CARB Tire Inflation Regulation, which took effect on September 1, 2010, and applies to vehicles with a gross vehicle weight rating of 10,000 pounds or less.</p> <p>Under this regulation, automotive service providers must, inter alia, check and inflate each vehicle’s tires to the recommended tire pressure rating, with air or nitrogen, as appropriate, at the time of performing any automotive maintenance or repair service, and to keep a copy of the service invoice for a minimum of three years, and make the vehicle service invoice available to the CARB, or its authorized representative upon request.</p>
	EPA and NHTSA GHG and CAFE standards.	<p>Mobile sources that travel to and from the project would be subject to EPA and NHTSA GHG and CAFE standards for passenger cars, light-duty trucks, and medium-duty passenger vehicles (75 FR 25324–25728 and 77 FR 62624–63200).</p>
Medium- and Heavy-Duty Vehicles	CARB In-Use On-Road Heavy-Duty Diesel Vehicles Regulation (Truck and Bus Regulation)	<p>Any heavy-duty trucks associated with the project will be subject to CARB standards.</p> <p>The regulation requires diesel trucks and buses that operate in California to be upgraded to reduce emissions. Newer heavier trucks and buses must meet PM filter requirements. Lighter and older heavier trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent.</p> <p>The regulation applies to nearly all privately and federally owned diesel fueled trucks and buses and to privately and publicly owned school buses with a gross vehicle weight rating greater than 14,000 pounds.</p>
	CARB In-Use Off-Road Diesel Vehicle Regulation	<p>Any relevant vehicle or machine use associated with the project will be subject to CARB standards.</p> <p>The CARB In-Use-Off-Road Diesel Vehicle Regulation applies to certain off-road diesel engines, vehicles, or equipment greater than 25 horsepower. The regulation (1) imposes limits on idling, requires a written idling policy, and requires a disclosure when selling vehicles; (2) requires all vehicles to be reported to CARB (using the Diesel Off-Road Online Reporting System) and labeled; (3) restricts the adding of older vehicles into fleets starting on January 1, 2014; and (4) requires fleets to reduce their emissions by retiring, replacing, or repowering older engines, or installing Verified Diesel Emission Control Strategies (i.e., exhaust retrofits).</p> <p>The requirements and compliance dates of the Off-Road regulation</p>

Table 4.8-4. Applicable Greenhouse Gas-Related Laws and Regulations

Project Component	Applicable Laws/Regulations	GHG Reduction Measures Required for Project
		vary by fleet size, as defined by the regulation.
	Heavy-Duty Vehicle GHG Emission Reduction Regulation	Any relevant vehicle or machine use associated with the project will be subject to CARB standards.  The CARB Heavy-Duty Vehicle GHG Emission Reduction Regulation applies to heavy-duty tractors that pull 53-foot or longer box-type trailers (CCR, Title 17, Division 3, Chapter 1, Subchapter 10, Article 4, Subarticle 1, Section 95300 et seq.). Fuel efficiency is improved through improvements in tractor and trailer aerodynamics and the use of low rolling resistance tires.
	EPA and NHTSA GHG and CAFE standards.	Mobile sources that travel to and from the project would be subject to EPA and NHTSA GHG and CAFE standards for medium- and heavy-duty vehicles (76 FR 57106–57513).
<b>Water Use</b>		
Water Use Efficiency	EO B-40-17	EO B-40-17 lifted the drought emergency in all California counties except Fresno, Kings, Tulare, and Tuolumne. It also rescinds EO B-29-15, but expressly states that EO B-37-16 remains in effect and directs the State Water Resources Control Board to continue development of permanent prohibitions on wasteful water use to which the project will be subject.
	SB X7-7	Water provided to the project will be affected by SB X7-7’s requirements for water suppliers.  SB X7-7, or the Water Conservation Act of 2009, requires all water suppliers to increase water use efficiency. It also requires, among other things, that the Department of Water Resources, in consultation with other state agencies, develop a single standardized water use reporting form, which would be used by both urban and agricultural water agencies.
	CALGreen Code	The project is subject to CALGreen Code’s water efficiency standards, including a required 20% mandatory reduction in indoor water use (CALGreen Code, Division 4.3).
	California Water Code, Division 6, Part 2.10, Sections 10910–10915.	Development and approval of the project requires the development of a project-specific Water Supply Assessment.
	Cap-and-Trade Program	Electricity usage associated with water and wastewater supply, treatment and distribution would be subject to the Cap-and-Trade Program.
	California RPS (SB X1-2, SB 350, SB 100)	Electricity usage associated with water and wastewater supply, treatment and distribution associated with the project will be required to comply with RPS set by SB X1-2, SB 350, and SB 100.

AB = Assembly Bill; CARB = California Air Resources Board; CEC = California Energy Commission; CFC = chlorofluorocarbon; CH4 = methane; CO2 = carbon dioxide; CO2e = carbon dioxide equivalent; CPUC = California Public Utilities Commission; EO = Executive Order; EPA = Environmental Protection Agency; GHG = greenhouse gas; GWP = global warming potential; HCFC = hydrochlorofluorocarbon; HFC = hydrofluorocarbon; gpm = gallons per minute; MT = metric tons; N2O = nitrous oxide; NHTSA = National Highway Traffic Safety Administration; PM = particulate matter; RPS = Renewable Portfolio Standard; RTP/SCS = Regional Transportation Plan/Sustainable Communities Strategy; SB = Senate Bill; SCAG = Southern California Association of Governments; VOC = volatile organic compound; ZEV = zero emission vehicle

As shown in Table 4.8-4, with implementation of GHG reduction measures required, the project would be consistent with and would not conflict with the applicable GHG-reducing strategies of the state.

**Consistency Evaluation with the City’s General Plan**

The City’s General Plan includes various goals and policies that promote the use of clean and renewable energy sources, facilitate alternative modes of transportation and reduce VMTs, reduce waste, conserve water, and promote the efficient and sustainable use of energy. The Conservation Element includes goals and policies that result in benefits with reducing GHG emissions. Table 4.8-5, Consistency with City of Sierra Madre’s General Plan Policies, summarizes the project’s consistency with these applicable policies.

**Table 4.8-5. Consistency with City of Sierra Madre’s General Plan Policies**

General Plan Policies	Project Consistency
<b>Policy 24.1:</b> Continue to review guidelines from time to time regarding the use of gas -powered lawn equipment, and consider tightening the restrictions on the type of equipment, hours and duration of operation.	<i>Consistent.</i> The project would install electrical outlets on the exterior of every residence to facilitate the use of electrically powered landscaping equipment in accordance with the 2019 Title 24 building standards.
<b>Policy L51.5:</b> Encourage and support the use of non-automotive travel throughout the City.	<i>Consistent.</i> The project is located less than 1 mile from the nearest bus stop providing access to the 268 and 487 bus lines through the Metropolitan Transportation Authority (MTA).
<b>Policy L51.6:</b> Encourage City staff, employees, residents and visitors to walk and bicycle as often as possible.	<i>Consistent.</i> The project will provide public benefits and amenities to the Sierra Madre community, inclusive of a public park that will welcome locals and visitors, provide natural style play features, connect to the Bailey Canyon Wilderness Park and trail, and act as a buffer along existing adjacent homes.
<b>Policy L51.7:</b> Utilize non-automotive transportation solutions as a tool to further goals related to environmental sustainability and economic development.	<i>Consistent.</i> The project is located less than 1 mile from the nearest bus stop providing access to the 268, 478, and 479 bus lines through MTA. Furthermore, the project connects to the Bailey Canyon Wilderness Park and trail.

**Source:** City of Sierra Madre 2015.

As shown in Table 4.8-5, the project would be consistent with the City’s General Plan Policies.

**Consistency Evaluation with the Scoping Plan**

The Scoping Plan, approved by CARB on December 12, 2008, provides a framework for actions to reduce California’s GHG emissions and requires CARB and other state agencies to adopt regulations and other initiatives to reduce GHGs. As such, the Scoping Plan is not directly applicable to specific projects. Relatedly, in the Final Statement of Reasons for the Amendments to the CEQA Guidelines, the CNRA observed that “[t]he [Scoping Plan] may not be appropriate for use in determining the significance of individual projects because it is conceptual at this stage and relies on the future development of regulations to implement the strategies identified in the Scoping Plan” (CNRA 2009). Under the Scoping Plan, however, there are several state regulatory measures aimed at the identification and reduction of GHG emissions. CARB and other state agencies have adopted many of the measures identified in the Scoping Plan. Most of these measures focus on area source emissions (e.g., energy usage, high-GWP GHGs in consumer products) and changes to the vehicle fleet (i.e., hybrid, electric, and more fuel-efficient

vehicles) and associated fuels (e.g., low-carbon fuel standard), among others. The proposed project would comply with all applicable regulations adopted in furtherance of the Scoping Plan to the extent required by law.

The Scoping Plan recommends strategies for implementation at the statewide level to meet the goals of AB 32 and establishes an overall framework for the measures that will be adopted to reduce California’s GHG emissions. Table 4.8-6 highlights measures that have been developed under the Scoping Plan and the proposed project’s consistency with those measures. The table also includes measures proposed in the 2017 Scoping Plan Update. To the extent that these regulations are applicable to the proposed project, its inhabitants, or uses, the proposed project would comply with all applicable regulations adopted in furtherance of the Scoping Plan.

**Table 4.8-6. Project Consistency with Scoping Plan GHG Emission-Reduction Strategies**

Scoping Plan Measure	Measure Number	Project Consistency
<b>Transportation Sector</b>		
Advanced Clean Cars	T-1	The proposed project’s residents would purchase vehicles in compliance with CARB vehicle standards that are in effect at the time of vehicle purchase.
Low Carbon Fuel Standard	T-2	Motor vehicles driven by the proposed project’s residents would use compliant fuels.
Low Carbon Fuel Standard (18 percent reduction in carbon intensity by 2030)	NA	Motor vehicles driven by the proposed project’s residents would use compliant fuels.
Regional Transportation-Related GHG Targets	T-3	The proposed project would encourage use of alternative forms of transportation.
Reduction in Vehicle Miles Traveled	NA	The proposed project is located on an infill site, which promotes compact walkable communities with an emphasis on proximity and accessibility.
<b>Electricity and Natural Gas Sector</b>		
Energy Efficiency Measures (Electricity)	E-1	The proposed project will comply with current Title 24, Part 6, of the California Code of Regulations energy efficiency standards for electrical appliances and other devices at the time of building construction.
Energy Efficiency (Natural Gas)	CR-1	The proposed project will comply with current Title 24, Part 6, of the California Code of Regulations energy efficiency standards for electrical appliances and other devices at the time of building construction.
Renewable Portfolios Standard (33 percent by 2020)	E-3	The proposed project would use energy supplied by Clean Power Alliance, which is in compliance with the Renewable Portfolio Standard.
Renewable Portfolios Standard (50 percent by 2050)	NA	The proposed project would use energy supplied by Clean Power Alliance, which is in compliance with the Renewable Portfolio Standard.
Senate Bill 1 Million Solar Roofs (California Solar Initiative, New Solar Home Partnership, Public Utility Programs) and Earlier Solar Programs	E-4	The proposed project would include solar roofs installations in accordance with the 2019 Title 24 building standards.



**Table 4.8-6. Project Consistency with Scoping Plan GHG Emission-Reduction Strategies**

Scoping Plan Measure	Measure Number	Project Consistency
<b>Water Sector</b>		
Water Use Efficiency	W-1	The proposed project is going to utilize water saving features including low-flow fixtures in accordance with CALGreen standards.
Water Recycling	W-2	The project would reclaim rainwater to be reused on site.
Reuse Urban Runoff	W-4	The project would reclaim rainwater to be reused on site.
<b>Green Buildings</b>		
State Green Building Initiative: Leading the Way with State Buildings (Greening New and Existing State Buildings)	GB-1	The proposed project would be required to be constructed in compliance with state or local green building standards in effect at the time of building construction.
Green Building Standards Code (Greening New Public Schools, Residential and Commercial Buildings)	GB-2	The proposed project’s buildings would meet green building standards that are in effect at the time of construction.
Beyond Code: Voluntary Programs at the Local Level (Greening New Public Schools, Residential and Commercial Buildings)	GB-3	The proposed project would be required to be constructed in compliance with local green building standards in effect at the time of building construction.
<b>Recycling and Waste Management Sector</b>		
Mandatory Commercial Recycling	RW-3	During both construction and operation of the proposed project, the proposed project would comply with all state regulations related to solid waste generation, storage, and disposal, including the California Integrated Waste Management Act, as amended. During construction, all wastes would be recycled to the maximum extent possible.
<b>High Global Warming Potential Gases Sector</b>		
Limit High Global Warming Potential Use in Consumer Products	H-4	The proposed project’s residents would use consumer products that would comply with the regulations that are in effect at the time of manufacture.

**Sources:** CARB 2008, 2017.

GHG = greenhouse gas; proposed project = The Farm in Poway; CARB = California Air Resources Board; EV = electric vehicle; SF<sub>6</sub> = sulfur hexafluoride.

Based on the analysis in Table 4.8-6, the proposed project would be consistent with the applicable strategies and measures in the Scoping Plan.

In addition to the measures outlined in the Table 4.8-6, the Scoping Plan also highlights, in several areas, the goals and importance of infill projects. Specifically, the Scoping Plan calls out an ongoing and proposed measure to streamline CEQA compliance and other barriers to infill development. The Scoping Plan encourages infill projects and sees them as crucial to achieving the state’s long-term climate goals. The Scoping Plan encourages accelerating equitable and affordable infill development through enhanced financing and policy incentives and mechanisms. The state prepared a January 2019 Draft California 2030 Natural and Working Lands Climate Change Implementation Plan (Implementation Plan), which evaluates a range of implementation scenarios for natural and working lands to identify long-term sequestration goals that can be incorporated into future climate

policy. The Implementation Plan includes programs to promote and provide incentives for infill development through community revitalization and urban greening and promote the adoption of regional transportation and development plans, such as SB 375 SCS and Climate Action Plans, which prioritize infill and compact development and also consider the climate change impacts of land use and management.

The following strategies were outlined to expand infill development within the Scoping Plan:

- Encouraging regional transfer of development rights programs to allow owners of natural and working lands to sell their development rights to developers who can use those rights to add additional density to development projects in preferred infill areas.
- Promoting regional transit-oriented development funds that leverage public resources with private-sector investment capital to provide flexible capital for transit-oriented development projects.
- Rebates for low-VMT/location-efficient housing, similar to programs that use rebates to encourage adoption of energy-efficient appliances, ZEVs, water-efficient yards, or renewable energy installation. For example, the rebate could reimburse residents for a portion of the down payment for purchasing or renting a qualified home in exchange for a minimum term of residence.
- Promotion of cross-subsidizing multi-station financing districts along transit corridors to leverage revenues from development in strong-market station areas in order to seed needed infrastructure and development in weaker-market station areas.
- Abatement of residential property tax increases in exchange for property-based improvements in distressed infill areas.
- Ways to promote reduced parking in areas where viable transportation alternatives are present.
- Additional creative financing mechanisms to enhance the viability of priority infill projects.
- Ways to promote and strengthen urban growth boundaries to promote infill development and conservation of natural and working lands by defining and limiting developable land within a metropolitan area according to projected growth needs.

### **Consistency Evaluation with SB 375 (SCAG RTP/SCS)**

On September 3, 2020, SCAG's Regional Council unanimously voted to approve and fully adopt Connect SoCal (2020–2045 RTP/SCS), and the addendum to the Connect SoCal Program Environmental Impact Report. SCAG's Connect SoCal is a regional growth-management strategy that targets per capita GHG reduction from passenger vehicles and light-duty trucks in the Southern California region. The SCS will integrate land use and transportation strategies that will achieve GHG emissions reduction targets that are forecasted to achieve reduction in GHG emissions to achieve the state's 2045 GHG reduction goals. The Connect SoCal incorporates local land use projections and circulation networks in city and county general plans. Typically, a project would be consistent with the RTP/SCS if the project does not exceed the underlying growth assumptions within the RTP/SCS. According to the VMT Assessment for the project (Appendix H), the project is located within a low VMT-generating zone that has VMT per service population that is 15% or more below the Northwest Region Baseline VMT. The project meets this definition for the 2012 base year and the 2040 cumulative year. Therefore, the project would support the VMT and GHG reducing goals of the Connect SoCal.

Because the project is not growth inducing, this type of consistency analysis does not apply. However, the major goals of the Connect SoCal are outlined in Table 4.8-7, along with the project's consistency with them.

Table 4.8-7. Project Consistency with the SCAG Connect SoCal RTP/SCS

RTP/SCS Measure	Project Consistency
Encourage regional economic prosperity and global competitiveness.	<i>Does not apply.</i> The project would not inhibit the Southern California Association of Governments (SCAG) from encouraging regional economic prosperity and global competitiveness.
Improve mobility, accessibility, reliability, and travel safety for people and goods.	<i>Does not apply.</i> The project would not inhibit SCAG from strengthening the regional transportation network for goods movement.
Enhance the preservation, security, and resilience of the regional transportation system.	<i>Does not apply.</i> The project would not inhibit SCAG from enhancing the resilience of the regional transportation system.
Increase person and goods movement and travel choices within the transportation system.	<i>Does not apply.</i> The project would not inhibit SCAG from increasing person and goods movement and travel choices within the transportation system.
Reduce greenhouse gas emissions and improve air quality.	<i>Consistent.</i> The project would result in criteria air pollutant and GHG emissions during construction and operation. However, emissions would not exceed the SCAQMD significance thresholds.
Support healthy and equitable communities.	<i>Consistent.</i> The project would provide public park space and connect to the Bailey Canyon Wilderness Park and trail.
Adapt to a changing climate and support an integrated regional development pattern and transportation network.	<i>Consistent.</i> The project is located less than 1 mile from the nearest bus stop providing access to the 268, 478, and 479 bus lines through the Metropolitan Transportation Authority (MTA).
Leverage new transportation technologies and data-driven solutions that result in more efficient travel.	<i>Does not apply.</i> The project would not inhibit SCAG from leveraging technology for the transportation system.
Encourage development of diverse housing types in areas that are supported by multiple transportation options.	<i>Consistent.</i> The project would develop 42 residential units less than 1 mile from the nearest bus stop providing access to the 268, 478, and 479 bus lines through MTA.
Promote conservation of natural and agricultural lands and restoration of habitats.	<i>Consistent.</i> The project would not impact natural lands during construction or operation as shown in Section 4.4, Biological Resources.

Source: SCAG 2020.

As shown in Table 4.8-7, the project would not conflict with the goals within SCAG’s Connect SoCal. Based on the growth forecast analysis, per capita VMT analysis, and consistency with the Connect SoCal goals, the project would be consistent with the principles of the Connect SoCal and the project would have a less than significant impact.

**Conclusion**

The project is consistent with the Scoping Plan, the City’s General Plan, and SCAG’s Connect SoCal, which all promote economic growth while achieving greater energy efficiency. The project would not conflict with any plans adopted with the purpose of reducing GHG emissions; therefore, the proposed project’s impacts on GHG emissions would be **less than significant**.

4.8.6 Mitigation Measures

No mitigation is required.

4.8.7 Level of Significance After Mitigation

Impacts would be **less than significant** without mitigation.

## 4.9 Hazards and Hazardous Materials

This section describes the existing hazardous materials conditions of The Meadows at Bailey Canyon Specific Plan Project (project or proposed project) site and vicinity, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures related to implementation of the proposed project.

### 4.9.1 Existing Conditions

A Phase I Environmental Site Assessment (ESA) and a Phase II ESA were prepared for the proposed project in July 2020 by Stantec Consulting Services Inc. (Stantec) (Appendix F1). The proposed project consists of approximately 17.30 acres of undeveloped land south of the Mater Dolorosa Retreat Center. North Sunnyside Avenue and Carter Avenue are located on the western and eastern portions of the project site, respectively. These roadways lead to the adjacent Mater Dolorosa Retreat Center to the north. The project site appears to have been used for agricultural purposes between circa 1938 and 2005. No structures or features were observed or have been historically located on the project site based on reviewed historic aerial photographs (Appendix F1).

#### Project Site

During the Phase I ESA, Stantec identified the following recognized environmental conditions (RECs) in connection with the project site (Appendix F1):

- **Historical Agricultural Use.** Based on review of aerial photographs, the project site appears to have been used for agricultural purposes between circa 1938 and 2005. Historic agricultural use can be a potential concern due to the possible use of pesticides and herbicides containing heavy metals. Accordingly, Stantec recommended collection of soil samples for chemical analysis to determine if pesticides or heavy metals associated with herbicides were present at levels that represent a REC or that are of concern to residential development.

#### Hazards in the Project Vicinity

According to regulatory records, one 500-gallon leaded gasoline underground storage tank (UST) was removed from the Mater Dolorosa Retreat Center in June 1992. This UST was not located on the project site, but on the adjacent property north of the northeast corner of the project site (see Figure 4.9-1, Soil and Soil Vapor Sampling Locations). According to a Closure Report dated July 23, 1992, prepared by Conservtech, two soil samples were collected from beneath the tank and the dispenser and did not have any detections of total petroleum hydrocarbons (TPH) of the fuel related volatile organic compounds (VOCs) benzene, toluene, ethylbenzene, and xylenes (BTEX) above laboratory reporting limits. Organic lead concentrations were reported at 0.73 and 0.81 milligrams per kilogram (mg/kg). Based on these results remedial action was not considered necessary and closure was recommended. The Los Angeles County Department of Public Works (DPW) issued a no further action letter dated January 4, 1993 (Appendix F1).

During the Phase I ESA, Stantec identified the following recognized environmental conditions (RECs) in connection with the project site vicinity (Appendix F1):

- **Former Gasoline Underground Storage Tank.** Based on Stantec's review of regulatory records, one 500-gallon leaded gasoline UST was removed from the adjacent property in 1992. The DPW issued a no further action letter the former UST, based on the absence of soil impacts. However, no soil vapor data was collected at the time of the closure assessment. Therefore, Stantec recommended a soil vapor assessment to evaluate if volatile organic compounds (VOCs) exists at concentrations of concern to development in close proximity to the former UST on the project site.

### Schools

The closest schools to the project site include the Don Benito Fundamental School, located approximately 0.3 miles west of the project site; the Alverno Heights Academy, located 0.3 miles south of the project site; and the Sierra Madre Elementary School, located approximately 0.5 miles southeast of the project site.

### Airports

The closest airport to the project site is the San Gabriel Valley Airport (formerly the El Monte Airport), located approximately 6 miles south of the project site. The San Gabriel Valley Airport is owned and operated by the County of Los Angeles (County) and is publicly available to general aviation. The project site is not located within the Airport Influence Area (AIA) of the San Gabriel Valley Airport (County of Los Angeles 2004).

### Wildfire Risk

As shown in Figure 4.9-2, Fire Hazard Severity Zones, the project site is located within a wildland–urban interface location that is statutorily designated as a Local Responsibility Area Very High Fire Hazard Severity Zone (VHFHSZ) by the California Department of Forestry and Fire Protection (CAL FIRE) and the Sierra Madre Fire Department (SMFD). A Fire Protection Plan (FPPO) has been prepared for the proposed project to address potential wildfire hazards (Appendix F2). While the project site has not been subject to any wildfires in recorded fire history, 74 wildfires have burned within 5 miles of the project site since the beginning of the historical fire data record, with an average fire size of 4,500 acres (Appendix F2).

Wildland fires are a common natural hazard in most of southern California with a long and extensive history. Southern California landscapes include a diverse range of plant communities, including vast tracts of grasslands and shrublands, like those found adjacent to the center of the project site. As a result of the anticipated growing population of Los Angeles County wildland–urban interface areas, and the region’s fire history, it can be anticipated that periodic wildfires may start on, burn onto, or spot into the project site. The most common type of fire anticipated in the vicinity of the project area is a wind-driven fire from the northeast moving through the native vegetation in the Angeles National Forest (Appendix F2).

Wildfire risks associated with the project are discussed in Section 4.20, Wildfire, of this Environmental Impact Report (EIR).

## 4.9.2 Relevant Plans, Policies, and Ordinances

### Federal

#### ***Federal Toxic Substances Control Act of 1976***

The Federal Toxic Substances Control Act of 1976 tasked the U.S. Environmental Protection Agency (EPA) with authority to require reporting, record-keeping and testing requirements, and restrictions relating to chemical substances and/or mixtures. The Federal Toxic Substances Control Act addresses the production, importation, use, and disposal of specific chemicals including PCBs, asbestos, radon, and lead-based paint (EPA 2020a).

### ***Resource Conservation and Recovery Act of 1976***

The objectives of the Resource Conservation and Recovery Act of 1976 are to protect human health and the environment from the potential hazards of waste disposal, conserve energy and natural resources, reduce the amount of waste generated, and ensure that wastes are managed in an environmentally sound manner. The Resource Conservation and Recovery Act affirmed and extended the “cradle-to-grave” system of regulating hazardous wastes. The use of certain techniques for the disposal of some hazardous wastes was specifically prohibited by the Hazardous and Solid Waste Act. The Hazardous and Solid Waste Amendments of 1984 also added Subtitle I, which governs underground storage tanks (EPA 2020b).

### ***Comprehensive Environmental Response, Compensation, and Liability Act of 1980***

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as “Superfund,” was enacted by Congress on December 11, 1980. This law provided broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. CERCLA established requirements concerning closed and abandoned hazardous waste sites, provided for liability of persons responsible for releases of hazardous waste at these sites, and established a trust fund to provide for cleanup when no responsible party could be identified. CERCLA also enabled the revision of the National Contingency Plan. The National Contingency Plan provided the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, or contaminants. The National Contingency Plan also established the National Priorities List, which is a list of contaminated sites warranting further investigation by EPA. CERCLA was amended by the Superfund Amendments and Reauthorization Act on October 17, 1986 (EPA 2018a).

### ***Superfund Amendments and Reauthorization Act***

The Superfund Amendments and Reauthorization Act amended CERCLA on October 17, 1986. The Superfund Amendments and Reauthorization Act had several changes and additions, including the following:

- Stressed the importance of permanent remedies and innovative treatment technologies in cleaning up hazardous waste sites
- Required Superfund actions to consider the standards and requirements found in other state and federal environmental laws and regulations
- Provided new enforcement authorities and settlement tools
- Increased state involvement in every phase of the Superfund program
- Increased the focus on human health problems posed by hazardous waste sites
- Encouraged greater citizen participation in making decisions on how sites should be cleaned up
- Increased the size of the trust fund to \$8.5 billion

The Superfund Amendments and Reauthorization Act also required the EPA to revise the Hazard Ranking System to ensure that it accurately assessed the relative degree of risk to human health and the environment posed by uncontrolled hazardous waste sites that may be placed on the National Priorities List (EPA 2018b).

### ***Hazardous Materials Transportation Act***

The U.S. Department of Transportation regulates hazardous materials transportation between states under the Code of Federal Regulations, Title 49, Chapter 1, Parts 100–185. In California, the California Department of Transportation (Caltrans) and the California Highway Patrol enforce federal law related to the transport of hazardous materials. Together, these agencies determine driver training requirements, load labelling procedures, and specifications for container types.

### ***Occupational Safety and Health Act of 1970 and Occupational Safety and Health Administration***

The Occupational Safety and Health Act of 1970 was passed to prevent workers from being killed or seriously harmed at work. The Occupational Safety and Health Act created the Occupational Safety and Health Administration (OSHA), which sets and enforces protective workplace safety and health standards. OSHA also provides information, training, and assistance to employers and workers. Under the Occupational Safety and Health Act, employers have the responsibility to provide a safe workplace (OSHA 2014).

### ***Federal Aviation Administration Functions***

The Federal Aviation Administration (FAA) has primary responsibility for the safety of civil aviation. The FAA's major functions regarding hazards include (1) developing and operating a common system of air traffic control and navigation for both civil and military aircraft; (2) developing and implementing programs to control aircraft noise and other environmental effects of civil aviation; (3) regulating U.S. commercial space transportation; (4) researching and developing the National Airspace System and civil aeronautics; (5) regulating civil aviation to promote safety, and (6) encouraging and developing civil aeronautics, including new aviation technology (FAA 2019).

## **State**

### ***Hazardous Materials Management Act***

Requires that businesses handling or storing certain amounts of hazardous materials prepare a hazardous materials business plan, which includes an inventory of hazardous materials stored on site (above specified quantities), an emergency response plan, and an employee training program.

### ***Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65)***

Requires the governor to publish and update, at least annually, a list of chemicals known to the state to cause cancer, birth defects, or other reproductive harm and to inform citizens about exposures to such chemicals.

### ***Hazardous Waste Management Planning and Facility Siting, also known as the Tanner Act (Assembly Bill 2948, 1986)***

Requires counties to prepare, for California Department of Toxic Substances Control (DTSC) approval, hazardous waste management plans and prescribes specific public participation activities, which must be carried out during the local land use permit process for siting new or expanding off-site commercial treatment, storage, and disposal facilities.

### ***California Environmental Protection Agency***

The boards, departments, and offices that make up the California Environmental Protection Agency (CalEPA) include the California Air Resources Board, the Department of Pesticide Regulation, the Department of Resources Recycling



and Recovery, DTSC, the Office of Environmental Health Hazard Assessment, and the State Water Resources Control Board. These boards, departments, and offices were placed within the CalEPA “umbrella” to create a cabinet-level voice for the protection of human health and the environment (such as clean air, clean water, clean soil, safe pesticides, and waste recycling and reduction) to assure the coordinated deployment of state resources (CalEPA 2020a).

### ***Cortese List/Government Code Section 65962.5***

Pursuant to Government Code, Section 65962.5, environmental regulatory database lists are compiled to identify and locate properties with known hazardous substance contamination (California Government Code, Section 65960 et seq.). Four state agencies are required to provide lists of facilities that have contributed to, harbor, or are responsible for environmental contamination within their jurisdiction. The four state agencies that are required to provide these lists to the Secretary for Environmental Protection include DTSC, the State Department for Health Services, the State Water Resources Control Board, and the California Integrated Waste Management Board. The Secretary for Environmental Protection then takes each of the four respective agency lists and forms one list, referred to as the Hazardous Waste and Substances Site List – Site Cleanup (Cortese List), which is made available to every city and/or county in California (CalEPA 2020b).

### ***California Occupational Safety and Health Administration***

Cal/OSHA is the primary agency responsible for worker safety in the handling and use of chemicals in the workplace. Cal/OSHA standards are generally more stringent than federal regulations. The employer is required to monitor worker exposure to listed hazardous substances and notify workers of exposure (8 California Code of Regulations [CCR] Sections 337–340). The regulations specify requirements for employee training, availability of safety equipment, accident prevention programs, and hazardous substance exposure warnings.

### ***California Hazardous Waste Control Law***

The California Hazardous Waste Control Law (California Health and Safety Code, Division 20, Chapter 6.5) is administered by CalEPA to regulate the management of hazardous wastes. While the California Hazardous Waste Control Law is generally more stringent than the Resource Conservation and Recovery Act, until EPA approves the California Hazardous Waste Control Program (which is charged with regulating the generation, treatment, storage, and disposal of hazardous waste), both the state and federal laws apply in California. The Hazardous Waste Control Law lists 791 chemicals and approximately 300 common materials that may be hazardous; establishes criteria for identifying, packaging, and labeling hazardous wastes; prescribes management controls; establishes permit requirements for treatment, storage, disposal, and transportation; and identifies some wastes that cannot be disposed of in landfills.

### ***California Accidental Release Prevention Program***

Similar to the Federal Risk Management Program, the California Accidental Release Prevention Program includes additional state requirements and an additional list of regulated substances and thresholds. The regulations of the program are contained in California Code of Regulations Title 19, Division 2, Chapter 4.5. The intent of the California Accidental Release Prevention Program is to prevent accidental releases of substances that can cause serious harm to the public and the environment, minimize the damage if releases do occur, and satisfy community right-to-know laws.

### ***California Health and Safety Code***

The handling and storage of hazardous materials is regulated by Division 20, Chapter 6.95, of the California Health and Safety Code. Under Sections 25500–25543.3, facilities handling hazardous materials are required to prepare a hazardous materials business plan. Hazardous materials business plans contain basic information on the location, type, quantity, and health risks of hazardous materials stored, used, or disposed of in the state. Chapter 6.95 of the California Health and Safety Code establishes minimum statewide standards for hazardous materials business plans.

In addition, in the event that a facility stores quantities of specific acutely hazardous materials above the thresholds set forth by the California Health and Safety Code, facilities are also required to prepare a risk management plan and California accidental release plan. The risk management plan and California accidental release plan provide information on the potential impact zone of a worst-case release and require plans and programs designed to minimize the probability of a release and mitigate potential impacts (California Health and Safety Code, Chapter 6.95).

### ***Title 24 California Building Standards Code***

#### **California Building Code**

Part 2 of Title 24 of the California Building Standards Code contains the California Building Code. Chapter 7A of the California Building Code regulates building materials, systems, and/or assemblies used in the exterior design and construction of new buildings located within a fire hazard area. Fire hazard areas as defined by the California Building Code include areas identified as a Fire Hazard Severity Zone (FHSZ) within a State Responsibility Area or a wildland–urban interface fire area. The purpose of Chapter 7A is to establish minimum standards for the protection of life and property by increasing the ability of structures located in a fire hazard area to resist the intrusion of flames or burning embers projected by a wildfire, and to contribute to a systematic reduction in structural losses from a wildfire. New buildings located in such areas must comply with the ignition-resistant construction standards outlined in Chapter 7A.

#### **California Fire Code**

Part 9 of Title 24 of the California Building Standards Code contains the California Fire Code (CFC), which incorporates by adoption the International Fire Code with necessary California amendments. The purpose of the CFC is to establish the minimum requirements to safeguard the public health, safety, and general welfare from the hazards of fire, explosion, or dangerous conditions in new and existing buildings, structures, and premises, and to provide safety and assistance to firefighters and emergency responders during emergency operations. Chapter 49 of the CFC contains minimum standards for development in the wildland–urban interface and fire hazard areas.

The CFC and Office of the State Fire Marshal provide regulations and guidance for local agencies in the development and enforcement of fire safety standards. The CFC is updated and published every 3 years by the California Building Standards Commission. The 2016 CFC took effect on January 1, 2017, and the 2019 CFC took effect on January 1, 2020.

### ***California Code of Regulations, Title 14, Division 1.5***

California Code of Regulations Title 14, Division 1.5, establishes the regulations for the California Department of Forestry and Fire Protection (CAL FIRE) and is applicable in all State Responsibility Areas—areas where CAL FIRE is responsible for wildfire protection. Any development in State Responsibility Areas must comply with these regulations. Among other things, Title 14 Section 1270, et seq. establishes minimum standards for emergency access, fuel modification, setback to property line, signage, and water supply.

### ***California Emergency Services Act***

Under the Emergency Services Act (California Government Code, Section 8550 et seq.), the State of California developed an emergency response plan to coordinate emergency services provided by federal, state, and local agencies. Rapid response to incidents involving hazardous materials or hazardous waste is an integral part of the plan, which is administered by the Governor’s Office of Emergency Services. The Office of Emergency Services coordinates the responses of other agencies, including the EPA, California Highway Patrol, Regional Water Quality Control Boards (RWQCBs), air quality management districts, and county disaster response offices.

### ***South Coast Air Quality Management District – Rule 1403***

The purpose of this rule is to specify work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials (ACM). The requirements for demolition and renovation activities include asbestos surveying, notification, ACM removal procedures and time schedules, ACM handling and clean-up procedures, and storage, disposal, and landfilling requirements for asbestos-containing waste materials (ACWM). All operators are required to maintain records, including waste shipment records, and are required to use appropriate warning labels, signs, and markings.

### **Local**

#### ***City of Sierra Madre Municipal Code***

##### ***Title 15, Chapter 15.04.030***

Title 15, Chapter 15.04.030 of the City of Sierra Madre Municipal Code (SMMC) contains an amendment to Section 702A of the 2019 California Building Code to include additional requirements for buildings or structures constructed within the Very High Fire Hazard Severity Zone within the City. Building or structures erected, constructed, moved within or into the very high fire hazard severity zone shall meet the requirements of this section as follows:

- 1) Exterior walls of all buildings shall be of one-hour, fire-resistive construction. Exterior glass in such walls shall be double-glazed. Wood shake shingles being used as an exterior wall covering shall be treated with an approved fire-retardant chemical.
- 2) Roof soffits (including eaves), open patios, carports, porches, unenclosed underfloor areas and all open structures, attached or detached, shall be protected on the under side with materials as approved for one-hour fire-resistive construction or shall be of incombustible materials throughout.

Exceptions:

- a) Asphalt composition shingles with Class “B” rating.
- b) When in the opinion of the Building Official, no material increase in fire hazard will occur, additions not exceeding twenty-five percent (25%) of the existing square footage over the life of the building, may be covered with the same materials used on the existing building.
- c) Any roof covering conforming to the specifications of the Underwriters Laboratory (UL) for Class “A” roof covering as published in the Underwriters Laboratory “List of Fire Protection Equipment and Materials” shall be considered a “fire-retardant” roof covering.

### **Title 15, Chapter 15.24**

SMMC Title 15, Chapter 15.24 contains the CFC, 2019 Edition. The CFC shall be enforced by the bureau of fire prevention in the fire department of the city which is established and which shall be operated under the supervision of the chief of the fire department. Local amendments to the 2019 CFC that shall be incorporated into the SMMC and serve as requirements for emergency planning and preparedness (Section 15.24.070).

### ***City of Sierra Madre Local Hazard Mitigation Plan***

The City is in the process of preparing a Local Hazard Mitigation Plan (LHMP) and a draft was released for public review in February 2020. The LHMP includes a broad range of activities designed to protect homes, schools, public buildings and critical facilities. The purpose of a LHMP is to reduce or eliminate long-term risk to people and property from natural hazards and their effects on the City. The LHMP includes risk assessment and mitigation strategies for hazards including earthquakes, flooding, windstorms, wildfires, landslides, and utility related events such as power outages (City of Sierra Madre 2020).

### ***Airport Land Use Compatibility Plan – County of Los Angeles***

The purpose of Airport Land Use Compatibility Plan (ALUCP) is to protect the public health, safety, and welfare by ensuring the orderly expansion of airports and the adoption of land use measures that minimize the public’s exposure to excessive noise and safety hazards within areas around public use airports. The Airport Land Use Commission (ALUC) is also concerned with airport activities that may adversely affect adjacent areas and nearby land use that may interfere with airport operations. The County-wide ALCUP applies to the 11 general aviation airports, including the San Gabriel Valley Airport (formerly the El Monte Airport), which is the closest airport to the project site (County of Los Angeles 2004).

### ***City of Sierra Madre General Plan***

The City of Sierra Madre General Plan includes the following objectives and policies relevant to the proposed project with regard to hazards and hazardous materials (City of Sierra Madre 2015). The proposed project’s consistency with these policies is provided in Table 4.11-1 in Section 4.11, Land Use and Planning.

### **Chapter Two – Resource Management**

**Objective R20:** Properly disposing toxic and hazardous waste.

### Chapter Three – Hazard Prevention

**Objective Hz1:** Providing adequate service levels of fire protection that meets the needs of Sierra Madre residents, businesses and visitors.

**Objective Hz2:** Providing adequate fire protection necessary for existing and future development.

**Policy Hz2.3:** Continue to require review of building plans by a Fire Captain.

**Policy Hz2.5:** Assess the impacts of incremental increases in development density and related traffic congestion on fire hazards and emergency response time, and ensure through the development review process that new development will not result in a reduction of fire protection services below acceptable levels.

**Policy Hz2.6:** Continue to require that new development provides adequate hydrants and show sufficient evidence that there is adequate water supply/fire flow and that it is available to accommodate the fire protection needs of new construction.

**Policy Hz2.8:** Develop vegetation management plans that manage chemise and chaparral to ensure adequate firebreaks, to provide adequate access for fire protection water systems, and access for firefighting.

**Objective Hz4:** Addressing emergency operations and disaster preparedness as a priority.

**Objective Hz5:** Limiting fire hazard through brush and weed abatement.

**Policy Hz5.1:** Mandate annual brush removal from April to June.

### 4.9.3 Thresholds of Significance

The significance criteria used to evaluate the project impacts related to hazards and hazardous materials are based on Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to hazards and hazardous material would occur if the project would:

1. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
2. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.
3. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.
4. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as result, would it create a significant hazard to the public or the environment.
5. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area.
6. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

7. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

### 4.9.4 Project Design Features

The following project design feature (PDF) would be implemented as part of the proposed project and would be applicable to hazards and hazardous materials:

**PDF-WF-1** The proposed project shall comply with the requirements outlined in the Fire Protection Plan (FPP) (Appendix F2) during construction and operations.

### 4.9.5 Impacts Analysis

1. *Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*

#### Construction Impacts

Construction of the proposed project would involve the transport of commonly used hazardous substances, such as gasoline, diesel fuel, lubricating oil, grease, and solvents. However, hazardous materials are highly regulated in California, including the methods by which they are transported, used, and stored. All such uses of these substances would be subject to applicable and required regulatory controls as described above under Section 4.9.2. The proposed project would be required to comply with all applicable federal, state, and local standards related to hazardous materials and wastes, such as controls on use, handling, storage, transportation, and disposal. Specifically, handling and storage of hazardous materials is regulated by Division 20, Chapter 6.95, of the California Health and Safety Code. Additionally, construction is temporary and use of these materials would cease upon completion. The use of these materials for their intended purpose would not pose a significant risk to the public or environment. Therefore, impacts would be **less than significant** during construction.

#### Operational Impacts

Once project construction is complete, the transport, use, or disposal of hazardous materials would be limited to consumer products such as household cleaning products, landscaping chemicals and fertilizers, and other substances associated with household and recreation (neighborhood park) uses. As discussed in the City's General Plan, the City maintains a Household Hazardous Waste Element which outlines strategies and planning to eliminate household hazardous wastes from the City's waste stream. City residents are provided with opportunities to safely dispose of common household goods that are not allowed into the traditional waste stream. Items such as light bulbs, batteries, used oil, electronic waste, and certain solvents and cleaners are dangerous to the environment and prohibited from landfills. The City works closely with the County of Los Angeles to create and maintain programs to collect and safely dispose of such waste. Once a year, the City hosts a County-sponsored Household Hazardous Waste Roundup at the Mariposa Parking Lot. The event accepts the hazardous waste at no charge to the resident (City of Sierra Madre 2015).

Although the proposed project would result in the increase in routine transport, use and disposal of hazardous materials and/or wastes generated by future growth, all hazardous materials would be transported and handled in

accordance with all federal, state, and local laws regulating the management and use of hazardous materials. Therefore, impacts would be **less than significant** during operation.

**2. *Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?***

### **Construction Impacts**

As discussed under Threshold 1, construction of the proposed project would involve the transport of commonly used hazardous substances, such as gasoline, diesel fuel, lubricating oil, grease, and solvents. However, hazardous materials are highly regulated in California, including the methods by which they are transported, used, and stored. Compliance with applicable regulations would reduce potential for reasonably foreseeable upset and accident of such hazardous substances during construction. Additionally, construction is temporary and use of these materials would cease upon completion.

As discussed above under Section 4.9.1, Existing Conditions, a Phase I and Phase II ESA was prepared for the proposed project. The Phase I ESA determined that the project site was historically an agricultural use and that a former gasoline UST was located just north of the northeast corner of the project site. As part of the Phase I, a visit to the project site and its vicinity was conducted by Stantec in May 2020. The site reconnaissance focused on observation of current conditions and observable indications of past uses and conditions of the project site that may indicate the presence of RECs. The reconnaissance of the project site was conducted on foot by Stantec. During site reconnaissance, no hazardous substances or petroleum products were identified. Additionally, no evidence of USTs or aboveground storage tanks (ASTs) was identified on the project site.

During preparation of the Phase II ESA, Stantec conducted a subsurface assessment to address the RECs identified during the Phase I ESA, including the historical agricultural use and former gasoline UST just north of the northeast corner of the project site as described in Section 4.9.1. The Phase II included eight composite samples (COMP-1 through COMP-8) from 30 soil borings, taken to assess the historical agricultural use, and two soil vapor borings (SV01 and SV02) in close proximity to the former UST at approximately 5 feet below ground surface (bgs) (see Figure 4.9-1). Composite soil samples were collected at 1 foot and 3 feet. The shallow composite samples were analyzed for organochlorine pesticides by EPA Method 8081A and arsenic/lead by EPA Method 6010B. The 3-foot composite soil samples were placed on hold, pending results of the shallow soil sample. Two soil vapor samples (SV01 and SV02) were analyzed for VOCs by EPA methodology as described in Appendix F1. Subsurface soil vapor probe installation was performed in accordance with the July 2015 DTSC “Advisory - Active Soil Gas Investigations” (DTSC Advisory). Results from the soil and soil vapor sampling are summarized below (Appendix F1).

### ***Agricultural Assessment***

No organochlorine pesticides were detected in any of the soil samples collected from the areas of historical agricultural activities. Lead was detected ranging in concentration between 9.9 and 32 milligrams per kilogram (mg/kg). These concentrations are well below the EPA Regional Screening Level (RSL) for residential use of 480 mg/kg, and also below the DTSC Human and Ecological Risk Office (HERO) residential screening level of 80 mg/kg for lead. Arsenic was detected at concentrations ranging from 3.7 mg/kg up to 5.8 mg/kg. These concentrations are above the EPA RSL for residential use of 0.68 mg/kg, but within the southern California regional background levels of 0.6 to 11.0 mg/kg (Appendix F1).

The reported concentrations of lead and arsenic related to the historic agricultural activities at the project site are below residential screening criteria or within naturally occurring background range. Given these arsenic and lead concentrations, along with the absence of organochlorine pesticides, the historic agricultural use of the project site is not considered a REC and Stantec recommended no further investigation regarding this issue (Appendix F1).

### ***Former Gasoline UST***

Various VOCs were detected in soil vapor during this investigation. Low levels of fuel-related VOCs, including but not limited to acetone, benzene, chloroform, chloromethane, dichlorodifluoromethane, ethylbenzene, isopropanol, tert-butyl alcohol (TBA), toluene, trichloroethene, and xylenes, were detected along the northern edge of the project site at concentrations below the risk-based screening levels for residential land use. Therefore, the former gasoline UST is not considered a REC to the project site and no further assessment or action is warranted (Appendix F1).

### ***Conclusion***

Based on the findings of the Phase I and Phase II ESAs, including the review of historical records, aerial photographs, environmental records/database search, and the collection of soil and soil vapor samples and subsequent testing, no evidence of RECs in connection to the project site were revealed and no further assessment was determined to be warranted. As such, the proposed project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment due to the historical agricultural use or former UST north of the northeast corner of the project site. Impacts would be **less than significant** during construction.

### ***Operational Impacts***

As discussed under Threshold 1, once project construction is complete, the transport, use, or disposal of hazardous materials would be limited to consumer products such as household cleaning products, landscaping chemicals and fertilizers, and other substances associated with household and recreation (neighborhood park) uses. Furthermore, all hazardous materials would be transported and handled in accordance with all federal, state, and local laws regulating the management and use of hazardous materials, reducing the potential for reasonably foreseeable upset and accident of such hazardous substances during construction.

Further, the reported concentrations of lead and arsenic related to the historic agricultural activities at the project site are below residential screening criteria or within naturally occurring background range, as described under Construction Impacts above. Additionally, with regard to the former UST, low levels of fuel-related VOCs were detected along the northern edge of the project site at concentrations below the risk-based screening levels for residential land use. Therefore, impacts associated with the reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment during operation of the project, including due to the historical agricultural use or former UST, would be **less than significant**.

### ***3. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?***

As discussed in Section 4.9.1, the closest schools to the project site include the Don Benito Fundamental School, located approximately 0.33 miles west of the project site; the Alverno Heights Academy, located 0.3 miles south of the project site; and the Sierra Madre Elementary School, located approximately 0.5 miles southeast of the project site. None of these schools are located within 0.25 miles of the project site and no schools are proposed within



0.25 miles of the project site. Nevertheless, as discussed above under Threshold 1, the proposed project would result in less-than-significant impacts related to the routine transport, use, or disposal of hazardous materials. As discussed above under Threshold 2, the proposed project would result in less-than-significant impacts related to the reasonably foreseeable upset and accident conditions involving the release of hazardous materials. Although the proposed project would involve the transport and use of commonly used hazardous substances during construction and operation, the proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 miles of an existing or proposed school. **No impact** would occur.

**4. *Would the project be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?***

A regulatory agency database search report was obtained from Environmental Data Resources Inc., a third-party environmental database search firm. A complete copy of the database search report, including the date the report was prepared, the date the information was last updated, and the definition of databases searched, is provided in Appendix F1.

Because the project site and Mater Dolorosa Retreat Center site share an address, the two sites were concurrently identified in the following environmental database reports: the Hazardous Waste Tracking System (HWTS), HAZNET, Los Angeles County Hazardous Materials System (HMS) environmental databases. The listings were related to commercial and institutional building construction in 2014, disposal of asbestos containing waste in 1992 and 2013, and disposal of waste oil/mixed oil in 1992. Because no development is currently present at the project site, these listing most likely occurred within the Mater Dolorosa Retreat Center site, located north of the project. Given there are no violations or indication of a release, these listings are not considered an environmental concern to the proposed project.

Furthermore, as discussed above under Threshold 2, the Phase I and Phase II ESA determined that the reported concentrations of lead and arsenic related to the historic agricultural activities at the project site are below residential screening criteria or within naturally occurring background range. Regarding to the former UST, low levels of fuel-related VOCs were detected along the northern edge of the project site at concentrations below the risk-based screening levels for residential land use. Therefore, the project site is not located on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, and implementation of the proposed project would not create a significant hazard to the public or the environment. Impacts would be **less than significant**.

**5. *For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?***

As discussed in Section 4.9.1, the closest airport to the project site is the San Gabriel Valley Airport (formerly the El Monte Airport), located approximately 6 miles south of the project site. An airport land use compatibility plan (ALCUP) has not been developed for the San Gabriel Valley Airport; however, a Countywide ALUCP has been adopted for all public airports within Los Angeles County. The Countywide ALUCP includes information pertaining to the San Gabriel Valley Airport, discussed therein as the El Monte Airport. The project site is not located within the AIA of the San Gabriel Valley Airport and is therefore not subject to the policies and programs of the Countywide ALUCP. Furthermore, the project site is not located within two miles of any other airport or public use airport. As such, the

proposed project would not result in a safety hazard or excessive noise for people residing or working in the project area. **No impact** would occur.

**6. *Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?***

The City has not adopted an emergency response plan or emergency evacuation plan. However, the City is in the process of preparing a Local Hazard Mitigation Plan (LHMP) and a draft was released for public review in February 2020 (City of Sierra Madre 2020). The purpose of a LHMP is to reduce or eliminate long-term risk to people and property from natural hazards and their effects on the City.

As stated in Section 4.20, the project site is within a WUI that is in an area statutorily designated an LRA VHFHSZ by CAL FIRE and the SMFD (Appendix F2). Additionally, as seen in Figure 4.9-2, the project site is designated by the City as a Very High Hazard area (City of Sierra Madre 2015). This designation does not indicate that development cannot occur safely, but does indicate that a higher level of ignition resistant construction must be implemented.

During construction of the project, a temporary increase in traffic on roadways surrounding the project site may occur due to increased truck loads or the transport of construction equipment to and from the project site during the construction period. However, all construction activities including staging would occur in accordance with City requirements (such as SMMC Chapter 17.30, which requires that streets be maintained free and clear during construction), which would ensure that adequate emergency access to the project site in the event of an emergency or evacuation order would be provided during construction of the project (see Threshold 1 in Section 4.20.5 for additional details). The proposed driveways and roadways (proposed and existing) providing access to the project site would comply with the City's roadway standards and the 2019 CFC Section 503. Additionally, all access roads would meet SMMC standards, requiring roadways to have a minimum 20-foot unobstructed width (30- and 36-foot-wide roadway surfaces are proposed) and a minimum 26-foot width within 25 feet of hydrants.

An FPP has been prepared for The Meadows at Bailey Canyon Specific Plan (Specific Plan) and included as Appendix F2 of this EIR. The FPP evaluates and identifies the potential fire risk associated with the project's land uses and identifies requirements for water supply, fuel modification and defensible space, access, building ignition and fire resistance, and fire protection systems. The FPP identifies project-specific measures to be implemented by and incorporated into the project to address potential wildfire risks, including site improvements prior to bringing lumber and combustible materials on site, ongoing/as needed fuel modification maintenance, provision of fuel modification areas around buildings, not using highly flammable plants in landscape plantings, and provision of a wildfire education program to residents and occupants. Furthermore, the proposed project would provide adequate emergency access throughout the project site in accordance with the street design requirements of the SMMC.

There are no officially adopted evacuation plans for the project area that are publicly available. The project's evacuation approach is consistent with the City's and County's evacuation approach and would not conflict. Residents would be aware of the potential for evacuations and would follow direction provided by law enforcement and fire personnel. As discussed in the FPP and Section 4.20.5 of the EIR, early evacuation for any type of wildfire emergency near the project site is the preferred method of providing for resident safety, consistent with the City's current approach. As such, each property owner would be individually responsible to adopt, practice, and implement a "Ready, Set, Go!" approach to site evacuation. The "Ready, Set, Go!" concept is widely known and encouraged by the state of California and most fire agencies. Pre-planning for emergencies, including wildfire emergencies, focuses on being prepared, having a well-defined plan, minimizing potential for errors, maintaining the site's fire protection systems, and implementing a conservative (evacuate as early as possible) approach to evacuation and site uses

during periods of fire weather extremes. Implementation of these evacuation requirements, would ensure that residents of the proposed project and nearby land uses, including the Mater Dolorosa Retreat Center and nearby residential uses, would be able to properly evacuate in the event of wildfire. During wildfire evacuations, law enforcement and fire agencies would manage the evacuation event and provide downstream intersection control, as needed, to move persons within higher threat areas to lower threat areas. Because the project and Mater Dolorosa Retreat Center would respond to evacuation orders according to provided direction, and depending on the threat level, would be aided by downstream intersection control, it is not anticipated that substantial delays to the existing population would occur. Therefore, through compliance with existing regulations and **PDF-WF-1**, which requires compliance with the FPP, the proposed project would not impair implementation of the LHMP once adopted. and because there is no officially adopted evacuation plan for the area, would therefore not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Impacts would be **less than significant**.

**7. *Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?***

The proposed project would introduce people and structures to the project site. As discussed in Section 4.9.1 and more comprehensively in Section 4.20, the project site is located within a wildland–urban interface location that is statutorily designated as a Local Responsibility Area VHFHSZ. As such, it can be anticipated that periodic wildfires may start on, burn onto, or spot into the project site. The most common type of fire anticipated in the vicinity of the project area is a wind-driven fire from the northeast moving through the native vegetation in the Angeles National Forest (Appendix F2). A FPP has been prepared for the proposed project to identify and address potential wildfire hazards. The FPP provides guidance for vegetation maintenance, enhanced ignition-resistant construction features, and fuel modification requirements to limit wildfire risk associated with implementation of the proposed project. Additionally, all proposed buildings would comply with the CBC (Chapter 7A), which requires compliance with ignition-resistant construction standards for all projects located in a fire hazard area (see Section 4.9.2 for details), and Chapter 5 of the Wildland-Urban (WUI) Interface code. These codes were specifically developed to address structure vulnerabilities related to wildfire. The primary means for structure ignition from wildfire are direct flame impingement, radiant/convective heat, and embers. The building and WUI codes provide for defensible space to minimize the potential for direct flame impingement, for ignition resistant construction that resists ignition from radiant/convective heat, and ember resistant openings that minimize the likelihood of ember penetration. These requirements were adopted into the code requirements over years of after fire structural loss and save assessments. This process involves identifying why building burn and developing protections to minimize those ignitions. Likewise, where building exposed to wildfire did not burn, reasons why are analyzed and findings incorporated into the fire protection system that is driven by these codes. The proposed project would also include fire protection systems including fire hydrants, automatic fire sprinkler system, and fire alarm systems and residential hazard detectors which will help protect the proposed residences and provide fire response infrastructure to reduce the risks of loss, injury or death associated with a wildland fire (Appendix F2). The Sierra Madre Fire Prevention Standards and 2019 CFC require the following: static water pressure will remain above 20 psi at 2,500 gallons per minute when meeting the fire requirements for a 2-hour duration.

The FPP that has been prepared for the project describes the risks associated with a potential wildland fire and the measures that will be implemented by and incorporated into the project to minimize those risks to the extent feasible. As discussed in the FPP (Appendix F2), there are no guarantees that a given structure will not burn during extreme fire conditions. The project design features discussed in this section and Section 4.20 identified in the FPP are designed to reduce the likelihood that fire will impinge upon the proposed project or threaten its occupants/visitors. Additionally, while there are no guarantees that fire will not occur in the area or that fire will not damage property or cause harm to

persons or their property, implementation of the required enhanced construction features provided by the applicable codes and the fuel modification requirements described in the FPP will reduce the site's vulnerability to wildfire. It will also help accomplish the goal of the FPP to assist firefighters in their efforts to defend structures. As such, with compliance with existing regulations and implementation of the project design features identified in the FPP (see **PDF-WF-1**), the proposed project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. Impacts would be **less than significant**.

### 4.9.6 Mitigation Measures

No mitigation measures would be required.

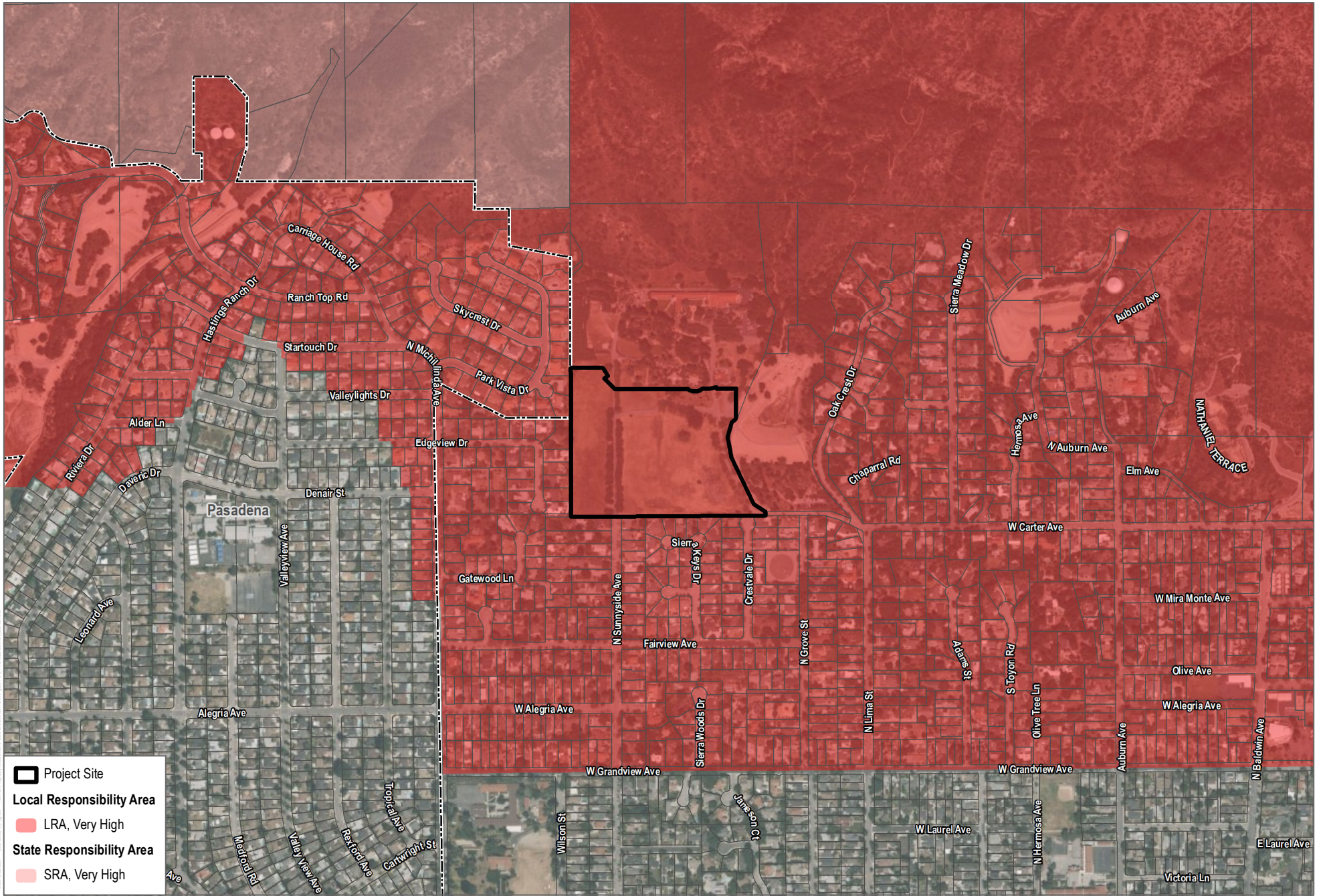
### 4.9.7 Level of Significance After Mitigation

No mitigation measures would be required. Impacts related to hazards and hazardous materials would be **less than significant**.



**FIGURE 4.9-1**  
Soil and Soil Vapor Sampling Locations  
The Meadows at Bailey Canyon EIR

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SOURCE: County of Los Angeles 2020; CalFire; Bing Maps



**FIGURE 4.9-2**  
**Fire Hazard Severity Zones**  
 The Meadows at Bailey Canyon EIR

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## 4.10 Hydrology and Water Quality

This section describes the existing hydrology and water quality conditions of The Meadows at Bailey Canyon Specific Plan Project (project or proposed project) site and vicinity, identifies associated regulatory requirements, evaluates potential impacts, and identifies applicable mitigation measures related to implementation of the proposed project.

### 4.10.1 Existing Conditions

#### **Project Site**

The project site is located within the northwestern portion of the City of Sierra Madre (City). As described in Chapter 2, Environmental Setting, of this Environmental Impact Report (EIR), the project site is located immediately south of the Mater Dolorosa Retreat Center and is bound by single-family residential areas to the west and south, and Bailey Canyon Wilderness Park to the east, and the foothills of the San Gabriel Mountains to the north of the Mater Dolorosa Retreat Center. The Bailey Canyon Debris Basin is also located to the east of the site. The Bailey Canyon Debris Basin is one of seven debris basins within the City that serves to control flood hazards associated with stormwater runoff channeled from the mouths of canyons in the northern part of the City (City of Sierra Madre 2015). The project site is located on the same parcel as the Mater Dolorosa Retreat Center, which is currently split within three different lots. A lot line adjustment would be processed to adjust the boundaries of the three existing lots that make up the Mater Dolorosa Retreat Center and the project site. The lot line adjustment would consolidate the two southern lots that make up the project site as one lot and adjust the northern boundary of this new lot further to the north.

#### **Hydrologic Features**

Under existing conditions, the project site includes an existing Los Angeles County Flood Control District (LACFCD) 36-inch-diameter reinforced concrete pipe (RCP) storm drain, which runs east, from the adjacent private properties west of the project site, into the project site and then north to south under a portion of the existing private roadway north of North Sunnyside Avenue (see Figure 3-7, Proposed Drainage Plan, in Chapter 3, Project Description). This existing storm drain collects storm water from an existing debris basin northwest of the site and eventually discharges into Arcadia Wash, located approximately 100 feet southeast of the intersection of South Lima Street and West Orange Grove Avenue.

The project site is divided into two major drainage areas, Areas A and B, which comprise four sub-drainage areas: A-1, A-2, B-2, and B-3. These drainage areas drain via sheet flow, natural concentrated flow, and street flow to the municipal separate storm sewer system (MS4). The site's existing drainage area is divided into the following sub-drainage areas:

- Drainage Area A-1, which is approximately 1.2 acre, consists of natural land cover and partially impervious roadway. This area drains to two existing catch basins, which feed two 21-inch RCPs, located on either side of North Sunnyside Avenue. These two 21-inch pipes join the existing 36-inch storm drain and are conveyed offsite to Arcadia Wash.
- Drainage Area A-2, which is approximately 5.2 acres, consists of natural land cover and impervious roadway. Flows from this area drain to an existing 24-inch RCP which connects into the existing 36-inch storm drain at the southern edge of the project site. Flows confluence with runoff generated from
- Drainage Area A-1 and are conveyed to Arcadia Wash. Drainage Area B-2 and B-3, which are approximately 11.0 acres, consist of natural land cover and impervious roadway. Runoff flows in a southeastern direction where it discharges to Crestvale Drive via a 24-inch, above ground culvert.

The northeastern portion of the Mater Dolorosa Retreat Center, located north of the site, flows to the Bailey Canyon Debris Basin to the east and discharges into Arcadia Wash. The project site does not flow towards the Bailey Canyon Debris Basin.

### **Groundwater**

#### Raymond Groundwater Basin

The project site lies completely within the Raymond Groundwater Basin, which previously provided groundwater to the City (UCLA 2020). Water to be consumed by the project uses would be provided by the Sierra Madre Water Department (SMWD), which previously sourced its water supply primarily from the Santa Anita Sub-area which is a sub-unit of the Raymond Groundwater Basin. For most of its time, the City's main source of water supply was through its groundwater. The Decreed Right of 1955 provided the City with water rights to 1,764 acre feet per year (AFY) from the Santa Anita Sub-area. The City also has the right to obtain credit for "salvage water." Salvage water is surface water percolated into the Santa Anita Sub-area minus losses for natural percolation and subsurface outflow. Salvage water credits allow the City to (annually) extract more than 1,764.0 acre-feet (AF) from the Santa Anita-Sub area. However, due to past multiple dry-year conditions, the Raymond Basin Management Board (RBMB) implemented a "500-foot" level limitation for all Decreed Rights to the Santa Anita Sub-area in 2013, which reduced well production by 95 percent. As a result, the City's adjusted right to the Santa Anita Sub-area was limited to 940 AFY. In October 2015, after five years of unprecedented drought and insufficient groundwater replenishment, the RBMB limited the amount of groundwater which the City is allowed to produce each year and authorized the use of imported water for spreading on behalf of the City. Metropolitan Water District of Southern California (MWD) entered into an agreement with the City and the San Gabriel Valley Municipal Water District (SGVMWD) to deliver up to 2,500 AFY of treated, imported water for spreading within the Santa Anita Sub-area. A new imported water connection was constructed at the Sierra Madre Spreading Grounds for the purposes of spreading to allow for additional groundwater by the City. Over the past five years, MWD has delivered 1,036 AFY to 2,044 AFY, with an average of 1,550 AFY, for spreading on behalf of the City. In addition, pursuant to this agreement, SGVMWD provides a portion of its annual State Water Project (SWP) allocation, which MWD then wheels to the City (City of Sierra Madre 2021).

Due to the "500-foot" level limitation that is in effect, the City's water rights to the Raymond Groundwater Basin are currently based on the adjusted rights to the Santa Anita Sub-area of 940.0 AFY plus any imported water spread at the Sierra Madre Spreading Grounds. Over the past five years, the City has produced 1,023 AFY to 2,387 AFY, with an average of 1,967 AFY from the Raymond Groundwater Basin (City of Sierra Madre 2021). However, with continued use of imported water, tunnel water, and any other viable sources for groundwater recharge, the City can expect the "500-foot rule" restriction to be lifted (UWMP 2021).

#### Main San Gabriel Groundwater Basin

The Main San Gabriel Groundwater Basin is a large groundwater basin replenished by stream runoff from the adjacent mountains and hills, by rainfall directly on the surface of the valley floor, subsurface inflow from Raymond Groundwater Basin and Puente Basin, and by return flow from water applied for overlying uses. Additionally, the Main San Gabriel Groundwater Basin is replenished with imported water. The Main San Gabriel Groundwater Basin serves as a natural storage reservoir, transmission system and filtering medium for wells constructed therein. There are three municipal wholesale water districts overlying and/or partially overlying the Main San Gabriel Groundwater Basin, including Upper District, SGVMWD, and Three Valleys Municipal Water District (TVMWD).

The Main San Gabriel Groundwater Basin has a freshwater storage capacity of about 8.7 million AF when the Key Well groundwater elevation is at 329.1 feet, of which about 125 feet of elevation change, or about 1,000,000 AF, has been used for historical basin operations. Local runoff is stored in a series of reservoirs operated by the Los Angeles County Department of Public Works (LACDPW) and diverted into spreading grounds to replenish the groundwater supply. Groundwater recharge occurs every year and is exhibited as increasing water levels.

The City is a party to the Main Basin Judgment, which means the City can pump from the Main San Gabriel Groundwater Basin. The Main Basin Judgment does not restrict the quantity of groundwater that can be produced but provides for a Replacement Water assessment for production in excess of water rights. Historically, the Main San Gabriel Groundwater Basin did not have wells. However, the City has proposed constructing a new well jointly with the City of Arcadia. The Main San Gabriel Groundwater Basin has been adjudicated and management of the local water resources within the Main San Gabriel Groundwater Basin is based on that adjudication. Management of the water resources in the Main San Gabriel Groundwater Basin is based upon Watermaster services under two Court Judgments: San Gabriel River Master and Main Basin Watermaster. Under the Main Basin Adjudication, the City does not have pumping rights but can pump from the Main San Gabriel Groundwater Basin. Although there is no limit on the quantity of water that may be extracted by parties to the Main Basin Adjudication, including the City, groundwater production in excess of a Party's water right, or its proportional share (pumper's share) of the Operating Safe Yield, requires purchase of untreated imported water to recharge the Main San Gabriel Basin. The City plans to obtain groundwater produced from the Main San Gabriel Basin and delivered through an inter-connecting pipeline with the City of Arcadia. If the City obtains any water from the Main San Gabriel Groundwater Basin, replacement water may be purchased from SGVMWD to recharge the Main San Gabriel Groundwater Basin. Any water pumped from Main San Gabriel Groundwater Basin wells on behalf of the City will be counted toward the City. Over the past five years, the City has not obtained any groundwater from the Main San Gabriel Groundwater Basin (through the City of Arcadia) (City of Sierra Madre 2021).

### Raymond Basin Judgment

To ensure the efficient use and supply of groundwater in the Raymond Groundwater Basin, water resources is managed by the Raymond Basin Judgment (RBJ). The RBJ is administered by the RBMB and is comprised of various participating parties, including the City, to manage and preserve groundwater levels of the Raymond Groundwater Basin. Under provisions of the 1984 RBJ (Section VI [3]), pumping is restricted when groundwater levels in the Santa Anita Sub-area drop below 500 feet above mean sea level. Significant threats on the City's water supply include increase in population, overdevelopment, and on-going drought conditions. The drought has driven home the point that Southern California is an arid region which does not have an adequate local water supply to meet current water demands, and that supplies of imported water cannot be counted upon in dry periods or in the event of a disaster (City of Sierra Madre 2015).

## 4.10.2 Relevant Plans, Policies, and Ordinances

### **Federal**

#### ***Clean Water Act***

The federal Clean Water Act (CWA) was enacted with the primary purpose of restoring and maintaining the chemical, physical, and biological integrity of the nation's navigable waters. The State Water Resources Control Board (SWRCB) and the Regional Water Quality Control Boards (RWQCBs) are responsible for enforcing water quality standards within the state. As mandated by Section 303(d) of the CWA, the SWRCB maintains and updates a list of

“impaired water bodies” (i.e., water bodies that do not meet state and federal water quality standards). This list is known as the Section 303(d) list of impaired water bodies. The state is required to prioritize waters/watersheds for development of total maximum daily load (TMDL) regulations. Section 303(d) of the CWA bridges the technology-based and water-quality-based approaches for managing water quality and requires each state to make a list of waters that are not attaining standards after implementation of the technology-based limits. For waters on this list (and where the U.S. Environmental Protection Agency [EPA] administrator deems it appropriate), the states develop TMDLs that are established at the level necessary to implement applicable water quality standards. A TMDL must account for all sources of pollutants that cause the water to be listed. Federal regulations require that TMDLs, at a minimum, account for contributions from point sources and nonpoint sources. This information is compiled in a list and submitted to the EPA for review and approval. Section 303(c)(2)(b) of the CWA requires states to update the TMDLs every 3 years (SWRCB 2019).

Section 319 of the CWA mandates specific actions for the control of pollution from nonpoint sources. The EPA has delegated responsibility for implementation of portions of the CWA, including water quality control planning and programs such as the National Pollutant Discharge Elimination System (NPDES) program, to the SWRCB and the RWQCBs.

### ***National Pollutant Discharge Elimination System Permit***

The NPDES permit system was established by the CWA to regulate both point-source discharges and nonpoint-source discharges. Nonpoint pollution often enters receiving waters in the form of surface runoff and is not conveyed by way of pipelines or discrete conveyances. Each NPDES permit contains limits on allowable concentrations and mass emissions of pollutants contained in the discharge. Sections 401 and 402 of the CWA contain general requirements regarding NPDES permits. Section 307 of the CWA describes the factors that the EPA must consider in setting effluent limits for priority pollutants.

A detailed discussion of the NPDES program is provided under the discussion of state regulations in this section, since the authority to implement the NPDES program has been delegated to the SWRCB and RWQCBs.

### ***Federal Antidegradation Policy***

The federal Antidegradation Policy (40 CFR Section 131.12) requires states to develop statewide antidegradation policies and identify methods for implementing them. Pursuant to this policy, state antidegradation policies and implementation methods will, at a minimum, protect and maintain (1) existing in-stream water uses; (2) existing water quality where the quality of the waters exceeds levels necessary to support existing beneficial uses, unless the state finds that allowing lower water quality is necessary to accommodate economic and social development in the area; and (3) water quality in waters considered an outstanding national resource. State permitting actions must be consistent with the federal Antidegradation Policy.

### ***National and State Safe Drinking Water Acts***

The federal Safe Drinking Water Act, established in 1974, is administered by the EPA and sets drinking water standards throughout the country. The drinking water standards established in the Act, as set forth in the Code of Federal Regulations (CFR), are referred to as the National Primary Drinking Water Regulations (Primary Standards; 40 CFR Part 141), and the National Secondary Drinking Water Regulations (Secondary Standards; 40 CFR Part 143). According to the EPA, the Primary Standards are legally enforceable standards that apply to public water systems. The Secondary Standards are non-enforceable guidelines regulating contaminants that may cause cosmetic or aesthetic effects in drinking water. The EPA recommends the Secondary Standards for water systems but does not require

systems to comply. California passed its own Safe Drinking Water Act in 1986 that authorizes the state's Department of Health Services to protect the public from contaminants in drinking water by establishing maximum contaminant levels (as set forth in the California Code of Regulations [CCR], Title 22, Division 4, Chapter 15) that are at least as stringent as those developed by the EPA, as required by the federal Safe Drinking Water Act.

### **State**

Responsibility for the protection of water quality in California rests with the SWRCB and nine RWQCBs. The SWRCB establishes statewide policies and regulations for the implementation of water quality control programs mandated by federal and state water quality statutes and regulations. The RWQCBs develop and implement water quality control plans that consider regional beneficial uses, water quality characteristics, and water quality problems. The project site is located within the jurisdiction of the Los Angeles RWQCB.

All projects resulting in discharges, whether to land or water, are subject to Section 13263 of the California Water Code and are required to obtain approval of waste discharge requirements (WDRs) by the RWQCBs. WDRs related to land and groundwater (i.e., non-NPDES WDRs) regulate discharges of privately or publicly treated domestic wastewater and process/wash-down wastewater. WDRs for discharges to surface water also serve as NPDES permits, which are further described in this section.

### ***Porter-Cologne Water Quality Control Act***

The Porter-Cologne Water Quality Control Act authorizes the SWRCB to adopt, review, and revise policies for all waters of the state (including surface water and groundwater) and directs the RWQCBs to develop regional water quality control plans. Section 13170 of the California Water Code authorizes the SWRCB to adopt water quality control plans on its own initiative.

### ***Waste Discharge Requirements***

All dischargers of waste to waters of the state are subject to regulation under the Porter-Cologne Water Quality Control Act, and the requirements for WDRs is incorporated into the California Water Code. This includes point-source and nonpoint-source dischargers. All current and proposed nonpoint-source discharges to land must be regulated under WDRs, waivers of WDRs, a water quality control plan prohibition, or some combination of these administrative tools. Discharges of waste directly to state waters are subject to an individual or general NPDES permit, which also serves as WDRs. The RWQCBs have primary responsibility for issuing WDRs to cover a category of discharges. WDRs may include effluent limitations or other requirements that are designed to implement applicable water quality control plans, including designated beneficial uses and the water quality objectives established to protect those uses and prevent the creation of nuisance conditions. Violations of WDRs may be addressed by issuing Cleanup and Abatement Orders or Cease and Desist Orders, assessing administrative civil liability, or seeking imposition of judicial civil liability or judicial injunctive relief.

### ***National Pollutant Discharge Elimination System Permits***

The NPDES permit system was established by the CWA to regulate both point-source discharges and nonpoint-source discharges. Nonpoint pollution often enters receiving waters in the form of surface runoff and is not conveyed by way of pipelines or discrete conveyances. Each NPDES permit contains limits on allowable concentrations and mass emissions of pollutants contained in the discharge. Sections 401 and 402 of the CWA contain general requirements regarding NPDES permits. Section 307 of the CWA describes the factors that the EPA must consider in setting effluent limits for priority pollutants.

### ***Construction General Permit***

The SWRCB permits all regulated construction activities under Order No. 2009-009-DWQ, as amended by 2010-0014-DWQ and 2012-0006-DWQ. The order requires that, prior to beginning any construction activity, the permit applicant obtain coverage under the Construction General Permit by preparing and submitting to the SWRCB a Permit Registration Document that includes a Notice of Intent and appropriate fee. The SWRCB may issue a Construction General Permit or an Individual Construction Permit that would contain more specific permit provisions. Individual Construction Permits replace Construction General Permit regulations and provisions, if issued. Additionally, coverage would not occur until an adequate Stormwater Pollution Prevention Plan (SWPPP) has been prepared. A separate Notice of Intent is submitted to the SWRCB for each construction site.

SWRCB adopted the Construction General Permit on September 2, 2009, and it became effective on July 1, 2011. In addition, 2010-0014-DWQ was adopted on November 16, 2010, and became effective on February 14, 2011. The amendment provided text changes to the fact sheet, Conditions for Permit Coverage, Special Provisions, Electronic Signature, and Certification Requirements of Order No. 2009-009-DWQ. Similarly, 2012-0006-DWQ was adopted on July 17, 2012. The amendment provided updated text changes to the Fact Sheet, primarily with respect to replacing numeric effluent limitations with narrative effluent limitations for Risk Level 3 and Linear Underground/Overhead Project Type 3 construction sites (with the exception of Active Treatment Systems).

Construction activities subject to the NPDES Construction General Permit include clearing, grading, and disturbances to the ground (e.g., stockpiling or excavating), which result in soil disturbances of at least 1 acre of total land area. Because construction of the project would cumulatively disturb more than 1 acre, all improvements and development activities would be subject to these permit requirements, and the project would be required to prepare a SWPPP. The SWPPP has two main objectives: to help identify the sources of sediment and other pollutants that affect the quality of stormwater discharges, and to describe and ensure the implementation of best management practices (BMPs) to reduce or eliminate sediment and other pollutants in stormwater and non-stormwater discharges.

### ***Sustainable Groundwater Management Act***

On September 16, 2014, Governor Jerry Brown signed into law a three-bill legislative package—Assembly Bill 1739 (Dickinson), Senate Bill 1168 (Pavley), and Senate Bill 1319 (Pavley)—collectively known as the Sustainable Groundwater Management Act (SGMA). SGMA requires governments and water agencies of high- and medium-priority basins to halt overdraft and bring groundwater basins into balanced levels of pumping and recharge. Under SGMA, these basins should reach sustainability within 20 years of implementing their sustainability plans. For critically over drafted basins, sustainability should be achieved by 2040. For the remaining high- and medium-priority basins, 2042 is the deadline. Through SGMA, the California Department of Water Resources provides ongoing support to local agencies through guidance, financial assistance, and technical assistance. SGMA empowers local agencies to form Groundwater Sustainability Agencies to manage basins sustainably and requires those Groundwater Sustainability Agencies to adopt Groundwater Sustainability Plans for crucial groundwater basins in California.

### ***California Water Code, Section 12924***

The California Department of Water Resources, in conjunction with other public agencies, conducts investigations of the state's groundwater basins. The Department of Water Resources identifies the state's groundwater basins on the basis of geological and hydrologic conditions and with consideration of political boundary lines whenever practical. The Department of Water Resources also investigates existing general patterns of groundwater extraction and groundwater recharge within those basins to the extent necessary to identify basins that are subject to critical conditions of overdraft (DWR 2016).

### Local

#### ***Los Angeles Regional Water Quality Control Board Basin Plan***

The Los Angeles RWQCB is responsible for the protection of the beneficial uses of waters within the coastal watersheds of Los Angeles and Ventura counties, including the project site. The Water Quality Control Plan Los Angeles Region, Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (Basin Plan), is designed to preserve and enhance water quality and protect the beneficial uses of all regional waters. Specifically, the Basin Plan (i) designates beneficial uses for surface and ground waters, (ii) sets narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and conform to the state's antidegradation policy, and (iii) describes implementation programs to protect all waters in the Region. In addition, the Basin Plan incorporates (by reference) all applicable State and Regional Board plans and policies and other pertinent water quality policies and regulations. Those of other agencies are referenced in appropriate sections throughout the Basin Plan (RWQCB 2014).

#### ***Sierra Madre Urban Water Management Plan***

The Urban Water Management Plan (UWMP) provides the Department of Water Resources (DWR) with information on present and future water resources and demands and provides an assessment of the water resource needs of Sierra Madre. Specifically, this UWMP will provide water supply planning for a 25-year planning period in 5-year increments. The UWMP will identify water supplies for existing and future demands, quantify water demands during normal year, single-dry year, and multiple-dry years, and identify supply reliability under the three hydrologic conditions (UWMP 2021).

#### ***City of Sierra Madre General Plan***

The Resource Management Element of the City's General Plan contains the following goals and objectives potentially relevant to the project (City of Sierra Madre 2015). Please see Section 4.11, Land Use and Planning, for a consistency analysis with these policies

**Goal 1:** Conservation of the City's water resources.

**Goal 5:** Meet or exceed water quality objectives.

**Objective R12:** Optimizing the use of water resources.

**Policy R12.3:** Develop new ways to capture and percolate storm water.

**Objective R14:** Ensuring adequate water availability for future growth in the City.

**Objective R15:** Conserving water during times of drought.

**Objective Hz6:** Addressing potential flooding and landslide hazards on public and private property.

**Policy Hz6.1:** Require that all new development incorporates sufficient measures to mitigate flood hazards, including the design of containment systems to capture stormwater runoff on-site, and site grading that minimizes stormwater runoff from increased impervious surfaces, thereby addressing impacts to on-site structures and adjacent properties.

**Policy Hz6.2:** Require that the landscape of open space areas provide the maximum permeable surface area to reduce site runoff, and prohibit the paving of a majority of these areas.

**Objective Hz8:** Maintaining adequate infrastructure to prevent flooding hazards.

**Policy Hz8.1:** Require that residential tract developers be responsible for construction of drainage/storm drain systems improvements that are compatible with City and County systems within or adjacent to their project site.

**Policy Hz8.2:** Install required public storm drainage improvements.

### ***City of Sierra Madre Municipal Code***

Per Section 7.08.030 of the Sierra Madre Municipal Code, prior to the issuance of a building permit for a new development project, the City shall evaluate the project using the guidelines and BMP list approved by the California RWQCB, Los Angeles Region and erosion and grading requirements of the City building official or director of public works to determine: (1) its potential to generate the flow of pollutants into the municipal storm sewer system both during and after construction; and (2) how well the urban runoff mitigation plan for the project meets the goals of this title. Each plan will be evaluated on its own merits according to the particular characteristics of the project and the site to be developed.

### 4.10.3 Thresholds of Significance

The significance criteria used to evaluate the project impacts to hydrology and water quality are based on Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to hydrology and water quality would occur if the project would:

1. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.
2. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.
3. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:
  - a. result in substantial erosion or siltation on or off site;
  - b. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site;
  - c. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or
  - d. impede or redirect flood flows.
4. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation.
5. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.



## 4.10.4 Project Design Features

The following project design feature (PDF) would be implemented as part of the proposed project and would be applicable to hydrology and water quality:

**PDF-UTL-1** Prior to issuance of a building unit, the project applicant will provide funds to the City to achieve one of the following:

1. Purchase supplemental water from the San Gabriel Valley Municipal Water District (SGVMWD) in an amount equal to the anticipated total indoor and outdoor water demand of each residential unit over a 50-year period. This purchase would be in addition to the City's existing agreement with SGVMWD, providing for the purchase of supplemental imported water.
2. Creation of a lawn retrofit program, which would provide homeowners with a grant provided to replace their lawn with turf;
3. Improvements to existing water infrastructure, such as pipe leakage fixes.

**PDF-GEO-7** **Fill Slopes.** Fill slopes activities shall comply with the following:

- Gradient: All fill slopes shall be designed at a gradient of 2:1 or less.
- Slope Face - Compaction Criteria: The contractor shall be required to obtain a minimum relative compaction of 90 percent out to the finish slope face of fill slopes, buttresses and stabilization fills. This may be achieved by overbuilding the slope a minimum of five feet, and cutting back to the compacted core, or by direct compaction of the slope face with suitable equipment, or by any other procedure which produces the required compaction. If the method of achieving the required slope compaction selected by the contractor fails to produce the necessary results, the contractor should rework or rebuild such slopes until the required degree of compaction is obtained. Slope testing shall include testing the outer six inches to three feet of the slope face during and after placement of the fill. In addition, during grading, density tests will be taken periodically on the flat surface of the fill three to five feet horizontally from the face of the slope.
- Slope Face - Vegetation: All fill slopes shall be planted or protected from erosion by methods specified in the geotechnical report, or required by the controlling governmental agency.

**PDF-GEO-9** **Construction Considerations.** Construction activities shall comply with the following:

- Erosion Control: Erosion control measures, when necessary, shall be provided by the contractor during grading and prior to the completion and construction of permanent drainage controls.
- Compaction Equipment: It is also the contractor's responsibility to have suitable and sufficient compaction equipment on the project site to handle the amount of fill being placed and the type of fill material to be compacted. If necessary, excavation equipment shall be shut down to permit completion of compaction in accordance with the recommendations contained herein. Sufficient watering devices/equipment shall also be provided by the contractor to achieve optimum moisture content in the fill material.
- Final Grading Considerations: Care shall be taken by the contractor during final grading to preserve any berms, drainage terraces, interceptor swales, or other devices of a permanent nature on or adjacent to the property.

## 4.10.5 Impacts Analysis

### **1. *Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?***

#### **Construction**

Construction activities associated with the project could result in wind and water erosion of the disturbed area leading to sediment discharges. Additionally, construction would involve the use of oil, lubricants, and other chemicals that could be discharged from leaks or accidental spills. These potential sediment and chemical discharges during construction would have the potential to impact water quality in receiving water bodies. Construction of the project would result in more than 1 acre of land disturbance; therefore, the project would be required to prepare and implement a SWPPP, in accordance with the Statewide Construction General Permit. This requires implementation of water quality BMPs to ensure that water quality standards are met and that stormwater runoff from the construction work areas does not cause degradation of water quality in receiving water bodies. Some of these BMPs would include use of silt screening or fiber filtration rolls, appropriate handling and disposal of contaminants, litter control and pick up, and vehicle and equipment repair and maintenance in designated areas. Implementation of SWPPP requirements would reduce potential water quality impacts associated with construction to **less than significant**.

#### **Operations**

During operation, the project would introduce 42 detached single-family residential units and approximately 3.04-acre dedicated neighborhood park, within the 17.30-acre project site, resulting in the addition of more impervious area to the site, which would result in more surface runoff. However, as part of project site improvements, the project would include development of two storm drain networks, in order to properly convey flows from the western and eastern portions of the site (see Figure 3-7). The increase in impervious area would result in reduced percolation and groundwater recharge as well as more surface runoff. An increase in surface runoff would increase the potential for violation of water quality standards or waste discharge requirements. As discussed in Section 4.10.1, Existing Conditions, the project is located within the Los Angeles RWQCB jurisdiction that oversees water quality in the Los Angeles region. The Los Angeles RWQCB has prepared a Basin Plan in order to preserve and enhance water quality and protect the beneficial uses of all regional waters. The Basin Plan designates beneficial uses for surface and ground waters, sets narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and conform to the state's antidegradation policy, and describes implementation programs to protect all waters in the Region. In addition, the Basin Plan incorporates (by reference) all applicable State and Regional Board plans and policies and other pertinent water quality policies and regulations (RWQCB 2014). The RWQCB also regulates discharges from MS4 in the Los Angeles region under an NPDES MS4 Permit. The MS4 Permit for the County of Los Angeles was adopted in November 2021 and became effective on December 28, 2012. The proposed project would be required to comply with the MS4 permit that regulates stormwater and non-stormwater discharges and the requirements of the Basin Plan, which includes implementation of BMPs to reduce water quality impacts. The structural BMPs implemented for the proposed project include the proposed 63,500-cubic-foot retention storage gallery, which would consist of approximately 2,400 linear feet of 60-inch diameter perforated pipe surrounded by gravel bed and would be consistent with the Cities Low-Impact Development (LID) Plan requirements found within Section 15.58.080, LID plan requirement, of the Sierra Madre Municipal Code. The retention storage gallery would be approximately 24 inches below ground and would promote water quality treatment through infiltration. Stormwater that is not retained in the underground storage gallery retention system or infiltrated into the ground would be routed

to the southeast corner of the proposed park and exit to Crestvale Drive via a surface culvert and to the MS4 downstream to Arcadia Wash. With implementation of these project site improvements as well as compliance with all existing water quality regulations, the project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. Impacts to water quality or waste discharge requirements would be **less than significant** during operations.

**2. *Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?***

As discussed in Section 4.10.1, above, the Raymond Groundwater Basin underlies the entire project site (UCLA 2020). Water to be consumed by the project would be provided by the SMWD, which previously sourced its water supply primarily from the Santa Anita Sub-area, which is a sub-unit of the Raymond Groundwater Basin. As discussed in Section 4.10.1, above, beginning October 2013, well production was reduced by 95 percent due to low groundwater levels of the Raymond Groundwater Basin. MWD entered into an agreement with the City and SGVMWD to deliver treated, imported water for spreading within the Santa Anita Sub-area, in order to allow for additional groundwater by the City. Pursuant to this agreement, SGVMWD also provides a portion of its annual SWP allocation which MWD then wheels to the City (City of Sierra Madre 2021). Therefore, the City receives water supplies from groundwater, imported water, and tunnel water (see Section 4.19.2, for further discussion related to the City's existing water supply). Water supply to the City would primarily be provided through imported water until the Raymond Groundwater Basin returns to a sufficient level of groundwater.

As described in Section 4.19.5, the proposed project would result in an increased water demand of approximately ~~11.91-26.30~~ AFY, resulting in approximately 1.14% for of SMWD's projected water demand for Years 2025, 2030; 1.13% for Years 2035 and 2040; and 1.12% for Year 2045. ~~5.1% of SMWD's projected water demand for both 2040 and 2045~~ as well as 0.02% of SGVMWD's supplies. As described in detail in Section 4.19.5 of this EIR, the total projected water supplies available to SMWD and ~~SGVMWD~~ during normal, single-dry, and multiple-dry years would be sufficient to meet the projected water demands for the proposed project. In the case SGVMWD does not have sufficient water supply to accommodate the purchase of supplemental water, the applicant would provide funds to the City to support the creation of a lawn retrofit program or improvements to existing water infrastructure, which achieve a commensurate level of water reduction. As discussed in Section 4.19, Utilities and Services Systems, of this EIR, the project would not use groundwater during construction.

Although a portion of the project's water demand could come from the Raymond Groundwater Basin, to ensure the efficient use and supply of groundwater in the Raymond Groundwater Basin, water resources is managed by the RBJ (see Section 4.10.1, above). The RBJ is administered by the RBMB and is comprised of various participating parties, including the City, to manage and preserve groundwater levels of the Raymond Groundwater Basin. Under provisions of the 1984 RBJ (Section VI [3]), pumping is restricted when groundwater levels in the Santa Anita Sub-area drop below 500 feet above mean sea level (City of Sierra Madre 2015). In addition, in order to meet future water demands, the City plans to implement future water projects focused on local groundwater supplies. This includes construction of a main basin well and transmission pipeline and rehabilitation groundwater wells to improve groundwater production. In addition, as discussed in Section 4.10.1, MWD entered into an agreement with the City and SGVMWD to deliver up to 2,500 AFY of treated, imported water for spreading within the Santa Anita Sub-area. A new imported water connection was constructed at the Sierra Madre Spreading Grounds for the purposes of spreading to allow for additional groundwater by the City (City of Sierra Madre 2021). Therefore, because the project would not result in a significant increase demand of the SMWD's or ~~SGVMWD's~~ existing supplies, and because ~~both SMWD and SGVMWD have~~ has sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years, it is not anticipated that the project would substantially decrease groundwater supplies.

Lastly, to achieve a net-zero impact on local water supplies, the project Applicant would provide funds to the City to contribute to one of three programs: (1) to increase the City's water supply through the purchase of additional supplemental water from the SGVMWD; (2) creation of a lawn retrofit program, which would provide homeowners with a grant provided to replace their lawn with turf; and (3) improvements to existing water infrastructure, such as pipe leakage fixes. ~~If the City opts for purchase of supplemental water, increase the City's water supply through the purchase of additional supplemental water from the SGVMWD.~~ The amount of supplemental water purchased from the SGVMWD would be equal to all anticipated indoor and outdoor water demands for the proposed residential units over a 50-year period (see **PDF-UTL-1** in Sections 3.3.13 and 4.10.4). This purchase of additional supplemental water would offset the demand placed on existing supplies, including groundwater supplies, and would be in addition to the City's existing agreement with SGVMWD, which allows the City to purchase up to 2,500 AFY of supplemental water from SGVMWD. The additional supplemental water procured by the City as a result of the project would be stored in the Main San Gabriel Groundwater Basin and would be available to serve the public, as needed. In addition, although the project would introduce impervious surfaces on-site, the proposed open space on site, which includes the 3.04-acre dedicated neighborhood public park at the southernmost portion of the project site, would remain pervious and therefore contribute to groundwater recharge. Additional drainage features, such as the proposed catch basins and storage gallery retention system, would further contribute to groundwater recharge. As such, the project would not substantially decrease groundwater supplies or interfere with groundwater recharge. Therefore, impacts associated with groundwater supplies and recharge would be **less than significant**.

**3. *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:***

**a. *Result in substantial erosion or siltation on or off site?***

Project construction would involve earth-disturbing activities, including grading, that could expose on-site soils to erosion and surface water runoff. Construction of the project would result in more than 1 acre of land disturbance; therefore, the project would be required to prepare and implement a SWPPP in accordance with the Statewide Construction General Permit. This requires implementation of BMPs for different phases of the construction to ensure that water quality standards are met and that stormwater runoff from the construction work areas does not cause degradation of water quality in receiving water bodies. Specific BMPs that address erosion impacts include erosion control blankets, watering of site, and sediment filters. BMP options that could be used during construction would include perimeter sediment control, sediment basins, sediment traps, hydroseed, geotextiles and mats, soil binders, silt fence, check dams, fiber rolls, gravel bag berms, street sweeping and vacuuming, storm drain inlet protection, stabilized construction entrance/exit, stabilized construction roadway, entrance/outlet tire wash, and dust control measures.

During operation, the project would introduce a new development on the site, resulting in more impervious area to the site. As such, the project site would be graded and paved, greatly reducing the possibility for soil erosion and siltation compared to current conditions. However, introducing more impervious area would result in more surface runoff, which could lead to more soil erosion and siltation. As shown in Figure 3-7 and discussed in Threshold 1, above, the project would include a new on-site storm drainage system, which would include removal and reconstruction of an existing 26-inch RCP along North Sunnyside Avenue; a new 36-inch RCP at North Sunnyside Avenue, between Streets A and B; two 18-inch RCP lateral connections to the southern end of the site; and four catch basins, within the western portion of the site. The eastern portion of the site would include 18-inch and 24-inch RCPs; two catch basins each within Streets A, B, and C; two catch basins, to be located just to the northeast of the project site, within the existing Carter Avenue; and a 63,500-cubic foot retention storage gallery, to be located

within the public park. The proposed underground storage gallery retention system would collect low flow project runoff from both the eastern storm drain system to ensure LID compliance. The underground storage gallery retention system would be implemented to address downstream water quality concerns through infiltration by slowly reducing runoff into the storm drain system, which will assist in reducing runoff velocities that contribute to downstream erosion and sediment transport; thus, reducing soil erosion and siltation. Lastly, per the Geotechnical Investigation prepared for the project (Appendix E), project design features (PDFs), such as **PDF-GEO-7**, which requires that fill slopes are planted to avoid erosion, and **PDF-GEO-9**, which requires erosion measures during grading and prior to the completion and construction of permanent drainage controls, would be incorporated into the design of the project (see Section 3.3.10, Grading Plan, in Chapter 3, Project Description, for details). More specifically, per **PDF-GEO-7**, slopes shall be designed at a gradient of 2:1 or less; slope face compaction shall obtain a minimum relative compaction of 90 percent out to the finish slope face of fill slopes, buttresses and stabilization fills; and All fill slopes shall be planted or protected from erosion by methods specified in the geotechnical report, or required by the controlling governmental agency. Per **PDF-GEO-9**, construction of the proposed project shall comply with Erosion control measures, when necessary, during grading and prior to the completion and construction of permanent drainage controls; and care shall be taken by the contractor during final grading to preserve any berms, drainage terraces, interceptor swales, or other devices of a permanent nature on or adjacent to the property. Therefore, with implementation of these PDFs, impacts associated with substantial erosion or siltation on or off site would be **less than significant**.

***b. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site?***

The project site is located in Zone X, an area of minimal flood hazard per the FEMA FIRM panel 06037C1400F effective September 26, 2008 (FEMA 2020). This area is higher in elevation than the 0.2% annual chance flood (i.e., 500-year flood). In addition, as previously discussed in Threshold 3(a), above, the project would introduce a new residential use with associated infrastructure and open space, resulting in more impervious area to the site. As such, the impervious area would result in more surface runoff that would potentially result in flooding on or off site. As discussed in Threshold 1, the project would include a new on-site storm drainage system inclusive of proposed catch basins that would capture offsite flows before entering the project site. Flows would be conveyed to the receiving waters of Arcadia Wash, located southeast of the project site. In addition, an underground storage gallery retention system would assist in reducing runoff velocities within the eastern portion of the site. In addition, final drainage plans would be required to be approved by the City as part of the final construction or grading plans, to ensure that stormwater retention is designed to meet, or exceed, the City's LID requirements for 85th percentile in a 24-hour storm event, and that onsite detention is designed to retain the capital 100-year storm event. As such, the potential for the project to create an increase in the rate or amount of surface runoff in a manner that would result in flooding on or off site would be **less than significant**.

***c. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?***

The project site contains an existing storm drain and catch basins within North Sunnyside Avenue (see Figure 3-7). As previously discussed under Threshold 3(a), above, the project involves development of two storm drain networks, to properly convey flows from the western and eastern portions of the site. Within the western portion of the site, the project would involve removal of portions of the existing 36-inch pipe, which would be reconstructed under the realignment of North Sunnyside Avenue and would connect with a proposed 36-inch RCP, to be located at North Sunnyside Avenue, between Street A and Street B. Additionally, the proposed western storm drain network would include development of two proposed 18-inch RCP lateral connections at the southern end of the project site; two

onsite catch basins within the southern end of North Sunnyside Avenue, to capture runoff generated from the western portion of the project site; and two additional catch basins, to be located just to the northeast of the project site to capture offsite flows before runoff enters the project site via the North Sunnyside Avenue realignment. The western storm drain network would tie in with an existing 36-inch storm drain in North Sunnyside Avenue, at the southwest portion of the site and ultimately conveys runoff to Arcadia Wash, located approximately 100 feet southeast of the intersection of South Lima Street and West Orange Grove Avenue.

The second storm drain network would be located on the eastern portion of the site and would be comprised of 18-inch and 24-inch RCPs. Streets A, B, and C would include two catch basins each, and would each capture and convey surface runoff to the east. The second storm drain network would extent along the majority of the proposed improvement of Carter Avenue and would also convey surface runoff captured by two catch basins, to be located directly to the northeast of the project site. A 24-inch RCP would be located in the southeastern portion of the project site and would run in the east to west direction into the proposed retention gallery, within the proposed park. The proposed retention storage gallery would be approximately 24 inches below ground and will promote water quality treatment through infiltration. Stormwater that is not retained in the underground storage gallery retention system or infiltrated into the ground would be routed to the southeast corner of the proposed park and exit to Crestvale Drive via a 24-inch surface culvert to the MS4 downstream to Arcadia Wash. Flows would then be conveyed via the MS4 to the receiving waters of Arcadia Wash, an open concrete lined channel located approximately 1 mile southeast of the project site. The detention basin would promote water quality treatment and HMP of stormwater runoff. Lastly, all stormwater draining south from the Mater Dolorosa Retreat Center would be conveyed into the proposed catch basins on the north side of North Sunnyside Avenue and the north side of Carter Avenue, before flowing underground within existing storm drains. Thus, within implementation of proposed stormwater improvements, there would be sufficient drainage capacity to accommodate drainage from the proposed project. Therefore, the project would not create or contribute runoff water, which would exceed the capacity of existing or planned stormwater drainage or provide substantial additional sources of polluted runoff. Impacts would be **less than significant**.

#### ***d. Impede or redirect flood flows?***

As discussed in Threshold 3(b), the project site is located in Zone X, an area of minimal flood hazard per the FEMA FIRM panel 06037C1400F effective September 26, 2008 (FEMA 2020). This area is higher in elevation than the 0.2% annual chance flood (i.e., 500-year flood). The project would introduce impervious area to the project site, which would increase surface runoff that could result in increased on- or off-site flooding. As discussed in Threshold 1, the project would include a new on-site stormwater drainage system inclusive of catch basins and an underground storage gallery retention system. The proposed catch basins that would capture off-site flows before entering the project site and convey flows to the receiving waters of Arcadia Wash, located southeast of the project site (see Figure 3-7). Additionally, the underground storage gallery retention system would assist in reducing runoff velocities that may result from the project. Therefore, impacts associated with impeding or redirecting flood flows would be **less than significant**.

#### ***4. In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?***

A seiche is generally associated with oscillation of enclosed bodies of water typically caused by ground shaking associated with a seismic event; however, the project site is not located near an enclosed body of water. The closest body of water to the project site is the Pacific Ocean, located approximately 26 miles west of the project site. Thus, the probability of inundation by seiche or tsunamis is considered negligible. As discussed previously, the project site is located in Zone X, an area of minimal flood hazard per the FEMA FIRM panel 06037C1400F effective

September 26, 2008 (FEMA 2020). This area is higher in elevation than the 0.2% annual chance flood (i.e., 500-year flood). As previously discussed, although internal drainage patterns would be somewhat altered as a result of project development, the project would maintain adequate stormwater conveyance as to not result in an increase of surface runoff that would result in flooding on or off site associated with the 50-year, 24-hour storm event (Capital Flood Event). Furthermore, as discussed previously, the project would include a new on-site stormwater drainage system inclusive of catch basins and an underground storage gallery retention system, to convey flows before being discharged to the MS4 (see Figure 3-7). The underground storage gallery retention system would assist in reducing runoff velocities that would potentially cause inundation to the project site. Runoff that is not retained onsite is conveyed to the southeast corner of the park and exit to Crestvale Drive via a surface culvert and to the MS4 downstream to Arcadia Wash. Therefore, impacts associated with flood hazard, tsunami, or seiche zones, and risk release of pollutants due to project inundation would be **less than significant**.

### **5. *Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?***

As discussed in Threshold 2, the Raymond Groundwater Basin underlies the entire project site (UCLA 2020). Water to be consumed by the project would be provided by the SMWD, which previously sourced its water supply primarily from the Santa Anita Sub-area, which is a sub-unit of the Raymond Groundwater Basin. However, as discussed in Section 4.10.1, above, beginning October 2013, well production was reduced by 95 percent due to low groundwater levels of the Raymond Groundwater Basin. Management of the water resources of the Raymond Groundwater Basin is based on the RBJ. The RBJ is administered by the RBMB and is comprised of various participating parties, including the City, to manage and preserve groundwater levels of the Raymond Basin. However, the Raymond Groundwater Basin is classified by DWR as a very low priority basin (DWR 2019). Therefore, no sustainable management plan has been prepared or is required for the Raymond Groundwater Basin.

As discussed above, due to multiple dry year conditions, the RBMB implemented a “500-foot” level limitation for all Decreed Rights to the Santa Anita Sub-area in 2013. As a result, the City’s adjusted right to the Santa Anita Sub-area was limited to 940 AFY. Until the groundwater level exceeds 500 feet above mean sea level, the limitation on production will remain (City of Sierra Madre 2021). As discussed under Threshold 2, above, construction of the project would not require the use of groundwater, while operations of the proposed project would result in an increased water demand of approximately 11.91 AFY. As described in detail in Section 4.19.5 of this EIR, the total projected water supplies available to SMWD and SGVMWD during normal, single-dry, and multiple-dry years would be sufficient to meet the projected water demands for the proposed project and would therefore not result in a substantial use of groundwater supplies that would conflict with or obstruct the implementation of a sustainable groundwater management plan.

Furthermore, as stated in Section 4.19, Utilities and Services Systems, of this EIR, to achieve a net-zero impact on local water supplies, the project Applicant would provide funds to the City ~~to~~ for one of three programs: (1) purchase supplemental water from the SGVMWD in an amount equal to the anticipated total indoor and outdoor water demand of each residential unit over a 50-year period; (2) the creation of a lawn retrofit program, which would provide homeowners with a grant provided to replace their lawn with turf; and (3) improvements to existing water infrastructure, such as pipe leakage fixes (see **PDF-UTL-1** in Sections 3.3.13 and 4.10.4). If the City opts for purchase of supplemental water, this purchase would be in addition to the City’s existing agreement with SGVMWD, which allows the City to purchase up to 2,500 AFY of supplemental water from SGVMWD, providing for the purchase of supplemental imported water. The additional supplemental water procured by the City as a result of the project would be stored in the Main San Gabriel Groundwater Basin and would be available to serve the public, as needed.

In addition, as discussed in Section 4.10.2, Relevant Policies, and Ordinances, and Threshold a, above, the Los Angeles RWQCB jurisdiction oversees water quality in the Los Angeles region. As such, the RWQCB has adopted the Basin Plan (RWQCB 2014). The Basin Plan is a water quality control planning document and designates beneficial uses and water quality objectives for waters including surface waters and groundwater. The project would be required to comply with applicable regulations and permit requirements intended to support the objectives and policies of the Basin Plan regarding water quality and erosion and sediment control. As discussed under Threshold a, above, the proposed project would be required to comply with the MS4 permit that regulates stormwater and non-stormwater discharges and the requirements of the Basin Plan, which includes implementation of BMPs to reduce water quality impacts. The structural BMPs implemented for the proposed project include development of features that would address downstream water quality concerns as well as assist in reducing runoff velocities that contribute to downstream erosion and sediment transport. These include an underground storage gallery retention system, which would promote water quality treatment and HMP of stormwater runoff. Thus, storm drainage improvements would reduce project impacts associated with water quality and soil erosion and would allow for the project to be consistent with objectives and policies identified in the Basin Plan. Therefore, the project would not obstruct implementation of a water quality plan or sustainable groundwater management plan; thus, impacts would be **less than significant**.

### 4.10.6 Mitigation Measures

No mitigation measures would be required.

### 4.10.7 Level of Significance After Mitigation

No mitigation measures would be required. Impacts to hydrology and water quality would be **less than significant**.



## 4.11 Land Use and Planning

This section provides an overview of land uses for The Meadows at Bailey Canyon Specific Plan Project (project or proposed project) site and surrounding region, the regulatory framework, and an analysis of potential conflicts with existing land use plans that would result from implementation of the proposed project.

### 4.11.1 Existing Conditions

#### **Project Site**

The project site is located within the northwestern corner of the City of Sierra Madre (City) within the current grounds of the Mater Dolorosa Retreat Center. The Mater Dolorosa Retreat Center currently is on the same legal parcel as the project site, which is currently split within three different lots. A lot line adjustment would be processed to adjust the boundaries of the three existing lots that make up the Mater Dolorosa Retreat Center and the project site. The lot line adjustment would consolidate the two southern lots that make up the project site as one lot and adjust the northern boundary of this new lot farther to the north. North Sunnyside Avenue, which crosses through the western portions of the site, and Carter Avenue, which extends through the eastern portion of the site. An additional access road traverses the northern portion of the site from east to west. Public access via both North Sunnyside Avenue and Carter Avenue currently ends at the Mater Dolorosa Retreat Center's gates within the southern portion of the site. Under existing conditions, the project site is vacant and consists of disturbed and maintained areas. Vegetation on-site consists of non-native grasslands and ornamental vegetation.

The project site is currently zoned and has a General Plan land use designation of Institutional (I) (City of Sierra Madre 2015, 2017).

#### **Surrounding Land Uses**

The project site is surrounded by Bailey Canyon and Bailey Canyon Wilderness Park to the east, existing single-family residential development to the south and west, and the Mater Dolorosa Retreat Center, which is primarily used to host religious and silent retreats and other activities, to the north. There is an access road through the project site that leads to the Mater Dolorosa Retreat Center; however, the Mater Dolorosa Retreat Center is not a part of the project site. The Mater Dolorosa Retreat Center's ongoing activities are not anticipated to be affected by the proposed project as the site will remain intact. The Mater Dolorosa Retreat Center is zoned and has a General Plan land use designation of Institutional (I) (City of Sierra Madre 2015, 2017). The surrounding area to the north of the Mater Dolorosa Retreat Center and east of the project site is zoned as Hillside Management (H). Land to the south, southwest, and east is zoned as One Family Residential, which has a minimum lot size of 7,500 square feet (R-1) (City of Sierra Madre 2017). The area directly west and northwest of the project site is located in the City of Pasadena and is zoned as Single Family Residential (RS) (City of Pasadena 2018). The City's General Plan designate land uses to the north as Natural Open Space (NOS); to the east as NOS, Municipal (M), and Constructed Open Space (COS); and to the south and southwest as Residential Low Density (RL) (City of Sierra Madre 2015). The land to west and northwest is located within the City of Pasadena and is designated by the City of Pasadena General Plan as Low Density Residential (0–6 dwelling units per acre) (City of Pasadena 2016).

## 4.11.2 Relevant Plans, Policies, and Ordinances

### **Federal**

There are no federal plans, policies, or ordinances related to land use and planning relevant to the proposed project.

### **State**

#### ***Regional Housing Needs Assessment***

The Regional Housing Needs Assessment (RHNA) is mandated by the State Housing Law as part of a periodic process of updating local housing elements in city and county general plans. RHNA quantifies the need for housing within each jurisdiction during specified planning periods. RHNA is produced by the Southern California Association of Governments and contains a forecast of housing needs within each jurisdiction in the region for 8-year periods (see additional discussion below).

### **Regional**

#### ***Southern California Association of Governments***

The Southern California Association of Governments (SCAG) is the nation's largest metropolitan planning organization, representing six counties (Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura), 191 cities, and more than 18 million residents. SCAG undertakes a variety of planning and policy initiatives to encourage a more sustainable Southern California. The agency develops long-range regional transportation plans, including sustainable communities' strategy and growth-forecast components, regional transportation improvement programs, regional housing needs allocations, and a portion of the south coast air quality management plans (SCAG 2016). As discussed above, the RHNA is mandated by the State Housing Law as part of a periodic process of updating local housing elements in city and county general plans. RHNA is produced by SCAG and contains a forecast of housing needs within each jurisdiction in the SCAG region for 8-year periods. The 5th Cycle RHNA Allocation Plan covers the planning period between October 2013 through October 2021. The 6th Cycle RHNA has been approved on March 22, 2021. The 6th Cycle identified a need for 1,341,827 additional housing units within the SCAG region. Of the SCAG regional allocation, the total assigned to the City was 204 units, and the total assigned to the County is 90,052 units (SCAG 2021). Based on a methodology that weighs a number of factors (e.g., projected population growth, employment, commute patterns, and available sites), SCAG determines quantifiable needs for dwelling units in the region according to various income categories. Once the RHNA allocation is established, local jurisdictions decide how to address their housing needs through the process of updating general plan housing elements. The City's latest housing element was produced in 2014 for the years 2014 through 2021. The proposed project would fall into the 6th Cycle of the RHNA and would therefore contribute to the City's efforts toward meeting its allocation.

### **Local**

#### ***City Council 6-Month Strategic Plan***

Every 6 months the City Council convenes a Strategic Planning Sessions to set the goals and objectives for the next six months. The City Council receives monthly updates at a regular Council meeting on the progression of the objectives.

### ***Parks and Facilities Master Plan***

The Parks and Facilities Master Plan helps meet the needs of the City's current and future residents and to build on the community's unique recreational facilities, parks, and trail assets. The Parks and Facilities Plan is intended to serve as a guide for future recreational facility and park improvements and acquisition. Another important purpose of the Parks and Facilities Master Plan is to represent the community's desires for a balance between parks, open space, and trails. Above all, the Parks and Facilities Master Plan seeks to contribute to a higher quality of life in Sierra Madre (City of Sierra Madre 2012).

### ***Community Forest Management Plan***

The Community Forest Management Plan ensures the continuation and enhancement of the tree canopy for the beauty, wellbeing, livability, and long-term environmental health of the community of Sierra Madre. The City of Sierra Madre's mission to grow and perpetuate the community forest is embodied in the Community Forest Master Plan. This mission is expressed through these overarching goals (City of Sierra Madre 2014a):

- Conserve and expand tree canopy cover equal to no net loss, with a gradual increase over time.
- Foster increased public awareness and education regarding the environmental value of trees as green infrastructure.
- Promote increased shade-tree canopy for energy conservation, storm water capture, and improved air quality.
- Encourage species selection appropriate for local environmental conditions and sustainability.
- Preserve and enhance community aesthetics and property values through increased canopy cover and diversity.
- Apply best management practices for planting, maintaining, and responding to changed environmental conditions in the community forest.

### ***City of Sierra Madre General Plan***

The City of Sierra Madre General Plan (General Plan) is a long-range policy document that lays out the framework for all future growth and development within the City. The General Plan is the blueprint that sets the basis for future policy decisions, in that it organizes the desires of the Sierra Madre community with respect to the physical, cultural, economic, and environmental character of the City. Most importantly, the Sierra Madre General Plan is a community-based document that reflects the community values and character as expressed in its goals and policies, while also serving as a technical document which provides information about the City. The General Plan shall be used as a guide by the City's decision makers to achieve the community's vision and preserve the history, character, and shared values of the community for future generations (City of Sierra Madre 2015).

### **Land Use**

The Land Use Element of the General Plan contains five components: land use designations, historic preservation, housing, economic development, and circulation and traffic. Goals, objectives, and policies are presented in the Land Use Element to support applicable growth, preservation, and diversity initiatives associated with the aforementioned categories. Section 4.11.5, Impacts Analysis, examines the project's consistency with the applicable goals, objectives, and policies (City of Sierra Madre 2015).

**Hazard Prevention Element**

The Hazard Prevention Element includes four components: fire safety, flood/landslide, seismic safety, and noise. The hazard components are further analyzed for safety concerns within the City and include relevant maps (City of Sierra Madre 2015).

**Housing Element**

The most recent Housing Element (2014–2021) was adopted by City Council on January 28, 2014. Because the Housing Element was recently updated and is subject to specific laws and timeframes dictated by the State of California, it is provided separate of the General Plan. The Housing Element focuses on strategies and programs including preserving housing and neighborhood assets, ensuring housing diversity, removing governmental constraints on housing, promoting environmental sustainability. In addition, the Element provides an analysis of the City’s demographics, household and housing characteristics and related housing needs; a review of potential market, governmental, and infrastructure constraints to meeting the City’s housing needs; an evaluation of residential sites and financial resources for housing; and the Housing Plan for addressing the City’s identified housing needs, constraints, and resources (City of Sierra Madre 2014b).

**Resource Management Element**

The Resource Management Element of the General Plan contains seven components: hillside preservation, co-existence with wildlife, Dark Sky, tree preservation, water resources, waste management/recycling, and air quality. With the exception of co-existence with wildlife and Dark Sky, all are required as part of the State-mandated conservation element (City of Sierra Madre 2015).

***City of Sierra Madre Municipal Code***

**Chapter 17.52 H Hillside Management Zone**

The purpose of Chapter 17.52 is to protect the natural environment of hillside areas from change by preserving and protecting views to and from hillside areas; facilitate hillside preservation through the development standards and guidelines set forth in this chapter; ensure that development in the hillside areas is located so as to result in the least environmental impact; and prohibit development that will cause hazards to the public peace, health, welfare, and safety.

**Dedication of Land for Park and Recreation Land**

At the time of approval of the tentative map or parcel map, the city council shall determine, pursuant to Section 16.44.040, the land required for dedication or in-lieu fee payment. As a condition of approval of a final subdivision map or parcel map, the subdivider shall dedicate land, pay a fee in-lieu thereof, or both, at the option of the city, for neighborhood and community park or recreational purposes at the time and according to the standards and formula contained in this chapter. In the event park and recreational services are provided by a public agency other than the city, the amount and location of land to be dedicated or fees to be paid shall be jointly determined by the city and such public agency.

**Tentative Map**

Per Section 16.40.050, an application for a tentative and final tract map will be submitted concurrently for approval in accordance with established requirements. A site plan, floor plan, and elevation plan also will be submitted for review and approval.

### 4.11.3 Thresholds of Significance

The significance criteria used to evaluate the project impacts to land use and planning are based on Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to land use and planning would occur if the project would:

1. Physically divide an established community.
2. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

### 4.11.4 Project Design Features

There are no project design features that apply to land use and planning.

### 4.11.5 Impacts Analysis

#### **1. *Would the project physically divide an established community?***

The project site is surrounded by Bailey Canyon and Bailey Canyon Wilderness Park to the east, existing single-family residential development to the south and west, and the Mater Dolorosa Retreat Center to the north. As discussed in Section 4.11.1, Existing Conditions, the Mater Dolorosa Retreat Center is on the same parcel as the project site, which is currently split within three different lots. However, the Mater Dolorosa Retreat Center is not a part of the project site and a lot line adjustment would be processed to adjust the boundaries of the three existing lots that make up the Mater Dolorosa Retreat Center and the project site. The lot line adjustment would consolidate the two southern lots that make up the project site as one lot and adjust the northern boundary of this new lot farther to the north. In addition, there are three existing roads within the project site: North Sunnyside running north to south on the west side, Carter Avenue running north to west on the east side, and an access road that crosses horizontally connecting North Sunnyside Avenue and Carter Avenue. Furthermore, the project site does not support any existing structures. Public access within both roads currently ends at the Mater Dolorosa Retreat Center's gates within the southern portion of the site.

Adoption of The Meadows at Bailey Canyon Specific Plan (Specific Plan) would establish the zoning and development standards to guide future development on-site, which would consist of 42 detached single-family residential units and 3.39 acres of open space (including an approximately 3.04-acre dedicated neighborhood park), within the 17.30-acre project site. Under future development of the site, access to the project site provided via North Sunnyside Avenue would become public. Carter Avenue would be improved and would become publicly accessible from within the project site and would serve as secondary access to the project site from the south. Furthermore, the project would include reconfiguration of North Sunnyside Avenue, which would be moved farther to the west. Lastly, three additional streets that run east to west would be provided within the project site. This includes Streets A, B, and C (see Figure 3-2, Conceptual Site Plan, in Chapter 3, Project Description, of this Environmental Impact Report [EIR]). Therefore, the project would improve circulation on the project site. Furthermore, part of the project would include the development of an approximately 3.04-acre dedicated neighborhood public park at the southernmost portion of the project site (see Figure 3-3, Proposed Park Conceptual Plan, in Chapter 3 of this EIR). The park's location along the southern boundary of the site and the proposed 6-foot sidewalk along the northern portion of Carter Avenue, between the southeastern portion of the

project site boundary and Lima Street, will provide enhanced connectivity to the Bailey Canyon Wilderness Park to the east. Therefore, the proposed project would not physically divide an established community and impacts would be **less than significant**.

**2. *Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?***

The project site is currently zoned and designated in the General Plan as Institutional (I) (City of Sierra Madre 2015, 2017). Implementation of the project would require amendments to the General Plan, Zoning Code, Zoning and Land Use maps, and approval of the Specific Plan. The General Plan and Zoning Code amendments would primarily change this land use designation from Institutional to Specific Plan. The approval of the Specific Plan would provide guidelines and standards for the implementation of future development of the project.

### **Sierra Madre General Plan**

#### ***Land Use Element***

The Land Use Element contains five components: land use designations, historic preservation, housing, economic development, and circulation and traffic. Goals, objectives, and policies are presented in the Land Use Element to support applicable growth, preservation, and diversity initiatives associated with the aforementioned categories. General Plan Land Use Element objectives relevant to the proposed project are outlined in Table 4.11-1 (City of Sierra Madre 2015).

As described above, the proposed project would amend the General Plan and Zoning Code to change the land use designation of the project site from Institutional to Specific Plan. As shown in Table 4.11-1, the proposed project would be consistent with most of the applicable goals, objectives, and policies of the City's General Plan Land Use Element. However, because the project would not implement bicycle facilities, the project would be inconsistent with Policy L52.8 of the Land Use Element. However, not constructing bicycle facilities would not result in environmental impacts. Therefore, inconsistencies with this General Plan policy would not result in a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

#### ***Housing Element***

The most recent Housing Element (2014–2021) was adopted by City Council on January 28, 2014. Because the Housing Element was recently updated and is subject to specific laws and timeframes dictated by the State of California, it is provided separate of the General Plan. The Housing Element focusses on strategies and programs including preserving housing and neighborhood assets, ensuring housing diversity, removing governmental constraints on housing, promoting environmental sustainability. In addition, the Housing Element provides an analysis of the City's demographics, household and housing characteristics and related housing needs; a review of potential market, governmental, and infrastructure constraints to meeting the City's housing needs; an evaluation of residential sites and financial resources for housing; and the Housing Plan for addressing the City's identified housing needs, constraints, and resources. Housing Element (2014–2021) goals relevant to the proposed project, as well as whether or not the project complies with these goals, are outlined in Table 4.11-1 (City of Sierra Madre 2014b). As shown in Table 4.11-1, the proposed project would not conflict with the Housing Element of the General Plan.

**Resource Management Element**

The Resource Management Element of the General Plan contains seven components: hillside preservation, co-existence with wildlife, Dark Sky, tree preservation, water resources, waste management/recycling, and air quality. With the exception of co-existence with wildlife and dark sky, all are required as part of the state-mandated conservation element. Objectives relevant to the proposed project, as well as whether or not the project complies with these objectives, are outlined in Table 4.11-1 (City of Sierra Madre 2014b, 2015). As discussed in Table 4.11-1, the project would be consistent with all goals, policies, and objectives of the Resource Management Element of the General Plan aside from Goal 4, use of local sources of groundwater rather than imported water and Goal 1, continued preservation and protection of existing trees. Inconsistencies with Goal 4 would take place because, in order to achieve a net-zero impact on local water supplies, the project Applicant will do one of three programs: (1) to increase the City’s water supply through the purchase of additional supplemental water from the San Gabriel Valley Municipal Water District (SGVMWD); (2) creation of a lawn retrofit program, which would provide homeowners with a grant provided to replace their lawn with turf; and (3) improvements to existing water infrastructure, such as pipe leakage fixes. provide funds to the City to If the City opts for purchase of supplemental water, the purchase of supplemental water from the San Gabriel Valley Municipal Water District (SGVMWD) in an amount equal to the anticipated total indoor and outdoor water demand of each residential unit over a 50-year period. This purchase would be in addition to the City’s existing agreement with SGVMWD (see PDF-UTL-1 in Sections 3.3.13 and 4.19.4) As discussed in Section 4.19, Utilities and Service Systems, water supply to the City would primarily be provided through imported water until the Raymond Groundwater Basin returns to a sufficient level of groundwater. Therefore, because the project could result in use of imported water, the project would be inconsistent with this goal. Nonetheless, as discussed in Section 4.19, the proposed project would not result in any environmental impacts associated with water supplies. Therefore, the use of imported water associated with the project would not result in significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. In addition, because the project would remove and result in direct impacts to existing trees, the project would be inconsistent with Goal 1. However, although various trees would be removed under the proposed project, the project would introduce new trees throughout the site, within the proposed public park, along proposed streets, and within the open space located in the northern portion of the project (see Figure 3-5, Conceptual Landscape Plan). Therefore, through replacement of existing trees and the presence of an arborist during the off-site widening of Carter Avenue, per **MM-BIO-3** (see Section 4.4, Biological Resources), the project would not result in significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect resulting from inconsistencies with this goal.

**Hazard Prevention Element**

The Hazard Prevention Element includes four components: fire safety, flood/landslide, seismic safety, and noise. The hazard components are further analyzed for safety concerns within the City and include relevant maps. Objectives relevant to the proposed project, as well as whether or not the project complies with these objectives, are outlined in Table 4.11-1 (City of Sierra Madre 2015). As shown in Table 4.11-1, the proposed project would not conflict with the Hazard Prevention Element of the General Plan.

**General Plan Conclusion**

As discussed above and shown in Table 4.11-1, the proposed project would not result in conflicts with any applicable policies element of the General Plan, aside from Goal 4 and Policies L51.82 and L52.8. However, as discussed above, these inconsistencies would not result in an environmental significant impact. As discussed above, not constructing bicycle facilities would not result in environmental impacts, and the environmental

impacts associated with the reconfiguration of North Sunnyside Avenue and improvements of Carter Avenue have been evaluated throughout this EIR. In addition, **MM-BIO-3** would be required to avoid inconsistencies with various tree preservation policies of the General Plan. As identified in the General Plan, the project site is designated as Institutional. As such, the proposed project would conflict with the current General Plan land use designations, as described above. However, the proposed project would involve an amendment to the General Plan and Zoning Code, changing the land use designation and zoning of the project site from Institutional to Specific Plan. This amendment to the General Plan and Zoning Code would allow the proposed land uses to be developed on the project site. Therefore, the proposed project would be consistent with the General Plan and no significant environmental impact would occur.

**Table 4.11-1. Project’s Consistency with City of Sierra Madre’s General Plan Goal and Policies**

General Plan Goals and Policy	Project Consistency
<i>Chapter One: Land Use</i>	
<p><b>Goal 1:</b> <u>Preserve the existing street and block patterns currently established throughout the City and provide additional non-vehicular connectivity where it is currently lacking in the downtown commercial area.</u></p>	<p><u>Consistent:</u> <u>The proposed project would result in reconfigurations of the existing North Sunnyside Avenue and Carter Avenue and development of Streets A, B, and C as through streets, which would connect to North Sunnyside Avenue and Carter Avenue. The proposed project is not located in the downtown commercial area; as such, the project is not required to additional non-vehicular connectivity where it is currently lacking in this area. The project would provide pedestrian improvements such as a pedestrian path extending from the east side of Carter Avenue as well as an off-site sidewalk along Carter Avenue. Sidewalks would also be provided throughout the project site.</u></p>
<p><b>Goal 2:</b> Preserve and enhance the diversity in the character of residential neighborhoods ensuring that new development is compatible in its design and scale with older established development in the surrounding neighborhood without attempting to replicate or mass produce a style of development.</p>	<p><u>Consistent.</u> The proposed project would assist in the implementation of this Goal through the provision of design guidelines, which would be compatible with existing surrounding neighborhoods.</p>
<p><b>Goal 3:</b> Ensure that development is done in harmony with its neighborhood, and preserves and protects privacy and mountain views of neighboring properties.</p>	<p><u>Consistent.</u> The proposed project includes development regulations and design guidelines for the project site created to be compatible with the surrounding neighborhood. The proposed project is designed in a manner that is sensitive to scenic viewpoints and/or viewsheds through building design, site layout and building heights.</p>
<p><b>Goal 4:</b> Ensure that development is done to maximize water conservation practices to reduce and minimize the impact on the City’s local water supply and the ability to serve its water customers.</p>	<p><u>Consistent.</u> The project would comply with City requirements per this Goal. Additionally, the project would include the incorporation of green infrastructure into the design (e.g., bioswales, permeable paving, and native/drought-resistant landscaping) to promote water conservation.</p>
<p><b>Goal 5:</b> Institute conservation measures so that the demand for water matches the City’s local supply.</p>	<p><u>Consistent.</u> This policy is a responsibility of and directed to the City of Sierra Madre. However, the proposed project would incorporate water conservation strategies into the project design, including the use of native/drought-resistant landscaping and use of recycled water. In</p>



Table 4.11-1. Project’s Consistency with City of Sierra Madre’s General Plan Goal and Policies

General Plan Goals and Policy	Project Consistency
	<p>addition, the project would achieve a net-zero impact on local water supplies to offset the demand placed on existing supplies and provide supplemental water to the City, available to serve the public; <u>creation of a lawn retrofit program; or improvements to existing water infrastructure, such as pipe leakage fixes</u> (see PDF-UTL-1 in Section 4.19, Utilities and Service Systems).</p>
<p><b>Goal 8:</b> Preserve existing and provide additional constructed and natural open space.</p>	<p><u>Consistent.</u> The project would comply with the City’s goal of providing additional constructed open space. The proposed project establishes open spaces zones on the project site, including the incorporation of a neighborhood park at the southern area of the project site and <del>dedication</del> <u>conservation</u> of approximately 35 acres of protected open space to the City, north of the Mater Dolorosa Retreat Center.</p>
<p><b>Objective L1:</b> Continuing the existing pattern of residential housing development.</p>	<p><u>Consistent.</u> The proposed project would assist with the implementation of this objective as it creates similar low-density residential and open space land uses as compared to those surrounding the project site.</p>
<p><b>Policy L1. 1:</b> Maintain areas of the City for single-family residences on varying lot sizes through the review and update of appropriate development standards.</p>	<p><u>Consistent.</u> The proposed project would assist with the implementation of this policy as it creates similar low-density residential land uses as compared to those surrounding the project site and would not remove existing single-family residences.</p>
<p><b>Policy L1.6:</b> Require that new residential development, substantial remodeling and additions comply with all adopted water conservation measures that reduce and minimize the impact on the City’s water supply and its ability to serve its water customers.</p>	<p><u>Consistent.</u> The proposed project would incorporate water conservation strategies into the project design, including the use of native/drought-resistant landscaping and use of recycled water. The proposed project would also achieve a net-zero impact on local water supplies through the purchase of supplemental water in order to offset the demand placed on existing supplies and provide supplemental water to the City, available to serve the public; <u>creation of a lawn retrofit program; or improvements to existing water infrastructure, such as pipe leakage fixes</u> (see PDF-UTL-1 in Section 4.19.4). Additional details are provided in Section 4.19, Utilities and Service Systems.</p>
<p><b>Objective L4:</b> Mitigating the impacts of new development on the City’s open space, trees, infrastructure, water, transit services, the character of existing development, and other public needs.</p>	<p><u>Consistent.</u> The proposed project would incorporate mitigation measures to reduce all potentially significant impacts to less than significant, including for protected tree replacement, as detailed in Table ES-1 of Chapter ES, Executive Summary. The proposed project would also <del>dedicate- conserve</del> approximately 35 acres of protected open space to the City and would incorporate water conservation measures such as the use of native/drought-resistant landscaping and use of recycled water. Ultimately, as determined in this EIR, the proposed project would not result in any significant and unavoidable impacts.</p>

**Table 4.11-1. Project’s Consistency with City of Sierra Madre’s General Plan Goal and Policies**

General Plan Goals and Policy	Project Consistency
<p><b>Policy L4. 2:</b> Except for those single family residences that would not otherwise require a conditional use permit (CUP), development projects that cumulatively comprise over one acre of land on one or more parcels require a CUP unless a specific plan or master plan is approved for the proposed project.</p>	<p><u>Consistent:</u> The proposed project would result in General Plan and zoning amendments to change the project site land use designation and zoning to Specific Plan (SP), consistent with this policy.</p>
<p><b>Policy L4. 3:</b> Ensure that new development and the expansion of existing uses incorporate water conservation measures that reduce and minimize the impact on the City’s water supply and its ability to serve its customers.</p>	<p><u>Consistent:</u> The proposed project would incorporate water conservation strategies into the project design, including the use of native/drought-resistant landscaping and use of recycled water. The proposed project would also achieve a net-zero impact on local water supplies through the purchase of supplemental water in order to offset the demand placed on existing supplies and provide supplemental water to the City, available to serve the public; <u>creation of a lawn retrofit program; or improvements to existing water infrastructure, such as pipe leakage fixes</u> (see <b>PDF-UTL-1</b> in Section 4.19.4). Additional details are provided in Section 4.19, Utilities and Service Systems.</p>
<p><b>Objective L5:</b> Preserving the existing grid street pattern which promotes community life.</p>	<p><u>Consistent:</u> The proposed project would result in improvements to North Sunnyside Avenue and would extend public accessibility along this roadway. Circulation throughout the project site would be provided by Streets A, B, and C, along with Carter Avenue. Roadway design on the project site would be consistent with the City’s existing grid street pattern.</p>
<p><b>Policy L5. 1:</b> Prohibit the use of cul-de-sacs and require through streets in new subdivisions except when no other access is physically feasible due to property ownership, parcel location or other physical factors.</p>	<p><u>Consistent:</u> The proposed project would not include the use of cul-de-sacs. Streets A, B, and C are proposed as through streets, which would connect to North Sunnyside Avenue and Carter Avenue.</p>
<p><b>Objective L6:</b> Development that is done in harmony with its neighborhood and preserves and protects the privacy, mountain and basin views of neighboring properties.</p>	<p><u>Consistent:</u> The proposed project is designed in a manner that is sensitive to scenic viewpoints and/or viewsheds through building design, site layout and building heights. The Specific Plan’s Design Guidelines for proposed balconies specify the protection of privacy of adjacent neighbors and to avoid balconies with overlooking views into adjacent properties. Additionally, the proposed project would result in less than significant impacts to scenic vistas as detailed in Section 4.1, Aesthetics.</p>
<p><b>Policy L6.2:</b> Ensure that any new or expanded structures in residential neighborhoods do not unreasonably obstruct significant mountain or basin views.</p>	<p><u>Consistent:</u> The proposed project is designed in a manner that is sensitive to scenic viewpoints and/or viewsheds through building design, site layout, and building heights. For example, landscaping is proposed to frame important viewsheds and reduce the visual impact of the building to adjacent neighbors. Additionally, the proposed project would result in less-than-significant impacts to scenic vistas as detailed in Section 4.1, Aesthetics.</p>

**Table 4.11-1. Project’s Consistency with City of Sierra Madre’s General Plan Goal and Policies**

General Plan Goals and Policy	Project Consistency
<p><b>Objective L7:</b> Development that is compatible in its design and scale with the neighborhood.</p>	<p><u>Consistent.</u> The proposed project would be compatible with existing surrounding neighborhoods by creating new low-density residential land uses, similar to the adjacent existing conditions.</p>
<p><b>Policy L7. 2:</b> Maintain a maximum floor area for ministerial approvals and require that properties which are proposed to exceed that floor area be reviewed as a discretionary project.</p>	<p><u>Consistent:</u> The proposed project would be reviewed as a discretionary project and development would be regulated by the development regulations and design guidelines of the Specific Plan.</p>
<p><b>Policy L7.3:</b> Limit the height of new buildings to reflect the prevailing height patterns on the street and within the Sierra Madre community.</p>	<p><u>Consistent:</u> The proposed project includes development regulations and design guidelines for the project site. However, any subsequent discretionary approval or amendment to the Specific Plan must be consistent with the General Plan as amended and/or updated. Minor modifications to the Specific Plan may be permitted, subject to the granting of a minor conditional use permit or minor variance pursuant to Chapter 17.60 of the Sierra Madre Municipal Code (SMMC).</p>
<p><b>Policy L7.4:</b> Encourage new residential development to be compatible with and complement existing structures including the following:</p> <ul style="list-style-type: none"> <li>a. Maintenance of front, side, and rear yard setbacks.</li> <li>b. Use of landscaping to complement the design of the structure and reflect the Sierra Madre vegetation patterns, with an emphasis on sustainable, low-water use landscaping and use of permeable surfaces for hardscaping, and the use of irrigation equipment that automatically senses the need for water.</li> <li>c. Minimize paving in the front yard as necessary to accommodate driveways and pedestrian walkways.</li> <li>d. Require that covered parking be provided.</li> <li>e. Prohibit required parking from being located in the front yard setback except in the Residential Canyon Zone.</li> </ul>	<p><u>Consistent:</u> The proposed project includes development regulations and design guidelines for the project site created to be compatible with the surrounding neighborhood.</p>
<p><b>Policy L8.1:</b> Encourage the use of sustainable materials in the design and construction of structures and landscapes.</p>	<p><u>Consistent:</u> The Specific Plan states that sustainable building materials and practices are encouraged (e.g., Green Seal certified products, products with low levels of volatile organic compounds [VOCs], Leadership in Energy and Environmental Design [LEED] certification). Furthermore, the project would refer to CALGreen for requirements on installing water-conserving and energy-efficient fixtures and appliances, managing stormwater, recycling, building materials, and other sustainable practices.</p>
<p><b>Policy L8.3:</b> Consider a water impact fee to apply to new residential dwelling units and additions to existing development that increase water consumption, to fund water fixture retrofits of existing homes and other water conservation measures.</p>	<p><u>Consistent:</u> The proposed project would incorporate water conservation measures guided by the development regulations and design guidelines of the Specific Plan. Water conservation measures would include the use of native/drought-resistant landscaping and use of recycled</p>

Table 4.11-1. Project’s Consistency with City of Sierra Madre’s General Plan Goal and Policies

General Plan Goals and Policy	Project Consistency
	<p>water. The proposed project would also achieve a net-zero impact on local water supplies through the purchase of supplemental water in order to offset the demand placed on existing supplies and provide supplemental water to the City, available to serve the public; <u>creation of a lawn retrofit program; or improvements to existing water infrastructure, such as pipe leakage fixes.</u> Furthermore, the project would refer to CALGreen for requirements on installing water-conserving and energy-efficient fixtures and appliances, managing stormwater, recycling, building materials, and other sustainable practices.</p>
<p><b>Objective L17:</b> Protecting views to and from hillside areas in order to maintain the image and identity of the City as a village of the foothills.</p>	<p><u>Consistent:</u> The proposed project is designed in a manner that is sensitive to scenic viewpoints and/or viewsheds through building design, site layout, and building heights. For example, landscaping is proposed to frame important viewsheds and reduce the visual impact of the building to adjacent neighbors. Additionally, the proposed project would result in less than significant impacts to scenic vistas as detailed in Section 4.1, Aesthetics.</p>
<p><b>Policy L17.1:</b> Require the use of natural materials where allowed and earth tone colors for all structures to blend in with the natural landscape and natural chaparral vegetative growth.</p>	<p><u>Consistent:</u> Development of the proposed project would be regulated by the development regulations and design guidelines in the Specific Plan. The design guidelines of the Specific Plan outline site planning and design, architectural design, and landscape design standards that would be implemented as a design of the project to ensure that development is consistent with surrounding development and natural landscape.</p>
<p><b>Policy L17.2:</b> Require that all development be designed to reflect the contours of the existing land form using techniques such as split pads, detached secondary structures (such as garages), and avoiding the use of excessive cantilevers.</p>	<p><u>Consistent:</u> A grading plan has been developed for the proposed project and included in Figure 3-10, Grading Plan, in Chapter 3. Topography at the project site would be altered to form four tiers (three tiers for the proposed residential development, and one tiered for the proposed park), with a slope between each tier. The creation of tiered building pads would allow the project to be designed to reflect the contours of the existing landform.</p>
<p><b>Policy L17.3:</b> Require that all development preserves, to the maximum extent possible, significant features of the natural topography, including swales, canyons, knolls, ridge lines, and rock outcrops.</p>	<p><u>Consistent:</u> Topography at the project site would be altered to form four tiers (three tiers for the proposed residential development, and one tiered for the proposed park), with a slope between each tier. The creation of tiered building pads would allow the project to maintain natural topography to the maximum extent possible. As detailed in Section 4.1, Aesthetics, the project site does not contain significant features and would result in a less than significant impacts to scenic vistas.</p>
<p><b>Policy L17.5:</b> Require that exterior lighting be directed away from adjacent properties and the night sky.</p>	<p><u>Consistent:</u> Development of the proposed project would be regulated by the development regulations and design guidelines in the Specific Plan. These design guidelines include strategies to eliminate skyward glare and preserve “dark skies.” Lighting would be fully shielded and pointing downward to reduce spillover and protect dark skies.</p>

Table 4.11-1. Project’s Consistency with City of Sierra Madre’s General Plan Goal and Policies

General Plan Goals and Policy	Project Consistency
	Additionally, as determined in Section 4.1, Aesthetics, of this EIR, the proposed project would not result in less than significant light and glare impacts.
<b>Objective L20:</b> Maintaining the massing and scale of the existing block and existing structures on sites.	<u>Consistent:</u> The site is currently undeveloped, aside from two access roads. The project would develop 42 detached single-family homes, consistent with the existing single-family residential developments to the south and west of the project site.
<b>Policy L20.1:</b> Require that new residential development be compatible with and complement existing structures on the block: a. Maintain existing front yard setbacks on the block; b. Use compatible building materials, colors, and forms; c. Minimize front yard paving and prohibit front yard parking.	<u>Consistent:</u> Development of the proposed project would be regulated by the development regulations and design guidelines in the Specific Plan. The design guidelines of the Specific Plan outline site planning and design, architectural design, and landscape design standards that would be implemented as a design of the project to ensure that development is consistent with surrounding development and natural landscape.
<b>Historic Preservation</b>	
<b>Objective L44:</b> The preservation of natural open space areas as crucial to the distinctive character of Sierra Madre, and as a key feature of sustainability and public safety	<u>Consistent:</u> The proposed project would <del>dedicate</del> <u>conserve</u> approximately 35 acres of protected open space <del>to the City,</del> north of the Mater Dolorosa Retreat Center.
<b>Policy L44.1:</b> Support the purchase of hillside property by the Sierra Madre Mountains Conservancy and similar organizations.	<u>Consistent:</u> Although the Specific Plan does not support the purchase, the Specific Plan does include the <del>dedication to the City or other perpetual</del> conservation of approximately 35 acres of open space hillside land to the north of the Mater Dolorosa Retreat Center.
<b>Objective 45:</b> Acquiring additional natural and constructed open space areas.	<u>Consistent:</u> The Specific Plan includes the <del>dedication to the City or other perpetual</del> conservation of approximately 35 acres of open space hillside land to the north of the Mater Dolorosa Retreat Center.
<b>Objective L46:</b> Identifying and encouraging the preservation of significant historic resources.	<u>Consistent:</u> A Historical Resources Technical Report was prepared for the proposed project and is included as Appendix D1 of this EIR. As discussed in Section 4.5, Cultural Resources, the Mater Dolorosa Retreat Center is not considered an historical resource for the purposes of CEQA. Additionally, the proposed project would also have no physical impact on the Mater Dolorosa Retreat Center or any historical resources.
<b>Objective L47:</b> Preserving in the long-term significant architectural and historical landmarks and districts.	<u>Consistent:</u> A Historical Resources Technical Report was prepared for the proposed project and is included as Appendix D1 of this EIR. As discussed in Section 4.5, Cultural Resources, the Mater Dolorosa Retreat Center is not considered an historical resource for the purposes of CEQA. Additionally, the proposed project would also have no physical impact on the Mater Dolorosa Retreat Center or any historical resources.

**Table 4.11-1. Project’s Consistency with City of Sierra Madre’s General Plan Goal and Policies**

General Plan Goals and Policy	Project Consistency
<b>Housing</b>	
<b>Goal 1.0:</b> Maintain and enhance the quality of existing housing and ensure that new residential development is consistent with Sierra Madre’s small town character.	<u>Consistent.</u> The proposed project would assist in the implementation of this goal through the incorporation of the Specific Plan’s design guidelines which would be compatible with existing surrounding neighborhoods.
<b>Policy 1.1:</b> Maintain sustainable neighborhoods with quality housing, infrastructure and open space that fosters neighborhood character and the health of residents.	<u>Consistent:</u> The proposed project would provide new low-density housing, infrastructure improvements, and open space to the project site.
<b>Goal 2.0:</b> Facilitate the provision of a range of housing types to meet community needs.	<u>Consistent:</u> The proposed project would provide new housing on the project site consistent with the surrounding residential community.
<b>Policy 2.1:</b> Encourage diversity in the type, size, price and tenure of residential development in Sierra Madre, while maintaining quality of life goals.	<u>Consistent:</u> The proposed project would assist in the implementation of this policy through the development of low density residential within the project site.
<b>Policy 2.2:</b> Provide adequate housing sites through appropriate zoning and land use designations, consistent with Sierra Madre’s regional housing growth needs.	<u>Consistent:</u> The proposed project would assist in the implementation of this policy through the introduction of 42 new housing units to further the City’s regional housing growth needs.
<b>Policy 2.5:</b> Encourage the construction of new, well designed second units in residential zones as a means of addressing a portion of Sierra Madre’s regional housing needs.	<u>Consistent:</u> The proposed project would assist in the implementation of this policy by allowing secondary uses, such accessory dwelling units, within the proposed land use zone under the Specific Plan, pursuant to the provisions in SMMC, Section 17.22, Second Units.
<b>Goal 5.0:</b> Promote environmental sustainability through support of existing and new development which minimizes reliance on natural resources.	<u>Consistent:</u> The proposed project would incorporate water and energy conservation measures guided by the development regulations and design guidelines of the Specific Plan. Water conservation measures would include the use of native/drought-resistant landscaping and use of recycled water. The proposed project would also achieve a net-zero impact on local water supplies. Furthermore, the project would refer to CALGreen for requirements on installing water-conserving and energy-efficient fixtures and appliances, managing stormwater, recycling, building materials, and other sustainable practices.
<b>Policy 5.2:</b> Promote the use of sustainable construction techniques and environmentally sensitive design for housing.	<u>Consistent:</u> The proposed project would refer to CALGreen (California Green Building Standards Code) for building materials and for requirements on installing water-conserving and energy-efficient fixtures and appliances, managing stormwater, recycling, building materials, and other sustainable practices. Additionally, the proposed project would implement <b>MM-AQ-1</b> , which requires construction equipment to meet or exceed the EPA Tier 4 Interim emission standard. Refer to Section 4.3, Air Quality, and Section 4.6, Energy, for additional information.
<b>Policy 5.3:</b> Promote the use of alternative energy sources such as solar energy, cogeneration, and non-fossil fuels.	<u>Consistent:</u> The proposed project would allow for the use of solar panels on proposed structures.

**Table 4.11-1. Project’s Consistency with City of Sierra Madre’s General Plan Goal and Policies**

General Plan Goals and Policy	Project Consistency
<p><b>Policy 5.4:</b> Incorporate transit and other transportation alternatives such as walking and bicycling into the design of new development.</p>	<p><u>Consistent:</u> The proposed project includes a Mobility Plan, which provides for a circulation system using private vehicular and non-vehicular modes of transportation in a system of public roadways and pedestrian pathways within the project site.</p>
<b>Circulation</b>	
<p><b>Goal 1:</b> A balanced transportation system which accommodates all modes of travel including automobiles, pedestrians, bicycles, and transit users.</p>	<p><u>Consistent:</u> The proposed project would provide for a circulation system using private vehicular and non-vehicular modes of transportation in a system of public roadways and pedestrian pathways within the project site. These transportation improvements include reconfiguration of North Sunnyside Avenue, located within the western portion of the site; improvements of Carter Avenue; and construction of Streets A, B, and C, which would run east to west within the project site. In addition, a pedestrian path extending <u>west</u> from the east side of Carter Avenue would <u>provide enhance</u> pedestrian access to Bailey Canyon Wilderness Park, <u>located</u> to the east of the site. Sidewalks would also be provided throughout the project site <u>and</u> <u>along the northern side of Carter Avenue just outside of the proposed project site.</u></p>
<p><b>Goal 2:</b> Safe and well-maintained streets.</p>	<p><u>Consistent:</u> The proposed project would extend public access along North Sunnyside Avenue and include new Streets A, B, and C to provide circulation throughout the project site. Carter Avenue would also be improved and would be publicly accessible from within the project site and would become an ingress and egress secondary access road at the southeastern portion of the site. The project would implement street sections that slow traffic and create a safe and pleasant small neighborhood environment.</p>
<p><b>Goal 3:</b> Preservation of quiet neighborhoods with limited thru traffic.</p>	<p><u>Consistent:</u> The proposed project would extend public access along North Sunnyside Avenue and include new Streets A, B, and C to provide circulation throughout the project site. Carter Avenue would also be improved and would be publicly accessible from within the project site and would become an egress and ingress secondary access road at the southeastern portion of the site.</p>
<p><b>Objective L51:</b> Developing a balanced and multi-modal transportation system to serve the needs of all roadway users, including motorists, public transit patrons, pedestrians, and cyclists.</p>	<p><u>Consistent:</u> The proposed project would provide for a circulation system using private vehicular and non-vehicular modes of transportation in a system of public roadways and pedestrian pathways within the project site. This includes the proposed pedestrian path, which would extend <u>west</u> from the east side of Carter Avenue; <del>and enhanced</del> pedestrian access to Bailey Canyon Wilderness Park to the east of the site <u>through proposed sidewalks along the northern side of Carter Avenue just outside of the proposed project site;</u> and sidewalks that would promote non-automobile travel throughout the project site. Due to the proximity of existing transit, including transit connection for</p>

Table 4.11-1. Project’s Consistency with City of Sierra Madre’s General Plan Goal and Policies

General Plan Goals and Policy	Project Consistency
	<p>routes 78 and 268, located at the transit stop on North Sunnyside Avenue and Sierra Madre Boulevard (0.6 miles south of the project site), Grand View Avenue, approximately 0.28 miles south of the site, and at the intersection of Michillinda Avenue and stops for the Gateway Coach, located at the intersection of North Sunnyside Avenue and West Grand View Avenue (approximately 0.28 miles south of the site), and at the intersection of Michillinda Avenue and West Grand View Avenue (approximately 0.34 miles southwest of the site ) the project’s residents would have access to existing transit facilities.</p>
<p><b>Policy L51.2:</b> Limit the development of new roadways or the expansion of existing roadways.</p>	<p><u>Consistent.</u> The proposed project would include reconfiguration of North Sunnyside Avenue, located within the western portion of the site, which would be moved farther to the west, and improvement of Carter Avenue. However, the proposed project would not result in expansion of these roadways beyond the boundaries of the project site, <u>aside from minor improvements to widen Carter Avenue, just outside of the project site.</u> Therefore, the project would be consistent with this policy.</p>
<p><b>Policy L51.5:</b> Encourage and support the use of non-automotive travel throughout the City.</p>	<p><u>Consistent:</u> The proposed project would provide for a circulation system using non-vehicular modes of transportation in a system of pedestrian pathways within the project site. In addition, as discussed under Objective L51, above, the proposed project’s residents would have access to existing transit facilities, including transit connection for routes 78 and 268 and stops for the Gateway Coach located at the intersection of North Sunnyside Avenue and West Grand View Avenue and at the intersection of Michillinda Avenue and West Grand View Avenue.</p>
<p><b>Policy L51.6:</b> Encourage City staff, employees, residents and visitors to walk and bicycle as often as possible.</p>	<p><u>Consistent.</u> The project will provide public benefits and amenities to the Sierra Madre community, inclusive of a public park that will welcome locals and visitors, provide natural style play features, <u>enhance connectivity</u> to the Bailey Canyon Wilderness Park and trail, and act as a buffer along existing adjacent homes.</p>
<p><b>Policy L51.7:</b> Utilize non-automotive transportation solutions as a tool to further goals related to environmental sustainability and economic development.</p>	<p><u>Consistent:</u> Refer to the consistency analysis for <b>Objective L51</b> above.</p>
<p><b>Policy L51.8:</b> Prioritize improvements for non-vehicular modes like bicycles, pedestrians, and transit to eliminate the need for new or expanded roadways and intersection improvements like traffic signals.</p>	<p><u>Inconsistent.</u> Due to the small size and scope of this project, bicycle facilities would not be implemented. Additionally, the project would expand existing roadways and develop new roads within the project site. Although no bicycle facilities and improvements are proposed under the project, the project would not impact existing bicycle facilities in the vicinity of the project, including the existing bicycle lanes within Sierra Madre Boulevard.</p>



Table 4.11-1. Project’s Consistency with City of Sierra Madre’s General Plan Goal and Policies

General Plan Goals and Policy	Project Consistency
	Nonetheless, because bicycle facilities would not be required and the project would result in expanded roadways, the project would be inconsistent with these policies.
<b>Objective L52:</b> Improving streets to maintain levels of service, vehicular, cyclist and pedestrian safety.	<u>Consistent:</u> The proposed project would improve both North Sunnyside Avenue and Carter Avenue and would develop new Streets A, B, and C to provide adequate circulation within the project site. The proposed project would also provide for a circulation system using private vehicular and non-vehicular modes of transportation in a system of public roadways and pedestrian pathways. The Specific Plan includes a Mobility Plan, including a Pedestrian Plan, which will improve both North Sunnyside Avenue and Carter Avenue and develop new Streets A, B, and C to provide adequate circulation within the project site. As determined in Section 4.17, Transportation, of this EIR, the proposed project would not result in transportation related hazards including to cyclists and pedestrians. In addition, as explained in a memorandum titled Traffic Conditions with the Proposed Sierra Madre Residential Project prepared for the project in November 2020, the proposed project would not result in impacts to existing levels of service at any nearby intersection (Fehr & Peers 2020).
<b>Policy L52.8:</b> Require the incorporation of bicycle facilities into the design of land use plans and capital improvements, including bicycle parking within new multi-family and non-residential sites or publicly accessible bicycle parking.	<u>Inconsistent.</u> Due to the small size and scope of this project, bicycle facilities would not be implemented. Although no bicycle facilities and improvements are proposed under the project, the project would not impact existing bicycle facilities in the vicinity of the project, including the existing bicycle lanes within Sierra Madre Boulevard. Nonetheless, because bicycle facilities would not be required, the project would be inconsistent with these policies.
<b>Policy L52.9:</b> Explore the possibility of sidewalk continuity where feasible.	<u>Consistent:</u> The proposed project would provide sidewalks throughout the project site <u>and along the northern side of Carter Avenue just outside of the proposed project site,</u> and includes a pedestrian path, which would extend <u>west</u> from the east side of Carter Avenue and <u>improve</u> pedestrian access to Bailey Canyon Wilderness Park to the east of the site.
<b>Objective L53:</b> Protecting residential neighborhoods from the intrusion of through traffic.	<u>Consistent:</u> The proposed project would extend public access into the project site along North Sunnyside Avenue. Adequate circulation would be provided throughout the project site through development of A, B, and C, and through internal public access along Carter Avenue. Carter Avenue would become an egress and ingress lane and would still allow access to the Mater Dolorosa Retreat Center. Because no existing residential uses would use Carter Avenue or North Sunnyside Avenue for access, the proposed project would not result in intrusive through traffic. These proposed circulation improvements would be

Table 4.11-1. Project’s Consistency with City of Sierra Madre’s General Plan Goal and Policies

General Plan Goals and Policy	Project Consistency
	used to serve the proposed project residents and would also allow access to the Mater Dolorosa Retreat Center. Due to their location, these proposed improvements would not result in through traffic in adjacent neighborhoods.
<b>Objective L54:</b> Providing off-street parking requirements, on-street parking, and public parking facilities to maximize parking opportunities and address future parking needs.	<u>Consistent:</u> Parking is proposed to be provided within both garages and driveways for single-family residential dwellings as well as a parking lot for the proposed public park. On-street parking would also be provided along North Sunnyside Avenue, Carter Avenue, and Streets A, B, and C.
<b>Chapter Two: Resource Management</b>	
<b>Hillside Preservation</b>	
<b>Goal 3:</b> Public access to the San Gabriel Mountains via parks, trails and roads	<u>Consistent:</u> The project would not hinder public access to the San Gabriel Mountains. In addition, the proposed project would include a neighborhood park <u>and a proposed off-site sidewalk along Carter Avenue.</u> that would <u>enhance connectivity</u> to the Bailey Canyon Wilderness park to the east of the project site, providing additional recreational resources in the area.
<b>Dark Sky</b>	
<b>Goal 1:</b> Protection of the starlit sky to avoid deterioration of the viewing of dark sky as it is a valuable resource.	<u>Consistent:</u> Development of the proposed project would be regulated by the development regulations and design guidelines in the Specific Plan. These design guidelines include strategies to eliminate skyward glare and preserve “dark skies.” Lighting would be fully shielded and pointing downward to reduce spillover and protect dark skies. Additionally, as determined in Section 4.1, Aesthetics, of this EIR, the proposed project would not result in significant glare that would adversely affect day or nighttime views in the area.
<b>Goal 3:</b> Consideration of neighboring properties and the community as a whole with regard to exterior lighting through the reduction of negative light impacts in the design of new exterior lighting schemes.	<u>Consistent:</u> Development of the proposed project would be regulated by the development regulations and design guidelines in the Specific Plan, which include lighting standards to reduce lighting impacts. Lighting would be fully shielded and pointing downward to reduce spillover and protect dark skies. As determined in Section 4.1, Aesthetics, of this EIR, the proposed project would not result in significant lighting that would adversely affect day or nighttime views in the area.
<b>Goal 4:</b> Energy conservation.	<u>Consistent:</u> The proposed project contains Design Guidelines including sustainable development attributes for water and energy conservation.
<b>Objective R6:</b> Reducing light pollution, trespass, and unnecessary glare through the use of light shielding methods, and elimination of lighting that is misdirected, excessive, or unnecessary.	<u>Consistent:</u> Development of the proposed project would be regulated by the development regulations and design guidelines in the Specific Plan, which include lighting standards to reduce lighting impacts. Lighting would be fully shielded and pointing downward to reduce spillover and protect dark skies. As determined in Section 4.1, Aesthetics, of this EIR, the proposed project would not result in significant lighting that would adversely affect day or nighttime views in the area.

**Table 4.11-1. Project’s Consistency with City of Sierra Madre’s General Plan Goal and Policies**

General Plan Goals and Policy	Project Consistency
<p><b>Policy R6.1:</b> Require that all new development projects utilize light fixtures that shield the light source so that light is cast downward to avoid light spillage off site or upward into the sky.</p>	<p><u>Consistent:</u> Development of the proposed project would be regulated by the development regulations and design guidelines in the Specific Plan, which include lighting standards to reduce lighting impacts. Lighting would be fully shielded and pointing downward to reduce spillover and protect dark skies. As determined in Section 4.1, Aesthetics, of this EIR, the proposed project would not result in significant lighting that would adversely affect day or nighttime views in the area.</p>
<p><b>Policy R6.2:</b> Discourage continuous all-night exterior lighting and encourage motion-sensored lighting.</p>	<p><u>Consistent:</u> Development of the proposed project would be regulated by the development regulations and design guidelines in the Specific Plan, which include lighting standards to reduce lighting impacts. Lighting would only be used when needed, only light areas that need it, and only be as bright as necessary. As determined in Section 4.1, Aesthetics, of this EIR, the proposed project would not result in significant lighting that would adversely affect day or nighttime views in the area.</p>
<p><b>Policy R6.3:</b> Encourage the use of fixtures like the "shoe box" design that are capable of providing accurate light patterns, and can often be used for lighting without spilling onto the neighboring property and upward into the sky.</p>	<p><u>Consistent:</u> Development of the proposed project would be regulated by the development regulations and design guidelines in the Specific Plan, which include lighting standards to reduce lighting impacts. As determined in Section 4.1, Aesthetics, of this EIR, the proposed project would not result in significant lighting or glare that would adversely affect day or nighttime views in the area.</p>
<p><b>Objective R7:</b> Minimizing lighting use and intensity, utilizing the most efficient lighting technology.</p>	<p><u>Consistent:</u> Development of the proposed project would be regulated by the development regulations and design guidelines in the Specific Plan, which include lighting standards to reduce lighting impacts. Lighting would only be used when needed, only light areas that need it, and only be as bright as necessary. As determined in Section 4.1, Aesthetics, of this EIR, the proposed project would not result in significant lighting that would adversely affect day or nighttime views in the area.</p>
<p><b>Policy R7.2:</b> The City shall, whenever possible, turn off the lights or use motion sensor controlled lighting and encourage the public to do the same.</p>	<p><u>Consistent:</u> Development of the proposed project would be regulated by the development regulations and design guidelines in the Specific Plan, which include lighting standards to reduce lighting impacts. Lighting would only be used when needed, only light areas that need it, and only be as bright as necessary. As determined in Section 4.1, Aesthetics, of this EIR, the proposed project would not result in significant lighting that would adversely affect day or nighttime views in the area.</p>
<p><b>Objective R8:</b> The reasonable use of outdoor lighting for nighttime safety, utility, security, and enjoyment while preserving the ambiance of the night.</p>	<p><u>Consistent:</u> Development of the proposed project would be regulated by the development regulations and design guidelines in the Specific Plan, which include lighting standards to reduce lighting impacts while providing adequate lighting for safety and security purposes. As determined in Section 4.1, Aesthetics, of this EIR, the proposed project would not result in significant lighting that would adversely affect day or nighttime views in the area.</p>

**Table 4.11-1. Project’s Consistency with City of Sierra Madre’s General Plan Goal and Policies**

General Plan Goals and Policy	Project Consistency
<p><b>Policy R8.1:</b> Encourage outdoor lighting to be designed and installed in a manner that confines the direct lighting rays to the property upon which the lighting is installed so as to protect adjacent and nearby residential districts and public rights-of-way, and reduce “skyglow.”</p>	<p><u>Consistent:</u> Development of the proposed project would be regulated by the development regulations and design guidelines in the Specific Plan, which include lighting standards to reduce lighting impacts. Lighting would be fully shielded and pointing downward to reduce spillover and protect dark skies. As determined in Section 4.1, Aesthetics, of this EIR, the proposed project would not result in significant lighting that would adversely affect day or nighttime views in the area.</p>
<p><b>Policy R8.2:</b> Lighting in and near residential areas shall be minimal and shielded to prevent nuisance glare.</p>	<p><u>Consistent:</u> Development of the proposed project would be regulated by the development regulations and design guidelines in the Specific Plan, which include lighting standards to reduce lighting impacts. Lighting would be fully shielded and pointing downward to reduce spillover and protect dark skies. As determined in Section 4.1, Aesthetics, of this EIR, the proposed project would not result in significant lighting or glare that would adversely affect day or nighttime views in the area.</p>
<p><b>Policy R8.3:</b> Lighting attached to single-family home structures should not exceed the height of the eave, and residential lighting pole height restrictions can be considered to control light trespass on adjacent properties and upward into the sky.</p>	<p><u>Consistent:</u> Development of the proposed project would be regulated by the development regulations and design guidelines in the Specific Plan, which include lighting standards to reduce lighting impacts. Lighting would be fully shielded and pointing downward to reduce spillover and protect dark skies and all lighting attached to the proposed residences would not exceed the height of the eave. As determined in Section 4.1, Aesthetics, of this EIR, the proposed project would not result in significant lighting or glare that would adversely affect day or nighttime views in the area.</p>
<p><b>Policy R8.4:</b> Provide adequate illumination of all streets, alleys, and public areas.</p>	<p><u>Consistent:</u> Development of the proposed project would be regulated by the development regulations and design guidelines in the Specific Plan, which include lighting standards to reduce lighting impacts. The proposed project would provide adequate lighting for illumination of all streets and public areas within the project site, including the proposed neighborhood park.</p>
<p><b>Tree Preservation</b></p>	
<p><b>Goal 1:</b> Continued preservation and protection of existing trees.</p>	<p><u>Inconsistent:</u> The proposed project would result in the removal of <del>1051</del> trees on the project site, <del>140</del> of which are protected trees by the City Tree Preservation and Protection Ordinance, <u>and direct impacts to 10 additional protected trees for the off-site widening of Carter Avenue.</u> However, this ordinance provides a permitting process for the removal of these protected trees that includes mitigation in the form of replacement trees. The proposed project would implement Mitigation Measure <b>MM-BIO-3</b>, which would require adequate replacement of protected trees <u>and the presence of an arborist on-site during the proposed widening of Carter Avenue,</u> in accordance with the City’s ordinance. With implementation of <b>MM-BIO-3</b>, the proposed</p>

Table 4.11-1. Project’s Consistency with City of Sierra Madre’s General Plan Goal and Policies

General Plan Goals and Policy	Project Consistency
	<p>project would result in less than significant impacts on protected trees. In addition, although various trees would be removed under the proposed project, the project would introduce new trees throughout the site, within the proposed public park, along proposed streets, and within the open space located in the northern portion of the project (see Figure 3-5, Conceptual Landscape Plan, in Chapter 3). Nonetheless, because the project would remove existing trees, the project would be inconsistent with this policy.</p>
<p><b>Goal 2:</b> Increase of the City’s community forest.</p>	<p><u>Consistent:</u> The proposed project would replace protected trees at a 1:1 ratio, in accordance with <b>MM-BIO-3</b> and the City’s Tree Preservation and Protection Ordinance. This would result in the replacement of at least <del>ten</del> <u>14</u> trees on-site. Additionally, the proposed project would include the planting of new trees throughout the project site, including within the neighborhood park and along streets (see Figure 3-5, Conceptual Landscape Plan, in Chapter 3).</p>
<p><b>Objective R10:</b> Maintaining and enhancing the City’s significant tree resources.</p>	<p><u>Consistent:</u> The proposed project would replace protected trees in accordance with <b>MM-BIO-3</b> and the City’s Tree Preservation and Protection Ordinance. Additionally, the proposed project would include the planting of new trees throughout the project site, including within the neighborhood park and along streets.</p>
<p><b>Policy R10.2:</b> Continue to develop tree preservation and protection measures.</p>	<p><u>Consistent:</u> The proposed project would result in the removal of <del>1054</del> trees on the project site, <del>140</del> of which are protected trees by the City Tree Preservation and Protection Ordinance. However, this ordinance provides a permitting process for the removal of these protected trees that includes mitigation in the form of replacement trees. The proposed project would implement <b>MM-BIO-3</b>, which would require adequate replacement of protected trees <u>and presence of an arborist on-site during the proposed widening of Carter Avenue</u> in accordance with the City’s ordinance. Additionally, the proposed project would include the planting of new trees throughout the project site, including within the neighborhood park and along streets. With implementation of <b>MM-BIO-3</b>, the proposed project would result in less than significant impacts on protected trees.</p>
<p><b>Policy R10.8:</b> Continue to monitor construction projects with regard to grading and construction effects on trees, tree removal and replacement</p>	<p><u>Consistent:</u> The proposed project would result in the removal of <del>1054</del> trees on the project site, <del>140</del> of which are protected trees by the City Tree Preservation and Protection Ordinance. However, this ordinance provides a permitting process for the removal of these protected trees that includes mitigation in the form of replacement trees. The proposed project would implement <b>MM-BIO-3</b>, which would require adequate replacement of protected trees <u>presence of an arborist on-site during the proposed widening of Carter Avenue</u>, in accordance with the City’s ordinance. Additionally, the proposed project would include the</p>

Table 4.11-1. Project’s Consistency with City of Sierra Madre’s General Plan Goal and Policies

General Plan Goals and Policy	Project Consistency
	planting of new trees throughout the project site, including within the neighborhood park and along streets. With implementation of <b>MM-BIO-3</b> , the proposed project would result in less-than-significant impacts on protected trees.
<b>Water Resources</b>	
<b>Goal 1:</b> Conservation of the City’s water resources.	<u>Consistent:</u> The proposed project would incorporate water conservation measures guided by the development regulations and design guidelines of the Specific Plan. Water conservation measures would include the use of native/drought-resistant landscaping and use of recycled water. The proposed project would also achieve a net-zero impact on local water supplies through the purchase of supplemental water in order to offset the demand placed on existing supplies and provide supplemental water to the City, available to serve the public; <u>creation of a lawn retrofit program; or improvements to existing water infrastructure, such as pipe leakage fixes</u> (see <b>PDF-UTL-1</b> in Section 4.19.4). Furthermore, the project would refer to CALGreen for requirements on installing water-conserving and energy-efficient fixtures and appliances, managing stormwater, recycling, building materials, and other sustainable practices.
<b>Goal 3:</b> Growth that is linked to the availability of water.	<u>Consistent:</u> The proposed project would also achieve a net-zero impact on local water supplies (see <b>PDF-UTL-1</b> in Section 4.19.4). As discussed in Section 4.19, Utilities and Service Systems, of this EIR, impacts associated with existing water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years would be less than significant.
<b>Goal 4:</b> Use of local sources of groundwater rather than imported water	<u>Inconsistent:</u> The proposed project would achieve a net-zero impact on local water supplies through the purchase of supplemental water in order to offset the demand placed on existing supplies and provide supplemental water to the City, available to serve the public; <u>creation of a lawn retrofit program; or improvements to existing water infrastructure, such as pipe leakage fixes</u> (see <b>PDF-UTL-1</b> in Section 4.19.4). However, because the project <del>would</del> <u>could result in</u> use imported water from SGVMWD, the project would be inconsistent with this goal.
<b>Goal 5:</b> Meet or exceed water quality objectives.	<u>Consistent:</u> As discussed in Section 4.10, Hydrology and Water Quality, of this EIR, the project would be required to prepare and implement a SWPPP during construction, in accordance with the Statewide Construction General Permit. This requires implementation of water quality best management practice to ensure that water quality standards are met and that stormwater runoff from the construction work areas does not cause degradation of water quality in receiving water bodies. During project operation, the proposed detention basin would receive stormwater to promote water quality treatment and hydromodification management of stormwater runoff. Impacts to water quality would be less than significant.

Table 4.11-1. Project’s Consistency with City of Sierra Madre’s General Plan Goal and Policies

General Plan Goals and Policy	Project Consistency
<p><b>Objective R12:</b> Optimizing the use of water resources.</p>	<p><u>Consistent:</u> Refer to the consistency analysis for Water Resources <b>Goal 1</b> above.</p>
<p><b>Policy R12.3:</b> Develop new ways to capture and percolate storm water.</p>	<p><u>Consistent:</u> Proposed stormwater infrastructure improvements would include the installation of proposed storm drains and catch basins which would flow into a combination of retention systems, storage galleries, and catch basins to help percolate storm water from the project site. In addition, the project would include development of a 63,500-cubic foot retention storage gallery, to be located within the public park, would consist of approximately 2,400 linear feet of 60-inch-diameter perforated pipe surrounded by gravel bed.</p>
<p><b>Objective R14:</b> Ensuring adequate water availability for future growth in the City.</p>	<p><u>Consistent:</u> The proposed project would achieve a net-zero impact on local water supplies through implementation of <b>PDF-UTL-1</b> (see Section 4.19.4). As discussed in Section 4.19, Utilities and Service Systems, impacts associated with existing water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years would be less than significant.</p>
<p><b>Objective R15:</b> Conserving water during times of drought.</p>	<p><u>Consistent:</u> The proposed project would achieve a net-zero impact on local water supplies through the purchase of supplemental water in order to offset the demand placed on existing supplies and provide supplemental water to the City, available to serve the public; <u>creation of a lawn retrofit program; or improvements to existing water infrastructure, such as pipe leakage fixes</u> (see <b>PDF-UTL-1</b> in Section 4.19.4). Therefore, the proposed project would not increase demand of the City’s water supply, including local groundwater. Additionally, as detailed in Section 4.19, Utilities and Service Systems, impacts associated with existing water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years would be less than significant.</p>
<p><b>Waste Management/Recycling</b></p>	
<p><b>Objective R20:</b> Properly disposing toxic and hazardous waste.</p>	<p><u>Consistent:</u> As discussed in Section 4.9, Hazards and Hazardous Materials, of this EIR, construction of the proposed project would involve the transport of commonly used hazardous substances, such as gasoline, diesel fuel, lubricating oil, grease, and solvents. Hazardous materials during operation of the proposed project would be limited to consumer products such as household cleaners, landscaping chemicals and fertilizers, and other substances associated with household and recreation (neighborhood park) uses. The proposed project would be required to comply with all applicable federal, state, and local standards related to hazardous materials and wastes. Thus, impacts from hazardous waste would be less than significant.</p>

**Table 4.11-1. Project’s Consistency with City of Sierra Madre’s General Plan Goal and Policies**

General Plan Goals and Policy	Project Consistency
<b>Objective R21:</b> Providing adequate waste disposal systems to meet the demands of existing and new development.	<u>Consistent:</u> As discussed in Section 4.19, Utilities and Service Systems, solid waste management services would be provided by Athens Services and the available capacity of the Scholl Canyon Landfill would be able to accommodate development allowed under the project.
<b>Air Quality</b>	
<b>Objective R22:</b> Attaining safe air standards.	<u>Consistent:</u> As determined in Section 4.3, Air Quality, of this EIR, the proposed project would result in less than significant impacts related to air quality.
<b>Policy 22.1:</b> Cooperate with the SCAQMD and incorporate the provisions of the AQMP.	<u>Consistent:</u> As discussed in Section 4.3, Air Quality, of this EIR, the proposed project would cooperate with the SCAQMD and would incorporate the provisions of the AQMP. Impacts related to air quality would be less than significant with implementation of <b>MM-AQ-1</b> .
<b>Policy 22.2:</b> Prohibit the development of land uses and land use practices which would contribute significantly to poor air quality.	<u>Consistent:</u> As determined in Section 4.3, Air Quality, of this EIR, the proposed project would not contribute significantly to poor air quality and impacts related to air quality would be less than significant with implementation of <b>MM-AQ-1</b> .
<b>Policy 22.3:</b> Establish controls and monitor uses in the City which contain operations or materials characterized by air pollutants which individually or cumulatively could significantly add to the air basin’s degradation (e.g., furniture manufacturers using paints and finishes, automobile repair, printing, and reproduction, and dry cleaners).	<u>Consistent:</u> As determined in Section 4.3, Air Quality, of this EIR, the proposed project would not result in a cumulatively considerable increase in emissions within the air basin and impacts related to air quality would be less than significant.
<b>Policy 22.4:</b> Encourage and participate in regional initiatives and programs to improve the South Coast Air Basin’s air quality.	<u>Consistent:</u> As discussed in Section 4.3, Air Quality, of this EIR, the proposed project would cooperate with the SCAQMD and would incorporate the provisions of the AQMP. Impacts related to air quality would be less than significant with implementation of <b>MM-AQ-1</b> .
<b>Policy 23.5:</b> Provide opportunities through appropriate zoning for the development of residential units in concert with commercial uses.	<u>Consistent:</u> The proposed project would establish the Specific Plan, which would establish the zoning and development standards to guide future development of single-family residential uses. No commercial uses are proposed. However, the change in the zoning would allow for residential development in an existing residential area with limited commercial uses. Therefore, the zoning change would allow for the project site to be developed with uses consistent with surrounding development.
<b>Objective R24:</b> Reducing fugitive dust generated from the use of gardening equipment and construction activity.	<u>Consistent:</u> As discussed in Section 4.3, Air Quality, of this EIR, the proposed project would implement various dust control strategies and would be required to comply with SCAQMD Rule 403 to control dust emissions generated during the grading activities. Proposed construction practices that would be employed to reduce fugitive dust emissions include watering of the active sites and unpaved roads two times per day depending on weather conditions and restricting vehicle speed on unpaved roads to 15 miles per hour.



**Table 4.11-1. Project’s Consistency with City of Sierra Madre’s General Plan Goal and Policies**

General Plan Goals and Policy	Project Consistency
<p><b>Policy 24.2:</b> Require dust abatement measures during grading and construction operations. This may include use of reclaimed water or other methods to control fugitive dust.</p>	<p><u>Consistent:</u> As discussed in Section 4.3, Air Quality, of this EIR, the proposed project would implement various dust control strategies and would be required to comply with SCAQMD Rule 403 to control dust emissions generated during the grading activities. Proposed construction practices that would be employed to reduce fugitive dust emissions include watering of the active sites and unpaved roads two times per day depending on weather conditions and restricting vehicle speed on unpaved roads to 15 miles per hour.</p>
<p><b>Policy 24.3:</b> Develop and enforce a fugitive dust control ordinance that regulates the following: visible dust emissions, soil stabilization, the carrying and tracking of dirt offsite, unpaved access and haul roads, storage piles and bulk materials, demolition, and dust control plans; the ordinance should include penalties to encourage compliance.</p>	<p><u>Consistent:</u> As discussed in Section 4.3, Air Quality, of this EIR, the proposed project would implement various dust control strategies and would be required to comply with SCAQMD Rule 403 to control dust emissions generated during the grading activities. Proposed construction practices that would be employed to reduce fugitive dust emissions include watering of the active sites and unpaved roads two times per day depending on weather conditions and restricting vehicle speed on unpaved roads to 15 miles per hour. Impacts related to air quality would be less than significant with implementation of <b>MM-AQ-1</b>.</p>
<p><b>Chapter Three: Hazard Prevention</b></p>	
<p><b>Fire Safety</b></p>	
<p><b>Objective Hz1:</b> Providing adequate service levels of fire protection that meets the needs of Sierra Madre residents, businesses and visitors.</p>	<p><u>Consistent:</u> As discussed in Section 4.15, Public Services, of this EIR, the Sierra Madre Fire Department (SMFD) has reviewed the project and has determined that it would not have a significant effect on service demands. Through payment of appropriate development fees by the project applicant, the proposed project would ensure adequate service levels of fire protection.</p>
<p><b>Policy Hz1.2:</b> Promote public education about fire safety at home, in the community, and in the work place.</p>	<p><u>Consistent:</u> The proposed project would be required to comply with the recommendations of the Fire Protection Plan (FPP). The FPP evaluates and identifies the potential fire risk associated with the project’s land uses and identifies requirements for water supply, fuel modification and defensible space, access, building ignition and fire resistance, and fire protection systems. Requirements of the FPP would be incorporated as project design feature <b>PDF-WF-1</b>. Compliance with the FPP would promote fire safety.</p>
<p><b>Policy Hz1.3:</b> Continue to coordinate the provision of fire services with all public safety service providers and monitor their adequacy and responsiveness to community needs.</p>	<p><u>Consistent:</u> As discussed in Section 4.15, Public Services, of this EIR, the SMFD has reviewed the project and has determined that it would not have a significant effect on service demands. Through payment of appropriate development fees by the project applicant, the proposed project would ensure adequate service levels of fire protection.</p>

**Table 4.11-1. Project’s Consistency with City of Sierra Madre’s General Plan Goal and Policies**

General Plan Goals and Policy	Project Consistency
<b>Objective Hz2:</b> Providing adequate fire protection necessary for existing and future development.	<u>Consistent:</u> As discussed in Section 4.15, Public Services, of this EIR, the SMFD has reviewed the project and has determined that it would not have a significant effect on service demands. Through payment of appropriate development fees by the project applicant, the proposed project would ensure adequate service levels of fire protection.
<b>Policy Hz2.1:</b> Continue to require all existing and new development to install and maintain adequate smoke detection systems.	<u>Consistent:</u> The proposed project would include smoke detection systems, required under California Building Code.
<b>Policy Hz2.2:</b> Continue to require all new development to install automatic fire sprinkler systems.	<u>Consistent:</u> The proposed project is located within a VHFHSZ and would meet all Fire Department regulations and applicable code requirements for building in these higher fire hazard areas, including as they pertain to automatic fire sprinkler systems.
<b>Policy Hz2.3:</b> Continue to require review of building plans by a Fire Captain.	<u>Consistent:</u> The SMFD would review the project and ensure compliance with the applicable fire and life safety regulations, codes, and ordinances as well as the SMFD Fire Prevention Standards for fire protection systems
<b>Policy Hz2.4:</b> Consider water availability in terms of quantity and water pressure for safety purposes when considering the size and location of new residential construction.	<u>Consistent:</u> The proposed project would achieve a net-zero impact on local water supplies through the purchase of supplemental water in order to offset the demand placed on existing supplies and provide supplemental water to the City, available to serve the public; <u>creation of a lawn retrofit program; or improvements to existing water infrastructure, such as pipe leakage fixes</u> (see PDF-UTL-1 in Section 4.19.4). As determined in Section 4.19, Utilities and Service Systems, of this EIR, there would be adequate water availability to meet the demand of the proposed project. Additionally, the proposed project would include a new water system within the planned roadways consisting of a network of mainlines for potable water delivery to the site. The SMFD has reviewed the project.
<b>Policy Hz2.5:</b> Assess the impacts of incremental increases in development density and related traffic congestion on fire hazards and emergency response time, and ensure through the development review process that new development will not result in a reduction of fire protection services below acceptable levels.	<u>Consistent:</u> The SMFD has reviewed the project and has determined that it would not have a significant effect on service demands. Through payment of appropriate development fees by the project applicant, the proposed project would ensure adequate service levels of fire protection.
<b>Policy Hz2.6:</b> Continue to require that new development provides adequate hydrants and show sufficient evidence that there is adequate water supply/fire flow and that it is available to accommodate the fire protection needs of new construction.	<u>Consistent:</u> The proposed project would meet all Fire Department regulations and applicable code requirements, including as they pertain to installation of fire hydrants. Additionally, as determined in Section 4.19, Utilities and Service Systems, of this EIR, there would be adequate water availability to meet the demand of the proposed project.
<b>Policy Hz2.8:</b> Develop vegetation management plans that manage chemise and chaparral to ensure adequate firebreaks, to provide adequate access for fire protection water systems, and access for firefighting.	<u>Consistent:</u> The proposed project would include fuel modification areas and proposed landscaping would be in accordance with the current Fuel Modification and Plant Selection Guidelines from the Los Angeles County Fire Department. Vegetation management would occur as required by Fire Department regulations and applicable code requirements.

Table 4.11-1. Project’s Consistency with City of Sierra Madre’s General Plan Goal and Policies

General Plan Goals and Policy	Project Consistency
<p><b>Objective Hz4:</b> Addressing emergency operations and disaster preparedness as a priority.</p>	<p><u>Consistent:</u> As discussed in Section 4.17, Transportation, of this EIR, all construction activities including staging would occur in accordance with City requirements (such as SMMC Chapter 17.30, which requires that streets be maintained free and clear during construction), which would ensure that adequate emergency access to the project site in the event of an emergency or evacuation order would be provided during construction of the project. Additionally, the proposed project would be adequately served by emergency response services and provide emergency access throughout the project site, as described in Section 4.15, Public Services, of this EIR. Lastly, the proposed project would be required to comply with the recommendations of the FPP. The FPP evaluates and identifies the potential fire risk associated with the project’s land uses and identifies requirements for water supply, fuel modification and defensible space, access, building ignition and fire resistance, and fire protection systems. Requirements of the FPP would be incorporated as project design feature <b>PDF-WF-1</b>.</p>
<p><b>Objective Hz5:</b> Limiting fire hazard through brush and weed abatement.</p>	<p><u>Consistent:</u> The proposed project would include fuel modification areas and proposed landscaping would be in accordance with the current Fuel Modification and Plant Selection Guidelines from the Los Angeles County Fire Department. Brush and weed abatement would occur as required by Fire Department regulations and applicable code requirements.</p>
<p><b>Policy Hz5.1:</b> Mandate annual brush removal from April to June.</p>	<p><u>Consistent:</u> The proposed project would include fuel modification areas and proposed landscaping would be in accordance with the current Fuel Modification and Plant Selection Guidelines from the Los Angeles County Fire Department. Brush removal would occur as required by Fire Department regulations and applicable code requirements.</p>
<p><b>Flood/Landslide</b></p>	
<p><b>Objective Hz6:</b> Addressing potential flooding and landslide hazards on public and private property.</p>	<p><u>Consistent:</u> As determined in Section 4.10, Hydrology and Water Quality, of this EIR, the project would maintain adequate stormwater conveyance as to not result in an increase of surface runoff that would result in flooding on or off site. Additionally, as discussed in Section 4.7, Geology and Soils, the proposed project would not result in landslide hazards.</p>
<p><b>Policy Hz6.1:</b> Require that all new development incorporates sufficient measures to mitigate flood hazards, including the design of containment systems to capture stormwater runoff on-site, and site grading that minimizes stormwater runoff from increased impervious surfaces, thereby addressing impacts to on-site structures and adjacent properties.</p>	<p><u>Consistent:</u> As determined in Section 4.10, Hydrology and Water Quality, of this EIR, the project would maintain adequate stormwater conveyance as to not result in an increase of surface runoff that would result in flooding on or off site.</p>

**Table 4.11-1. Project’s Consistency with City of Sierra Madre’s General Plan Goal and Policies**

General Plan Goals and Policy	Project Consistency
<p><b>Policy Hz6.2:</b> Require that the landscape of open space areas provide the maximum permeable surface area to reduce site runoff, and prohibit the paving of a majority of these areas.</p>	<p><u>Consistent:</u> The proposed project would introduce more impervious area would result in more surface runoff. However, the project would include a new stormwater drainage system that would assist in reducing runoff velocities. Additionally, the proposed neighborhood park would remain pervious, allowing percolation of water into the underlying soils. Lastly, the project would include landscaped parkways, tree plantings, landscaping throughout the project site, providing pervious area that would reduce surface runoff.</p>
<p><b>Objective Hz8:</b> Maintaining adequate infrastructure to prevent flooding hazards.</p>	<p><u>Consistent:</u> As determined in Section 4.10, Hydrology and Water Quality, of this EIR, the project would maintain adequate stormwater conveyance as to not result in an increase of surface runoff that would result in flooding on or off site.</p>
<p><b>Policy Hz8.1:</b> Require that residential tract developers be responsible for construction of drainage/storm drain systems improvements that are compatible with City and County systems within or adjacent to their project site.</p>	<p><u>Consistent:</u> The proposed project would include a new storm drainage system. A new 36-inch-diameter storm drain would be installed on the western portion of the site, which would run from the north to south and join an existing 36-inch-diameter storm drain located within North Sunnyside Avenue. The proposed drainage plan is provided in Figure 3-5 in Chapter 3.</p>
<p><b>Policy Hz8.2:</b> Install required public storm drainage improvements.</p>	<p><u>Consistent:</u> The proposed project would include a storm drainage system. A new 36-inch-diameter storm drain would be installed on the western portion of the site, which would run from the north to south and join an existing 36-inch-diameter storm drain located within North Sunnyside Avenue. The proposed drainage plan is provided in Figure 3-7 in Chapter 3.</p>
<p><b>Seismic Safety</b></p>	
<p><b>Objective Hz10:</b> Assessing the viability of development based on seismic safety considerations.</p>	<p><u>Consistent:</u> A geotechnical investigation was completed for the proposed project, included as Appendix E of this EIR. As discussed in Section 4.7, Geology and Soils, of this EIR, seismic safety has been adequately evaluated and all seismic related impacts would be less than significant.</p>
<p><b>Policy Hz10.2:</b> Investigate the limitations on the location of new or altered residences and critical, sensitive and high occupancy facilities in areas near active faults, and consider conducting a comprehensive geologic investigation to show where active faults pose a hazard to structures.</p>	<p><u>Consistent:</u> A geotechnical investigation was completed for the proposed project, included as Appendix E of this EIR. As discussed in Section 4.7, Geology and Soils, of this EIR, fault hazards have been adequately evaluated and all fault related impacts would be less than significant.</p>
<p><b>Objective Hz11:</b> Minimizing to the extent possible the loss of life, serious injuries, and major social and economic disruption caused by the collapse of or severe damage to vulnerable buildings in an earthquake.</p>	<p><u>Consistent:</u> A geotechnical investigation was completed for the proposed project, included as Appendix E of this EIR. As discussed in Section 4.7, Geology and Soils, of this EIR, earthquake hazards have been adequately evaluated and all earthquake related impacts would be less than significant.</p>

Table 4.11-1. Project’s Consistency with City of Sierra Madre’s General Plan Goal and Policies

General Plan Goals and Policy	Project Consistency
<p><b>Policy Hz 11.2:</b> Encourage seismic review of buildings.</p>	<p><u>Consistent:</u> A geotechnical investigation was completed for the proposed project, included as Appendix E of this EIR. As discussed in Section 4.7, Geology and Soils, of this EIR, seismic safety has been adequately evaluated and all seismic related impacts would be less than significant.</p>
<p><b>Objective Hz13.2:</b> Adopt and maintain high standards for seismic performance of buildings, through prompt adoption and careful enforcement of the best available standards for seismic design.</p>	<p><u>Consistent:</u> A geotechnical investigation was completed for the proposed project, included as Appendix E of this EIR. As discussed in Section 4.7, Geology and Soils, of this EIR, seismic safety has been adequately evaluated and all seismic related impacts would be less than significant. the project would adhere to the most current CBC standards with specific provisions pertaining to seismic load and design.</p>
<p><b>Noise</b></p>	
<p><b>Objective Hz14:</b> Maintaining the quiet residential character of the City, free from excessive noise from transportation or fixed source generators.</p>	<p><u>Consistent:</u> Noise impacts were analyzed in Section 4.13, Noise, of this EIR. As discussed therein, the proposed project would not result in excessive noise from transportation sources. The proposed project would implement mitigation measure <b>MM-NOI-1</b> to reduce construction related noise impacts to a less than significant level. The proposed project would also implement mitigation measure <b>MM-NOI-2</b> to reduce operational noise impacts related to residential HVAC systems to a less than significant level.</p>
<p><b>Policy Hz14.1:</b> Formulate measures to mitigate noise impacts from mobile and stationary noise sources through compatible land use planning and the discretionary review of development projects.</p>	<p><u>Consistent:</u> Noise impacts were analyzed in Section 4.13, Noise, of this EIR. As discussed therein, the proposed project would not result in excessive noise from transportation sources. The proposed project would implement mitigation measure <b>MM-NOI-1</b> to reduce construction related noise impacts to a less than significant level. The proposed project would also implement mitigation measure <b>MM-NOI-2</b> to reduce operational noise impacts related to residential HVAC systems to a less than significant level. Additionally, the proposed project would be compatible with surrounding land uses.</p>
<p><b>Policy Hz14.2:</b> Identify and control the noise levels associated with transportation and general circulation patterns in the City to ensure the residential quality of the community.</p>	<p><u>Consistent:</u> Noise impacts were analyzed in Section 4.13, Noise, of this EIR. As discussed therein, the proposed project would not result in excessive noise from transportation sources.</p>
<p><b>Policy Hz14.5:</b> To the extent possible, protect schools, hospitals, libraries, churches, parks and recreational areas from excessive sound levels so as not to adversely affect their normal activities.</p>	<p><u>Consistent:</u> Noise impacts were analyzed in Section 4.13, Noise, of this EIR. As discussed therein, the proposed project would not result in excessive noise from transportation sources. The proposed project would implement mitigation measure <b>MM-NOI-1</b> to reduce construction related noise impacts to a less than significant level. The proposed project would also implement mitigation measure <b>MM-NOI-2</b> to reduce operational noise impacts related to residential HVAC systems to a less than significant level. Therefore, the proposed project would not adversely affect schools, hospitals, libraries, churches, parks, or recreational areas due to excessive noise levels.</p>

**Table 4.11-1. Project’s Consistency with City of Sierra Madre’s General Plan Goal and Policies**

General Plan Goals and Policy	Project Consistency
<b>Objective Hz16:</b> Minimizing the impacts of construction noise on adjacent uses.	<u>Consistent:</u> Noise impacts were analyzed in Section 4.13, Noise, of this EIR. As discussed therein, the proposed project would implement mitigation measure <b>MM-NOI-1</b> to reduce construction related noise impacts to a less-than-significant level.
<b>Policy Hz16.1:</b> Limit construction activities to reasonable weekday and weekend/holiday hours in order to reduce noise impacts on adjacent residences.	<u>Consistent:</u> Construction of the proposed project would be limited to reasonable weekday and weekend/holiday hours in accordance with this policy.
<b>Policy Hz16.2:</b> Require that construction activities incorporate feasible and practical techniques to minimize the noise impacts on adjacent uses	<u>Consistent:</u> Noise impacts were analyzed in Section 4.13, Noise, of this EIR. As discussed therein, the proposed project would implement mitigation measure <b>MM-NOI-1</b> to reduce construction related noise impacts to a less-than-significant level.
<b>Chapter Four: Community Services</b>	
<b>Law Enforcement</b>	
<b>Policy C1.1:</b> Provide professional police response and protection to the community by partnering with residents, business persons and visitors to the City.	<u>Consistent:</u> As discussed in Section 4.15, Public Services, of this EIR, the Sierra Madre Police Department (SMPD) stated the proposed development would affect response times and service ratios under existing staff and facility conditions. However, payment of development fees by the project applicant, as required by Chapter 15.52 of the SMMC, would be used to offset the costs of increased personnel or equipment that could be required in order to maintain acceptable service ratios, response times, and other performance objectives. Impacts to police services would be less than significant.
<b>Policy C1.2:</b> Assess the impact of increases in population on response time, calls for service and traffic through the development review process so law enforcement assets will not be degraded.	<u>Consistent:</u> As discussed in Section 4.15, Public Services, of this EIR, (SMPD stated the proposed development would affect response times and service ratios under existing staff and facility conditions. However, payment of development fees by the project applicant, as required by Chapter 15.52 of the SMMC, would be used to offset the costs of increased personnel or equipment that could be required in order to maintain acceptable service ratios, response times, and other performance objectives. Impacts to police services would be less than significant.
<b>Policy C3.1:</b> Evaluate on a continual basis the delivery of police services to monitor their adequacy and responsiveness to community needs.	<u>Consistent:</u> As discussed in Section 4.15, Public Services, of this EIR, SMPD stated the proposed development would affect response times and service ratios under existing staff and facility conditions. However, payment of development fees by the project applicant, as required by Chapter 15.52 of the SMMC, would be used to offset the costs of increased personnel or equipment that could be required in order to maintain acceptable service ratios, response times, and other performance objectives. Impacts to police services would be less than significant.

Table 4.11-1. Project’s Consistency with City of Sierra Madre’s General Plan Goal and Policies

General Plan Goals and Policy	Project Consistency
<p><b>Policy C4.3:</b> Maximize passive prevention measures for new and existing development through the development review process.</p>	<p><u>Consistent:</u> As discussed in Section 4.15, Public Services, of this EIR, SMPD stated the proposed development would affect response times and service ratios under existing staff and facility conditions. However, payment of development fees by the project applicant, as required by Chapter 15.52 of the SMMC, would be used to offset the costs of increased personnel or equipment that could be required in order to maintain acceptable service ratios, response times, and other performance objectives. Impacts to police services would be less than significant. The development fees required for this development would help offset the costs of increased personnel or equipment that could be required in order to maintain acceptable service ratios, response times, and other performance objectives.</p>
<p><b>Recreation Services</b></p>	
<p><b>Objective C6:</b> Providing quality recreation, leisure and social programs and facilities for the various segments of the Sierra Madre community</p>	<p><u>Consistent:</u> The proposed project would include a publicly accessible neighborhood park.</p>
<p><b>Policy C8.1:</b> Continue a park maintenance program to secure the existing nature and beauty of the City Parks and open space areas.</p>	<p><u>Consistent:</u> The proposed project would include a publicly accessible neighborhood park, which would be maintained by the City of Sierra Madre, Landscape Maintenance District, or similar public Maintenance Assessment District.</p>
<p><b>Policy C8.3:</b> Install and replace existing landscape with native and drought resistant plants in City parks where deterioration has occurred</p>	<p><u>Consistent:</u> The proposed project would use fire-resistant and drought tolerant tree and plant species in landscaping.</p>
<p><b>Policy C8.4:</b> Identify each recreational site with its name and encompassing facilities with signage visible to the public</p>	<p><u>Consistent:</u> The proposed project would include signage in compliance with the design requirements and procedures found within Chapter 17.72, Signs, of the SMMC.</p>
<p><b>Objective C10:</b> Increasing parkland and recreational facilities in the City.</p>	<p><u>Consistent:</u> The proposed project would include a publicly accessible neighborhood park.</p>
<p><b>Policy C10.4:</b> Require that all new commercial and residential subdivision developments provide open space areas on-site for passive or active recreation or contribute fees for public development of such uses.</p>	<p><u>Consistent:</u> The proposed project would include a publicly accessible neighborhood park.</p>
<p><b>Objective C11:</b> Coordinating the management of parks and recreation efforts throughout the City</p>	<p><u>Consistent:</u> The proposed project would include a publicly accessible neighborhood park, which would be maintained by the City of Sierra Madre, Landscape Maintenance District, or similar public Maintenance Assessment District.</p>
<p><b>Policy C11.2:</b> Maintain and update a maintenance and repair plan for existing and future City facilities.</p>	<p><u>Consistent:</u> The proposed project would include a publicly accessible neighborhood park, which would be maintained by the City of Sierra Madre, Landscape Maintenance District, or similar public Maintenance Assessment District.</p>
<p><b>Transit Services</b></p>	
<p><b>Objective C30:</b> Improving traffic safety.</p>	<p><u>Consistent:</u> The proposed project would extend public access along North Sunnyside Avenue and include new Streets A, B, and C to provide circulation throughout the project site. Carter Avenue would also be improved and would provide secondary egress and ingress access to the</p>

Table 4.11-1. Project’s Consistency with City of Sierra Madre’s General Plan Goal and Policies

General Plan Goals and Policy	Project Consistency
	site, as well as internal circulation. As discussed in Section 4.17, Transportation, of this EIR, the proposed project would not result in new traffic hazards, including due to a geometric design feature.
<b>Policy C30.2:</b> Continue to evaluate measures, such as speed bumps, that reduce speeding.	<u>Consistent:</u> The proposed project would extend public access along North Sunnyside Avenue and include new Streets A, B, and C to provide circulation throughout the project site. Carter Avenue would also be improved and would provide secondary egress and ingress access to the site, as well as provide internal circulation <u>and off-site road widening of Carter Avenue</u> . The project would implement street sections that slow traffic and create a safe and pleasant small neighborhood environment.
<b>Policy C30.3:</b> Maintain safety and efficient circulation without impacting the village atmosphere.	<u>Consistent:</u> The proposed project would extend public access along North Sunnyside Avenue and include new Streets A, B, and C to provide circulation throughout the project site. Carter Avenue would also be improved and would provide secondary egress and ingress access to the site, as well as provide internal circulation <u>and off-site road widening of Carter Avenue</u> . The project would implement street sections that slow traffic and create a safe and pleasant small neighborhood environment.
<b>Public Services</b>	
<b>Objective C31:</b> Providing adequate water, wastewater/sewer, storm drainage, electrical, and telecommunications systems to meet the demands of new and existing development.	<u>Consistent:</u> As discussed in Section 4.19, Utilities and Service Systems, of this EIR, the proposed project would provide adequate water, wastewater, sewer, storm drainage, electrical, and telecommunications systems to meet the demand of the proposed project.
<b>Policy C31.1:</b> Provide for storm drainage improvements where existing systems are deficient.	<u>Consistent:</u> The proposed project would include a new storm drainage system. A new 36-inch-diameter storm drain would be installed on the western portion of the site, which would run from the north to south and join an existing 36-inch-diameter storm drain located within North Sunnyside Avenue. The proposed drainage plan is provided in Figure 3-7 in Chapter 3.
<b>Policy C31.3:</b> Require that new development be contingent upon the ability to be served by adequate sanitation collection and treatment, water, electrical and natural gas energy, telecommunication, storm drainage, and other supporting infrastructure.	<u>Consistent:</u> As discussed in Section 4.19, Utilities and Service Systems, of this EIR, the proposed project would be adequately served by sanitation collection and treatment, water, electrical, natural gas, energy, telecommunication, and storm drainage facilities.
<b>Policy C31.4:</b> Upgrade areas that are deficient and maintain lighting fixtures in good working condition.	<u>Consistent:</u> The proposed project would include adequate lighting as required by the SMMC.
<b>Policy C31.5:</b> Require that new development capture for percolation on site the maximum practical amount of storm water.	<u>Consistent:</u> The proposed project would include a new storm drainage system. A new 36-inch-diameter storm drain would be installed on the western portion of the site, which would run from the north to south and join an existing 36-inch-diameter storm drain located within North Sunnyside Avenue. The proposed drainage plan is provided



**Table 4.11-1. Project’s Consistency with City of Sierra Madre’s General Plan Goal and Policies**

General Plan Goals and Policy	Project Consistency
	<p>in Figure 3-7 in Chapter 3. Proposed infrastructure improvements would also include catch basins which would flow into a combination of retention systems, storage galleries, and catch basins to help percolate storm water from the project site. In addition, the project would include development of a 63,500-cubic foot retention storage gallery, to be located within the public park, would consist of approximately 2,400 linear feet of 60-inch diameter perforated pipe surrounded by gravel bed.</p>

**Parks and Facilities Maintenance and Master Plan**

The Parks and Facilities Maintenance and Master Plan helps meet the needs of the City of Sierra Madre’s current and future residents and to build on the community’s unique recreational facilities, parks, and trail assets. The Parks and Facilities Master Plan is intended to serve as a guide for future recreational facility and park improvements and acquisition. Another important purpose of the Parks and Facilities Master Plan is to represent the community’s desires for a balance between parks, open space, and trails. Above all, the Parks and Facilities Maintenance and Master Plan seeks to contribute to a higher quality of life in Sierra Madre. The Parks and Facilities Master Plan outlines goals and priorities to help achieve improvements at existing parks and recreational facilities. Goals and priorities relevant to the project include the following (City of Sierra Madre 2012):

***Bailey Canyon Wilderness Park***

- The goal for this park is to maintain the area as a wilderness park with minimal improvements.

As previously mentioned, adoption of the Specific Plan would result in future development of an approximately 3.04-acre dedicated neighborhood public park at the southernmost portion of the project site (see Figure 3-3 in Chapter 3 of this EIR). The park’s location along the southern boundary of the site and the proposed sidewalk along the northern side of Carter Avenue, just outside of the proposed project site, provides enhanced connectivity to the Bailey Canyon Wilderness Park to the east. As such, the project would be consistent with the Park and Facilities Master Plan goal by providing improved access to Bailey Canyon Wilderness Park.

**Community Forest Management Plan**

The Community Forest Management Plan ensures the continuation and enhancement of the tree canopy for the beauty, wellbeing, livability, and long-term environmental health of the community of Sierra Madre. The City of Sierra Madre’s mission to grow and perpetuate the community forest is embodied in the Community Forest Master Plan. This mission is expressed through these overarching goals (City of Sierra Madre 2014a):

- Conserve and expand tree canopy cover equal to no net loss, with a gradual increase over time.
- Foster increased public awareness and education regarding the environmental value of trees as green infrastructure.
- Promote increased shade-tree canopy for energy conservation, storm water capture, and improved air quality.
- Encourage species selection appropriate for local environmental conditions and sustainability.

- Preserve and enhance community aesthetics and property values through increased canopy cover and diversity.
- Apply best management practices for planting, maintaining, and responding to changed environmental conditions in the community forest.

Although various trees would be removed under the proposed project, the project would introduce new trees throughout the site, within the proposed public park, along proposed streets, and within the open space located in the northern portion of the project (see Figure 3-5, Conceptual Landscape Plan, in Chapter 3). Without mitigation for tree replacement, impacts to the Community Forest Management Plan would be **potentially significant (Impact LU-1)**. However, as discussed in Section 4.4, Biological Resources, **MM-BIO-3** would be implemented and would require the project to adhere to the City's Tree Preservation and Protection Ordinance (Chapter 12.20), which identifies tree replacement requirements for tree removal associated with a development project. In total, up to ~~ten~~ 14 protected trees would be removed for this project while 10 trees located within the off-site improvement area would have direct impacts as construction is anticipated within the tree protection zone. Each will be replaced on a 1:1 basis, at a minimum with a 24-inch box tree, with a like species. The specific location of individual mitigation tree plantings on site would be addressed in the mitigation planting plan or landscape design plan prepared for the site. In addition, all mitigation tree plantings shall be subject to a 5-year monitoring effort by an independent third-party certified arborist. The monitoring effort shall consider growth, health, and condition of the subject trees to evaluate success. The monitoring effort may result in a recommendation of remedial actions should any of the tree plantings exhibit poor or declining health. In addition, because trees would be directly impacted during the road widening, an arborist will be required to be present on-site during the proposed widening of Carter Avenue. Thus, with adherence to **MM-BIO-3** and implementation of the project's landscape plan, the project would be consistent with the goals outlined in the Community Forest Management Plan.

### Conclusion

As demonstrated throughout the analysis for Threshold 2, with adherence to **MM-BIO-3**, the proposed project would not result in a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Impacts would be **less than significant**.

### 4.11.6 Mitigation Measures

The following mitigation measure will be implemented during and prior to project construction in order to reduce potential project-related impacts to land use and planning to a less-than-significant level.

**MM-BIO-3 Protected Tree Replacement.** [See Section 4.4.6 in Section 4.4, Biological Resources, for details.]

### 4.11.7 Level of Significance After Mitigation

Impacts related to land use and planning would be **less than significant**.

## 4.12 Mineral Resources

This section describes the existing mineral resources conditions of The Meadows at Bailey Canyon Specific Plan Project (project or proposed project) site and vicinity, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures related to implementation of the proposed project.

### 4.12.1 Existing Conditions

The California Geological Survey (CGS) and Department of Conservation (DOC) classify the regional significance of mineral resources in accordance with the California Surface Mining and Reclamation Act of 1975. The State Geologist is responsible for classifying areas within California that are subject to urban expansion or other irreversible land uses. The State Geologist is also responsible for classifying Mineral Resources Zones (MRZs) to record the presence or absence of significant resources in the state based on California Geological Survey data. According to the City of Sierra Madre (City) General Plan Environmental Impact Report (EIR), the entire City is located in areas mapped MRZ-3 and MRZ-4, defined as areas containing mineral deposits, the significance of which cannot be evaluated from available data, and areas where available information is inadequate for assignment to any other MRZ zone, respectively (City of Sierra Madre 2015). The project site is located entirely within an area mapped as MRZ-3 (DOC 1994).

### 4.12.2 Relevant Plans, Policies, and Ordinances

#### Federal

There are no federal plans, policies, or ordinances related to mineral resources relevant to the proposed project.

#### State

##### *Surface Mining and Reclamation Act of 1975*

As mandated by the California Surface Mining and Reclamation Act, the California State Mining and Geology Board classifies the state's mineral resources with the MRZ system. This system includes identification of presence/absence conditions for meaningful sand and gravel deposits.

The classification system emphasizes Portland Cement Concrete aggregates, which are used in manufacturing strong, durable concrete, and have stricter specifications than other aggregate materials.

Mineral land classifications for the region are designated as follows (California PRC, Sections 2710–2796):

- **MRZ-1** – Areas where adequate information indicates that no significant mineral deposits are present or where it is judged that little likelihood exists for their presence.
- **MRZ-2** – Areas where adequate information indicates that significant mineral deposits are present or where it is judged that there is a high likelihood for their presence.
- **MRZ-3** – Areas containing mineral deposits, the significance of which cannot be evaluated from available data.
- **MRZ-4** – Areas where available information is inadequate for assignment to any other MRZ zone.

## Local

There are no local plans, policies, or ordinances related to mineral resources relevant to the proposed project.

### 4.12.3 Thresholds of Significance

The significance criteria used to evaluate the project impacts to mineral resources are based on Appendix G of the California Environmental Quality Act (CEQA) Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to mineral resources would occur if the project would:

1. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?
2. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

### 4.12.4 Project Design Features

There are no project design features that apply to mineral resources.

### 4.12.5 Impacts Analysis

1. ***Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?***

As described in Section 4.12.1, Existing Conditions, the project site is located within an area mapped as MRZ-3. MRZ-3 indicates areas of undetermined mineral resource significance (DOC 1994). Further, the project site is not zoned for mineral resource extraction, and the nature of the surrounding land uses, including residential uses located to the south and east, and the Mater Dolorosa Retreat Center, located to the north, would preclude any potential mineral resource extraction operation from being feasible on the project site even if mineral resources were identified. Therefore, because there are no known mineral resources within the City or on the project site, and due to the developed nature of the surrounding area, the proposed project would not result in the loss of availability of a known mineral resource. Impacts would be **less than significant**.

2. ***Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?***

As discussed above under Threshold 1, the project site is located within an area mapped as MRZ-3, which includes areas of undetermined mineral resource significance. As such, there are no known mineral resources on the project site. Additionally, no mineral resources are identified within the City's General Plan and there are no locally important resource recovery sites in the City. In addition, the developed nature of the site's surroundings would preclude any potential mineral resource extraction operation from being feasible on the project site even if mineral resources were identified. Therefore, the proposed project would not result in the loss of availability of a locally important mineral resource recovery site. Impacts would be **less than significant**.

#### 4.12.6 Mitigation Measures

No mitigation measures would be required.

#### 4.12.7 Level of Significance After Mitigation

Impacts related to mineral resources would be less than significant. No mitigation measures would be required.

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## 4.13 Noise

This section describes the existing noise conditions of The Meadows at Bailey Canyon Specific Plan Project (project or proposed project) site and vicinity, identifies associated regulatory requirements, evaluates potential noise and vibration impacts, and identifies mitigation measures related to implementation of the proposed project.

### 4.13.1 Existing Conditions

#### 4.13.1.1 Noise Factors and Terminology

Vibrations, traveling as waves through air from a source, exert a force perceived by the human ear as sound. Sound pressure level (referred to as sound level) is measured on a logarithmic scale in decibels (dB) that represent the fluctuation of air pressure above and below atmospheric pressure. Frequency, or pitch, is a physical characteristic of sound and is expressed in units of cycles per second or hertz (Hz). The normal frequency range of hearing for most people extends from about 20 to 20,000 Hz. The human ear is more sensitive to middle and high frequencies, especially when the noise levels are quieter. As noise levels get louder, the human ear starts to hear the frequency spectrum more evenly. To accommodate for this phenomenon, a weighting system to evaluate how loud a noise level is to a human was developed. The frequency weighting called “A” weighting is typically used for quieter noise levels, which de-emphasizes the low-frequency components of the sound in a manner similar to the response of a human ear. This A-weighted sound level is called the “noise level” and is referenced in units of dBA.

Because sound is measured on a logarithmic scale, a doubling of sound energy results in a 3 dB increase in the noise level. Changes in a community noise level of less than 3 dB are not typically noticed by the human ear (Caltrans 2013). Changes from 3 to 5 dB may be noticed by some individuals who are extremely sensitive to changes in noise. A 5 dB increase is readily noticeable. The human ear perceives a 10 dB increase in sound level as a doubling of the sound level (i.e., 65 dBA sounds twice as loud as 55 dBA to a human ear).

An individual’s noise exposure occurs over a period of time; however, noise level is a measure of noise at a given instant in time. The equivalent continuous sound level ( $L_{eq}$ ), also referred to as the average sound level, is a single number representing the fluctuating sound level in A-weighted decibels (dBA) over a specified period of time. It is a sound-energy average of the fluctuating level and is equal to a constant unchanging sound of that dB level. Community noise sources vary continuously, being the product of many noise sources at various distances, all of which constitute a relatively stable background or ambient noise environment.

Noise levels are generally higher during the daytime and early evening when traffic (including airplanes), commercial, and industrial activity is the greatest. However, noise sources experienced during nighttime hours when background levels are generally lower can be potentially more conspicuous and irritating to the receiver. In order to evaluate noise in a way that considers periodic fluctuations experienced throughout the day and night, a concept termed “community noise equivalent level” (CNEL) was developed. The CNEL scale represents a time-weighted 24-hour average noise level based on the A-weighted sound level. CNEL accounts for the increased noise sensitivity during the evening hours (7 p.m. to 10 p.m.) and nighttime hours (10 p.m. to 7 a.m.) by adding 5 dB to the average sound levels occurring during the evening hours and 10 dB to the sound levels occurring during nighttime hours. Additional noise definitions are provided below.

**Ambient Noise Level.** The composite of noise from all sources near and far. The normal or existing level of environmental noise at a given location.

**A-Weighted Sound Level (dBA).** The sound pressure level in decibels as measured on a sound level meter using the A-weighted filter network. The A-weighting filter deemphasizes the very low and very high frequency components of the sound in a manner similar to the frequency response of the human ear and correlates well with community equivalent sound level.

**Community Noise Equivalent Level (CNEL).** CNEL is the A-weighted equivalent continuous sound exposure level for a 24-hour period with a 10 dB adjustment added to sound levels occurring during the nighttime hours (10 p.m.–7 a.m.) and 5 dB added to the sound during the evening hours (7 p.m.–10 p.m.).

**Day Night Average Sound Level (DNL or  $L_{dn}$ ).** Similar to the CNEL noise metric, except that no penalty is added during the evening hours (7 p.m.–10 p.m.). Typically, the CNEL and  $L_{dn}$  noise metrics vary by approximately 1 decibel or less and are often considered to be functionally equivalent.

**Decibel (dB).** The decibel is a unit for measuring sound pressure level and is equal to 10 times the logarithm to the base 10 of the ratio of the measured sound pressure squared to a reference pressure, which is 20 micropascals.

#### 4.13.1.2 Noise-Sensitive Land Uses

Land use types considered to be noise-sensitive include residences, colleges, schools and universities, churches, libraries, hospitals, rest homes, open space/recreation areas, and long- term medical or mental health care facilities, retreat centers or other places in which an expectation of relative quiet is customary.

#### 4.13.1.3 Project Site

The project site is located at 700 North Sunnyside Avenue, in the northwestern portion of the City of Sierra Madre (City), within the County of Los Angeles (County), California. The northwestern portion of the project site borders the City of Pasadena, and the San Gabriel Mountains are located approximately 460 feet north of the site. The site is surrounded by Bailey Canyon and the Bailey Canyon Wilderness Park to the east, and existing single-family residential development to the south and west, and the Mater Dolorosa Retreat Center, which is primarily used to host religious and silent retreats and other activities, to the north

Noise measurements were conducted on and near the project site on October 21, 2020,<sup>1</sup> to characterize the existing ambient noise environment. Table 4.13-1 provides the locations, date, and times these noise measurements were performed.

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<sup>1</sup> The noise measurements were conducted approximately 7 months into the COVID-19 pandemic, during which state and regional public health orders limiting gatherings, school openings, non-essential travel, and other activities intended to control the spread of the virus were in effect. Consequently, ambient noise levels (such as from traffic) may have been lower than they otherwise would be. However, to the extent that such levels are compared to noise from the proposed project, lower ambient noise levels would result in a larger projected noise increase from the project; thus, the results would be conservative.



Table 4.13-1. Measured Community Noise Levels

Receptor	Location/Address	Date (mm/dd/yy)	Time (hh:mm)	L <sub>eq</sub> (dBA)	L <sub>max</sub> (dBA)
ST1	On-site, southwestern corner of project site, adjacent to existing residences	10/20/20	9:29–9:44 a.m.	52.7	69.1
ST2	Mater Dolorosa Retreat Center, at Fountain Plaza	10/20/20	10:03–10:18 a.m.	55.4	70.6
ST3	Bailey Canyon Park, west side	10/20/20	10:42–10:58 a.m.	52.1	58.3
ST4	Adjacent to residence at 390 Carter Avenue	10/20/20	11:05–11:20 a.m.	56.1	75.9
ST5	Adjacent to residence at 441 North Sunnyside Avenue	10/20/20	11:29–11:45 a.m.	56.1	74.4

Source: Appendix G.

L<sub>eq</sub> = equivalent continuous sound level (time-averaged sound level); L<sub>max</sub> = maximum sound level during the measurement interval; dBA = A-weighted decibels; ST = short-term noise measurement locations.

The five short-term (ST) noise measurement locations were selected to represent sample existing noise-sensitive receivers on and near the project site. These locations are depicted as receivers ST1–ST5 in Figure 4.13-1, Noise Measurement and Modeling Locations. The measured energy-averaged (L<sub>eq</sub>) and maximum (L<sub>max</sub>) noise levels at these field survey locations are provided in Table 4.13-1. The primary noise sources at the sites consisted of light traffic along adjacent roadways, distant traffic, the sounds of rustling leaves, distant conversations, and birdsong. The measured sound levels ranged from approximately 52.1 dBA L<sub>eq</sub> at ST3 to 56.1 dBA L<sub>eq</sub> at ST4 and ST5. More details of the collected noise measurement data can be found in Appendix G.

## 4.13.2 Relevant Plans, Policies, and Ordinances

### Federal

There are no federal noise standards that would directly regulate environmental noise during construction and operation of the proposed project. The following is provided because guidance summarized herein is used or pertains to the analysis.

#### *Federal Transit Administration*

In its Transit Noise and Vibration Impact Assessment guidance manual, the Federal Transit Administration (FTA) provides guidance and methodology related to construction noise and groundborne vibration which is used in this analysis as detailed in Section 4.13.5, Impacts Analysis.

### State

#### *California Code of Regulations, Title 24*

Title 24 of the California Code of Regulations sets standards which new development in California must meet. According to Title 24, interior noise levels are not to exceed 45 dB CNEL for new multifamily residences, hotels, and other attached residences.

Title 24 also requires that an interior acoustical study demonstrating that interior noise levels due to exterior sources will be less than or equal to 45 CNEL be performed for affected multifamily structures and hotels that are exposed to exterior noise levels in excess of 60 CNEL.

#### ***California Department of Health Services Guidelines***

The State Department of Health Services has developed guidelines of community noise acceptability for use by local agencies (OPR 2017). Selected relevant levels are listed here:

- Below 60 dBA CNEL: normally acceptable for low-density residential use
- 50 to 70 dBA: conditionally acceptable for low-density residential use
- Below 65 dBA CNEL: normally acceptable for high-density residential use and transient lodging
- 60 to 70 dBA CNEL: conditionally acceptable for high-density residential, transient lodging, churches, educational, and medical facilities

The normally acceptable exterior noise level for transient lodging use is up to 65 dBA CNEL. Conditional acceptable exterior noise levels range up to 70 dBA CNEL for transient lodging.

#### ***California Department of Transportation***

In its Transportation and Construction Vibration Guidance Manual, the California Department of Transportation (Caltrans) recommends a vibration velocity threshold of 0.2 inches per second (ips) peak particle velocity (PPV) (Caltrans 2020) for assessing “annoying” vibration impacts to occupants of residential structures. Although this Caltrans guidance is not a regulation, it can serve as a quantified standard in the absence of such limits at the local jurisdictional level. Similarly, thresholds to assess building damage risk due to construction vibration vary with the type of structure and its fragility but tend to range between 0.2 ips and 0.4 ips PPV for typical residential structures (Caltrans 2020).

#### **Local**

The proposed project would be located in the City of Sierra Madre, but there are nearby noise-sensitive receptors in the City of Pasadena, located directly west of the site. City of Sierra Madre noise standards would be applicable to the proposed project. City of Pasadena noise standards are provided for informational and contextual purposes.

#### ***City of Sierra Madre General Plan***

In its General Plan Technical Background Report (City of Sierra Madre 2015), the City has identified noise compatibility standards for siting new noise-sensitive land uses within the City. The noise compatibility standards provide planners with a tool to gauge the compatibility of new land uses relative to existing and future noise levels. Table 4.13-2 presents the City’s noise compatibility criteria (taken from City of Sierra Madre 2015).

Table 4.13-2. Land Use Compatibility for Community Noise Exposure

Land Uses	CNEL (dBA)					
	55	60	65	70	75	80
Residential – Low Density Single Family, Duplex, Mobile Homes						
Residential – Multiple Family						
Transient Lodging, Motels, Hotels						
Schools, Libraries, Churches, Hospitals, Nursing Homes						
Auditoriums, Concert Halls, Amphitheaters						
Sports Arena, Outdoor Spectator Sports						
Playgrounds, Neighborhood Parks						
Golf Courses, Riding Stables, Water Recreation, Cemeteries						
Office Buildings, Businesses, Commercial and Professional						

Table 4.13-2. Land Use Compatibility for Community Noise Exposure

Land Uses	CNEL (dBA)					
	55	60	65	70	75	80
Industrial, Manufacturing, Utilities, Agricultural						

Source: City of Sierra Madre 2015.

**Normally Acceptable:** Specified land use is satisfactory based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements.

**Normally Unacceptable:** New construction or development should generally be discouraged. If new construction does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

**Conditionally Acceptable:** New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and the needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.

**Clearly Unacceptable:** New construction or development should generally not be undertaken.

The City of Sierra Madre General Plan, Hazard Prevention chapter, has established the following objectives and policies with regard to noise (City of Sierra Madre 2015). The proposed project's consistency with these policies is provided in Table 4.11-1 in Section 4.11, Land Use and Planning.

**Objective Hz14:** Maintaining the quiet residential character of the City, free from excessive noise from transportation or fixed source generators.

**Policy Hz14.1:** Formulate measures to mitigate noise impacts from mobile and stationary noise sources through compatible land use planning and the discretionary review of development projects.

**Policy Hz14.2:** Identify and control the noise levels associated with transportation and general circulation patterns in the City to ensure the residential quality of the community.

**Policy Hz14.5:** To the extent possible, protect schools, hospitals, libraries, churches, parks and recreational areas from excessive sound levels so as not to adversely affect their normal activities.

**Objective Hz16:** Minimizing the impacts of construction noise on adjacent uses.

**Policy Hz16.1:** Limit construction activities to reasonable weekday and weekend/holiday hours in order to reduce noise impacts on adjacent residences.

**Policy Hz16.2:** Require that construction activities incorporate feasible and practical techniques to minimize the noise impacts on adjacent uses.

### ***City of Sierra Madre's Code of Ordinances***

Additionally, the City of Sierra Madre's Code of Ordinances (i.e., Sierra Madre Municipal Code) establishes noise standards for non-transportation noise sources through their Noise Ordinance (Title 9, Chapter 9.32). The City's Noise Ordinance is designed to limit noise generated on a property from adversely affecting noise-sensitive land uses.

Noise generated at residential properties is prohibited from exceeding existing ambient noise levels by more than 6 dB; noise levels generated at commercial and industrial properties is prohibited from exceeding existing ambient noise levels by more than 8 dB.

Noise generated on public property (e.g., parks, schools) is prohibited from generating more than 15 dB above the local ambient noise level at a distance of 25 feet or more; Sound-amplifying equipment and special events noise is prohibited from exceeding 60 dBA at a distance of 50 feet from the source without an exemption issued by the City Manager (Section 9.32.050, Public Property Noise Limits).

The Sierra Madre Municipal Code provides exemptions (Section 9.32.060, Special Exception Provisions) for certain noise sources and for noise generated during the daytime hours when people are generally less sensitive to noise. The noise from any noise source is considered exempt from the maximum permissible noise levels (i.e., 6 dB above ambient levels at residential properties and 8 dB above ambient levels at commercial properties) provided that noise occurs between the hours of 7:00 a.m. and 9:00 p.m. Monday through Saturday or 10:00 a.m. and 6:00 p.m. on Sundays and federal holidays and does not produce noise levels that exceed 80 dBA at a distance of 25 feet (Section 9.32.060[A]).

Noise from construction authorized by a valid city permit is exempt between the hours of 7:00 a.m. and 7:00 p.m. daily, except Sundays and holidays when the exemption is between 10:00 a.m. and 6:00 p.m., provided the noise level at any point outside the property plane does not exceed 85 dBA (Section 9.32.060[C]).

### ***City of Pasadena General Plan***

The City of Pasadena has established guidelines and standards in its General Plan (City of Pasadena 2002). The City of Pasadena General Plan Noise Element recognizes that construction activity is a source of occasional temporary nuisance noise throughout the City and that these and other such nuisance noises are common to cities and, because of their unpredictable nature, must be addressed on a case-by-case basis. The following policies are applicable to the project:

**Policy 7b:** The City will encourage limitations on construction activities adjacent to sensitive noise receptors.

**Policy 7c:** The City will encourage construction and landscaping activities that employ techniques to minimize noise.

### ***City of Pasadena Municipal Code***

#### **Section 9.36.050 – General Noise Sources**

Section 9.36.050 states, "It is unlawful for any person to create, cause, make or continue to make or permit to be made or continued any noise or sound which exceeds the ambient noise level at the property line of any property by more than 5 decibels." Adjustments are made to the allowable noise level for steady audible tones, repeated impulsive noise, and noise occurring for limited time periods.

**Section 9.36.070 – Construction Projects**

- A. No person shall operate any pile driver, power shovel, pneumatic hammer, derrick power hoist, forklift, cement mixer or any other similar construction equipment within a residential district or within a radius of 500 feet therefrom at any time other than as listed below:
  1. From 7:00 AM to 7:00 PM Monday through Friday;
  2. From 8:00 AM to 5:00 PM on Saturday; and
  3. Operation of any of the listed construction equipment is prohibited on Sundays and holidays.
- B. No person shall perform any construction or repair work on buildings, structures or projects within a residential district or within a radius of 500 feet therefrom in such a manner that a reasonable person of normal sensitiveness residing in the area is caused discomfort or annoyance at any time other than as listed below:
  1. From 7:00 AM to 7:00 PM Monday through Friday;
  2. From 8:00 AM to 5:00 PM on Saturday; and
  3. Performance of construction or repair work is prohibited on Sundays and holidays.
- C. For purposes of this section, holidays are New Year’s Day, Martin Luther King Jr. Day, Lincoln’s Birthday, Washington’s Birthday, Memorial Day, Independence Day, Labor Day, Veterans Day, Thanksgiving Day, Day after Thanksgiving, and Christmas.

**Section 9.36.080 – Construction Equipment.**

It is unlawful for any person to operate any powered construction equipment if the operation of such equipment emits noise at a level in excess of 85 dBA when measured within a radius of 100 feet from such equipment.

### 4.13.3 Thresholds of Significance

The significance criteria used to evaluate the project impacts related to noise are based on Appendix G of the California Environmental Quality Act (CEQA) Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to noise would occur if the project would:

1. Result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.
2. Result in generation of excessive groundborne vibration or groundborne noise levels.
3. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels.

In light of these significance criteria, this analysis uses the following standards to evaluate potential noise and vibration impacts.

- **Construction noise** – Consistent with Chapter 9.32 of the City’s Noise Ordinance, construction activity noise emission at or beyond the property line of the source would result in a significant impact if it exceeds 80 dBA hourly  $L_{eq}$  at a distance of 25 feet for any allowable construction hour or 85 dBA  $L_{eq}$  at or beyond a noise-sensitive receiver’s property boundary.

- **Off-site project-attributed transportation noise** – Guidance regarding the determination of a substantial permanent increase in transportation noise levels in the project vicinity above existing levels is provided by the 1992 findings of the Federal Interagency Committee on Noise (FICON), which assessed the annoyance effects of changes in ambient noise levels resulting from aircraft operations. The FICON recommendations are based upon studies that relate aircraft and traffic noise levels to the percentage of persons highly annoyed by the noise. Annoyance is a qualitative measure of the adverse reaction of people to noise that generates speech interference, sleep disturbance, or interference with the desire for a tranquil environment.

The rationale for the FICON recommendations is that it is possible to consistently describe the annoyance of people exposed to transportation noise in terms of  $L_{dn}$  (and, by extension, CNEL<sup>2</sup>). The changes in noise exposure that are shown in Table 4.13-3 are expected to result in equal changes in annoyance at sensitive land uses. Although the FICON recommendations were specifically developed to address aircraft noise impacts, they are used in this analysis to define a substantial increase in community noise levels related to all transportation noise sources.

**Table 4.13-3. Measures of Substantial Increase for Community Noise Sources**

Ambient Noise Level Without Project ( $L_{dn}$ /CNEL)	Significant Impact Assumed to Occur if the Project Increases Ambient Noise Levels by:
<60 dB	+ 5 dB or more
60–65 dB	+ 3 dB or more
>65 dB	+ 2 dB or more

Source: FICON 1992.

- **On-site project-attributed stationary noise** – A noise impact would be considered significant if noise from typical operation of HVAC and other electro-mechanical systems or other operational noise associated with the project resulted in an increase in ambient noise levels of more than 6 dBA within the City of Sierra Madre.
- **Construction vibration** – Guidance from Caltrans indicates that a vibration velocity level of 0.2 ips PPV received at a structure would be considered annoying by occupants within (Caltrans 2020). As for the receiving structure itself, aforementioned Caltrans guidance discussed in Section 4.13.2, Relevant Plans, Policies, and Ordinances, recommends that a vibration level of 0.2 ips PPV would represent the threshold for “architectural” building damage risk.

#### 4.13.4 Project Design Features

There are no project design features that apply to noise.

<sup>2</sup> As discussed in Section 4.13.1, the  $L_{dn}$  and CNEL noise metrics are very similar and often used interchangeably.

## 4.13.5 Impacts Analysis

1. *Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

### Construction

Construction noise and vibration are temporary phenomena. Construction noise and vibration levels vary from hour to hour and day to day, depending on the equipment in use, the operations performed, and the distance between the source and receptor.

Equipment that would be in use during construction would include, in part, graders, backhoes, dozers, loaders, cranes, forklifts, pavers, rollers, and air compressors. The typical maximum noise levels for various pieces of construction equipment at a distance of 50 feet are presented in Table 4.13-4. However, construction equipment usually operates in alternating cycles of full power and low power, producing time-averaged noise levels that are thus less than the maximum noise level emitted during instances of full-power operation. The average sound level of construction activity also depends on the amount of time that the equipment operates on site and the intensity of construction activities during that time.

**Table 4.13-4. Typical Construction Equipment Maximum Noise Levels**

Equipment Type	Typical Equipment ( $L_{max}$ , dBA at 50 Feet)
All other equipment >5 horsepower	85
Backhoe	78
Compressor (air)	78
Crane	81
Dozer	82
Excavator	81
Front-end loader	79
Generator	72
Grader	85
Man lift	75
Paver	77
Roller	80
Scraper	84
Welder/torch	73

**Source:** FHWA 2008.

$L_{max}$  = maximum sound level; dBA = A-weighted decibels.

Per Table 4.13-4, the maximum noise level for an individual piece of construction equipment anticipated for this development project would be approximately 85 dBA at 50 feet.

Project construction would take place both near and far from adjacent, existing noise-sensitive uses. For example, some construction activity phases near the southern and western project site boundaries would take place within approximately 25 feet of existing residential property boundaries, as well as within approximately 75 feet of the retreat center to the north. But during other construction phases, the same noise-sensitive receptors would be



further away from operating equipment and processes. For these reasons and for purposes of this assessment, construction noise is predicted for two different conditions as follows:

- Conservatively, construction noise is predicted at the noise-sensitive receptor boundary when the distance between it and one or more pieces of equipment or processes for each phase is expected to be shortest. Since construction equipment is usually mobile, and because equipment cannot be “stacked” at the same nearest position to a receptor at the same time, equipment distances vary but are located relatively near the project boundary.
- In a manner similar to the “general assessment” construction noise prediction method described by FTA guidance (FTA 2018), one can assume that—on average—all construction activities associated with a particular phase would be represented geographically by an acoustic centroid, which (because of the size of the project site) would be approximately 500 to 550 feet from the closest existing noise-sensitive land uses. This acoustic centroid represents the average position of mobile construction equipment and ongoing processes across the entire project site.

The FHWA Roadway Construction Noise Model (RCNM) (FHWA 2008) was used to estimate construction noise levels at the nearest noise-sensitive land use. Although the RCNM was funded and promulgated by the FHWA, it is often used for non-roadway projects, because the same types of construction equipment used for roadway projects are often used for other types of construction. Input variables for the predictive modeling consist of the equipment type and number of each (e.g., two graders, a loader, a tractor), the duty cycle for each piece of equipment (e.g., percentage of time within a specific time period, such as an hour, when the equipment is expected to operate at full power or capacity and thus make noise at a level comparable to what is presented in Table 4.13-4), and the distance from the noise-sensitive receiver. No topographical or structural shielding was assumed in the modeling. The RCNM has default duty-cycle values for the various pieces of equipment, which were derived from an extensive study of typical construction activity patterns. Those default duty-cycle values were used for this noise analysis.

Estimated noise levels from the listed major construction phases were predicted for the nearest noise-sensitive land use, as presented in Table 4.13-5. The details of these calculations with respect to the shortest phase-to-receptor and acoustic centroid to receptor distance inputs are provided in Appendix G.

As presented in Table 4.13-5, during typical periods of construction, when construction activities would be distributed around the project site, construction noise would not exceed the applicable significance threshold of 85 dBA  $L_{eq}$ . However, when the predictive analysis focuses on the estimated construction noise levels for the shortest expected equipment-to-receptor distances by phase, estimated noise levels are predicted to be higher. For example, Table 4.13-5 shows that such predicted noise levels are as high as 88 dBA  $L_{eq}$  at the nearest existing residential property lines (as close as 25 feet away) when remedial and mass excavation, finish grading and surface improvement (i.e., paving) activities take place near the residences along the western and southern project boundary, and as high as 81 dBA  $L_{eq}$  at the Mater Dolorosa Retreat Center to the north. For these instances when operation of construction equipment and processes are sufficiently proximate to cause activity noise levels to exceed 85 dBA  $L_{eq}$ , the project would exceed the City of Sierra Madre threshold for construction noise exposure.

Although nearby off-site residences in the community surrounding the project would be exposed to elevated construction noise levels, the increased noise levels would typically be relatively short term. It is anticipated that construction activities associated with the project would take place within the allowable hours of the City of Sierra Madre (7:00 a.m. to 9:00 p.m. Monday through Saturday or 10:00 a.m. and 6:00 p.m. on Sundays and federal

holidays). In the event that construction is required to extend beyond these times, extended hours permits would be required and would be obtained by the applicant.

If work were to occur outside of the allowable hours, annoyance or sleep disturbance could result from construction noise; also, due to the relatively limited distance to existing adjacent residences, construction noise annoyance could result even during daytime hours. Regardless, since typical construction noise during allowable daytime hours would exceed the City's 85 dBA  $L_{eq}$  threshold and would be higher than existing ambient daytime noise levels when construction takes place near the project's southern and western boundaries, temporary construction-related noise impacts would be considered **potentially significant (Impact NOI-1)**.

Table 4.13-5. Construction Noise Levels at Noise-Sensitive Uses

Off-Site Receptor Location	Noise-Sensitive Land Use	Distance from Construction Activity to Noise Receptor (feet)	Estimated Construction Noise Levels (dBA Leq 8-hr)									Exceed Significance Threshold (80 dBA Leq at 25 feet or 85 dBA Leq at Property Line)?
			Clear and Grub	Remedial & Mass Excavation	Balance Site (Grading)	Finish Grading	Building Construction	Wet Utilities	Dry Utilities	Surface Improvements	Architectural Coating	
West and south of the project	Single-family residences	Nearest Construction Activity/ Receiver Distance (25)	<b>87</b>	<b>88</b>	<b>81</b>	<b>88</b>	80	<b>85</b>	<b>83</b>	<b>88</b>	80	Yes
		Typical Construction Activity/ Receiver Distance (500)	64	70	55	70	70	70	63	66	54	No
East of the project	Bailey Canyon Park	Nearest Construction Activity/ Receiver Distance (120)	75	78	68	78	78	78	72	76	66	No
		Typical Construction Activity/ Receiver Distance (550)	63	70	54	70	70	70	62	65	53	No
North of the project	Mater Dolorosa Retreat Center	Nearest Construction Activity/ Receiver Distance (75)	79	81	72	81	81	81	75	79	73	No
		Typical Construction Activity/ Receiver Distance (500)	64	70	55	70	70	70	63	66	64	No

Source: Appendix G

Notes: dBA Leq: Average noise energy level. Leq 8-hr noise level is assumed to be the same as the 1-hour noise exposure level.

**Bolded** numbers indicate an exceedance of the applicable construction noise threshold.

## Operational

### Off-Site Traffic Noise

The project would result in the creation of additional vehicle trips on local arterial roadways (i.e., North Sunnyside Avenue, Sierra Madre Boulevard, North Michillinda Avenue), which could result in increased traffic noise levels at adjacent noise-sensitive land uses. In particular, the project would create additional traffic along North Sunnyside Avenue, Sierra Madre Boulevard, and North Michillinda Avenue. As discussed in Section 4.17, Transportation, of this Environmental Impact Report, the proposed project would add 396 total average daily trips to the local roadway network

The City’s General Plan Hazards Element establishes the following objective (Objective Hz14): “Maintaining the quiet residential character of the City, free from excessive noise from transportation or fixed source generators.” However, no numerical standard is provided; therefore, the FICON noise guidance (referenced in Section 4.13.3, Thresholds of Significance, and shown in Table 4.13-3) is used.

Potential noise effects from vehicular traffic were assessed using the Federal Highway Administration’s Traffic Noise Model Version 2.5 (FHWA 2004). Information used in the model included the roadway geometry, existing (year 2020), existing (year 2020) plus project, future year (2025) without project, and future year (2025) plus project traffic volumes and posted traffic speeds. Noise levels were modeled at representative noise-sensitive receivers ST1, ST2, ST5, and M1–M3, as shown in Figure 4.13-1. The receivers were modeled to be 5 feet above the local ground elevation. The noise model results are summarized in Table 4.13-6. Based on results of the model, implementation of the project would not result in readily perceptible increases in traffic noise.

**Table 4.13-6. Traffic Noise Levels for Local Roadways Under Existing, Existing plus Project, Future, and Future plus Project Scenarios (dBA CNEL)**

Receiver Location	Existing	Existing + Project	Future (Year 2025)	Future (Year 2025) + Project	Maximum Noise Level Increase (dB)
ST1 – On Site; Southwest Side	53	56	53	56	3
ST2 – Mater Dolorosa Retreat Center	51	54	51	54	3
ST5 – North Sunnyside Avenue	57	60	57	60	3
M1 – Michillinda Avenue North of Sierra Madre Blvd.	68	68	68	68	0
M2 – Michillinda Avenue South of Sierra Madre Blvd.	69	69	69	69	0
M3 – Sierra Madre Blvd. East of Michillinda Avenue	66	66	66	66	0

**Source:** Appendix G

Table 4.13-6 shows that at all six listed representative receivers, the addition of project traffic to the roadway network would result in a maximum noise level increase of 3 dB CNEL. This noise level increase is less than what would be considered to be a substantial increase using FICON thresholds as shown in Table 4.13-3. Furthermore, at receiver locations anticipated to experience an increase in noise levels, the existing with project and future with project noise levels would continue to be compatible with City of Sierra Madre, California Code of Regulations Title

24 and California Department of Health Services guidelines for noise/land use compatibility. Thus, project-related off-site traffic noise increases affecting existing residences in the vicinity would be **less than significant**.

### ***Interior Noise Impact***

While current CEQA noise-related guidelines do not require an assessment of exterior-to-interior noise intrusion or noise exposure to occupants of newly created residences or non-residential uses attributed to the development of the project, the State requires that interior noise levels not exceed a CNEL of 45 dB within residences. Typically, with the windows open, building shells provide approximately 15 dB (i.e., an average of 12–18 dB [OPR 2017]) of noise reduction; while with windows closed residential construction generally provides a minimum of 25 dB attenuation (FHWA 2011). Therefore, rooms exposed to an exterior CNEL not greater than 60 dB would result in an interior background CNEL of 45 dB or less, even with open windows. The state Building Code recognizes this relationship and, therefore, requires interior noise studies when the exterior noise level is projected to exceed 60 dBA  $L_{dn}$ .

The data shown in Table 4.13-5 indicates that the future with project on-site noise levels (as represented by Receiver ST1) would range up to approximately 56 dBA CNEL at the proposed residences fronting on North Sunnyside Avenue. The unmitigated interior noise levels within the habitable rooms of these dwelling units would therefore comply with the 45 dBA CNEL noise criterion; no subsequent interior noise analysis would be required for the proposed residences.

At the Mater Dolorosa Retreat Center, the future with project noise level near the Mater Dolorosa Retreat Center's southern boundary (as represented by Receiver ST2) is estimated to be approximately 54 dBA CNEL with the proposed project. The unmitigated interior noise levels within the habitable rooms of the Mater Dolorosa Retreat Center (which are located further from the roadway) would be lower. Therefore, the interior noise levels would comply with the 45 dBA CNEL noise criterion.

At the existing residences located along North Sunnyside Avenue, the future with project noise level (as represented by Receiver ST5) is estimated to be approximately 60 dBA CNEL with the proposed project. The unmitigated interior noise levels within the habitable rooms of these dwelling units would therefore comply with the 45 dBA CNEL noise criterion.

At the existing residences and other land uses along Michillinda Avenue and Sierra Madre Boulevard (represented by Receivers M1–M3), the exterior future with project noise levels are estimated to increase by 0 dB, when rounded to whole numbers. The traffic noise associated with the proposed project would not cause or exacerbate an exceedance of interior noise standards at residences or other land uses along arterial roadways in the project vicinity. Noise impacts associated with interior noise levels would be **less than significant**.

### ***Stationary On-Site Noise Sources***

The construction of new residences within the project site would result in the addition of noise-producing mechanical equipment in the form of heating, ventilation, and air conditioning (HVAC) units. Also, the project would include a public neighborhood park.

### **Residential HVAC Operation Noise**

For purposes of this analysis, each of the 42 detached single-family homes is anticipated to include an HVAC system, with the outdoor condenser component of the system assumed to be located at ground level adjacent to

the home's rear or side wall. Based on the project site, it is further assumed that the minimum distance from any one of the condenser units to the nearest off-site noise-sensitive receiver is 25 feet. Assuming that each condenser unit has a sound power level<sup>3</sup> of 72 dBA<sup>4</sup> (Carrier 2014), the sound pressure level at a distance of 25 feet would be approximately 47 dBA L<sub>eq</sub> (operated continuously). The measured ambient noise levels in and adjacent to the project site (ST1 through ST3) ranged from approximately 52 to 55 dBA L<sub>eq</sub>. When the 47 dBA L<sub>eq</sub> noise level is added to the existing ambient noise levels of 52 to 55 dBA L<sub>eq</sub>, the resultant combined noise level would be approximately 53 to 56 dBA L<sub>eq</sub> (i.e., an increase of approximately 1 dB). Two adjacent residences with their HVAC systems running would result in a combined increase above existing ambient noise levels of approximately 2 dB. Thus, the noise levels with the assumed relatively quiet HVAC equipment would not result in a 6 dB increase; however, there is a wide range of noise levels produced by various residential HVAC systems. For this reason, residential HVAC operation noise is considered **potentially significant impact (Impact NOI-2)**.

### **Neighborhood Park**

The proposed project would also include an approximately 3.04-acre dedicated neighborhood public park at the southernmost portion of the project site (see Figure 3-3, Proposed Park Conceptual Plan, in Chapter 3, Project Description, of this Environmental Impact Report). The proposed park would feature resilient play surfacing, a slope slide, a play structure and features, seat walls, benches, picnic areas, large turf areas, a small (seven-space) parking lot, decomposed granite trail, and a water quality treatment and detention basin.. With the exception of the play structure, the park usage would be passive in nature, and noise levels would be relatively low and in keeping with the surrounding community. No performance spaces, restrooms, courts, or ball fields would be provided, and there would be no sound amplification systems constructed within the park. In short, the park would not be designed or intended to host large groups of people and would be designed to only serve the neighboring community. All parks in the City are open from 6:00 a.m. to 10:00 p.m. (City of Sierra Madre 2020). Therefore, the proposed neighborhood public park would operate only between these hours. Additionally, the proposed project would not include any stationary mechanical equipment (such as pumps, motors, fans) associated with the proposed stormwater retention facilities that could generate noise levels with the potential to impact noise-sensitive receptors.

Per Section 9.32.050 of the Sierra Madre Municipal Code, sound-amplifying equipment and special events noise is prohibited from exceeding 60 dBA at a distance of 50 feet from the source without an exemption issued by the City Manager. Should such an exemption be issued by the City Manager, the precise nature of such an event or the noise level produced by sound-amplifying equipment is not known or foreseen at this time, and thus an assessment of impact would be speculative. Furthermore, noise from the proposed park would be subject to the Sierra Madre Municipal Code standards and enforcement. For these reasons, the proposed park would not result in a 6 dB increase above existing ambient noise levels, and potential impacts due to the operation of the proposed park would be **less than significant**.

In addition, as discussed above, the proposed neighborhood public park's hours of operations would be limited to 6:00 a.m. to 10:00 p.m.

<sup>3</sup> Unlike sound pressure, for which a distance dimension (i.e., feet or meters) is necessary for the level to have real meaning, sound power is the dimensionless energy rate, or sound energy per unit of time, emitted by a source.

<sup>4</sup> As for a 24VNA9 Infinity series air conditioner, manufactured by Carrier, or similar unit. Appendix G contains details for this product.

## 2. *Would the project result in generation of excessive groundborne vibration or groundborne noise levels?*

Generally, construction activities can expose persons to excessive groundborne vibration or groundborne noise, which can cause a potentially significant impact. Caltrans has collected groundborne vibration information related to construction activities (Caltrans 2020). Information from Caltrans indicates that continuous vibrations with a PPV of approximately 0.2 ips are considered “annoying.” For context, heavier pieces of construction equipment, such as a bulldozer that may be expected on the project site, have peak particle velocities of approximately 0.089 ips or less at a reference distance of 25 feet (FTA 2018). A vibratory roller, anticipated for the surface improvements phase of construction, exhibits 0.21 ips at 25 feet per the same FTA guidance.

Groundborne vibration attenuates rapidly—even over short distances. In addition, when groundborne vibration encounters a building foundation, a coupling loss occurs depending on its mass and design. For typical single-wood-frame houses, like those in the neighborhood near the project site, this coupling loss is usually approximately 5 vibration velocity decibels (VdB) according to FTA guidance (FTA 2018). Unlike peak particle velocity, vibration velocity decibels are an expression of the root mean square vibration velocity magnitude with respect to a reference value. The attenuation of groundborne vibration as it propagates from source to receptor through intervening soils and rock strata can be estimated with expressions found in FTA and Caltrans guidance. By way of example, and without consideration of potential foundation coupling loss, for a bulldozer operating on site and as close as the eastern project boundary (i.e., 25 feet from the nearest receiving sensitive land use) the estimated vibration velocity level would be approximately 0.089 ips and thus less than the annoyance threshold recommended by Caltrans. Foundation coupling loss would only reduce this vibration velocity amplitude.

Since the vibratory roller associated with paving activities is expected to be the greatest source of vibration, its anticipated PPV at a distance of 25 feet would just barely exceed the Caltrans annoyance standard of 0.2 ips; however, foundation coupling loss of 5 VdB at the receiving structure would reduce the apparent PPV to a level of less than 0.12 ips, and thus below this annoyance standard.

Construction vibration, at sufficiently high levels, can also present a building damage risk. However, anticipated construction vibration associated with this project would not yield levels that surpass this risk. Per Caltrans, the recommended PPV threshold for newer residential structures is 0.4 to 0.5 ips and 0.2 to 0.3 ips for older residential structures, both of which are less stringent than the aforementioned threshold to annoy occupants of such structures. Therefore, significant impacts due to generation of excessive groundborne vibration or groundborne noise levels, such as annoyance or risk to nearby structures, from construction activities would be **less than significant**.

## 3. *For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?*

The project is not located within the vicinity of a private airstrip nor is the project located within an airport land use plan. The closest public airport to the project site is the San Gabriel Valley Airport, located approximately 6.1 miles to the south. The project would therefore not expose people residing or working in the project area to excessive noise levels, and there would be **no impact**.

## 4.13.6 Mitigation Measures

The following mitigation measure shall be implemented to reduce potentially significant temporary noise impact during construction activities when construction takes place near the project boundaries (**Impact NOI-1**) to a level of less than significant.

**MM-NOI-1** The City of Sierra Madre (City) and/or its Construction Contractor shall implement the following noise reduction measures during all construction activities:

- A temporary noise barrier shall be constructed along the project site's southern, and western boundaries. The construction noise barrier shall be a minimum of 8 feet in height. The barrier may be constructed of 3/4-inch Medium Density Overlay (MDO) plywood sheeting, or other material of equivalent utility having a surface weight of 2 pounds per square foot or greater. Alternatively, prefabricated acoustic barriers are available from various vendors. When barrier units are joined together, the mating surfaces of the barrier sides should be flush or overlap with one another. Gaps between barrier units, and between the bottom edge of the barrier panels and the ground, should be closed with material that will completely fill the gaps, and be dense enough to attenuate noise.
- Construction noise reduction methods such as shutting off idling equipment; installing temporary acoustic barriers around stationary construction noise sources; and, where feasible, use of electric air compressors and similar power tools, rather than diesel equipment, shall be employed.
- Equip all construction equipment (fixed or mobile) with properly operating and maintained mufflers, consistent with or exceeding manufacturers' standards.
- Ensure that construction equipment engine enclosures and covers as provided by manufacturers shall be in place during operation.
- Place all stationary construction equipment so that the equipment is as far as feasible from noise-sensitive receptors and so that the emitted noise is directed away from the noise-sensitive receptors.
- Locate equipment and materials staging in areas that will create the greatest distance between staging area noise sources and noise-sensitive receptors during project construction.
- Ensure that construction equipment is shut down when not in use.
- Limit haul truck deliveries to the same hours specified for the operation of construction equipment.

The following mitigation measure shall be implemented to reduce potentially significant operational noise impacts from HVAC noise, depending on the noise emission level of the selected residential HVAC systems (**Impact NOI-2**), to a level of less than significant.

**MM-NOI-2** To ensure that the project's HVAC systems do not result in an exceedance of applicable noise standards (i.e., an increase of more than 6 dBA in the City of Sierra Madre, the HVAC system for each residence shall have a maximum noise level specification not to exceed 72 dBA sound power level (equivalent to a sound pressure level of 47 dBA at a measured distance of 25 feet [7.6 meters]) over a reflecting plane.



## 4.13.7 Level of Significance After Mitigation

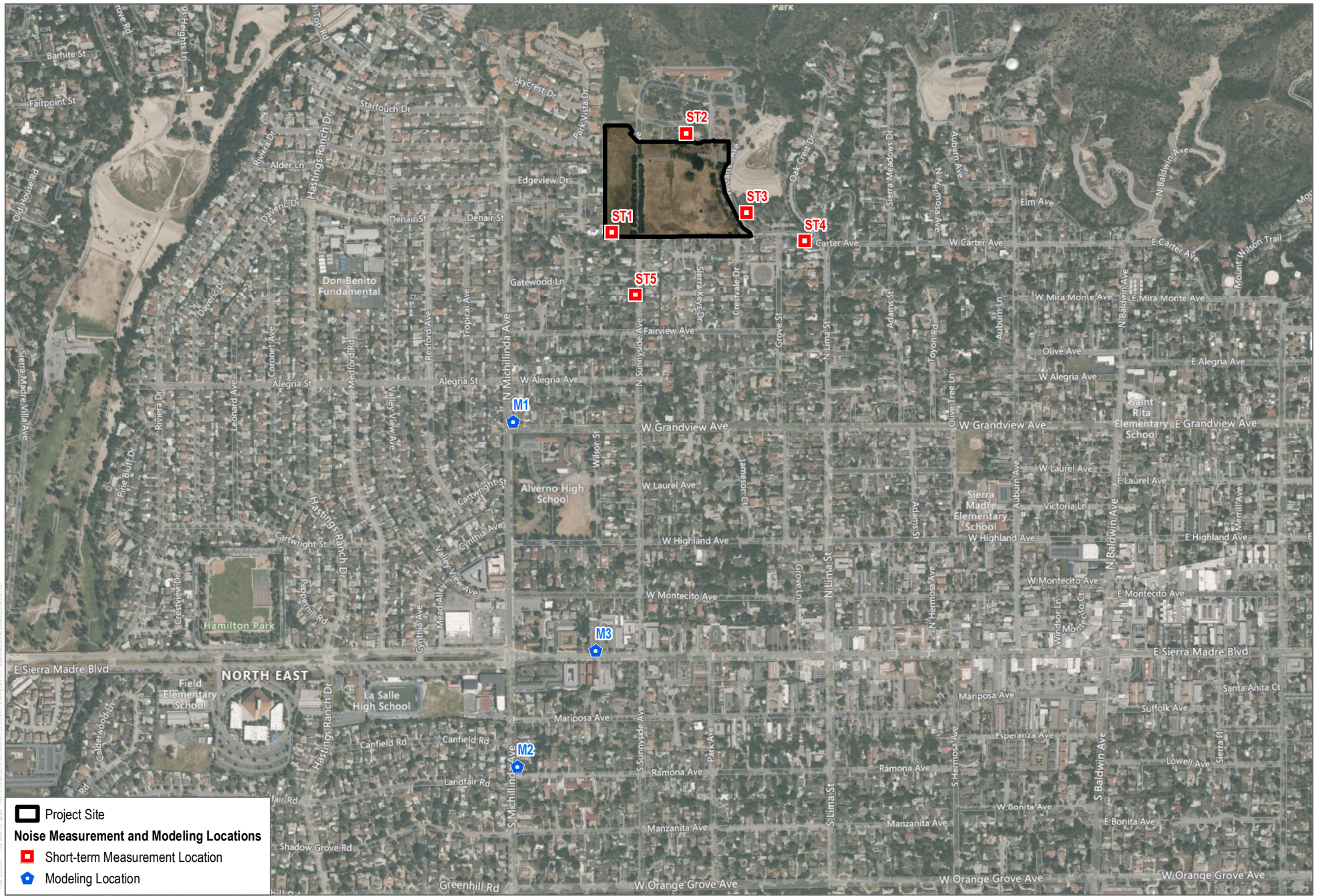
### Construction Noise

The project would result in excessive noise levels during construction activities, exceeding the applicable thresholds (80 dBA at 25 feet or 85 dBA  $L_{eq}$  at or beyond a noise-sensitive receiver's property boundary) (**Impact NOI-1**). However, through implementation of **MM-NOI-1** requiring the use of administrative controls, engineering controls, and noise barriers, construction noise levels would be within the City's noise limits. The temporary construction noise barrier alone would provide a noise reduction of approximately 9 dB or more along the southern and western boundaries, and at least 5 dB or more along the northern boundary. As shown in Table 4.13-4, along the southern and western boundaries the threshold was exceeded by 3 dB or less, and along the northern boundary the threshold would not be exceeded. Therefore, the temporary construction noise barriers would result in mitigated noise levels below the applicable construction noise thresholds. Implementation of the other measures would cumulatively provide further reductions. Because the proposed noise mitigation would ensure compliance with the applicable noise limits, construction noise impacts would be mitigated to **less than significant**.

### Operational Noise

Operation of HVAC systems at the proposed residences was found to have the potential to exceed City of Sierra Madre noise thresholds, depending upon the noise level specification of the HVAC systems selected and installed by the project constructor (**Impact NOI-2**). However, implementation of **MM-NOI-2** would ensure that the HVAC systems would be of sufficiently low sound levels as to be in compliance with the noise threshold of the Cities of Sierra Madre. Therefore, operational noise from the proposed projects' HVAC systems would be mitigated to **less than significant**.

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SOURCE: County of Los Angeles 2020; Bing Maps

**FIGURE 4.13-1**  
**Noise Measurement and Modeling Locations**  
 The Meadows at Bailey Canyon EIR

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## 4.14 Population and Housing

This section describes the existing population and housing conditions of The Meadows at Bailey Canyon Specific Plan Project (project or proposed project) site and vicinity, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures related to implementation of the proposed project.

### 4.14.1 Existing Conditions

This section describes the existing conditions on the project site, presents existing U.S. Census population data for the City of Sierra Madre (City) and also identifies population, housing, and employment projections for the City, the County of Los Angeles (County), and the Southern California Association of Governments (SCAG) region.

#### **Project Site**

The approximately 17.30-acre project site is currently undeveloped, aside from various access roads. Therefore, the project site does not currently support a residential population. Similarly, existing conditions on site do not consist of job-generating land uses to support an employment population.

#### **U.S. Census**

The U.S. Census is taken and published every 10 years and includes population and housing data for the entire United States. Census data is the baseline from which most demographic projections are calculated. The 2010 U.S. Census identified the population of the City was approximately 10,917 people. The Census estimates population change within the 10-year period as well. In July 2019, the estimated population for the City was 10,793, which represents a 1.1% decrease from the 2010 U.S. Census (U.S. Census Bureau 2020).

#### **Population, Housing, and Employment Projections**

SCAG is a federally designed Metropolitan Planning Organization for six counties in Southern California: Ventura, Orange, San Bernardino, Riverside, Imperial, and Los Angeles. SCAG develops long-range regional transportation plans, including a sustainable communities strategy and growth forecast components, regional transportation improvement programs, regional housing needs allocations, and a portion of the South Coast Air Quality Management District's plans.

SCAG's 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) develops a regional growth forecast, which reflects recent and past trends; key demographic and economic assumptions; and local, regional, and state policies. Additionally, SCAG prepared Demographics and Growth Forecast for all jurisdictions within the SCAG region comparing cities, counties, and the region on recent past and projected population, household, and employment changes. SCAG's 2020-2045 RTP/SCS was adopted on September 3, 2020 (SCAG 2021).

The City's population, household, and employment growth forecast between 2016 and 2045 is detailed in Table 4.14-1. In addition, Los Angeles County's and the SCAG region's population, household, and employment growth forecast between 2016 and 2045 are detailed in Table 4.14-2 and Table 4.14-3, respectively.

**Table 4.14-1. City of Sierra Madre Growth Forecast**

	2016	2045	Change 2016–2045	Change 2016–2045	No. of Years	Percentage of Change/Year
Population	11,000	11,300	300	2.7%	29	0.09%
Households	4,800	5,000	200	4.0%	29	0.14%
Employment	2,200	2,400	200	8.3%	29	0.29%

Source: SCAG 2020a

**Table 4.14-2. Los Angeles County Growth Forecast**

	2016	2045	Change 2016–2045	Change 2016–2045	No. of Years	Percentage of Change/Year
Population	10,110,000	11,674,000	1,564,000	13.4%	29	0.46%
Households	3,319,000	4,119,000	800,000	19.4%	29	0.67%
Employment	4,743,000	5,382,000	639,000	11.9%	29	0.41%

Source: SCAG 2020a

**Table 4.14-3. SCAG Region Growth Forecast**

	2016	2045	Change 2016–2045	Change 2016–2045	No. of Years	Percentage of Change/Year
Population	18,832,000	22,504,000	3,672,000	16.3%	29	0.56%
Households	6,012,000	7,633,000	1,621,000	21.2%	29	0.73%
Employment	8,389,000	10,049,000	1,660,000	16.5%	29	0.57%

Source: SCAG 2020a

**Population**

As shown in Tables 4.14-1 through 4.14-3, according to the growth forecast by SCAG, the City's population is anticipated to grow by 3% (approximately 0.1% per year) between 2016 and 2045. Comparatively, Los Angeles County is expected to experience a higher increase of approximately 13% (approximately 0.5% per year) between 2016 and 2045. Finally, Table 4.14-3 demonstrates the SCAG region as a whole is anticipated to grow by 16% (approximately 0.6% per year) between 2016 and 2045 (SCAG 2020a).

**Housing**

Tables 4.14-1 through 4.14-3, according to the growth forecast by SCAG, the number of households within the City is anticipated to grow by 4% (approximately 0.1% per year) between 2016 and 2045. Comparatively, Los Angeles County is expected to experience a higher increase of approximately 19% (approximately 0.7% per year) between 2016 and 2045. Finally, Table 4.14-3 demonstrates the SCAG region's housing supply as a whole is anticipated to grow by 21% (approximately 0.7% per year) between 2016 and 2045 (SCAG 2020a).

**Employment**

As shown in Tables 4.14-1 through 4.14-3, according to the growth forecast by SCAG, the City’s workforce is anticipated to grow by 8% (approximately 0.3% per year) between 2016 and 2045. Comparatively, Los Angeles County is expected to experience a higher increase of approximately 12% (approximately 0.4% per year) between 2016 and 2045. Finally, Table 4.14-3 demonstrates the SCAG region as a whole is anticipated to grow by 17% (approximately 0.6% per year) between 2016 and 2045 (SCAG 2020a).

**Jobs-to-Housing Ratio**

The “jobs-to-housing ratio” represents the extent to which job opportunities in a given geographic area are sufficient to meet the employment needs of area residents. An area with a jobs-to-housing ratio that is lower than the regional ratio would be considered a “jobs poor” area, indicating that many of the residents must commute to places of employment outside of the area. Table 4.14-4 shows the projected jobs-to-housing ratios for the City, Los Angeles County, the SCAG region, based on SCAG’s 2020–2045 RTP/SCS.

**Table 4.14-4. Projected Future Jobs-to-Housing Ratios**

	Employment in 2045	Number of Housing Units in 2045	2045 Jobs-to-Housing Ratio
City of Sierra Madre	2,400	5,000	0.48
Los Angeles County	5,382,000	4,119,000	1.31
SCAG Region	10,049,000	7,633,000	1.32

Source: SCAG 2020a

As shown on Table 4.14-4, the City’s 2045 jobs-to-housing ratio was lower than those of the County and the SCAG region. The projected jobs-to-housing ratios for the City, County, and SCAG region in 2045 are 0.48, 1.31, and 1.32, respectively (SCAG 2020a). By these estimates, the City is considered a jobs-poor area under the SCAG projections, meaning that there are less jobs than residential households, which require residents to commute outside the City for employment.

4.14.2 Relevant Plans, Policies, and Ordinances

**Federal**

There are no federal plans, policies, or ordinances related to population and housing relevant to the proposed project.

**State**

**Regional Housing Needs Assessment**

The Regional Housing Needs Assessment (RHNA) is mandated by the State Housing Law as part of a periodic process of updating local housing elements in city and county general plans. RHNA is produced by SCAG and contains a forecast of housing needs within each jurisdiction in the SCAG region for 8-year periods. The 5th Cycle RHNA Allocation Plan, covers the planning period between October 2013 through October 2021. The 6th Cycle RHNA has been approved on March 22, 2021. The 6th Cycle identified a need for 1,341,827 additional housing units within the SCAG region. Of the SCAG regional allocation, the total assigned to the City was 204 units, and the total assigned to the County is 90,052 units (SCAG 2021). Based on a methodology that weighs a number of factors (e.g., projected population growth, employment, commute patterns, and available sites), SCAG determines

quantifiable needs for dwelling units in the region according to various income categories. Once the RHNA allocation is established, local jurisdictions decide how to address their housing needs through the process of updating general plan housing elements. The City's latest housing element was produced in 2014 for the years 2014 through 2021. The proposed project would fall into the 6th Cycle of the RHNA and would therefore contribute to the City's efforts toward meeting its allocation.

### Regional

#### *Regional Transportation Plan/Sustainable Communities Strategy*

As mentioned previously, SCAG develops long-range regional transportation plans, including an RTP/SCS that sets broad goals for the region and provides strategies to reduce problems associated with congestion and mobility. In recognition of the close relationship between traffic and air quality issues, the assumptions, goals, and programs contained in the RTP parallel those used to prepare the Air Quality Management Plan (AQMP) for the South Coast Air Quality Management District. As part of its RTP/SCS document, SCAG develops population and housing forecasts for the SCAG region and for the jurisdictions that make up the SCAG region (SCAG 2020a). Population and housing forecasts for the City, the County, and the SCAG region are from SCAG's most recent 2020–2045 RTP/SCS, shown in Tables 4.14-1 through 4.14-3.

### Local

#### *General Plan*

The Housing Element of the City's General Plan is one of the required General Plan elements mandated by state law. State law requires that each jurisdiction's Housing Element adequately plans to meet the existing and projected housing needs; provide goals, policies, and quantified objectives to meet such needs; and schedule actions for the preservation, improvement, and development of housing. Please refer to Section 4.11.4 for a consistency with these policies.

The most recent Housing Element was adopted by the City on January 28, 2014, and projects housing production goals for through 2021 (City of Sierra Madre 2014). The following goals and policies from the Housing Element may be applicable to the proposed project. The proposed project's consistency with these policies is provided in Table 4.11-1 in Section 4.11, Land Use and Planning.

- Goal 1.0:** Maintain and enhance the quality of existing housing and ensure that new residential development is consistent with Sierra Madre's small town character.
- Policy 1.1:** Maintain sustainable neighborhoods with quality housing, infrastructure and open space that fosters neighborhood character and the health of residents.
- Goal 2.0:** Facilitate the provision of a range of housing types to meet community needs.
- Policy 2.1:** Encourage diversity in the type, size, price and tenure of residential development in Sierra Madre, while maintaining quality of life goals.
- Policy 2.2:** Provide adequate housing sites through appropriate zoning and land use designations, consistent with Sierra Madre's regional housing growth needs.



### 4.14.3 Thresholds of Significance

The significance criteria used to evaluate the project impacts to population and housing are based on Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to population and housing would occur if the project would:

1. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).
2. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

### 4.14.4 Project Design Features

There are no project design features that apply to population and housing.

### 4.14.5 Impacts Analysis

- 1. *Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?***

Adoption of The Meadows at Bailey Canyon Specific Plan (Specific Plan) would establish the zoning and development standards to guide future development on-site. Future development under the proposed project would include 42 detached single-family residential units and 3.39 acres of open space (including a 3.04-acre neighborhood public park) on an 17.30-acre project site. The proposed project would result in new land use design and regulatory standards for the project site through the approval of the Specific Plan, a General Plan amendment, and Zoning Code change. The project would introduce new residential units to the City, which would contribute to but not exceed the number of housing units projected for the City, as discussed in Section 4.14.1, Existing Conditions.

#### **Construction**

Construction activities at the project site that would result under adoption of the Specific Plan would lead to the temporary need for construction workers, which may come from the City, other areas of Los Angeles County, or elsewhere within the SCAG region. The proposed project involves fairly common construction requirements that would not require a highly specialized labor force to permanently relocate from other regions. Construction of the project is anticipated to begin in February 2024 and would end in May 2025, for construction activities spanning over approximately 16 months. The different construction activities require specific skill sets for a much shorter duration than the overall construction schedule. Because construction workers would not be needed continuously and only for varying portions of the project phases, it is reasonable to assume that workers/crews would work at the project site on a temporary basis only, and thus, are not likely to relocate their households as a consequence of the construction job opportunities presented by the project. Because the demand for construction workers would be short-term, and because the project site within an urban metropolitan region with a high diversity of skilled labor, a permanent need for new workers to relocate in order to accommodate the proposed project's temporary construction workforce is not anticipated. Therefore, potential project-related population growth during construction activities is considered **less than significant**.

### **Operation**

As discussed previously, adoption of the Specific Plan would result in development of 42 detached single-family residential units and a 3.04-acre park on a 17.30-acre lot. Therefore, implementation of the project would result in a new residential population onto the project site and immediate vicinity.

According to SCAG's Connect SoCal Program EIR, the average household size in the SCAG region was 3.2 persons per household in 2018 (SCAG 2019). Using the 2018 regional average as a guide, 3.2 persons per household for the project's proposed 42 residential units could generate a population increase of approximately 134 persons.

### **Population**

SCAG estimates that Los Angeles County would have a population of 11,647,000 residents by 2045 (see Table 4.14-2) and the City would have an estimated 11,300 residents by 2045 (see Table 4.14-1). The forecasted population growth for the City is estimated to increase by 300 people (see Table 4.14-1) and by 1,564,000 people for Los Angeles County between 2016 and 2045 (SCAG 2020a).

Upon development of the site, it is possible that existing City residents could move into the proposed residential units. However, for the purposes of a conservative population growth analysis, it is assumed that all 134 potential residents would move to the proposed units from a location outside the City. As described above, SCAG has projected that the City will undergo an increase of 300 people from 2016 to 2045. The population growth anticipated to occur as a result of the project (134 residents) represents 45% of the City's projected population growth for 2016 to 2045, and 0.008% of the County's projected population growth in the same time period. Therefore, the project is projected to be within the anticipated population growth for the City and would not exceed the population growth projections for the surrounding County.

Other indirect factors are also taken into consideration in regards to a project's ability to substantially increase population growth. For instance, the removal of impediments to growth (e.g., constructing utility infrastructure and service systems in a previously undeveloped region) can induce growth. The project site is located in a residential area on the northwestern edge of the city limits and adjacent to similar residential land uses in nearby Pasadena. The surrounding area is developed and supported by existing road and utility infrastructure. The project would include connections to existing utilities and infrastructure and would not result in the extension of infrastructure or roads into an undeveloped area leading to substantial population growth. Therefore, the project would not have the potential to induce growth via infrastructure development or expansion of roads or utility infrastructure.

### **Housing**

Housing projections for the City, as projected by SCAG and shown in Table 4.14-1, indicate the number of households in the City is anticipated to increase from 4,800 households in 2016 to 5,000 households in 2045, an increase of 200 households. Based on the SCAG's growth projections for housing for the City, the project's 42 dwelling units would represent 21% of the 200 households projected to be added to the City between 2016 and 2045.

However, the project would contribute to state-mandated RHNA housing goals and would be consistent with regional efforts to boost housing growth and meet regional housing needs. In its 6th RHNA Cycle, SCAG identifies the City's share of housing needs is 204 new units (SCAG 2012). In response to the RHNA allocation, cities must update the Housing Element of the General Plan to address how to meet the regional housing needs. Cities must prepare an annual progress report on the jurisdiction's status and progress in implementing its housing element, and thus, meeting its RHNA allocation. According to the 5th Cycle annual progress report permit summary maintained by the California Department

of Housing and Community Development, as of October 2020, the City has issued 68 permits for housing developments, which is above its 55-unit RHNA allocation (HCD 2020). As such, the City has met its RHNA allocation for the 5th Cycle RHNA Allocation Plan. However, as previously indicated, SCAG recently adopted its 6th Cycle RHNA allocation plan, which would be in effect from 2021 through 2029. As discussed in Chapter 3, Project Description, of this Draft Environmental Impact Report (EIR), the project's anticipated construction schedule is anticipated to conclude in May 2025. Therefore, the project would be accounted for in the City's 6th Cycle RHNA allocation.

### ***Employment***

As indicated by SCAG and shown in Table 4.14-1, the projected number of jobs in the City is anticipated to increase from 2,200 in 2016 to 2,400 in 2045, for an increase of 200 jobs. The project does not include employment-generating land uses. Thus, the project would not exceed the projected employment growth anticipated for the City and would not result in unplanned population growth as a result of increased employment opportunities.

### ***Jobs-to-Housing Ratio***

As discussed in Section 4.14.1, Existing Conditions, the City is considered a jobs-poor community and projected to continue to be jobs-poor in 2045, according to SCAG estimates shown in Table 4.14-4. Development under the adopted Specific Plan would add 42 residential units to the City and not include employment-generating land uses to the project site. Since the project would add more housing units than jobs to the project site, the project would contribute to the jobs-poor area compared to the regional jobs-to-housing ratio. However, as discussed above, the project would be consistent with SCAG's growth projections of population and housing as well as RHNA allocations. Lastly, one of the objectives of the project is to provide above-moderate income housing, in accordance with the City's 6th Cycle RHNA (see Section 3.2). Thus, the project would not result in a substantial unplanned population growth. The population growth anticipated to occur as a result of the project (134 residents) represents 45% of the City's projected population growth for 2016 to 2045, and 0.008% of the County's projected population growth in the same time period. Although under existing conditions, the City is a jobs-poor community, the City is within a jobs-rich Los Angeles County and adjacent to Pasadena as a designated "job center", which represents an area with local employment peaks (SCAG 2020c). As such, the project would not result in unplanned growth as a result of an increase in housing.

### ***Summary***

Once operational, the proposed 42-unit residential project would generate approximately 134 new residents to the City. The project would not exceed the projected growth for the City or the County between 2016 and 2045. The population growth anticipated to occur as a result of the project (134 residents) represents 45% of the City's projected population growth for 2016 to 2045, and 0.008% of the County's projected population growth in the same time period. In addition, the project's 42 residential units would contribute to the City's Housing Element objectives and policies and the State-mandated RHNA housing goals.

As further discussed in Chapter 6, Growth Inducement, of this EIR, the project site is in an urbanized area and is surrounded by residential land uses. Given the developed nature of the surrounding area the proposed internal roadway network, utility connections, and utility infrastructure would not induce population growth by removal of impediments to growth (e.g., constructing utility infrastructure and service systems in a previously undeveloped region). Further, the project's infrastructure plan would support the development of the project and would not accommodate the growth beyond what is proposed. Therefore, given the urbanized nature of the City, the project would not stimulate substantial unplanned population growth and impacts related to population growth would be **less than significant**.

**2. *Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?***

Under existing conditions, the project site consists of 17.30 acres of undeveloped land, aside from three access roads which cross the project site. None of the existing land uses includes housing, and thus, the project site does not currently support a residential population. Similarly, the project site does not consist of employment-generating land uses to support an existing employment population. Therefore, the project would not displace substantial numbers of existing people or housing and **no impact** would occur.

4.14.6 Mitigation Measures

The project would not result in significant impacts; therefore, no mitigation is required.

4.14.7 Level of Significance After Mitigation

All impacts were determined to be less than significant. No mitigation is required.

## 4.15 Public Services

This section describes the existing public services conditions of The Meadows Specific Plan Project (project or proposed project) site and vicinity, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures related to implementation of the proposed project.

### 4.15.1 Existing Conditions

#### **Project Site**

The project site is located in the northwestern portion of the City of Sierra Madre (City). The existing fire stations, police stations, parks, schools, and libraries present in the surrounding of the project site are discussed herein and shown in Figure 4.15-1, Facility Locations.

#### ***Fire Protection Services***

The City of Sierra Madre Fire Department (SMFD) provides fire protection services for the City, including the project site. SMFD is responsible for emergency medical calls, fire response, and inspection and plan check services. Fire protection services provided to the City include fire, emergency medical, search and rescue, hazardous materials prevention and response, and other emergency response resources. SMFD is a single station department located at 242 West Sierra Madre Boulevard, approximately 0.7 miles southeast of the project site.

According to the SMFD, the current staffing level at the City's station is at 10 sworn personnel. In response to a request for information, the SMFD noted a fully staffed station would be at 15 sworn personnel with a goal to increase staffing to 21 sworn personnel. The increase in personnel would allow for one additional firefighter on the engine as well as one Battalion Chief, which is currently contracted out by another agency. Current plans to expand equipment at the station are the purchase of a new rescue ambulance and a new fire engine, both of which would replace existing vehicles (City of Sierra Madre 2020a). According to the SMFD, the City includes the following apparatus at the station:

- Two Type I Fire Engines
- One Type I Rescue Ambulance
- One Type III Rescue Ambulance
- One Type Water Tender
- One Utility Vehicle
- One Command Vehicle

SMFD does not have any signed mutual aid agreements for fire protection. However, the City has automatic aid agreements with the Angeles National Forest and the County of Los Angeles (City of Sierra Madre 2021).

#### ***Police Protection Services***

The Sierra Madre Police Department (SMPD) provides police protection services to the City. The SMPD station is located at 242 West Sierra Madre Boulevard, approximately 0.7 miles southeast of the project site. The SMPD station performs various law enforcement, code enforcement, traffic enforcement, investigative functions, and

various administrative duties. SMPD also participates in a mutual-aid agreement with the local surrounding cities of Pasadena, Arcadia, and Monrovia (City of Sierra Madre 2015a, 2020b).

According to the SMPD, current staffing levels include 16 full-time police officers, 1 civilian supervisor, 4 dispatchers, and 2 part-time civilians (City of Sierra Madre 2020b). According to City’s General Plan Environmental Impact Report (EIR), the City does not utilize an officer-to-resident population ratio to assess acceptable performance standards (City of Sierra Madre 2015a).

Response times, according to call load statistical data from the General Plan EIR, average at approximately 3 minutes and 31 seconds for Priority One Calls with the highest priority needs, 4 minutes and 13 seconds for Priority Two Calls with miscellaneous calls for service, and 4 minutes and 48 seconds for Priority Three Calls typically used for reporting (City of Sierra Madre 2015a).

**Schools**

The project site is served by the Pasadena Unified School District (PUSD). Schools within the project area include Sierra Madre Elementary School, Sierra Madre Middle School, and Pasadena High School. Sierra Madre Elementary School serves grades K–5, is located at 141 West Highland Avenue in Sierra Madre, and is located approximately 0.48 miles southeast of the project site. Sierra Madre Middle School serves grades 6–8, is located at 160 North Canon in Sierra Madre, and is located approximately 1.08 miles southeast of the project site. Pasadena High School is located at 2925 East Sierra Madre Boulevard in Pasadena and is located approximately 1.47 miles southwest of the project site (City of Sierra Madre 2015a). Table 4.15-1 details the enrollment and capacity of each campus.

**Table 4.15-1. Enrollment and Capacity for 2012–2013**

School	Current Enrollment	Current Capacity	Remaining Capacity
Sierra Madre Elementary School	744	800	56
Sierra Madre Middle School	410	410 (650 <sup>a</sup> )	0 (240 <sup>a</sup> )
Pasadena High School	1,897	2,800	903
<b>Total</b>	<b>3,051</b>	<b>4,010 (4,250<sup>a</sup>)</b>	<b>959 (1,199<sup>a</sup>)</b>

Source: City of Sierra Madre 2015a.

<sup>a</sup> Sierra Madre Middle School was under construction at the time of the City’s General Plan EIR was prepared (City of Sierra Madre 2015a). The campus is currently operational at the time of this EIR (PUSD 2020).

PUSD assumes a student generation rate of 0.13, 0.07, and 0.09 for grades K-5, 6-8, and 9-12, respectively, to estimate the number of students generated by new development projects in order to determine adequate need for facilities (City of Sierra Madre 2015a). Furthermore, in November 2008, voters passed a \$350 million bond initiative (Measure TT) for PUSD to repair and upgrade existing campuses. In addition, it is anticipated that funding from the bond would support expansion of Sierra Madre School to support Elementary and Middle School campuses as well as renovations to Pasadena High School (City of Sierra Madre 2015a).

**Parks**

The City maintains six parks within the municipal boundaries. Bailey Canyon Wilderness Park, located at 451 Carter Avenue, is approximately 15 acres and is the closest park to the project site. Bailey Canyon Wilderness

Park offers picnic areas, drinking fountain, hiking trails, trail marker signage, native botanical area, fire ring, interpretive display, handicap accessibility, outdoor restrooms, and a kiosk (City of Sierra Madre 2015b).

Section 16.44.030 (General Standard) of the City's Municipal Code identifies a standard of 3 acres of park and recreation facilities per 1,000 residents (City of Sierra Madre 2020b). According to the City's General Plan EIR, the City maintains 23 acres of parkland. As a result, the existing park to population ratio in the City, based on the City's population of 11,030, is 2.09 acres of parkland per 1,000 residents (City of Sierra Madre 2015b). Thus, the park to population ratio is under the City's minimum standard under existing conditions. The City's General Plan EIR states a need for approximately 10 acres of parkland to reach the desired parkland per resident ratio in the City (City of Sierra Madre 2015b).

### **Libraries**

The Sierra Madre Public Library is located at 440 West Sierra Madre Boulevard, approximately 0.65 miles south of the project site. Library services provide a collection of books, reference materials, and media resources in addition to online databases, social programs, workshops, and study spaces (City of Sierra Madre 2015a).

There are no prescriptive standards set for public libraries. According to the City's General Plan EIR, outcome-based assessment processes are used to serve different communities with varying needs. In order to allow for a potential expansion of the existing library building in the future, the property at 449 Mariposas Avenue was rezoned in 2013 to permit library facilities, and the Children's Room of the Sierra Madre Public Library was completed in 2012 to improve the use of the existing space. Furthermore, the Sierra Madre's Public Library's Board of Trustees follow the City's strategic planning process to assess the needs of the library for new services and facilities (City of Sierra Madre 2015a).

Sierra Madre Public Library includes four full-time staff and ten part-time employees, weekly from Monday through Saturday (City of Sierra Madre 2015c). Funding for the City's library facilities are provided by the City's General Fund and grants which vary year to year as well as through the collection of Public Facilities Fees, in accordance with Chapter 15.52 (Public Facilities Fee) of the Sierra Madre Municipal Code.

## 4.15.2 Relevant Plans, Policies, and Ordinances

### **Federal**

There are no federal plans, policies, and ordinances related to public services relevant to the proposed project.

### **State**

#### **California Fire Code**

The California Fire Code is Chapter 9 of Title 24 of the California Code of Regulations. The California Fire Code provides regulations for safeguarding life and property from fire and explosion hazards derived from the storage, handling, and use of hazardous substances, materials, and devices. The provisions of this code apply to construction, alteration, movement, enlargement, replacement, repair, equipment, use and occupancy, location, maintenance, removal, and demolition of every building or structure or any appurtenance connected or attached to such building structures throughout the state.

**California Health and Safety Code**

State fire regulations are set forth in Section 13000 et seq. of the California Health and Safety Code, including regulations for building standards (also set forth in the California Building Code), fire protection and notification systems, fire protection devices such as extinguishers and smoke alarms, high-rise building and childcare facility standards, and fire suppression training.

**Mutual Aid Agreements**

The California Disaster and Civil Defense Master Mutual Aid Agreement, as provided by the California Emergency Services Act, provides statewide mutual aid between and among local jurisdictions and the state. The statewide mutual aid system exists to ensure that adequate resources, facilities, and other supports are provided to jurisdictions whenever resources prove to be inadequate for a given situation. Each jurisdiction controls its own personnel and facilities but can give and receive help whenever needed.

**California Education Code**

PUSD's facilities and services are subject to the rules and regulations of the California Education Code and governance of the State Board of Education. Traditionally, the state has passed legislation for the funding of local and public schools, and provided the majority of monies to fund education in the state. To assist in providing facilities to serve students generated from new development projects, the state passed Assembly Bill 2926 in 1986, allowing school districts to collect impact fees from developers of new residential, commercial, and industrial developments. Section 65996 of the California Government Code designates Section 17620 of the Education Code (the mitigation fees authorized by Senate Bill 50) and Section 65970 of the California Government Code to be the exclusive method for considering and mitigating development impacts on school facilities. Section 65996 legislates that development impact fees collected under Section 17620 of the Education Code (the mitigation fees authorized by Senate Bill 50) and Section 65970 of the California Government Code be deemed, "to provide full and complete school facilities mitigation." Under California Government Code Section 65996, a state or local agency may not deny or refuse to approve the development of real property on the basis that school facilities are inadequate.

Under Senate Bill 50, there are three levels of developer fees that may be imposed upon new development by the governing school district. PUSD, which serves the City, collects Level I Fees, which are currently \$2.24 per residential square foot (City of Sierra Madre 2015a). Per Section 6.32.070 of the Sierra Madre Municipal Code (SMMC), fees collected by PUSD may vary, as deemed necessary by the City (see discussion of the SMMC, below).

**Quimby Act**

California Government Code Section 66477, Subdivision Map Act, referred to as the Quimby Act, permits local jurisdictions to require developers to dedicate land and/or pay in-lieu fees toward the conservation of parkland. The Quimby Act was legislated to encourage the pre-emptive mitigation of developments' impact to parks and open space with the overarching goal of achieving a jurisdictional standard of 3.5 acres of parkland per 1,000 residents. The land dedication and/or fees differ by project and are based upon the residential density, parkland cost, and other factors. Land dedication and fees collected pursuant to the Quimby Act may be used for acquisition, improvement, and expansion of park, playground, and recreational facilities or the development of public school grounds.



Local

***City of Sierra Madre General Plan***

Chapter Three, Hazard Prevention, of the City’s General Plan discusses the existing conditions, facilities, and operations for City’s fire protection services and the Sierra Madre Fire Department. In addition, this section within the General Plan identifies objectives and policies related to service levels, quality of fire protection for existing and future development, policies toward mutual aid, and disaster preparedness priorities to name a few (City of Sierra Madre 2015d).

Chapter Four, Community Services, of the City’s General Plan outlines goals and policies for the City’s law enforcement, recreation services, and library services. Similar to fire protection services, the City’s General Plan outlines goals and policies related to existing law enforcement services with the SMPD. For example, the General Plan identifies objectives related to sufficiency in resources and disaster preparedness. In addition, the General Plan describes the existing conditions of parks, recreational facilities, service goals and objectives managed by City’s Community Services Department. Objectives are also identified for library services to provide the City with facilities for community events and education (City of Sierra Madre 2015d).

General Plan objectives and policies relevant to the proposed project with regard to public services are below (City of Sierra Madre 2015d). The proposed project’s consistency with these policies is provided in Table 4.11-1 in Section 4.11, Land Use and Planning.

**Chapter Three: Hazard Prevention**

**Policy Hz1.3:** Continue to coordinate the provision of fire services with all public safety service providers and monitor their adequacy and responsiveness to community needs.

**Objective Hz2:** Providing adequate fire protection necessary for existing and future development.

**Policy Hz2.2:** Continue to require all new development to install automatic fire sprinkler systems.

**Policy Hz2.3:** Continue to require review of building plans by a Fire Captain/Fire Marshal.

**Policy Hz2.5:** Assess the impacts of incremental increase in development density and related traffic congestion on fire hazards and emergency response times, and ensure through the development review process that new development will not result in a reduction of fire protection services below acceptable levels.

**Chapter Four: Community Services**

**Policy C1.1:** Provide professional police response and protection to the community by partnering with residents, business persons and visitors to the City.

**Policy C1.2:** Assess the impact of increases in population on response time, calls for service and traffic through the development review process so law enforcement assets will not be degraded.

**Policy C3.1:** Evaluate on a continual basis the delivery of police services to monitor their adequacy and responsiveness to community needs.

**Policy C4.3:** Maximize passive prevention measures for new and existing development through the development review process.

***City of Sierra Madre Municipal Code***

**Fire Protection Services**

Title 15 (Building and Construction), Chapter 15.24 (Fire Code)

Chapter 15.24 of the SMMC adopts the most current California Fire Code, which includes precautionary regulations and standards such as fire-retardant roofs, automatic life safety support sprinkler system, and fire extinguishers.

Title 15 (Building and Construction), Chapter 15.52 (Public Facilities Fee)

Chapter 15.52 of the SMMC imposes a fee as a condition of issuance of any project permit to mitigate potential impacts of new development on public facilities, including fire protection services.

**Police Protection Services**

Title 2 (Administration and Personnel) Chapter 2.60 (Reserve Police Force)

Chapter 2.60 of the SMMC organizes a reserve police force of a maximum of 25 volunteer members appointed by the Chief of Police to assist SMPD with enforcement of the law and maintenance of peace and order.

Title 15 (Building and Construction) Chapter 15.52 (Public Facilities Fee)

Chapter 15.52 of the SMMC imposes a fee as a condition of issuance of any project permit to mitigate potential impacts of new development on public facilities, including police protection services.

**School Services**

Title 16 (Subdivisions) Chapter 16.32 (Dedications, Improvements, and Requirements) Section 16.32.070 (School Sites)

Chapter 16.32 Section 16.32.070 of the SMMC requires any developer who develops or completes the development of a subdivision in the City to dedicate land, pay fees in lieu of, or an appropriate pro rata share to the school district as necessary for the purpose of constructing or expanding new school facilities to assure residents of the subdivision have adequate public school services.

**Parks**

Title 16 (Subdivision), Chapter 16.44 (Regulations for Dedication of Land for Park and Recreation Land)

The SMMC requires parkland dedication or in-lieu park fees for all new developments to ensure the City provides its residents with adequate parks and recreational activities. The dedication of parkland is based on a formula that takes into account the type of dwelling unit (e.g., single-family, duplex, cluster, apartments) and average density being proposed, as outlined in Section 16.44.040 (Formula for Dedication of Land). If no park or recreation facility is designated within the proposed subdivision to serve the immediate and future needs of the residents of the subdivision, the developer is required to, in lieu of dedicating land, pay a fee equal to the

value of that land using a formula outlined in Section 16.44.050 (Formula for Fees In Lieu of Land Dedication). The revenue generated from this fee is required to be used only for the purpose of acquiring necessary parkland and developing new or rehabilitating existing parks or recreational facilities reasonably related to serving the subdivision development. Section 16.44.030 (General Standard) sets a general City-wide standard of three acres of parkland per 1,000 residents to ensure an adequate amount of neighborhood and community parks exist within the city to serve its residents. The standard is in accordance with the parkland requirements of the Quimby Act.

### **Other Public Services**

#### **Title 15 (Building and Construction) Chapter 15.52 (Public Facilities Fee)**

Chapter 15.52 of the SMMC imposes a fee as a condition of issuance of any project permit to mitigate potential impacts of new developments on public facilities. The public facilities covered by this fee include general government, library, public safety, library, parks, traffic, water, and sewer (City of Sierra Madre 2020b).

### 4.15.3 Thresholds of Significance

The significance criteria used to evaluate the project impacts to public services are based on Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to public services would occur if the project would:

1. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:
  - a. Fire protection.
  - b. Police protection.
  - c. Schools.
  - d. Parks.
  - e. Other public facilities.

### 4.15.4 Project Design Features

There are no project design features that apply to public services.

## 4.15.5 Impacts Analysis

1. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:*

- a. *Fire protection?*

### Construction

The proposed project would establish The Meadows Specific Plan (Specific Plan), which would establish the zoning and development standards to guide future development of the project site. Construction activities associated with the proposed project may temporarily increase demand for fire protection and emergency medical services. Construction activities may involve the operation of construction equipment and machinery, storage, handling, and disposal of combustible materials, and the use of flammable or toxic materials.

To comply with California Department of Industrial Relations, Division of Occupational Safety and Health (Cal-OSHA) and Fire and Building Code requirements, construction managers and personnel would be trained in fire prevention and emergency response, and fire suppression equipment specific to construction would be maintained on site. Project construction would comply with all applicable codes and ordinances related to the maintenance of mechanical equipment, handling and storage of flammable materials, and cleanup of spills of flammable materials. City and state regulations and code requirements would, in part, require personnel to be trained in fire prevention and emergency response, maintenance for fire suppression equipment, and implementation of proper procedures for storage and handling of flammable materials. Thus, compliance with regulatory requirements would reduce the potential for construction activities to expose people to the risk of fire explosion related to hazardous materials.

Project construction could also affect the provision of SMFD services in the project vicinity as a result of construction impacts to surrounding roadways. However, as described in Section 4.17, Transportation, of this EIR, all construction activities including staging would occur in accordance with City requirements (such as SMMC Chapter 17.30, which requires that streets be maintained free and clear during construction), which would ensure that adequate emergency access to the project site during construction of the project. Emergency procedures or design features required by City, State, or federal regulations would be implemented as appropriate during construction. Furthermore, Section 21806 of the California Vehicle Code allows drivers of emergency vehicles to have a variety of options for avoiding traffic, such as using sirens to clear a path of travel and driving in the lanes of opposing traffic. Based on these considerations, construction of the proposed project would not be considered a high-risk activity, and the SMFD is equipped and prepared to deal with construction-related traffic and fires, should they occur. Due to compliance with applicable codes and fire safety standards, project construction is not expected to adversely impact firefighting and emergency services to the extent that there would be a need for the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility in order to maintain acceptable fire protection services, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection. Therefore, potential construction impacts would be **less than significant**.

## Operation

SMFD currently serves the project site and the surrounding area. Each additional development that provides net new square footage creates a greater demand on existing resources. The increased use of the project site resulting from future development of the project site would be expected to increase the frequency of emergency response calls relative to existing conditions. However, for the reasons enumerated below, the proposed increase in development intensity at the project site would not be expected to result in the need for new or expanded fire protection facilities.

The need for new or expanded public services (such as fire protection facilities) is typically associated with a population increase. As described in Section 4.14, Population and Housing, of this EIR, new residential units would result in an increase of approximately 134 new residents on the project site. However, due to the minor nature of the population growth that could result from development allowed under the proposed project and because this growth falls well within the projected population growth for the City, the population growth that could be caused by the proposed project is not considered substantial and has been accounted for in local and regional population projections. Furthermore, the proposed project would be designed and constructed in accordance with all applicable provisions of the fire code, which includes requirements for adequate fire flows, width of emergency access routes, turning radii, automatic sprinkler systems, fire alarms, and floor to sky height limits along emergency access routes. In addition, a Fire Protection Plan (FPP) was prepared for the project in November 2020 (included as Appendix F2 of this EIR). The FPP evaluates and identifies the potential fire risk associated with the project's land uses and identifies requirements for water supply, fuel modification and defensible space, emergency access, building ignition and fire resistance, fire protection systems, and wildfire emergency pre-planning, among other pertinent fire protection criteria. The purpose of the FPP is to generate and memorialize the fire safety requirements of the City along with project-specific measures based on the site, its intended use, and its fire environment. Compliance with the fire code standards (including those listed in Section 4.15.2, Relevant Plans, Policies, and Ordinances) would be ensured through the plan check process and SMFD review prior to the issuance of building permits for the project. More specifically, the proposed project would be designed to include fire protection features, which would help prevent fire hazards. For example, the buildings placement on the site would limit the possibility of building-to-building fire spread to the extent practicable and structural framing elements and some non-structural elements would have specific fire resistance ratings as required by the California Building Code and Title 15 (Building and Construction), Chapter 15.24 (Fire Code) and the project would be designed with fire protection systems such as fire hydrants and automatic fire sprinkler systems, per these codes. These fire safety features and compliance with fire code standards would reduce the potential demand for fire services by decreasing the likelihood and/or severity of a fire emergency at the site.

The project site is currently served by one existing fire station, which is approximately 0.7 miles southeast of the project site. The SMFD station maintains a response time of 5.5 minutes. No expansion of these facilities is currently contemplated (City of Sierra Madre 2020a). As discussed in Section 4.15.1, the current staffing level at the City's station is at 10 sworn personnel. In response to a request for information, the SMFD noted a fully staffed station would be at 15 sworn personnel with a goal to increase staffing to 21 sworn personnel. The increase in personnel would allow for one additional firefighter on the engine as well as one Battalion Chief, which is currently contracted out by another agency. Therefore, in a request for information, the SMFD indicated that existing facilities are sufficient to accommodate the proposed (City of Sierra Madre 2020a). In the event that the City's fire station cannot meet the immediate needs of a call for services independently or does not have capability to address the full extent of a larger incident, existing mutual aid agreements would enable non-lead fire agencies to respond to fire emergencies outside their district boundaries. Payment of development fees by the project applicant, as required by Chapter 15.52 of the SMMC, would be used to offset the costs of increased

personnel or equipment that could be required in order to maintain acceptable service ratios, response times, and other performance objectives.

SMFD has reviewed the project and has determined that it would not have a significant effect on service demands (City of Sierra Madre 2020a). Therefore, through payment of appropriate development fees by the project applicant, the proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities. Impacts would therefore be **less than significant**.

### *b. Police protection?*

#### **Construction**

There is the potential for project construction associated with adoption of the Specific Plan to create an increase in demand for police protection services, as construction sites can be sources of attractive nuisances, can provide hazards, and can invite theft and vandalism when not properly secured. This could result in an increase in the demand for police protection services. Consequently, developers and construction contractors typically take precautions to prevent trespassing through construction sites. During construction, temporary security features including fencing would be implemented in compliance with the SMMC. These features would reduce the need for police protection services during the project's construction phase.

Project construction could also potentially impact the provision of police protection services in the project vicinity as a result of construction impacts to surrounding roadways. However, as described in Section 4.17, Transportation, of this EIR, all construction activities including staging would occur in accordance with City requirements (such as SMMC Chapter 17.30, which requires that streets be maintained free and clear during construction), which would ensure that adequate emergency access to the project site during construction of the project. Emergency procedures or design features required by City, State, or federal regulations would be implemented as appropriate during construction. Furthermore, Section 21806 of the California Vehicle Code allows drivers of emergency vehicles to have a variety of options for avoiding traffic, such as using sirens to clear a path of travel and driving in the lanes of opposing traffic. Based on these considerations, construction of the proposed project would not substantially affect police protection services and would not result in substantial adverse physical impacts associated with the provision of, or the need for, new or physically altered government facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable police protection services. Therefore, potential construction impacts would be **less than significant**.

#### **Operation**

As with fire protection services, the increased use of the project site attributable to the proposed project would be expected to increase the frequency of emergency and non-emergency calls to the SMPD. The project site is currently undeveloped. Future development of the proposed project site associated with adoption of the Specific Plan is expected to increase demands relative to existing conditions. However, the proposed project would incorporate operational practices and design elements to increase safety and to reduce the potential for crime to occur, which could lessen the demand for police protection services at the project site. The project would be designed to minimize secluded areas and potential hiding places. Signage and lighting would be used to facilitate wayfinding and safe pedestrian movement throughout the site and within the proposed buildings. These design practices and operational practices would lessen the demand for police protection services at the project site by reducing the potential for crime to occur.

The SMPD employs a total of 16 full-time police officers, 1 civilian supervisor, 4 dispatchers, and 2 part-time civilians (City of Sierra Madre 2020c). According to the General Plan EIR, the City does not utilize an officer-to-resident population ratio to measure adequacy of service. However, in response to a public services information request, the SMPD stated the proposed development would affect response times and service ratios under existing staff and facility conditions. Under existing conditions, the average response time to the project site would be approximately 2 minutes and there are no existing plans to increase facilities or equipment (City of Sierra Madre 2020c). Payment of development fees by the project applicant, as required by Chapter 15.52 of the SMMC, would be used to offset the costs of increased personnel or equipment that could be required in order to maintain acceptable service ratios, response times, and other performance objectives. In addition, as discussed in Section 4.15.1, the SMPD participates in mutual-aid agreements with the local surrounding agencies of Pasadena, Arcadia, and Monrovia (City of Sierra Madre 2015a; 2020b). Finally, the proposed project is expected to increase the City’s population by approximately 134 people. This represents a negligible effect on the existing officer-to-population ratio and indicates that the proposed project would have minimal effects on the service levels provided by the SMPD.

While new development places increased demand on police protection services, it is not anticipated that the proposed project would result in the need for construction or expansion of police facilities. In the event that additional personnel or assets are added to the City, these additional resources would improve public safety but would not likely require the construction or expansion of physical facilities with the potential to result in environmental effects. Furthermore, police units are continuously mobile, and service calls are responded to by the nearest available mobile unit. As such, the location of the proposed project relative to the City’s police station would not affect police protection. For these reasons, while the proposed project could contribute to existing demands for police protection services, it would not require new or physically altered police protection facilities, the construction of which would cause environmental impacts. Therefore, the proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities. Impacts would therefore be **less than significant**.

### c. Schools?

The need for new school facilities is typically associated with a population increase that generates an increase in enrollment large enough to cause new schools to be constructed. Table 4.15-2 provides the number of students generated by the proposed project.

**Table 4.15-2. Students Generated by Proposed Project Households**

Grade Level	Student Generation Rate	Number of Households	Number of Students
K-5	0.13	42	5
6-8	0.07	42	1
9-12	0.09	42	4
<b>Total</b>			<b>10</b>

**Source:** City of Sierra Madre 2015a.

As shown in Table 4.15-1, the schools serving the project site are projected to have a surplus capacity of approximately 1,199 seats in the future (56 seats for grades K-5, 240 seats for grades 6-8, and 903 seats for grades 9-12). The anticipated increase in 10 students would result in an increase in enrollment. However, this increase in enrollment is expected to be well accommodated through the schools’ anticipated availability in capacity, especially considering that students would likely be spread across elementary, middle, and high school.

Additionally, per California Government Code Section 65995, developer fees paid to LAUSD would address any effects to schools. As such, impacts would be **less than significant**.

**d. Parks?**

The City maintains six parks across 23 acres (City of Sierra Madre 2015b). The City's General Plan identifies a standard of three acres of parkland per 1,000 residents (City of Sierra Madre 2020b). Based on the City's population of 11,030, the park to population ratio is 2.09 acres of parkland per 1,000 residents. Therefore, the City currently has a parkland deficiency regardless of the Project. The City's General Plan EIR states a need for approximately 10 acres of parkland to reach the desired parkland per resident ratio in the City (City of Sierra Madre 2015b).

Increased demand for neighborhood and regional parks or recreational facilities is most commonly associated with a substantial population increase such that existing parks and recreational amenities would be over-utilized and deteriorate as a result. As discussed in Section 4.14, Population and Housing, of this EIR, future development under the Specific Plan is anticipated to add approximately 134 new residents to the City. At least a portion of these new residents are anticipated to frequent the various public parks located in proximity to the project site, including Bailey Canyon Wilderness Park, located approximately 300 feet to the east of the site

In addition to the nearby parks, project residents would have access to a proposed on-site park that would be provided as part of the project. The proposed park would be 3.04 acres in size and located at the southernmost portion of the project site (see Figure 3-3, Proposed Park Conceptual Plan, in Chapter 3, Project Description, of this EIR). The proposed park would feature landscaped mounds, one pond, pedestrian paths, shared open turf/play areas, adventure/natural play equipment, native garden beds, picnic areas, benches, overlook areas, a restroom building, a water fountain, landscaping, water quality facilities, and a small parking lot. The park's location along the southern boundary of the site provides enhanced connectivity to the Bailey Canyon Wilderness Park to the east. The location also provides the closest access to existing residential uses. Thus, the project would provide opportunities for passive and limited active recreation on site. These on-site amenities would provide an alternative to off-site public parks and recreational facilities, allowing the project's residents to recreate on the project site while incrementally reducing potential impacts to off-site public parks.

Although the City is currently experiencing a deficit in the desired parkland ratio, the project would be subject to the State's Quimby Act, and the SMMC. More specifically, the Quimby Act allows the City to require development projects to set aside land, donate conservation easements, or pay in-lieu fees for park improvements. SMMC Title 16 (Subdivision), Chapter 16.44 (Regulations for Dedication of Land for Park and Recreation Land) requires parkland dedication or in-lieu park fees for all new developments. The dedication of parkland is based on a formula that takes into account the type of dwelling unit and average density being proposed, as outlined in SMMC Section 16.44.040 (Formula for Dedication of Land). Using Alternative 2 (Formula Based on Dwelling Units) to calculate the number of acres of parkland dedication required under the proposed project would compare the proposed 42 detached single-family units to the standard acres per dwelling unit of 3 acres per 250 dwelling units (City of Sierra Madre 2020c). Thus, the proposed project would be required to provide 0.5 acres of parkland on-site. As mentioned above, the project would include 3.04 acres for a neighborhood public park. Therefore, the project applicant would provide substantially more than the required amount of parkland in compliance with the SMMC and help to reduce the overall Citywide parkland deficit.

Due to the inclusion of a dedicated neighborhood public park, the population growth that would occur as a result of the project is not anticipated to result in the overuse of existing parks such that the need for new or



physically altered parks would be necessary. Therefore, impacts associated with park facilities would be **less than significant**.

**e. Other public facilities?**

Other public facilities and services provided within the City include library services. Library services are provided at the Sierra Madre Public Library. The Sierra Madre Public Library is located at 440 West Sierra Madre Boulevard, approximately 0.65 miles south of the project site. As stated above, there are no prescriptive standards set for public libraries. According to the City’s General Plan EIR, outcome-based assessment processes are used to serve different communities with varying needs. As such, due to the nominal increase in service population associated with future development of the site, the increase in residents would not substantially impact library facilities. Thus, it is anticipated that existing library services would accommodate any increase in demand due to implementation of the proposed project. In addition, payment of development fees by the project applicant would be used to offset the costs of increased personnel or equipment that could be required in order to maintain such services. Therefore, impacts to other public facilities in the area resulting from the proposed project would be **less than significant**.

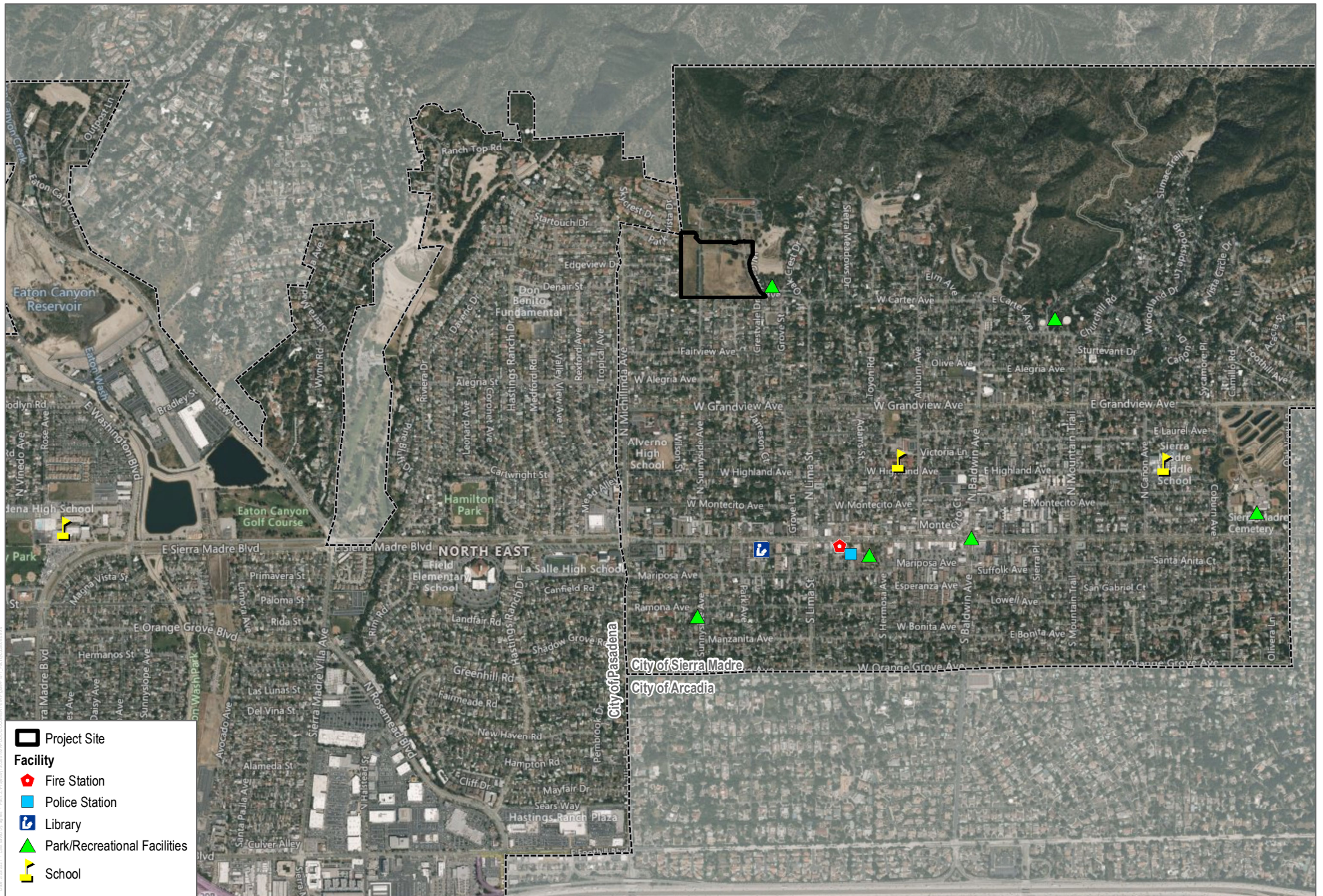
#### 4.15.6 Mitigation Measures

Impacts would be less than significant. No mitigation measures are required.

#### 4.15.7 Level of Significance After Mitigation

Impacts would be **less than significant**.

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SOURCE: County of Los Angeles 2020; Bing Maps

**FIGURE 4.15-1**  
**Facility Locations**  
 The Meadows at Bailey Canyon EIR

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## 4.16 Recreation

This section describes the existing recreation conditions of The Meadows at Bailey Canyon Specific Plan Project (project or proposed project) site and vicinity, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures related to implementation of the proposed project.

### 4.16.1 Existing Conditions

#### Project Site

There are no recreational facilities currently on the project site.

#### Project Vicinity

##### *Parks*

The proposed project is located within the northwestern portion of the City of Sierra Madre (City). The City maintains six parks across 23 acres within the municipal boundaries (see Figure 4.15-1, Facility Locations, in Section 4.15, Public Services, of this EIR). Bailey Canyon Wilderness Park, approximately 15 acres in size, is the closest park to the project site, located immediately east of the project site. Figure 4.15-1 and Table 4.16-1 detail the City's existing parks and recreational facilities.

**Table 4.16-1. City of Sierra Madre Existing Parks and Recreational Facilities**

Name	Address	Park/Recreational Facility Size	Description of Amenities	Distance from Project Site
Bailey Canyon Wilderness Park	451 Carter Avenue	15 acres	Picnic areas, hiking trails, signage, native botanical areas, outdoor restrooms, and a kiosk	200 feet
Kersting Court	Intersection of Baldwin Avenue and Sierra Madre Boulevard	2,500 square feet	Small grassy area, picnic tables, and benches	0.80 miles
Memorial Park and Hart Park House Senior Center	222 West Sierra Madre Boulevard	3.5 acres	Playground, outdoor restrooms, picnic areas, a covered pavilion, tennis courts, community gardens, Veteran's Memorial Wall, and the Hart Park House/Senior Center building, which provides recreational opportunities including arts, computer education, gardening, physical fitness activities, health screenings, and educational activities for seniors aged 60 years and over.	0.72 miles

Table 4.16-1. City of Sierra Madre Existing Parks and Recreational Facilities

Name	Address	Park/Recreational Facility Size	Description of Amenities	Distance from Project Site
Milton and Harriet Goldberg Recreation Area	171 North Sunnyside Avenue	0.21 acres	Passive recreation areas, picnic areas, stone benches, native plants, and a sand play area	0.29 miles
Mira Monte/Mount Wilson Trail Park	189 East Mira Monte Avenue	0.34 acres	Playground equipment, picnic tables, open grass areas, restrooms, access to Mount Wilson trail, and the historic Richardson House and Lizzie's Trail Inn	0.77 miles
Sierra Vista Park	611 East Sierra Madre Boulevard	5 acres	Community recreation center office, community room, youth activity center, aquatic center, covered pavilion, picnic areas, playground, tennis courts, volleyball court, basketball court, baseball fields, dog park, and outdoor restrooms	1.4 miles
Youth Activity Center	611 East Sierra Madre Boulevard	N/A	Partnership with YMCA program for youth ages 11 to 17; Monday through Thursday	1.4 miles
Aquatic Center	611 East Sierra Madre Boulevard	N/A	Partnership with Waterworks Aquatics, pool open for swim lessons, lap swimming, water aerobics, swim team, recreational swim and special events	1.4 miles
Senior Center	222 West Sierra Madre Boulevard	N/A	Open Monday through Friday for low-cost lunches for ages 60 years and over; provides recreational opportunities including arts, computer education, gardening, physical fitness activities, health screenings, and educational activities.	0.72 miles

Sources: City of Sierra Madre 2015a; Google Earth 2020

### Trails

The City of Sierra Madre is located at the base of the southern foothills of the San Gabriel Mountains, which provides access to over 550 miles of hiking and equestrian trails within the Angeles National Forest (USDA 2010). The Bailey Canyon ~~Mount Wilson~~ Trail is the closest active recreation opportunity to the project site, located ~~at the corner of Mountain Trail Avenue and East Mira Monte Avenue~~ within the Bailey Canyon Wilderness Park at West Carter Avenue and North Grove Street and approximately ~~0.77 miles~~ 200 feet east of the project site.

### **Recreational Centers**

There are no immediate recreational centers within the project site’s vicinity. However, the City maintains a few centers within the City, including the Youth Activity Center, Aquatic Center, and Senior Center. The Community Recreation Center, which hosts the Youth Activity Center and the Aquatic Center, is approximately 1.4 miles southeast of the project site, at 611 East Sierra Madre Boulevard. In addition, the City’s Senior Center located at 222 West Sierra Madre Boulevard, which is approximately 0.72 miles from the project site (City of Sierra Madre 2015a; Google Earth 2020).

## 4.16.2 Relevant Plans, Policies, and Ordinances

### **Federal**

There are no federal plans, policies, or ordinances related to recreation relevant to the proposed project.

### **State**

#### ***Quimby Act***

California Government Code Section 66477, referred to as the Quimby Act, permits local jurisdictions to require developers to dedicate land and/or pay in-lieu fees towards the conservation of parkland in connection with the approval of a tentative subdivision map or parcel map. The Quimby Act was legislated to encourage the pre-emptive mitigation of developments’ impact to parks and open space with the overarching goal of achieving a jurisdictional standard of 3.5 acres of parkland per 1,000 residents. The land dedication and/or fees differ by project and are based on the residential density, parkland cost, and other factors. Land dedication and fees collected pursuant to the Quimby Act may be used for acquisition, improvement, and expansion of park, playground, and recreational facilities or the development of public school grounds.

### **Local**

#### ***City of Sierra Madre General Plan***

Chapter Four, Community Services, of the City’s General Plan outlines goals and policies for various topics, including recreation services. This section of the General Plan describes the existing conditions of parks, recreational facilities, service objectives and policies managed by City’s Community Services Department. The following General Plan goals, objectives, and policies relevant to the proposed project with regard to recreation are below (City of Sierra Madre 2015b). The proposed project’s consistency with these policies is provided in Table 4.11-1 in Section 4.11, Land Use and Planning.

#### **Chapter One: Land Use**

**Goal 8:** Preserve existing and provide additional constructed and natural open space.

#### **Chapter Four: Community Services**

**Objective C6:** Providing quality recreation, leisure and social programs and facilities for the various segments of the Sierra Madre community.

**Policy C8.1:** Continue a park maintenance program to secure the existing nature and beauty of the City Parks and open space areas.

**Policy C8.3:** Install and replace existing landscape with native and drought resistant plants in City parks where deterioration has occurred.

**Policy C8.4:** Identify each recreational site with its name and encompassing facilities with signage visible to the public.

**Objective C10:** Increasing parkland and recreational facilities in the City.

**Policy C10.4:** Require that all new commercial and residential subdivision developments provide open space areas on-site for passive or active recreation or contribute fees for public development of such uses.

**Objective C11:** Coordinating the management of parks and recreation efforts throughout the City.

**Policy C11.2:** Maintain and update a maintenance and repair plan for existing and future City facilities.

***City of Sierra Madre Municipal Code***

Title 16 (Subdivision), Chapter 16.44 (Regulations for Dedication of Land for Park and Recreation Land) of the City of Sierra Madre Municipal Code requires parkland dedication or in-lieu park fees for all new developments to ensure the City provides its residents with adequate parks and recreational activities. The dedication of parkland is based on a formula that takes into account the type of dwelling unit (e.g., single-family, duplex, cluster, apartments) and average density being proposed, as outlined in Section 16.44.040 (Formula for Dedication of Land). If no park or recreation facility is designated within the proposed subdivision to serve the immediate and future needs of the residents of the subdivision, the developer is required to, in lieu of dedicating land, pay a fee equal to the value of that land using a formula outlined in Section 16.44.050 (Formula for Fees In Lieu of Land Dedication). The revenue generated from this fee is required to be used only for the purpose of acquiring necessary parkland and developing new or rehabilitating existing parks or recreational facilities reasonably related to serving the subdivision development. Section 16.44.030 (General Standard) sets a general citywide standard of three acres of parkland per 1,000 residents to ensure an adequate amount of neighborhood and community parks exist within the city to serve its residents. The standard is in accordance with the parkland requirements of the Quimby Act (City of Sierra Madre 2020).

### 4.16.3 Thresholds of Significance

The significance criteria used to evaluate the project impacts to recreation are based on Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to recreation would occur if the project would:

1. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.
2. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

### 4.16.4 Project Design Features

There are no project design features that apply to recreation.



## 4.16.5 Impacts Analysis

### **1. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?**

Section 16.44.030 (General Standard) of the Sierra Madre Municipal Code identifies a standard of 3 acres of park and recreation facilities per 1,000 residents (City of Sierra Madre 2020). Based on the City's population of 11,030, the park/recreation to population ratio is 2.09 acres of parkland per 1,000 residents. Therefore, the City currently has a parkland deficiency. The City's General Plan EIR states a need for approximately 10 acres of parkland to reach the desired parkland per resident ratio in the City (City of Sierra Madre 2015a).

As discussed in Section 4.14, Population and Housing, of this EIR, the project is anticipated to add approximately 134 new residents to the City. At least a portion of these new residents are anticipated to frequent the various public parks located in proximity to the project site, including Bailey Canyon Wilderness Park, located approximately 300 feet to the east of the site. The project would also provide a 3.04-acre on-site public park.

In addition to the nearby parks, project residents and nearby residents would have access to the proposed public park. The proposed park would be 3.04 acres in size and located at the southernmost portion of the project site (see Figure 2-3, Proposed Park Conceptual Plan). The proposed park would feature landscaped mounds, one pond, pedestrian paths, shared open turf/play areas, adventure/natural play equipment, native garden beds, picnic areas, benches, overlook areas, a restroom building, a water fountain, landscaping, water quality facilities, and a small parking lot. The park's location along the southern boundary of the site, and proposed sidewalk along the northern side of Carter Avenue just outside of the proposed project site provides enhanced connectivity to the Bailey Canyon Wilderness Park to the east. The location also provides the closest access to existing residential uses. Further, each residential unit would be provided with private open space such as balconies for individual units. Thus, the project would provide opportunities for passive and active recreation on site. These on-site amenities would provide an alternative to off-site public parks and recreational facilities, allowing the project's residents to recreate on the project site while incrementally reducing potential impacts to off-site public parks.

Although the City is currently experiencing a deficit in the desired parkland ratio, the project would be subject to the State's Quimby Act and the Sierra Madre Municipal Code at such time a tentative subdivision map is submitted to the City. More specifically, the Quimby Act allows the City to require development projects to set aside land, donate conservation easements, or pay in-lieu fees for park improvements as part of the subdivision map process. Title 16 (Subdivision), Chapter 16.44 (Regulations for Dedication of Land for Park and Recreation Land) of the Sierra Madre Municipal Code requires parkland dedication or in-lieu park fees for all new developments. The dedication of parkland is based on a formula that takes into account the type of dwelling unit and average density being proposed, as outlined in Section 16.44.040 (Formula for Dedication of Land). Using Alternative 2 (Formula Based on Dwelling Units) to calculate the number of acres of parkland dedication required under the proposed project would compare the proposed 42 detached single-family units to the standard acres per dwelling unit of 3 acres per 250 dwelling units (City of Sierra Madre 2020). Thus, the proposed project would be required to provide 0.5 acres of parkland on-site. As mentioned above, the project would include 3.04 acres for a neighborhood public park. Therefore, the project applicant would provide more than the required amount of parkland in compliance with the Sierra Madre Municipal Code.

Due to the inclusion of a dedicated neighborhood public park on-site, the population growth that would occur as a result of the project is not anticipated to result in the overuse of existing park and recreation facilities such that the need for new or physically altered park and recreation facilities would be necessary. Therefore, impacts associated with park and recreation facilities would be **less than significant**.

**2. Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?**

Under existing conditions, the project site is an undeveloped lot. The proposed project would result in the construction of 42 detached single-family residential homes with a 3.04-acre neighborhood public park to be located on the southernmost portion of the project site.

**Construction**

Construction activities related to the proposed project would involve introducing heavy machinery to the project site for grading, excavation, and development of the 3.04-acre neighborhood public park. Impacts associated with the project construction would be temporary. Staging of construction equipment and construction activities would be implemented in accordance with the City's existing regulations. In addition, implementation of the neighborhood public park would comply with the proposed design guidelines associated with The Meadows at Bailey Canyon Specific Plan.

Potential adverse physical effects resulting from the construction of the project as a whole, including construction of the proposed park, are addressed throughout this EIR as part of the proposed project, and with incorporation of proposed mitigation measures impacts associated with the construction of the neighborhood public park would be **less than significant**.

**Operation**

During operation of the proposed project, the neighborhood park would be available to the public. The park's location would be accessible to existing nearby residential uses. Residents and visitors would be able to access the park along the southern boundary of the project site. In addition, the proposed park would be immediately adjacent to ~~the entrance of~~ Bailey Canyon Wilderness Park to the east. The location of both recreational opportunities provides enhanced connectivity and access, which would reduce impacts related to vehicle trip generation. Lastly, as discussed above, potential adverse physical effects resulting from the project as a whole, including operation of the proposed park, are addressed throughout this EIR as part of the proposed project, and with incorporation of proposed mitigation measures impacts associated with the construction of the neighborhood public park. As such, operational impacts associated with the proposed park would be **less than significant**.

#### 4.16.6 Mitigation Measures

The project would not result in significant impacts related to the proposed park; therefore, no mitigation is required.

#### 4.16.7 Level of Significance After Mitigation

All impacts would be **less than significant**. No mitigation is required.

## 4.17 Transportation

This section describes the existing transportation conditions of The Meadows at Bailey Canyon Specific Plan Project (project or proposed project) site and vicinity, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures related to implementation of the proposed project. The discussion in this section is based on the Vehicle Miles Travelled (VMT) Assessment for the Proposed Sierra Madre Residential Project (VMT Assessment), prepared by Fehr and Peers in October 2020. The complete VMT Assessment is provided in Appendix H of this Environmental Impact Report (EIR).

### 4.17.1 Existing Conditions

#### **Regional Circulation and Local Access**

The project site is located within the northwestern portion of the City of Sierra Madre (City). Regional access to and from the project is possible via Michillinda Avenue, located to the west of the site, which is the only street considered a major street in the City's General Plan Circulation Element, and Baldwin Avenue, located approximately 0.61 miles west of the project site. Michillinda Avenue is shared by the City of Pasadena, located to the west of the project site, and the City of Arcadia, located to the south and east of the City, and provides a connection to Interstate 210. Michillinda Avenue is 750 feet west of the project site and can be accessed via several local streets off North Sunnyside Avenue. Baldwin Avenue, located approximately 0.61 miles west of the project site, also provides direct access to Interstate 210, and can be accessed via Carter Avenue which extends east of the site. Sierra Madre Boulevard, located approximately 0.6 miles south of the project site, is classified as a collector street in the Sierra Madre General Plan Circulation Element (City of Sierra Madre 2015). Sierra Madre Boulevard also can be accessed off North Sunnyside Avenue and provides another direct connection to Pasadena and Arcadia.

#### **Local Roadway Circulation and Access**

There are currently two access roads that run north/south through the project site to the Mater Dolorosa Retreat Center. North Sunnyside Avenue, which crosses through the western portions of the site, and Carter Avenue, which extends through the eastern portion of the site. An additional access road traverses the northern portion of the site from east to west. Public access for both roadways currently ends at the Mater Dolorosa Retreat Center's gates within the southern portion of the site.

#### **Pedestrian and Bike Facilities**

Pedestrian facilities in the vicinity of the project site are limited. North Sunnyside Avenue and Carter Avenue currently do not provide sidewalks. Sierra Keys Drive, located approximately 160 feet to the south of the site, provides a sidewalk on one side. Bailey Canyon Wilderness Park, located to the east of the site, provides public hiking trails.

Although there were no defined bicycle facilities within the City at the time the City's General Plan was adopted, the City's General Plan identified the need for a bike lane along Sierra Madre Boulevard, through the length of the City (City of Sierra Madre 2015). This bike lane has been recently installed between Lima Street and Michillinda Avenue, approximately 0.6 miles south of the project site, and on South Baldwin Avenue from West Orange Grove Avenue and Suffolk Avenue, approximately 0.9 miles southeast of the project site. In addition, streets within the City, particularly Local Collectors and Local Streets, are generally wide, with enough cross-sectional space to accommodate bicyclists even when parking is provided.

## Transit Facilities

The surrounding area is served by transit provided by the Los Angeles County Metropolitan Transportation Authority. Transit connection for routes 487 and 268 would go to the transit stop on North Sunnyside Avenue and Sierra Madre Boulevard, located 0.6 miles south of the project site (MTA 2020a). In addition, the City is served by the Gateway Coach, a fixed route public transportation service provided by the City. The Gateway Coach runs from 10:00 AM to 2:00 PM. The closest stops to the project site are located at the intersection of North Sunnyside Avenue and West Grand View Avenue, approximately 0.28 miles south of the site, and at the intersection of Michillinda Avenue and West Grand View Avenue, approximately 0.34 miles southwest of the site (City of Sierra Madre 2018).

### 4.17.2 Relevant Plans, Policies, and Ordinances

#### Federal

There are no federal plans, policies, or ordinances related to transportation relevant to the proposed project.

#### State

##### *Senate Bill 743*

In September 2013, the Governor’s Office signed State Bill (SB) 743 into law, starting a process that fundamentally changes the way transportation impact analysis is conducted under the California Environmental Quality Act (CEQA). Within the State’s CEQA Guidelines, these changes include the elimination of auto delay, level of service (LOS), and similar measurements of vehicular roadway capacity and traffic congestion as the basis for determining significant impacts. The guidance identifies vehicle miles traveled (VMT) as the most appropriate CEQA transportation metric, along with the elimination of auto delay/LOS for CEQA purposes statewide. The justification for this paradigm shift is that auto delay/LOS impacts lead to improvements that increase roadway capacity and therefore induce more traffic and greenhouse gas (GHG) emissions. The legislation was also intended to incentivize development in and around Transit Priority Areas (TPAs) and High-Quality Transit Corridors (HQTCs), and to encourage high-density infill and mixed-use projects. In January 2016, the Governor’s Office of Planning and Research (OPR) issued Draft Guidance, which provided recommendations for updating the State’s CEQA Guidelines in response to SB 743 and recommended practice for VMT analysis in an accompanying Technical Advisory on Evaluating Transportation Impacts in CEQA (Technical Advisory). OPR’s most recent Technical Advisory is dated December 2018. Per SB 743, cities are required to adopt VMT thresholds by July 2020. The City adopted its Transportation Study Guidelines for Vehicle Miles Traveled Assessment, which includes transportation impact guidelines and VMT analysis methodology in September 2020 (City of Sierra Madre 2020a).

##### *Statewide Transportation Improvement Program*

The Statewide Transportation Improvement Program (STIP), run by the California Transportation Commission, is a multi-year, statewide, intermodal program of transportation projects that is consistent with the statewide transportation plan and planning processes, metropolitan plans, and Title 23 of the Code of Federal Regulations (CFR). The latest version of the STIP was adopted on March 25, 2020 (California Transportation Commission 2020). The STIP is prepared in cooperation with the California Department of Transportation (Caltrans), the metropolitan planning organizations, and the regional transportation planning agencies. The regional

transportation planning agency that includes the City is the San Gabriel Valley Council of Governments, which is a subset of the Southern California Association of Governments (SCAG). The STIP contains all capital and non-capital transportation projects or identified phases of transportation projects for funding under the Federal Transit Act and CFR Title 23, including federally funded projects.

***Interregional Transportation Improvement Program***

The 2015 Interregional Transportation Improvement Program (ITIP) was approved by Caltrans in December 2015. California Government Code Section 14526 specifies that the purpose of the ITIP is to fund projects that improve interregional movement for people and goods across California on the State Highway System and develop Intercity Passenger Rail corridors of strategic importance. The ITIP is one of many state funding programs that collectively invest in transportation infrastructure, maintenance and operations and is prepared by Caltrans for submittal to the California Transportation Commission to assist with recommendations for projects in the STIP.

**Local**

***City of Sierra Madre General Plan***

The City’s General Plan is a long-range policy document which lays out the framework for all future growth and development within the City. The City adopted the 2015 General Plan in July 2015 and includes the following goals, objectives, and policies relevant to the proposed project with regard to transportation (City of Sierra Madre 2015). The proposed project’s consistency with these policies is provided in Table 4.11-1 in Section 4.11, Land Use and Planning.

- Objective L4:** Mitigating the impacts of new development on the City’s open space, trees, infrastructure, water, transit services, the character of existing development, and other public needs.
- Objective L5:** Preserving the existing grid street pattern which promotes community life.
- Policy L5. 1:** Prohibit the use of cul-de-sacs and require through streets in new subdivisions except when no other access is physically feasible due to property ownership, parcel location or other physical factors.
- Objective L51:** Developing a balanced and multi-modal transportation system to serve the needs of all roadway users, including motorists, public transit patrons, pedestrians, and cyclists.
- Policy L51.2:** Limit the development of new roadways or the expansion of existing roadways.
- Policy L51.5:** Encourage and support the use of non-automotive travel throughout the City.
- Objective L52:** Improving streets to maintain levels of service, vehicular, cyclist and pedestrian safety.
- Policy L52.8:** Require the incorporation of bicycle facilities into the design of land use plans and capital improvements, including bicycle parking within new multi-family and non-residential sites or publicly accessible bicycle parking.
- Policy L52.9:** Explore the possibility of sidewalk continuity where feasible.
- Objective L53:** Protecting residential neighborhoods from the intrusion of through traffic.

**Housing Policy 5.4:** Incorporate transit and other transportation alternatives such as walking and bicycling into the design of new development.

**Circulation Goal 1:** A balanced transportation system which accommodates all modes of travel including automobiles, pedestrians, bicycles, and transit users.

**Circulation Goal 2:** Safe and well-maintained streets.

**Circulation Goal 3:** Preservation of quiet neighborhoods with limited thru traffic.

**Objective C30:** Improving traffic safety.

**Policy C30.2:** Continue to evaluate measures, such as speed bumps, that reduce speeding.

**Policy C30.3:** Maintain safety and efficient circulation without impacting the village atmosphere.

### 4.17.3 Thresholds of Significance

The significance criteria used to evaluate the project impacts to transportation are based on Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to transportation would occur if the project would:

1. Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.
2. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).
3. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
4. Result in inadequate emergency access.

#### **VMT Impact Thresholds**

The updated CEQA Guidelines themselves do not establish a significance threshold and the OPR's Technical Advisory recommends a threshold of significance for residential, office and other land uses. While the recommended threshold for per capita or per employee for residential or office projects, respectively, is 15% below that of existing development, lead agencies can use more location-specific information to develop their own specific threshold for other project/land use types. The City has adopted criteria related to VMT evaluation in the City of Sierra Madre Transportation Study Guidelines for Vehicles Traveled Assessment, September 2020 (City of Sierra Madre 2020a).

Per the City’s criteria, a VMT-related impact would be considered significant if implementation of the proposed project meets the following two conditions:

- The baseline project-generated VMT, per service population;<sup>1</sup> home-based VMT per capita; or home-based-work VMT per employee exceeds the 15% below the Northwest Region<sup>2</sup> baseline<sup>3</sup> VMT; or
- The cumulative project-generated VMT exceeds 15% below the Northwest Region baseline VMT.

#### 4.17.4 Project Design Features

There are no project design features that apply to transportation.

#### 4.17.5 Impacts Analysis

##### **1. *Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?***

The City’s General Plan contains objectives and policies that support alternative transportation measures (Objective L51, L51.2, L51.3), improve safety (Objective L51, Objective C30, Policy C30.2, Policy C30.3), and encourage biking and pedestrian use (Objective L52, Policy L52.8) (see Section 4.17.2, Relevant Plans, Policies, and Ordinances, for these policies).

The proposed project would involve development of a 3.04-acre dedicated neighborhood park, to be located within the southern portion of the site (see Figure 3-3, Proposed Park Conceptual Plan, in Chapter 3, Project Description, of this EIR). The proposed park would involve pedestrian paths as well as enhanced connectivity to the Bailey Canyon Wilderness Park to the east. In addition, the proposed project would include a landscaped parkway and sidewalk on the west side of North Sunnyside Avenue and Carter Avenue, and a sidewalks within the south sides of proposed A, B, and C Streets, enhancing pedestrian safety and mobility, consistent with Objective L51 and Policy C30.3. Further, as discussed in Section 4.11, Land Use and Planning, of this EIR, the project would provide an internal circulation system that would facilitate safe and efficient access to the site from North Sunnyside Avenue while minimizing traffic impacts to adjacent residential streets. The proposed project would include reconfiguration of North Sunnyside Avenue, located within the western portion of the site, and improvements of Carter Avenue, located within the eastern portion of the site. Lastly, three additional streets that run east to west would be provided within the project site. This includes Streets A, B, and C (see Figure 3-2, Conceptual Site Plan, in Chapter 3 of this EIR). The proposed street sections are shown in Figure 3-6, Proposed Street Sections, in Chapter 3 of this EIR. As such, through creating an efficient and safe transportation system, the proposed project would be consistent with Land Use Element Objective L52 and C30, and Policy C30.3. As discussed in Section 4.17.1, Existing Conditions, the surrounding area is served by transit provided by the Los Angeles County Metropolitan Transportation Authority (MTA). While there are no bus routes that travel adjacent to the project site, transit connection for route 78 and 268 would go to the transit stop on North Sunnyside Avenue

<sup>1</sup> The City has selected VMT per service population for its impact threshold. However, the City will allow for use of VMT to be isolated by trip purpose with review and approval of the City Traffic Engineer.

<sup>2</sup> The City is located in the Northwest region of San Gabriel Valley Council of Governments.

<sup>3</sup> Baseline data is available from the SCAG model or appropriate sub-area model approved by the City Traffic Engineer. This data is also available in the San Gabriel Valley Council of Governments VMT Assessment Tool. Baseline conditions typically represent the year of the Notice of Preparation (NOP). Interpolation between the base and future year model will be required to identify the VMT representative of the baseline year.

and Sierra Madre Boulevard, located 0.6 miles south of the project site (MTA 2020a). In addition, stops for the Gateway Coach are located at the intersection of North Sunnyside Avenue and West Grand View Avenue, approximately 0.28 miles south of the site, and at the intersection of Michillinda Avenue and West Grand View Avenue, approximately 0.34 miles southwest of the site (City of Sierra Madre 2018). Although no bicycle facilities and improvements are proposed under the project, the project would not impact existing bicycle facilities in the vicinity of the project, including the existing bicycle lanes within Sierra Madre Boulevard. Thus, the future residents of the project would have access to major roadways, freeways, transit, bicycle, and pedestrian facilities. As such, the project would be consistent with Objective L51 of the City’s Land Use Element. Therefore, impacts associated with the project conflicting with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, would be **less than significant**.

**2. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?**

Prior to initiating a VMT assessment, the City has identified project screening criteria pursuant to CEQA guidance provided by the Office of Planning and Research (OPR). If a project meets any one of the following three screening criteria, then no further VMT assessment would be required. The three criteria, as well as an analysis as to whether or not the project meets this criterion, is provided below.

**1. Project Type Screening**

OPR identified local-serving project types that may be presumed to have a less than significant impact, absent substantial evidence to the contrary. These include uses such as resident and/or employee-serving uses, including retail, daycare facilities, parks, gas stations. This screening criteria also allows for projects generating less than 110 daily vehicle trips<sup>4</sup> typically corresponding with the following:

- 11 single-family housing units
- 16 multi-family, condominiums, or townhouse housing units

The proposed project would result in development of 42 single-family subdivisions. As shown in Table 4.17.1, the proposed project would generate 396 daily trips, 31 AM peak trips and 42 PM peak-hour trips. Therefore, the project cannot be screened out under this criterion.

**Table 4.17-1. Project Trip Generation (Weekday)**

Trip Generation Rates*								
Land Use	Daily Trip Rate	Unit	AM Peak Hour			PM Peak Hour		
			% In	% Out	Total	% In	% Out	Total
Single-Family Detached Housing (ITE Code 210)	9.44	DU	25%	75%	0.74	63%	37%	0.99

<sup>4</sup> This threshold ties directly to the OPR technical advisory and notes that CEQA provides a categorical exemption for existing facilities, including additions to existing structures of up to 10,000 square feet, so long as the project is in an area where public infrastructure is available to allow for maximum planned development and the project is not in and environmentally sensitive area (CEQA Guidelines Section 15301(e)(2)). Typical project types for which trip generation increases relatively linearly with building footprint (i.e. general office building, single tenant office building, office park, and business park) generate or attract an additional 110–124 trips per 10,000 square feet. Therefore, absent substantial evidence otherwise, it is reasonable to conclude that the addition of 100 or fewer trips could be considered not to lead to a significant impact.



Table 4.17-1. Project Trip Generation (Weekday)

Trip Generation									
Land Use	Total No. of Units	Unit	Daily	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
Single-Family Detached Housing	42	DU	396	8	23	31	26	16	42
Existing (Vacant Building)	0	ksf	0	0	0	0	0	0	0
<b>Total Net New Trip Generation</b>			<b>396</b>	<b>8</b>	<b>23</b>	<b>31</b>	<b>26</b>	<b>16</b>	<b>42</b>

\* Trip rates from the Institute of Transportation Engineers, Trip Generation, 10th Edition, 2017.  
DU = dwelling unit; ksf = thousand square feet

## 2. Transit Priority Area (TPA) Screening

Projects located within a TPA may be presumed to have a less than significant impact. A TPA<sup>5</sup> is defined as a half-mile area around an existing major transit stop or an existing stop along a high-quality transit corridor. As mentioned previously, bus route 487 and 268 provides service to the transit stop on North Sunnyside Avenue and Sierra Madre Boulevard, located 0.6 miles south of the project site. Bus route 487 operates every hour throughout the day, Monday through Friday, and on Saturdays, Sundays, and holidays (MTA 2020b). The frequency of bus route 268 varies from 26 minutes to 1 hour throughout the day, Monday through Friday, and approximately 1 hour on Saturdays, Sundays, and holidays (MTA 2020c). Since the frequency of the bus service is longer than 15 minutes along the route, it is not considered a high-quality transit corridor. Therefore, the proposed project is not located within a TPA. and cannot be screened out under this criterion.

## 3. Low VMT Area Screening

Residential projects located within a low VMT-generating area may be presumed to have a less-than-significant impact and thus be screened out. The project's VMT was estimated using the SCAG 2016 Regional Transportation Plan (RTP) 2012 Base Year model. The following methods can be used to calculate the project's VMT:

- The Production/Attraction (PA) method for calculating VMT sums all weekday VMT generated by trips with at least one trip end in a project's study. Productions are land use types that generate trips (residences) and attractions are land use types that attract trips (employment). The PA method does not include external trips that have one trip end outside of the model boundary (internal-external trips), and therefore do not include those trips in the VMT estimates. This approach also only works for individual uses and is not recommended for mixed-use projects as the internalization between uses is not captured in the estimates. This method is used to calculate a project's VMT based on trip purpose, i.e. home-based work VMT per capita.
- The Origin/Destination (OD) method for calculating VMT sums all weekday VMT generated by trips with at least one trip end in the study area. Origins are all vehicle trips that start in a specific traffic analysis zone,

<sup>5</sup> Per Pub. Resources Code, Section 21064.3, a 'Major transit stop' means a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. Per Pub. Resources Code, Section 21155, a high-quality transit corridor means a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.

and destinations are all vehicle trips that end in a specific traffic analysis zone. This method provides a more complete capture of all travel within the study area and can be normalized based on the number of residents and employees i.e. service population present in the zone.

The City accepts the project-generated VMT using PA method if appropriate. The project has been previously evaluated under a pilot study in San Gabriel Valley Council of Governments SB 743 project, using Home-based VMT per capita metric and failed in screening. However, the project is located in a mixed-use area as the Mater Dolorosa Retreat Center, located directly to the north of the site, which attracts trips other than Home-based trips. Therefore, based on City’s input, it was deemed appropriate to evaluate the VMT impact from all trip purposes and not just home-based work trips and use the OD method to determine the screening result. Additionally, the City recommends using service population as its VMT metric and threshold, unless VMT assessment by trip purpose and per capita or employee is required and approved by the City Traffic Engineer.

As defined by the City, a low VMT-zone has a VMT per service population of 15% or more below the Northwest Regional Baseline VMT. Per Table 4.17-2, the proposed project would have a VMT per service population of 31.01 and 30.47, which is below the 2012 baseline Northwest Region VMT Service Population for the 2012 Base Year of 37.02 from the SCAG model (see Figure 4.17-1, VMT per Service Population). Therefore, the proposed project would satisfy the screening criteria based upon the OD method.

**Table 4.17-2. Origin-Destination Vehicle Miles Travelled Analysis**

Analysis Metrics: OD VMT	2012 Base Year	2040 Cumulative Year
<i>Project TAZ 22212000 VMT per Service Population</i>	<b>31.01</b>	<b>30.47</b>
2012 Baseline Northwest Region VMT per Service Population	37.02	
Percent Difference with 2012 Baseline	-16%	-18%

**Source:** Appendix H.  
 OD = Origin-Destination; VMT = vehicle miles travelled; TAZ = Traffic Analysis Zone

Therefore, as discussed above and shown in Table 4.17-2, the proposed project’s VMT is 16% and 18% below the 2012 baseline VMT for the Northwest region under 2012 and 2040 conditions, respectively. Therefore, the proposed project would be screened out using the Low VMT Area Screening criteria and can be presumed to have a less than significant VMT impact. Therefore, the project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3(b), and impacts would be **less than significant**.

**3. Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?**

The proposed project would include reconfiguration of North Sunnyside Avenue, located within the western portion of the site, which would be moved farther to the west. In addition, the project would involve improvements of Carter Avenue. North Sunnyside Avenue would be a public street with one vehicular lane in each direction providing primary vehicular access to and from the project site (specifically from the proposed public park), internal circulation for the residential land, and access through the project site to the Mater Dolorosa Retreat Center. It will have a maximum 56.5-foot right-of-way with curbs and gutters, parking on both sides, a landscaped parkway and sidewalk on the west side, and tree plantings on the east side of the street. Carter Avenue would provide secondary egress and ingress access to the site, as well as internal circulation for the residential land uses. Carter Avenue would have a maximum 46-foot right-of-way with parking, curbs and gutters, parkways and tree plantings, and parking on the west side of the street. In addition, off-site improvements to Carter Avenue are

proposed between the southeastern portion of the project site boundary and Lima Street (See Figure 3-11, Proposed Off-Site Improvements and Figure 3-12, Carter Avenue Offsite Improvement Plan). The applicant would acquire approximately 9 feet of public right-of-way in order to widen Carter Avenue to a total of 24 feet (10 feet for each travel lane plus one 4-foot curb along the southern boundary of Carter Avenue) and a 6-foot sidewalk on the north side of Carter Avenue.

Lastly, three additional streets that run east to west would be provided within the project site. This includes Streets A, B, and C (see Figure 3-2, Conceptual Site Plan, in Chapter 3 of this EIR). Streets A, B, and C would be public streets with one vehicular lane in each direction providing internal circulation for the residential land uses. Street A would have a maximum 38.5-foot right-of-way. Streets B and C would have a maximum 42.5-foot right-of-way. All three streets would include curbs and gutters, a sidewalk, parkway and parking on the south side of the street, and tree plantings on the north side of the street. The proposed street sections for all proposed streets are shown in Figure 3-6, Proposed Street Sections, in Chapter 3 of this EIR.

The project does not include any project elements that could potentially create a traffic hazard for motor vehicles, bicycles, or pedestrians due to a proposed, non-standard design feature. The proposed project's circulation system is designed to interconnect with the existing adjacent public street system and discourage cut-through automobile traffic. Access points would not create a hazard for vehicles or people entering or exiting the site. In addition, in order to further ensure no vehicle or pedestrian safety issues would occur, the project applicant is proposing off-site improvements to widen Carter Avenue between the southeastern portion of the project site boundary and Lima Street (see Section 3.3.12 and Figure 3-11, Proposed Off-Site Improvements. Lastly, a stop sign would be provided at the southern portion of the project site along Carter Avenue for safety of vehicle and pedestrians. Additionally, the project would not result in a hazardous roadway design or unsafe roadway configuration; place incompatible uses on existing roadways; or create or place curves, slopes, or walls that impede adequate sight distance on a roadway. Therefore, the project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment) and impacts would be **less than significant**.

#### **4. Would the project result in inadequate emergency access?**

The project may result in a temporary increase in traffic on roadways surrounding the project site due to increased truck loads or the transport of construction equipment to and from the project site during the construction period. However, all construction activities including staging would occur in accordance with City requirements (such as Sierra Madre Municipal Code Chapter 17.30, which requires that streets be maintained free and clear during construction), which would ensure that adequate emergency access to the project site in the event of an emergency or evacuation order would be provided during construction of the project. As discussed in Section 4.9, Hazards and Hazardous Materials, of this EIR, the City has not adopted an emergency response plan or emergency evacuation plan. However, the City is in the process of preparing a Local Hazard Mitigation Plan (LHMP) and a draft was released for public review in February 2020 (City of Sierra Madre 2020b). The purpose of a LHMP is to reduce or eliminate long-term risk to people and property from natural hazards and their effects on the City. The proposed project would not impair implementation of the LHMP once adopted, as the proposed project would not exacerbate the potential for natural hazards or interfere with emergency services. Additionally, the proposed project would be adequately served by emergency response services and provide emergency access throughout the project site, as described in Section 4.15, Public Services, of this EIR. Lastly, the proposed project would be required to comply with the recommendations of the Fire Protection Plan (FPP), per PDF-WF-1 (Appendix F2). Per the FPP, project site access, including road widths and connectivity, will be consistent with the City's roadway standards and the 2019 California Fire Code (CFC) Section 503. Specific requirements for provision of

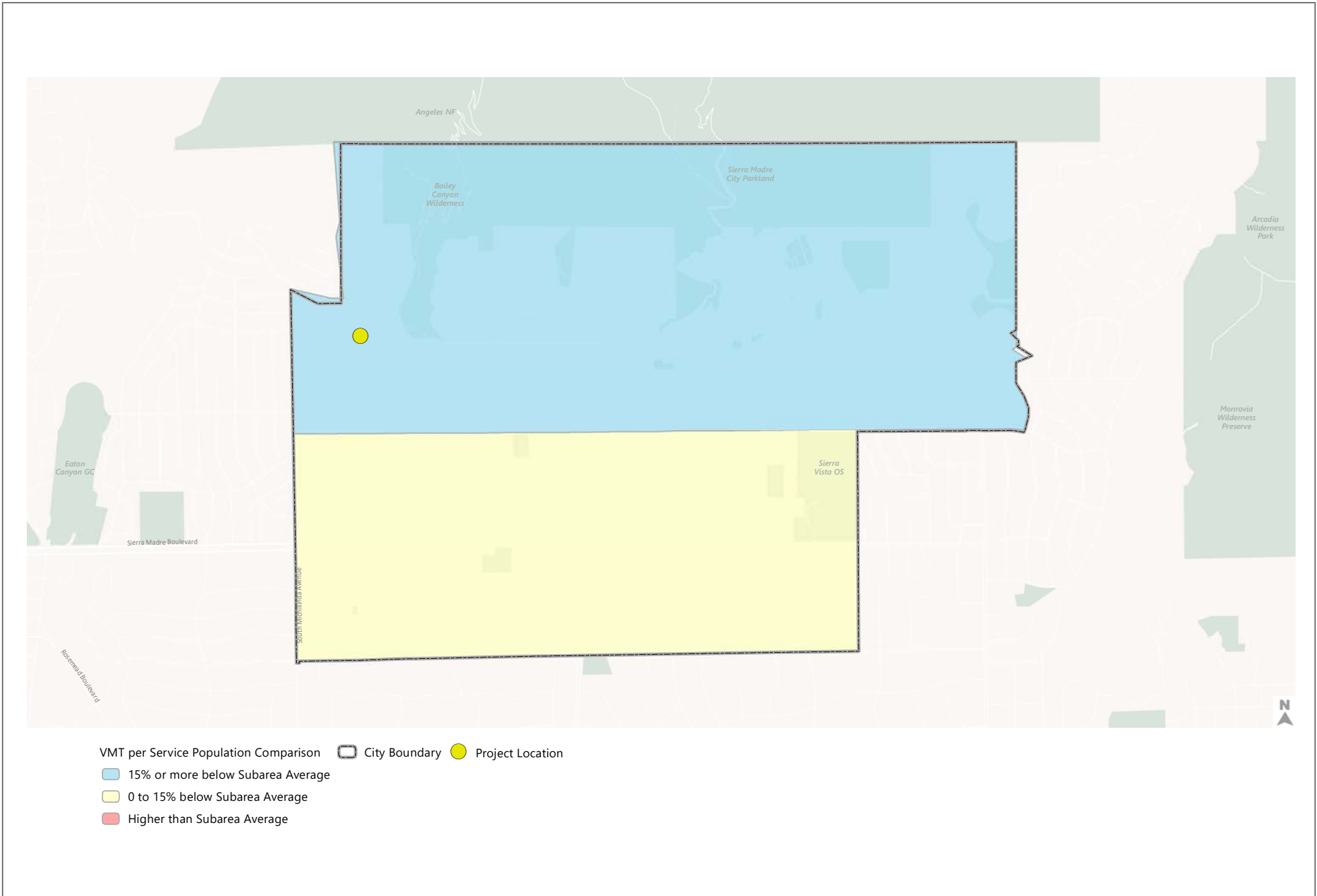
fire apparatus access roads is provided in Appendix F2. Therefore, through compliance with all existing requirements and recommendations of the FPP, the project would not result in inadequate emergency access; impacts would be **less than significant**.

#### 4.17.6 Mitigation Measures

Impacts to transportation would be less than significant. No mitigation would be required.

#### 4.17.7 Level of Significance After Mitigation

Impacts to transportation would be **less than significant**.



**FIGURE 4.17-1**  
**VMT per Service Population**  
 The Meadows at Bailey Canyon EIR

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## 4.18 Tribal Cultural Resources

This section describes the existing tribal cultural resources (TCRs) conditions of The Meadows at Bailey Canyon Specific Plan Project (project or proposed project) site and vicinity, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures related to implementation of the proposed project.

### 4.18.1 Existing Conditions

#### **Project Site and Vicinity**

An Archaeological Resources Assessment was prepared for the proposed project and is included as Appendix D2 to this Environmental Impact Report (EIR). The Archaeological Resources Assessment contains a discussion on Native American coordination which is incorporated herein by reference.

#### ***SCCIC Records Search***

A California Historical Resources Information System (CHRIS) records search was previously requested by Brian F. Smith and Associates and completed by South Central Coastal Information Center (SCCIC) Staff for the project site and a 1-mile records search buffer on June 9, 2020. This search included the SCCIC's collections of mapped prehistoric, historic, and built environment resources, Department of Parks and Recreation Site Records, technical reports, and ethnographic references. Additional consulted sources included historical maps of the project site, the National Register of Historic Places (NRHP), the California Register of Historical Resources (CRHR), the California Historic Property Data File, the lists of California State Historical Landmarks, California Points of Historical Interest, and the Archaeological Determinations of Eligibility. Dudek reviewed the SCCIC records to determine whether implementation of the proposed project would have the potential to impact known and unknown cultural resources, including TCRs (Appendix D2).

#### **Previously Conducted Cultural Resource Studies**

The SCCIC records indicate that 17 previous cultural resource studies have been conducted within the records search area between 1993 and 2016. None of these studies are mapped as overlapping/intersecting the project site. The entirety of the project site has not been subject to any previous investigations. See Table 4.5-1 in Section 4.5, Cultural Resources, of this EIR for a summary of all 17 previous cultural resources studies within the records search area.

#### **Previously Recorded Cultural Resources**

The SCCIC records indicate that 56 previously recorded cultural resources are located within the records search area. Of these, two resources are historic-period archaeological sites and the remaining 54 are historic built environment resources. None of the resources are TCRs and none are located within the project site. See Tables 4.5-2 and 4.5-4 in Section 4.5, Cultural Resources, for lists of these previously recorded historic built environment resources and archaeological sites, respectively.

### ***Native American Coordination***

#### **NAHC Sacred Lands File Search**

As part of the process of identifying cultural resources within or near the proposed project site, Dudek contacted the Native American Heritage Commission (NAHC) on October 6, 2020, to request a review of the Sacred Lands Files (SLF). The NAHC replied via email on October 8, 2020, stating that the SLF search was completed with negative results. Because the SLF search does not include an exhaustive list of Native American cultural resources, the NAHC provided a list of eight Native American individuals that should be contacted for more information on potential tribal sensitivities regarding the proposed project. No additional tribal outreach was conducted by Dudek; however, in compliance with Assembly Bill (AB) 52 and Senate Bill (SB) 18, the City of Sierra Madre has contacted all NAHC-listed traditionally geographically affiliated tribal representatives that have requested project notification. Documents related to the NAHC SLF search are included in Appendix D2.

#### **Assembly Bill 52 Compliance**

The proposed project is subject to compliance with AB 52 (PRC 21074), which requires consideration of impacts to TCRs as part of the California Environmental Quality Act (CEQA) process, and that the lead agency notify California Native American Tribal representatives that have requested notification who are traditionally or culturally affiliated with the geographic area of the project site. All records of correspondence related to AB 52 notification and any subsequent consultation are on file with the City of Sierra Madre and included in Confidential Appendix D in Appendix D2.

#### **Senate Bill 18 Compliance**

The proposed project is subject to compliance with SB 18 (Government Code Section 65352.3), which requires local governments to invite California Native American Tribal representatives to participate in consultation about proposed General Plan and Specific Plan adoptions or amendments. The City of Sierra Madre is considering an amendment to the General Plan and adoption of a Specific Plan for the proposed project site and as such, initiated SB 18 consultation. All records of correspondence related to SB 18 notification and any subsequent consultation are on file with the City of Sierra Madre.

### ***Field Survey***

#### **Methods**

As part of the Archaeological Resources Assessment prepared for the proposed project, an intensive-level survey was conducted on the project site. Survey methods consisted of a pedestrian survey conducted in parallel transects, spaced no more than 15 meters apart (approximately 50 feet), over the entire proposed project site, from east to west. Deviations from transects only occurred in areas containing steep slopes, dense vegetation, or impassible natural features. The ground surface was inspected for prehistoric artifacts (e.g., flaked stone tools, tool-making debris, groundstone tools, ceramics, fire-affected rock), soil discoloration that might indicate the presence of a cultural midden, soil depressions, features indicative of structures and/or buildings (e.g., standing exterior walls, post holes, foundations), and historical artifacts (e.g., metal, glass, ceramics, building materials). Ground disturbances such as burrows, cut banks, and drainages were also visually inspected for exposed subsurface materials. No artifacts were collected during the survey (Appendix D2).



All fieldwork was documented using field notes and an Apple Generation 6 iPad (iPad) equipped with ESRI Collector and Avenza PDF Maps software with close-scale georeferenced field maps of the proposed project site, and aerial photographs. Location-specific photographs were taken using the iPad's 8-mega-pixel resolution camera. All field notes, photographs, and records related to the current study are on file at Dudek's Pasadena, California office. All field practices met the Secretary of Interior's standards and guidelines for a cultural resources inventory (Appendix D2).

### **Results**

The intensive-level archaeological survey of the project site was conducted October 30, 2020, by Dudek archaeologist, Linda Kry. Ground visibility throughout the proposed project site was generally good (80%–90%). The site generally slopes south and includes terraces immediately south of the Mater Dolorosa Retreat Center. Soils within the project site are consistent with soils defined by the United States Department of Agriculture (USDA). The project site is generally undeveloped with ornamental trees (approximately 10%) and landscaped areas, concrete retaining walls along the northern perimeter of the site, including access roads through the site lined with rocks. A portion of the northeast area of the project site, immediately south of the staff house and garage associated with the Mater Dolorosa Retreat Center, was partially covered on the surface with gravel. Visible disturbances to the project site include site maintenance activities and activities associated with the Mater Dolorosa Retreat Center. Additionally, the landscape has an undulating terrain, with bioturbation activities throughout (Appendix D2). Photographs taken during the archaeological field survey are provided in Appendix D2.

The intensive-level archaeological survey resulted in the identification of widely dispersed cultural material on the surface of the site associated with the Mater Dolorosa Retreat Center. However, the archaeological survey did not identify in situ archaeological resources or features, including TCRs (Appendix D2).

## 4.18.2 Relevant Plans, Policies, and Ordinances

### **Federal**

There are no federal plans, policies, or ordinances related to TCRs relevant to the proposed project.

### **State**

#### ***California Environmental Quality Act***

CEQA was amended in 2014 through AB 52, which created a new category of "tribal culture resources" that must be considered under CEQA, and applies to all projects that file a Notice of Preparation or notice of negative declaration or mitigated negative declaration on or after July 1, 2015. AB 52 requires lead agencies to provide notice to and begin consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of a project if that tribe has requested, in writing, to be kept informed of projects by the lead agency prior to the determination whether a negative declaration, mitigated negative declaration, or environmental impact report will be prepared. If a tribe requests consultation within 30 days upon receipt of the notice, the lead agency must consult with the tribe. AB 52 also specifies mitigation measures that may be considered to avoid or minimize impacts on TCRs. Specifically, California Public Resources Code (PRC) Section 21074 provides the following guidance:

- (a) Tribal Cultural Resources are either of the following:
  - 1. Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:
    - (A) Included or determined to be eligible for inclusion in the California Register of Cultural Resources.

- (B) Included in a local register of cultural resources as defined in subdivision (k) of §5020.1.
- (2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of §5024.1. In applying the criteria set forth in subdivision (c) of §5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.
- (b) A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.
- (c) A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a “nonunique archeological resource” as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms with the criteria of subdivision (a).

In the event that Native American human remains or related cultural material are encountered, Section 15064.5(e) of the state CEQA Guidelines (as incorporated from PRC Section 5097.98) and Health and Safety Code Section 7050.5 define the subsequent protocol. In the event of the accidental discovery or recognition of any human remains, excavation or other disturbances shall be suspended of the site or any nearby area reasonably suspected to overlie adjacent human remains or related material. Protocol requires that a county-approved coroner be contacted to determine if the remains are of Native American origin. Should the coroner determine the remains to be Native American, the coroner must contact the NAHC within 24 hours. The most likely descendant may make recommendations to the landowner or the person responsible for the excavation work, for means of treating, with appropriate dignity, the human remains and any associated grave goods as provided in PRC Section 5097.98 (14 CCR 15064.5[e]).

### **California State Assembly Bill 52**

AB 52 of 2014 amended PRC Section 5097.94 and added PRC Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3. AB 52 established that TCRs must be considered under CEQA and also provided for additional Native American consultation requirements for the lead agency. Section 21074 describes a TCR as a site, feature, place, cultural landscape, sacred place, or object that is considered of cultural value to a California Native American Tribe and that is either:

- On or determined to be eligible for the California Register of Historical Resources or a local historic register; or
- A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1.

AB 52 formalizes the lead agency–tribal consultation process, requiring the lead agency to initiate consultation with California Native American groups that are traditionally and culturally affiliated with the project site, including tribes that may not be federally recognized. Lead agencies are required to begin consultation prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report.

Section 1 (a)(9) of AB 52 establishes that “a substantial adverse change to a tribal cultural resource has a significant effect on the environment.” Effects on TCRs should be considered under CEQA. Section 6 of AB 52 adds Section 21080.3.2 to the PRC, which states that parties may propose mitigation measures “capable of avoiding or substantially lessening potential significant impacts to a tribal cultural resource or alternatives that would avoid significant impacts to a tribal cultural resource.” Further, if a California Native American tribe requests consultation regarding project alternatives, mitigation measures, or significant effects to tribal cultural resources, the

consultation shall include those topics (PRC Section 21080.3.2[a]). The environmental document and the mitigation monitoring and reporting program (where applicable) shall include any mitigation measures that are adopted (PRC Section 21082.3[a]).

### **Senate Bill 18**

The Local and Tribal Intergovernmental Consultation process, commonly known as Senate Bill (SB) 18 was signed into law September of 2004 and took effect March 1, 2005. SB 18 refers to PRC Section 5097.9 and 5097.995, which defines cultural places as:

- Native American sanctified cemetery place of worship, religious or ceremonial site, or sacred shrine (PRC Section 5097.9).
- Native American historic, cultural, or sacred site that is listed or may be eligible for listing in the California Register of Historic Resources pursuant to Section 5024.1, including any historic or prehistoric ruins, any burial ground, any archaeological or historic site (PRC Section 5097.993).

SB 18 established responsibilities for local governments to contact, provide notice to, refer plans to, and consult with California Native American tribes that have been identified by the NAHC and if that tribe requests consultation after local government outreach as stipulated in Government Code Section 65352.3. The purpose of this consultation process is to protect the identity of the cultural place and to develop appropriate and dignified treatment of the cultural place in any subsequent project. The consultation is required whenever a general plan, specific plan, or open space designation is proposed for adoption or to be amended. Once local governments have sent notification, tribes are responsible for requesting consultation. Pursuant to Government Code Section 65352.3(a)(2), each tribe has 90 days from the date on which they receive notification to respond and request consultation.

In addition to the requirements stipulated previously, SB 18 amended Government Code Section 65560 to “allow the protection of cultural places in open space element of the general plan” and amended Civil Code Section 815.3 to add “California Native American tribes to the list of entities that can acquire and hold conservation easements for the purpose of protecting their cultural places.”

### **California Health and Safety Code Section 7050.5**

California law protects Native American burials, skeletal remains, and associated grave goods, regardless of their antiquity, and provides for the sensitive treatment and disposition of those remains. California Health and Safety Code Section 7050.5 requires that if human remains are discovered in any place other than a dedicated cemetery, no further disturbance or excavation of the site or nearby area reasonably suspected to contain human remains shall occur until the county coroner has examined the remains (Section 7050.5[b]). PRC Section 5097.98 also outlines the process to be followed in the event that remains are discovered. If the coroner determines or has reason to believe the remains are those of a Native American, the coroner must contact NAHC within 24 hours (Section 7050.5[c]). NAHC will notify the “most likely descendant.” With the permission of the landowner, the most likely descendant may inspect the site of discovery. The inspection must be completed within 48 hours of notification of the most likely descendant by NAHC. The most likely descendant may recommend means of treating or disposing of, with appropriate dignity, the human remains, and items associated with Native Americans.

### **Local**

There are no local plans, policies, or ordinances related to TCRs relevant to the proposed project.

### 4.18.3 Thresholds of Significance

The significance criteria used to evaluate the project impacts to TCRs are based on Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to TCRs would occur if the project would:

1. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
  - a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k).
  - b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

### 4.18.4 Project Design Features

There no project design features that apply to TCRs.

### 4.18.5 Impacts Analysis

1. ***Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:***
  - a. ***Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?***

As discussed in Section 4.18.1, Existing Conditions, no cultural resources were identified within the project site through the CHRIS records search, archival review, or NAHC SLF search or as a result of tribal consultation. As such, no TCRs, defined by PRC Section 5020.1(k), have been identified within areas that would be impacted by the proposed project.

The NAHC provided the City with a list of eight Native Americans who should be contacted pursuant to SB 18 and AB 52 because of their cultural affiliation to the project site and surrounding area. In compliance with AB 52, the City contacted all tribal representatives that have requested formal project notification on March 30, 2021. In compliance with SB 18, the City contacted all NAHC-listed traditionally geographically affiliated tribal representatives on March 30, 2021. One Native American Contact, Gabrieleño Band of Mission Indians-Kizh Nation, responded to the City's notification letter on April 5, 2021, and indicated that the project site is within the Gabrieleño Band of Mission Indians-Kizh Nation ancestral territory and requested to engage in formal consultation. The City held a virtual meeting with the Gabrieleño Band of Mission Indians-Kizh Nation on May 20, 2021. During this meeting, the Gabrieleño Band of Mission Indians-Kizh Nation requested the geotechnical investigation prepared for the proposed project, as well as a copy of the SLF. In addition, the Gabrieleño Band of Mission Indians-Kizh

asked the City to confirm that a CHRIS Records had been prepared for the proposed project. The City provided all requested data/information to the Gabrieleño Band of Mission Indians-Kizh Nation on May 21, 2021. In addition, the City provided the Gabrieleño Band of Mission Indians-Kizh Nation with a copy of the original iteration of the mitigation measures outlined in Section 4.5.6. On May 26, 2021, the City contacted Gabrieleño Band of Mission Indians-Kizh Nation by email asking if they had any questions or concerns and did not receive a response. On June 4, 2021, the City contacted Gabrieleño Band of Mission Indians-Kizh Nation by email again and provided the Gabrieleño Band of Mission Indians-Kizh Nation until June 10, 2021 to respond or the City would consider the consultation process officially closed. The Gabrieleño Band of Mission Indians-Kizh Nation responded by email on June 7, 2021 explaining they would provide further information as soon as they could. On June 9, 2021, the City responded by email asking that the Gabrieleño Band of Mission Indians-Kizh Nation consider the cultural mitigation measures previously provided. On July 8, 2021, the Tribe contacted the City by email to say they did not agree that the cultural mitigation measures provided were sufficient to TCRs and asked that the City utilize mitigation measures the Gabrieleño Band of Mission Indians-Kizh Nation provided in the same email. On July 14, 2021, the City provided the Gabrieleño Band of Mission Indians-Kizh Nation, by email, with TCR mitigation measures developed based on the mitigation measures the Gabrieleño Band of Mission Indians-Kizh Nation previously provided (provided in Section 4.18.6). On July 14, 2021 the Gabrieleño Band of Mission Indians-Kizh Nation contacted the City by email to say they agree with the mitigation measures provided on July 14, 2021 and asked that the Gabrieleño Band of Mission Indians-Kizh Nation be contacted prior to development. The City responded by email saying the City would keep the Gabrieleño Band of Mission Indians-Kizh Nation informed. On July 15, 2021, the City contacted the Gabrieleño Band of Mission Indians-Kizh Nation by email to inform the Gabrieleño Band of Mission Indians-Kizh Nation the consultation process is officially closed (Table 4.18-1). All records of correspondence related to AB 52 notification and any subsequent consultation are on file with the City and have been included in Confidential Appendix D in Appendix D211.

**Table 4.18-1. Assembly Bill 52 and Senate Bill 18 Native American Tribal Consultation Results**

Native American Tribal Representatives	Method and Date of Notification	Response to City Notification Letters	Consultation Date and Results
Gabrieleño/Tongva San Gabriel Band of Mission Indians; Anthony Morales, Chairperson	March 30, 2021, Letter sent via email and certified mailing Letter Memo emailed to Chief Anthony Morales	No response received	No consultation requested or held
Gabrieleño Band of Mission Indians - Kizh Nation (Kizh Nation); Andrew Salas, Chairperson	March 30, 2021, Letter sent via email and certified mailing Letter Memo emailed to Andrew Salas	Response received by the City on April 5, 2021 from Andrew Salas of the Gabrieleño Band of Mission Indians-Kizh Nation confirming location of proposed Project site is within his Tribe’s ancestral territory and requested formal consultation.	May 20, 2021 - City held a virtual consultation meeting with the Gabrieleño Band of Mission Indians-Kizh Nation represented by Andrew Salas. Mr. Salas requested a copy of the geotechnical report, the NAHC SLF result and confirmation that a CHRIS records search had been conducted. The City provided all

Table 4.18-1. Assembly Bill 52 and Senate Bill 18 Native American Tribal Consultation Results

Native American Tribal Representatives	Method and Date of Notification	Response to City Notification Letters	Consultation Date and Results
			requested data to the Tribe on May 21, 2021 along with proposed cultural mitigation measures for the Tribe's review. Multiple communications between the City and the Tribe (documented above in detail) resulted in the development of a mitigation measure to address the potential impact to unknown TCRs. On July 14, 2021, the Tribe confirmed they agreed with the mitigation measures and on July 15, 2021, the City formally closed the consultation process.
Gabrieliño/Tongva Nation; Sandonne Goad, Chairperson	March 30, 2021, Letter sent via email and certified mailing Letter Memo emailed to Sandonne Goad	No response received	No consultation requested or held
Gabrieliño Tongva Indians of California Tribal Council; Robert Dorame, Chairperson	March 30, 2021, Letter sent via email and certified mailing Letter Memo emailed to Robert Dorame	No response received	No consultation requested or held
Gabrieliño-Tongva Tribe; Charles Alvarez	March 30, 2021, Letter sent via email and certified mailing Letter Memo emailed to Charles Alvarez	No response received	No consultation requested or held
Santa Rosa Band of Cahuilla Indians; Lovina Redner, Tribal Chair	March 30, 2021, Letter sent via email and certified mailing Letter Memo emailed to Lovina Redner	No response received	No consultation requested or held
Soboba Band of Luiseño Indians; Scott Cozart, Chairperson	March 30, 2021, Letter sent via email and certified mailing Letter Memo emailed to Scott Cozart	No response received	No consultation requested or held

Table 4.18-1. Assembly Bill 52 and Senate Bill 18 Native American Tribal Consultation Results

Native American Tribal Representatives	Method and Date of Notification	Response to City Notification Letters	Consultation Date and Results
Soboba Band of Luiseño Indians; Joseph Ontiveros, Cultural Resource Department	March 30, 2021, Letter sent via email and certified mailing Letter Memo emailed to Joseph Ontiveros	No response received	No consultation requested or held

Ground-disturbing activities associated with construction of the proposed project could result in the unanticipated discovery of previously uncovered TCRs. As such, impacts to previously undiscovered TCRs would be **potentially significant (Impact TCR-1)**. To mitigate any potential impacts to TCRs resulting from ground-disturbing activities, one mitigation measure (**MM-TCR-1**) will be implemented. **MM-TCR-1** requires that a Native American monitor be present during activities interpreted as having the potential to encounter unknown TCR. Implementation of this measure would reduce potential impacts to TCRs to **less than significant**.

- b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?*

As discussed in Section 4.5, Cultural Resources, and in Appendix D2, the project site has been subject to consistent ground disturbance as a result of agricultural use of the site, site maintenance activities, and activities associated with the Mater Dolorosa Retreat Center and the former Monastery. Considering these factors, the potential for buried archaeological deposits, specifically TCRs within the project site, is considered to be relatively low, but possible. Ground disturbing activities associated with construction of the proposed project could result in the unanticipated discovery of previously uncovered TCRs. As such, impacts to previously undiscovered TCRs would be potentially significant (**Impact TCR-1**). To mitigate any potential impacts to TCRs resulting from ground disturbing activities, one mitigation measure **MM-TCR-1** shall be implemented. **MM-TCR-1** requires that a Native American monitor be present during activities interpreted as having the potential to encounter unknown TCRs and reducing impacts to TCRs to **less than significant**.

## 4.18.6 Mitigation Measures

The following mitigation measure would be implemented to reduce potentially significant impacts to previously uncovered TCRs (**Impact TCR-1**) associated with project construction.

- MM-TCR-1 Native American Monitoring.** Prior to the commencement of any ground disturbing activity at the Project site, with a minimum of 30 days advance written notice, the project applicant shall retain a Native American Monitor approved by the Gabrieleño Band of Mission Indians-Kizh Nation (Consulting Tribe on this project pursuant to Assembly Bill A52). A copy of the executed contract shall be submitted to the City of Sierra Madre Planning and Building Department prior to the issuance of any permit necessary to commence a ground-disturbing activity. The applicant will inform the Gabrieleño Band of Mission Indians-Kizh Nation of the day, time, and location of the Workers Environmental Awareness Program (WEAP) preconstruction meeting, with a minimum of 5 days advance written notice, as well as make provisions for participation in the training. The Tribal

monitor will only be present on-site during the construction phases that involve initial ground-disturbing activities. Initial ground-disturbing activities is defined as initial mass grading and associated movement of sediments from their place of last deposition prior to commencement of the Project. (Initial ground disturbing activities includes but is not necessarily limited to, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching. ~~does not include site preparation, grubbing, clearing, potholing, surveying, auguring, or tree removals.~~) As it pertains to Native American monitoring, this definition excludes movement of sediments after they have been initially disturbed or displaced by project-related construction.

\_\_\_\_\_ The Tribal Monitor will complete daily monitoring logs that will provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when the qualified archaeologist has determined, and in good faith consultation with the Gabrieleño Band of Mission Indians-Kizh Nation, that all initial ground-disturbing activities on the Project Site (as defined above) are completed, or when the qualified archaeologist and Tribal Representatives/Monitor have indicated that all upcoming ground-disturbing activities at the Project Site have little to no potential for impacting tribal cultural resources (whichever defined threshold is met first). Upon discovery of any tribal cultural resources, construction activities shall cease in the immediate vicinity of the find and a buffer of ~~100~~50 feet will be established where no ground disturbing work will be allowed to occur until the find can be assessed and if required, treated according to CEQA requirements. All tribal cultural resources unearthed by project activities shall be evaluated by the qualified archaeologist retained on-call and Tribal monitor approved by the Consulting Tribe. If the resources are Native American in origin, the Consulting Tribe will retain it/them in the form and/or manner the Tribe deems appropriate, for educational, cultural and/or historic purposes. If human remains and/or grave goods are discovered or recognized at the Project Site, all ground disturbance shall immediately cease within 100 feet of the find and suspected extent of human remains as determined by the qualified archaeologist retained on-call and Tribal monitor approved by the Consulting Tribe. The county coroner shall be notified per Public Resources Code Section 5097.98, and Health & Safety Code Section 7050.5. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2). Work may continue on other parts of the Project Site (outside the 100-foot buffer) while evaluation and, if necessary, mitigation takes place (CEQA Guidelines Section 15064.5[f]).

### 4.18.7 Level of Significance After Mitigation

Implementation of **MM-TCR-1** would reduce potentially significant impacts to previously undiscovered TCR resources (**Impact TCR-1**) to a **less than significant**.



## 4.19 Utilities and Service Systems

This section describes the existing utilities conditions of The Meadows at Bailey Canyon Specific Plan Project (project or proposed project) site and vicinity, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures related to implementation of the proposed project.

### 4.19.1 Existing Conditions

#### **Project Site and Vicinity**

##### ***Water***

The City of Sierra Madre (City) is the licensee and operator of its own water distribution system under the Sierra Madre Water Department (SMWD). The SMWD provides water to all of its residents and commercial uses totaling approximately 3,700 metered connections. The SMWD owns and maintains approximately 46 miles of water mains.

##### **Water Supply**

##### **Raymond Groundwater Basin**

The City's traditional potable water source is groundwater from the Raymond Groundwater Basin. The Raymond Groundwater Basin is located in Los Angeles County about 10 miles north-easterly of downtown Los Angeles. The Raymond Groundwater Basin is a wedge in the northwesterly portion of the San Gabriel Valley and is bounded on the north by the San Gabriel Mountains, on the west by the San Rafael Hills and is separated from the Main San Gabriel Groundwater Basin on the southeast by the Raymond Fault. The Raymond Groundwater Basin is divided into the Eastern Unit, which is the Santa Anita Sub-area, and the Western Unit, which is the Pasadena Sub-area and the Monk Hill Sub-area Basin. The project site is located within the Santa Anita Sub-area. The Decreed Right of 1955 provided the City with water rights to 1,764 acre feet per year (AFY) from the Santa Anita Sub-area. The City also has the right to obtain credit for "salvage water." Salvage water is surface water percolated into the Santa Anita Sub-area minus losses for natural percolation and subsurface outflow. Salvage water credits allow the City to (annually) extract more than 1,764.0 acre-feet (AF) from the Santa Anita-Sub area. However, due to past multiple dry-year conditions, the Raymond Basin Management Board (RBMB) implemented a "500-foot" level limitation for all Decreed Rights to the Santa Anita Sub-area in 2013. As a result, the City's adjusted right to the Santa Anita Sub-area was limited to 940 AFY. In October 2015, after five years of unprecedented drought and insufficient groundwater replenishment, the RBMB limited the amount of groundwater which the City is allowed to produce each year and authorized the use of imported water for spreading on behalf of the City. Metropolitan Water District of Southern California (MWD) entered into an agreement with the City and the San Gabriel Valley Municipal Water District (SGVMWD) to deliver up to 2,500 AFY of treated, imported water for spreading within the Santa Anita Sub-area. A new imported water connection was constructed at the Sierra Madre Spreading Grounds for the purposes of spreading to allow for additional groundwater by the City. Over the past five years, MWD has delivered 1,036 AFY to 2,044 AFY, with an average of 1,550 AFY, for spreading on behalf of the City (City of Sierra Madre 2021a).

Due to the "500-foot" level limitation that is in effect, the City's water rights to the Raymond Groundwater Basin are currently based on the adjusted rights to the Santa Anita Sub-area of 940.0 AFY plus any imported water spread at the Sierra Madre Spreading Grounds. Over the past five years, the City has produced 1,023 AFY to 2,387 AFY, with an average of 1,967 AFY from the Raymond Groundwater Basin. However, with continued use of imported water,

tunnel water, and any other viable sources for groundwater recharge, the City can expect the “500-foot rule” restriction to be lifted (City of Sierra Madre 2021a).

### Tunnel Water

The City owns two tunnels (East and West tunnels) located in the Little Santa Anita Canyon, located in the mountains above the City. These tunnels act as horizontal wells and produce water by gravity flow (City of Sierra Madre 2021a). The City's wells and tunnels have traditionally supplied water to the City for the last 90 years. Currently, water is only taken directly into the City's distribution system from the West Tunnel, which has a maximum capacity of approximately 500 gallons per minute. The East Tunnel water is currently inactive due to the influence of surface water on its north branch. Since the production of water from these tunnels is dependent on the hydrologic cycle, production rates decline after several consecutive years of dry conditions. Thus, in multiple dry years, these tunnels would not provide a significant source of supply. Over the past five years, the City has produced 4 AFY to 9 AFY, with an average of 6 AFY from the West Tunnel (City of Sierra Madre 2021a).

### Main San Gabriel Groundwater Basin

The Main San Gabriel Groundwater Basin is a large groundwater basin replenished by stream runoff from the adjacent mountains and hills, by rainfall directly on the surface of the valley floor, subsurface inflow from Raymond Groundwater Basin and Puente Basin, and by return flow from water applied for overlying uses. Additionally, the Main San Gabriel Groundwater Basin is replenished with imported water. The Main San Gabriel Groundwater Basin serves as a natural storage reservoir, transmission system and filtering medium for wells constructed therein. The City produces groundwater from four production wells (Wells No. 3, No. 4, No. 5, and No. 6). There are three municipal wholesale water districts overlying and/or partially overlying the Main San Gabriel Groundwater Basin. The three districts are Upper District, SGVMWD, and Three Valleys Municipal Water District (TVMWD).

The City is a party to the Main Basin Judgment, which means the City can pump from the Main San Gabriel Groundwater Basin. The Main Basin Judgment does not restrict the quantity of groundwater that can be produced, but provides for a Replacement Water assessment for production in excess of water rights. Historically, the Main San Gabriel Groundwater Basin did not have wells. However, the City has proposed constructing a new well jointly with the City of Arcadia. The Main San Gabriel Groundwater Basin has been adjudicated and management of the local water resources within the Main San Gabriel Groundwater Basin is based on that adjudication. Management of the water resources in the Main San Gabriel Groundwater Basin is based upon Watermaster services under two Court Judgments: San Gabriel River Master and Main Basin Watermaster. Under the Main Basin Adjudication, the City does not have pumping rights but can pump from the Main San Gabriel Basin. Although there is no limit on the quantity of water that may be extracted by parties to the Main Basin Adjudication, including the City, groundwater production in excess of a Party's water right, or its proportional share (pumper's share) of the Operating Safe Yield, requires purchase of untreated imported water to recharge the Main San Gabriel Basin. The City plans to obtain groundwater produced from the Main San Gabriel Basin and delivered through an inter-connecting pipeline with the City of Arcadia. If the City obtains any water from the Main San Gabriel Groundwater Basin, replacement water may be purchased from SGVMWD to recharge the Main San Gabriel Groundwater Basin. Any water pumped from Main San Gabriel Groundwater Basin wells on behalf of the City will be counted toward the City. Over the past five years, the City has not obtained any groundwater from the Main San Gabriel Groundwater Basin (through the City of Arcadia) (City of Sierra Madre 2021a).

San Gabriel Valley Municipal Water District and Metropolitan Water District of Southern California

The City is a member of the SGVMD, a wholesale water supplier. The City can purchase treated, imported water from SGVMD through the MWD. SGVMWD coordinated with MWD to construct an emergency connection in 2012 for the City to receive treated imported water, which initially was delivered to the City’s distribution system. The capacity of the connection is approximately 2,500 gallons per minute (gpm). Beginning October 2013, well production was reduced by 95 percent due to low groundwater levels of the Raymond Groundwater Basin. Beginning in 2015, the City began delivering the treated imported water to the Sierra Madre Spreading Grounds for the purposes of groundwater spreading. The imported water spread is used as a credit to supplement the City’s water production rights in the Raymond Groundwater Basin (City of Sierra Madre 2021a).

MWD entered into an agreement with the City and SGVMWD to deliver treated, imported water. Pursuant to this agreement, SGVMWD provides a portion of its annual State Water Project (SWP) allocation which MWD then wheels to the City.

**Water Demand**

Historically, SMWD has relied on all of its sources, wells, and tunnels, to meet City demands. To ensure the efficient use and supply of groundwater in the Raymond Groundwater Basin, water resources is managed by the Raymond Basin Judgment (RBJ). The RBJ is administered by the RBMB and is comprised of various participating parties, including the City, to manage and preserve groundwater levels of the Raymond Groundwater Basin. Under provisions of the 1984 RBJ (Section VI [3]), pumping is restricted when groundwater levels in the Santa Anita Sub-area drop below 500 feet above mean sea level. Significant threats on the City’s water supply include increase in population, overdevelopment, and on-going drought conditions. The drought has driven home the point that Southern California is an arid region which does not have an adequate local water supply to meet current water demands, and that supplies of imported water cannot be counted upon in dry periods or in the event of a disaster (City of Sierra Madre 2015).

In July 2021, the City of Sierra Madre adopted the 2020 Urban Water Management Plan (UWMP) (City of Sierra Madre 2021a). The City’s 2020 UWMP ensures that water supplies are being planned to meet future growth (City of Sierra Madre 2015). Table 4.19-1, Normal Water Year Supply and Demand Comparison, Table 4.19-2, Single Dry Year Supply and Demand Comparison, and Table 4.19-3, Multiple Dry Years Supply and Demand Comparison represent the water supply and demand projections for the years 2025 through 2045.

**Table 4.19-1. Normal Year Supply and Demand Comparison**

	2025	2030	2035	2040	2045
Supply Totals	2,487	2,499	2,512	2,522	2,533
Demand Totals	2,487	2,499	2,512	2,522	2,533
<b>Difference</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

**Source:** City of Sierra Madre 2021a

**Notes:** Supply and Demand represented in acre-feet per year (AFY)

**Table 4.19-2. Single Dry Year Supply and Demand Comparison**

	2025	2030	2035	2040	2045
Supply Totals	2,331	2,342	2,353	2,364	2,375
Demand Totals	2,331	2,342	2,353	2,364	2,375

**Table 4.19-2. Single Dry Year Supply and Demand Comparison**

	2025	2030	2035	2040	2045
<b>Difference</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

Source: City of Sierra Madre 2021a

Notes: Supply and Demand represented in acre-feet per year (AFY)

**Table 4.19-3. Multiple Dry Year Supply and Demand Comparison**

		2025	2030	2035	2040	2045
First Year	Supply Totals	2,793	2,806	2,819	2,833	2,846
	Demand Totals	2,793	2,806	2,819	2,833	2,846
	<b>Difference</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
Second Year	Supply Totals	2,954	2,968	2,982	2,996	3,010
	Demand Totals	2,954	2,968	2,982	2,996	3,010
	<b>Difference</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
Third Year	Supply Totals	2,599	2,611	2,623	2,635	2,647
	Demand Totals	2,599	2,611	2,623	2,635	2,647
	<b>Difference</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
Fourth Year	Supply Totals	2,210	2,220	2,230	2,241	2,251
	Demand Totals	2,210	2,220	2,230	2,241	2,251
	<b>Difference</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
Fifth Year	Supply Totals	2,299	2,310	2,320	2,331	2,342
	Demand Totals	2,299	2,310	2,320	2,331	2,342
	<b>Difference</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

Source: City of Sierra Madre 2021a

Notes: Supply and Demand represented in acre-feet per year (AFY)

As depicted from the Tables 4.19-1 through 4.19-3, the City can expect to meet future demands for normal year, single dry years, and five consecutive year drought periods from 2025 through 2045.

**Water Conservation**

Water conservation can be considered an additional source of potable water because it frees up water that otherwise might be used inefficiently. In light of drought conditions, the City has needed to review and update its “Mandatory Water Conservation Plan” on several occasions during 2013 and 2014. The City has also adopted Water Efficient Landscape and Low Impact Development Ordinances to require water conservation efforts associated with development and redevelopment.

**Sewer/Wastewater**

The sewer collection system is owned by the City and is managed, operated, and maintained by the City’s Public Works Department. The 32-mile sewer pipeline system that serves the City operates on gravity and intersects Los Angeles County Sanitation District (LACSD) trunk pipelines within the City. The City sewer main lines are 8 inches in diameter and are found below most City streets (City of Sierra Madre 2015).

LACSD provides, under contract with the City, the treatment of wastewater and the ultimate disposal of effluent and solids in compliance with the waste discharge requirements set by the California Regional Water Quality Control Board (RWQCB). The City currently provides sewer service to approximately 90% of the City's residents and commercial establishments. The balance is served by private septic tank systems or by County-owned and operated trunk mains in East Orange Grove Avenue, and South Baldwin Avenue. About 93% of flows from these local sewers discharge into LACSD facilities for conveyance, treatment, and disposal at the San Jose Creek Water Reclamation Plant (SJCWRP) and the Whittier Narrows Water Reclamation Plant (WNWRP). The remaining 7% of total sewage generated within the City passes through the adjacent City of Arcadia sewer system and is conveyed to LACSD facilities. The SJCWRP plant serves a population of approximately 1 million people, largely composed of a residential population (City of Sierra Madre 2015).

The City has prepared and updated a Sewer System Management Plan (SSMP). This requirement by the State Water Resources Control Board was accomplished in 2006 and updated in 2014. The SSMP provides specific actions to respond to spills, provides for an analysis on system capacities and areas that are subject to leaks or breaks (City of Sierra Madre 2015).

The City does not maintain individual sewer laterals, either on private property or within street rights-of way. Maintenance of those portions of the sewer system is considered the responsibility of the individual property owner served by the lateral (City of Sierra Madre 2015).

### ***Solid Waste***

The City has an exclusive franchise contract with Athens Services to collect all waste within the City. Refuse collection is conducted once a week for most residential and commercial customers. Some commercial and multi-unit properties may have service more frequently if needed. For residential customers, Athens Services provides a three-can system to separate waste from recyclable material and organic material (City of Sierra Madre 2015).

The City is a member of the Scholl Canyon Wasteshed and much of the material collected by Athens Service is taken to the Scholl Canyon Landfill. Waste was previously taken to Puente Hills Landfill but after closure of that facility, waste is now taken to the Scholl Canyon Landfill (City of Sierra Madre 2015).

### ***Stormwater Drainage***

The City owns and maintains approximately 9.62 miles of storm drains. Seven debris basins are located within the City. Six of the seven debris basins are owned and maintained by the Los Angeles County Department of Public Works (LACDPW). The basins are located in the northern portion of the City in the hillside area, where the project site is located. LACDPW also maintains the Sierra Madre Dam located at the north end of Woodland Drive (City of Sierra Madre 2015).

### ***Electric Power, Natural Gas, and Telecommunication Facilities***

#### **Electrical Power**

Electrical service to the City is provided by Southern California Edison Company (SCE). Existing SCE facilities presently provide adequate electrical service throughout the City. The majority of SCE facilities in the City are overhead, consisting of wood power poles, overhead conductors, transformers, and various other types of pole-mounted equipment. Some customers have individual underground-fed services, such as a customer being served from a pad mounted transformer, or a residential customer who has opted to have their service installed

underground. According to SCE, no deficiencies or inefficiencies currently exist and there are no plans by SCE to expand electrical facilities at this time. SCE regularly reviews its grid system and infrastructure for reliability of service to its customers (City of Sierra Madre 2015).

### **Natural Gas**

The City's natural gas needs are provided by Southern California Gas Company (SoCalGas). SoCalGas does not have any natural gas building facilities within the City's boundaries and no deficiencies or inefficiencies currently exist. Additionally, there are no plans by SoCalGas to expand natural gas facilities at this time (City of Sierra Madre 2015).

### **Telecommunication Facilities**

Phone service to the project site would be provided by Frontier or Spectrum. Additionally, a Charter cable runs from the backyards of existing homes on the north and east sides of Sierra Keys Drive up Carter Avenue to the Mater Dolorosa Retreat Center (Dudek 2020). Furthermore, the City's General Plan states that Time Warner Cable can provide cable television to the project site (City of Sierra Madre 2015).

## 4.19.2 Relevant Plans, Policies, and Ordinances

### **Federal**

#### ***Integrated Waste Management Act of 1989 (AB 341)***

The Integrated Waste Management Act of 1989, or Assembly Bill (AB) 341, requires each city, county, and regional agency to develop a source reduction and recycling element of an integrated waste management plan that includes source reduction, recycling, and composting components. A minimum of a 50% diversion rate of all solid waste from landfill disposal or transformation by January 1, 2000, was required and met. The current policy goal of the state is no less than 75% of solid waste generated be source reduced, recycled, or composted by the year 2020.

### **State**

#### ***Urban Water Management Planning Act***

In 1983, the Legislature enacted the Urban Water Management Planning Act (UWMP Act) (California Water Code, Sections 10610–10656), which requires specified urban water suppliers within the state to prepare an Urban Water Management Plan (UWMP) and update it every 5 years. State and local agencies and the public frequently use UWMPs to determine if agencies are planning adequately to reliably meet water demands in various service areas. As such, UWMPs serve as an important element in documenting water supply availability and reliability for purposes of compliance with state laws, Senate Bill (SB) 610 and SB 221, which link water supply sufficiency to large land-use development project approvals. Urban water suppliers also must prepare UWMPs, pursuant to the UWMP Act, to be eligible for state funding and drought assistance.

The UWMP provides information on water usage, water supply sources, and water reliability planning within a specified water agency service area. It also may provide implementation schedules to meet projected demands over the planning horizon; a description of opportunities for new development of desalinated water; groundwater information (where groundwater is identified as an existing or planned water source); description of water quality over the planning horizon; and identification of water management tools that maximize local resources and

minimize imported water supplies. Additionally, the UWMP evaluates the reliability of water supplies within the specified service area. This includes a water supply reliability assessment, water shortage contingency plan, and development of a plan in case of an interruption of water supplies.

### ***Senate Bills 610 and 221***

On January 1, 2002, SB 610 took effect. SB 610, which was codified in the Water Code beginning with Section 10910, requires the preparation of a water supply assessment for projects within cities and counties that propose to construct 500 or more residential units or the equivalent. SB 610 stipulates that when environmental review of certain development projects is required, the water agency that is to serve the development must complete the water supply assessment to evaluate water supplies that are or will be available during normal, single-dry, and multiple-dry years during a 20-year projection to meet existing and planned future demands, including the demand associated with a project.

SB 221, enacted in 2001 and codified in the Water Code, requires a city, county, or local agency to include a condition to any tentative subdivision map that a sufficient water supply shall be available to serve the subdivision. The term “sufficient water supply” is defined as the total water supplies available during normal, single-dry, and multiple-dry years within a 20-year projection that would meet the proposed subdivision project’s projected water demand, in addition to existing and planned future water uses, including agricultural and industrial uses, within the specified service area. SB 221 further requires any verification of “projected” water supplies to be based on entitlement contracts, capital outlay programs and regulatory permits and approvals.

### ***Title 14: Natural Resources – Division 7***

Title 24 of the California Code of Regulations regarding Natural Resources sets minimum standards for solid waste handling and disposal, including specific regulations regarding waste tire storage and disposal, hazardous waste disposal facilities, construction and demolition and inert debris transfer/processing, construction and demolition waste and inert debris disposal, transfer/processing operations and facilities, siting and design, operation standards, record keeping, and additional operating requirements for facilities. Additional guidance and requirements for compostable materials handling operations and facilities, asbestos handling and disposal, resource conservation programs, farm and ranch solid waste cleanup and abatement, used oil recycling program, electronic waste recovery and recycling, solid waste cleanup among others are also addressed in Title 14.

### ***Title 27: Environmental Protection – Division 2, Solid Waste***

Title 27 of the California Code of Regulations regarding Environmental Protection and Solid Waste set the criteria for all waste management units, facilities, and disposal sites including regulations of the California Integrated Waste Management Board and State Water Resources Control Board. Waste classification, siting, construction standards, water quality monitoring and response programs, operating criteria, daily and immediate cover, handling and equipment, controls, gas monitoring and control, closure and post-closure standards, and financial assurances are all aspects covered in Title 27.

### ***Assembly Bill 939 and Assembly Bill 341***

In 1989, AB 939, known as the Integrated Waste Management Act (California Public Resources Code, Sections 40000 et seq.), was passed because of the increase in waste stream and the decrease in landfill capacity. The statute established the California Integrated Waste Management Board, which oversees a disposal reporting system. AB 939 mandated a reduction of waste being disposed where jurisdictions were required to meet diversion goals of all solid waste through source reduction, recycling, and composting activities of 25% by 1995 and 50% by the year 2000.

AB 341 (2011) amended the California Integrated Waste Management Act of 1989 to include a provision declaring that it is the policy goal of the state that not less than 75% of solid waste generated be source-reduced, recycled, or composted by the year 2020 and annually thereafter. In addition, AB 341 required the California Department of Resources Recycling and Recovery (CalRecycle) to develop strategies to achieve the state's policy goal. CalRecycle has conducted multiple workshops and published documents that identify priority strategies that CalRecycle believes would assist the state in reaching the 75% goal by 2020.

### ***Executive Order B-29-15***

In response to the ongoing drought in California, Executive Order (EO) B-29-15 (April 2015) set a goal of achieving a statewide reduction in potable urban water usage of 25% relative to water use in 2013. The term of the EO extended through February 28, 2016, although many of the directives have since become permanent water-efficiency standards and requirements. The EO includes specific directives that set strict limits on water usage in the state. In response to EO B-29-15, the California Department of Water Resources has modified and adopted a revised version of the Model Water Efficient Landscape Ordinance that, among other changes, significantly increases the requirements for landscape water use efficiency and broadens its applicability to include new development projects with smaller landscape areas.

### **Local**

#### ***Household Hazardous Waste Element***

Resolution 98-06, adopted in December of 1997, created the City's Household Hazardous Waste Element. This document outlined strategies and planning to eliminate household hazardous wastes from the City's waste stream. The City's residents are provided with opportunities to safely dispose of common household goods that are not allowed into the traditional waste stream. Items such as light bulbs, batteries, used oil, electronic waste, and certain solvents and cleaners are dangerous to the environment and prohibited from landfills. The City works closely with the County of Los Angeles to create and maintain programs to collect and safely dispose of such waste. Once a year, the City hosts a County-sponsored Household Hazardous Waste Roundup at the Mariposa Parking Lot. The event accepts the hazardous waste at no charge to the resident. A calendar of such events that are being hosted by nearby cities is maintained and available to residents, and the County's website is also a source for such reference.

#### ***Urban Water Management Plans***

The Urban Water Management Plan (UWMP) Act requires that each urban water supplier providing water for municipal purposes, either to more than 3,000 customers, or more than 3,000 AFY, must prepare, adopt, and update a UWMP at least once every 5 years on or before December 31, in years ending in 5 and 0. The intent of an UWMP is to present information on water supply, water usage/demand, recycled water, and water use efficiency programs in a respective water district's service area. The UWMP also serves as a valuable resource for planners and policy makers over a 25-year time frame. As such, the City's 2020 UWMP ensures that water supplies are being planned to meet future growth. UWMPs are developed to manage the uncertainties and variability of multiple supply sources and demands over the long term (City of Sierra Madre 2021a). As discussed above, the City adopted its 2020 UWMP in July 2021.



### *City of Sierra Madre General Plan*

The City's General Plan discusses the City's owned and operated municipal utility systems. The General Plan recognizes that the City shall achieve public services goals through adequate and safe public infrastructure (utility systems) that support land uses. The General Plan includes objectives and policies in the Community Services Element that require the provision of adequate utility systems to meet demands of new and existing development (City of Sierra Madre 2015). The following goals, objectives, and policies from the City's General Plan are relevant to the project. The proposed project's consistency with these policies is provided in Table 4.11-1 in Section 4.11, Land Use and Planning.

**Land Use Goal 4:** Ensure that development is done to maximize water conservation practices to reduce and minimize the impact on the City's local water supply and the ability to serve its water customers.

**Land Use Goal 5:** Institute conservation measures so that the demand for water matches the City's local supply.

**Policy L1.6:** Require that new residential development, substantial remodeling and additions comply with all adopted water conservation measures that reduce and minimize the impact on the City's water supply and its ability to serve its water customers.

**Objective L4:** Mitigating the impacts of new development on the City's open space, trees, infrastructure, water, transit services, the character of existing development, and other public needs.

**Policy L4. 3:** Ensure that new development and the expansion of existing uses incorporate water conservation measures that reduce and minimize the impact on the City's water supply and its ability to serve its customers.

**Policy L8.3:** Consider a water impact fee to apply to new residential dwelling units and additions to existing development that increase water consumption, to fund water fixture retrofits of existing homes and other water conservation measures.

**Water Resources Goal 3:** Growth that is linked to the availability of water.

**Water Resources Goal 4:** Use of local sources of groundwater rather than imported water.

**Policy Hz2.4:** Consider water availability in terms of quantity and water pressure for safety purposes when considering the size and location of new residential construction.

**Objective C31:** Providing adequate water, wastewater/sewer, storm drainage, electrical, and telecommunications systems to meet the demands of new and existing development.

**Policy C31.1:** Provide for storm drainage improvements where existing systems are deficient.

**Policy C31.3:** Require that new development be contingent upon the ability to be served by adequate sanitation collection and treatment, water, electrical and natural gas energy, telecommunication, storm drainage, and other supporting infrastructure.

**Policy C31.4:** Upgrade areas that are deficient and maintain lighting fixtures in good working condition.

**Policy C31.5:** Require that new development capture for percolation on site the maximum practical amount of storm water.

### ***Sewer System Management Plan***

The City's SSMP was prepared in compliance with the formal and executive orders issued by the State Water Resources Control Board. Those orders require every owner and operator of publicly owned sewer systems to develop and implement a system specific SSMP. The SSMP sets forth goals and actions to be followed, and guidelines for various activities involved in managing, operating, maintaining, replacing, and expanding the sewer system (City of Sierra Madre 2014). The goals of the SSMP include the following:

- City wastewater collection system facilities are properly operated, maintained, and managed to reduce frequency and severity of sanitary sewer overflows (SSO) and their potential impacts on public health, safety, and on the environment; and
- When SSO occurs, prompt action is taken to identify, contain, remove the cause and then to promptly report the event to appropriate regulatory authorities and that the public is adequately and timely notified; and
- All SSO and system deficiencies and remedial actions taken are well documented; and
- City sewer system operations, employees, contractors, responders, or other agents are adequately trained and equipped to effectively address an SSO event; and
- City sewer system is properly designed, constructed, and funded to provide adequate capacity to convey base flows and peak flows while meeting or exceeding applicable regulations, laws, and the generally acceptable practices relative to sanitary sewer system operations and maintenance.

### ***Sierra Madre Municipal Code***

#### **Sewer Connection**

Sierra Madre Municipal Code Section 13.12.250, states that for each lot, a 6-inch internal diameter house connection sewer shall be provided in the street, straight in alignment and grade between the main-line sewer and the property line, with minimum depths as required by Section 13.12.170, and at right angles to the mainline sewer whenever possible. An exception, includes house connection sewers constructed in the street under the provisions of Chapter 15.20, or house connection sewers provided in the street for lots restricted to single-family residential use under the provisions of the Title 17 of this code may have an internal diameter of 4 inches.

#### **Waste Management Plan**

All projects within the City, which the City reasonably determines will cost \$50,000 or more to construct shall be subject to the Waste Management Plan (WMP) requirement of Section 8.13.040. Per Section 8.13.040 of the Sierra Madre Municipal Code, a completed WMP shall indicate the estimated volume or weight of construction and demolition material or debris, by material type to be generated; maximum volume or weight of such materials that can be diverted via reuse or recycling; the vendor or facility that the construction and demolition applicant proposes to use to collect or receive that material; the estimated volume or weight of construction and demolition materials that will be sent to a disposal site; and the estimated volume or weight of inert materials to be sent to an inert disposal facility.

#### **Mandatory Water Conservation Plan**

The purpose of the Mandatory Water Conservation Plan is to minimize the effects of a water shortage to the water customers of the City, to comply with California Water Code Sections 10608(a) and (b), and to significantly reduce the delivery and consumption of water, thereby extending the period of available water to match the water which may be supplied or delivered to the distribution system of the City.

**Low-Impact Development Plan**

The provisions of Chapter 15.58 contain requirements for construction activities and facility operations of development and redevelopment projects to comply with the current “municipal NPDES permit,” lessen the water quality impacts of development, and integrate low-impact-development design principles to mimic predevelopment hydrology through infiltration, evapotranspiration and rainfall harvest and use. Low-impact development shall be inclusive of the Los Angeles Countywide Standard Urban Stormwater Mitigation Plan requirements.

**Water Efficient Landscape Ordinance**

Chapter 15.60 of the Sierra Madre Municipal Code defines the Water Efficient Landscape Ordinance. The City’s City Council finds that the Water Efficient Landscape Ordinance should at least be effective in conserving water as the model local water efficient landscape ordinance adopted by the California Department of Water Resources pursuant to Government Code Section 65595. This ordinance shall implement goals related to the use and preservation of water including to assure beneficial, efficient, and responsible use for all water users within the City.

### 4.19.3 Thresholds of Significance

The significance criteria used to evaluate the project impacts to utilities and service systems are based on Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to utilities and service systems would occur if the project would:

1. Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.
2. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.
3. Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments.
4. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.
5. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

### 4.19.4 Project Design Features

The following project design feature (PDF) would be implemented as part of the proposed project and would be applicable to utilities and service systems:

**PDF-UTL-1** Prior to issuance of a building unit, the project applicant will provide funds to the City to achieve one of the following:

1. Purchase supplemental water from the San Gabriel Valley Municipal Water District (SGVMWD) in an amount equal to the anticipated total indoor and outdoor water demand of each residential unit over a 50-year period. This purchase would be in addition to the City’s existing agreement with SGVMWD providing for the purchase of supplemental imported water.

2. Creation of a lawn retrofit program, which would provide homeowners with a grant provided to replace their lawn with turf;
3. Improvements to existing water infrastructure, such as pipe leakage fixes.

#### 4.19.5 Impacts Analysis

- 1. *Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?***

##### **Water**

As discussed in Section 4.19.1, Existing Conditions, the City is the licensee and operator of its own water distribution system under the SMWD. The SMWD owns and maintains approximately 46 miles of water mains. The City receives water supplies from groundwater, imported water, and tunnel water. Refer to Section 4.19.1 for further details regarding water supply in the City. As mentioned in this section, water supply to the City would primarily be provided through imported water until the Raymond Groundwater Basin returns to a sufficient level of groundwater.

Based on the City's Comprehensive Water and Wastewater Cost of Service Study, on average, a resident in the City utilizes approximately 55 gallons of water per day for indoor water use, which equates to 0.000168789 AF of water use per resident (see Appendix J, Comprehensive Water and Wastewater Cost of Service Study). As discussed in Section 4.14, Population and Housing, Southern California Association of Governments (SCAG's) Connect SoCal Program EIR, the average household size in the SCAG region was 3.2 persons per household in 2018 (SCAG 2019). Using the 2018 regional average as a guide, 3.2 persons per household for the project's proposed 42 residential units could generate a population increase of approximately 134 persons. Using these numbers, the proposed project would result in an increased demand of approximately 0.023 AF per day for the 134 residents associated with the project, or a total of 8.26 AFY of indoor water use. In addition, the proposed project's anticipated outdoor water use was calculated using the Maximum Applied Water Allowance (MAWA), which represents the maximum potential outdoor water use permitted by low impact design standards set by the California Building Code. MAWA uses average lot sizes, home sizes, and driveway sizes to calculate water usage associated with outdoor areas, and accounts for water evaporation rates. Per MAWA calculations performed by GroundLevel Landscape Architecture, Inc, the outdoor water use associated with the project would be approximately ~~3.65~~ 18.04 AFY. This includes 10.50 AFY associated with the proposed park and 7.54 AFY associated with the proposed open space (GroundLevel Landscape Architecture, Inc 2021). Therefore, the proposed project would result in an increased water demand of approximately ~~11.91~~ 26.30 AFY (8.26 AFY associated with indoor water use and ~~3.65~~ 18.04 AFY associated with outdoor water use). This number represents the maximum amount of water usage that the project would be allowed to use, per Chapter 15.60, Water Efficient Landscape Ordinance, of the Sierra Madre Municipal Code (SMMC). As discussed in further detail below, water efficiency features such as the use drought tolerant and native landscape palate and compliance with the California Green Building Code would substantially reduce this number.

Tables 4.19-1 through 4.19-3 show that the City can expect to meet future demands for normal year and single dry years and five consecutive year drought periods from 2025 through 2045. The City's 2021 UWMP accounts for projected populations in the City's service area based on growth rate projections obtained by SCAG's 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The 2020-2045 RTP/SCS assumed a 2016 population of 11,000 residents and a 2045 population of 11,300 residents. Therefore, the forecasted population growth for the City is estimated to increase by 300 people between 2016 and 2045 (SCAG 2020). As discussed in Section 4.14, the project's proposed 42 residential units would generate a population increase of

approximately 134 persons. Therefore, the increase in growth generated by the proposed project would be accounted for in the growth anticipated in the 2020 RTC/SCS and therefore in the assumptions of the City's 2021 UWMP. In addition, the City has indicated that the project was included as a contemplated project in the City's 2021-2029 Housing Element and has been included in order to provide a complete picture of potential housing growth in the community during the eight-year planning period (City of Sierra Madre 2021b). Therefore, the growth associated with the proposed project has been accounted in City planning documents.

Per Table 3.19-3, the SMWD's water supply and demands for Years 2040 and 2045 during multiple dry years (fifth year)<sup>1</sup> would be 2,299 AFY for Year 2025; 2,310 AFY for Year 2030, 2,331 AFY for Year 2040, and 2,342 AFY for Year 2045, respectively (City of Sierra Madre 2021a). As estimated above, the project would consume approximately 11.9126.30 AF of water per year of water use (8.26 AF of water per year of indoor water use and 3.6518.04 AF per year for outdoor water use). Therefore, estimated water consumption of the proposed project would result in approximately 1.14% for 0.51% of SMWD's projected water demand and supply for Years 2025, 2030; 1.13% for Years 2035 and 2040; and 1.12% for both Year 2040 and 2045, during a fifth year of a multiple dry year. As discussed above, the City's 2021 UWMP accounts for projected populations in the City's service area based on growth rate projections obtained by SCAG's 2020-2045 RTP/SCS, which accounts for projected residential development. Therefore, SMWD would have sufficient available supply to meet the water demand associated with the proposed project.

In addition, the project site would be developed in compliance with the California Green Building Code (which implements water efficiency standards for appliances and fixtures), which would further reduce project water usage. Further, the Specific Plan requires the project to incorporate drought tolerant and native landscape palate that would further reduce outdoor water usage. Therefore, the project's anticipated water demand, outlined above, represents the maximum amount of water usage allowed for the project under Chapter 15.60; Water Efficient Landscape Ordinance, of the SMMC and this number is anticipated to be substantially lower as the project's design is finalized. Further, to achieve a net-zero impact on local water supplies, the project Applicant would provide funds to the City for one of three programs: (1) to increase the City's water supply through the purchase of additional supplemental water from the SGVMWD; (2) the creation of a lawn retrofit program, which would provide homeowners with a grant provided to replace their lawn with turf; and (3) improvements to existing water infrastructure, such as pipe leakage fixes. If the City opts for purchase of supplemental water, tThe amount of supplemental water purchased from the SGVMWD would be equal to all anticipated indoor and outdoor water demands for the proposed residential units over a 50-year period (see project design feature [PDF]-UTL-1 in Sections 3.3.13 and 4.19.4). This purchase of additional supplemental water would offset the demand placed on existing supplies and would be in addition to the City's existing agreement with SGVMWD, which allows the City to purchase up to 2,500 AFY of supplemental water from SGVMWD. Therefore, this additional water supply has been accounted for in SGVMWD's UWMP. The additional supplemental water procured by the City as a result of the project would be stored in the Main San Gabriel Groundwater Basin and would be available to serve the public, as needed.

As shown in Figure 3-8, Proposed Water System, in Chapter 3, Project Description, of this EIR, the potable water delivery system would consist of a network of water mainlines, to be located within planned roadways. The existing 8-inch water main in the eastern portion of the project site would be removed and reconstructed as a 12-inch water main within Carter Avenue. The existing 8-inch sewer at the southwest corner of the project site would be removed. Additional 8-inch water mains are proposed within the other planned roadways (North Sunnyside Avenue extension and A, B and C Streets) and would distribute the potable water for connection to laterals located on individual lots. The proposed water mainlines would join the existing water mainlines at North Sunnyside Avenue

<sup>1</sup> Multiple dry year (fifth year) demand projections were chosen to provide a conservative analysis.

and Carter Avenue at Lima Street, located approximately 670 feet east of the site, and will tie into the existing Oak Crest transmission main. These improvements would serve the proposed project only and occur within the boundaries of the project site. Therefore, these water improvements would not require or result in the relocation or construction of new or expanded water. In addition, as discussed above, the proposed project would not substantially increase demand of the City's water supply such that relocation or construction of new or expanded water supply facilities would be needed. Therefore, impacts would be **less than significant**.

### **Sewer/Wastewater**

The sewer collection system is owned by the City and is managed, operated, and maintained by the City's Public Works Department. The 32-mile sewer pipeline system operates on gravity and intersects LACSD trunk pipelines within the City. The City sewer main lines are 8 inches in diameter and are found below most City streets. Figure 3-9, Proposed Wastewater System, in Chapter 3 depicts the on-site sewer system to serve the project. As shown in Figure 3-9, the proposed sewer system would consist of a network of 8-inch sewer mainlines that would be constructed within planned roadways. The proposed sewer mainlines would collect the sewage from laterals located on individual lots. The existing Mater Dolorosa Retreat Center sewer line on the project site would be relocated to be within Carter Avenue. Therefore, with implementation of wastewater facilities, the project would provide adequate wastewater facilities to serve the proposed project.

As discussed in Section 4.19.2, Relevant Plans, Policies, and Ordinances, about 93% of flows from these local sewers discharge into LACSD facilities for conveyance, treatment, and disposal at the San JWCWRP and the WNWWRP. The remaining 7% of total sewage generated within the City passes through the adjacent City of Arcadia sewer system and is conveyed to LACSD facilities. Wastewater produced by development allowed under the project would be treated at SJCWRP. SJCWRP currently has a treatment capacity of about 100 million gallons per day (MGD). Based on CalEEMod generation rates, development allowed under the proposed project would generate approximately 2.74 MGY of wastewater (Appendix B). Thus, wastewater generated by the project annually would be minimal in relation to the SJCWRP's daily treatment capacity. The SJCWRP treatment level is coagulation, filtration, and disinfection tertiary effluent. The SJCWRP has room for an expansion of an additional 25 MGD, although there is no schedule for such an expansion. Regardless of the future expansion, the existing sewer collection system and wastewater system would be able to adequately support the project. Therefore, impacts would be **less than significant**.

### **Stormwater Drainage**

Hydrology is discussed in detail in Section 4.10, Hydrology and Water Quality, of this EIR. Development allowed under the proposed project would alter the existing drainage of the project site by introducing impervious area to the site. More specifically, the project would introduce 42 detached single-family residential units and approximately 3.04-acre dedicated neighborhood park, within the 17.30-acre project site, resulting in the addition of more impervious area to the site, which would result in more surface runoff. However, as part of project site improvements, the project would include development of two storm drain networks, in order to properly convey flows from the western and eastern portions of the site (see Figure 3-7, Proposed Drainage Plan, in Chapter 3). As discussed in Chapter 3 and Section 4.10, Hydrology and Water Quality, the project would involve removal of portions of the existing 36-inch-diameter pipe within the western portions of the site, which would be reconstructed under the realigned extension of North Sunnyside Avenue and would connect with a proposed 36-inch RCP, to be located at North Sunnyside Avenue, between Street A and Street B. Additionally, the proposed western storm drain network would include development of two 18-inch RCP lateral connections at the southern end of the project site; two onsite catch basins within the southern end of North Sunnyside Avenue, to capture runoff generated from the

western portion of the project site; and two additional catch basins, to be located directly to the northeast of the project site, within the existing Carter Avenue, to capture offsite flows before runoff enters the project site via the North Sunnyside Avenue extension. The western storm drain network would tie in with an existing 36-inch storm drain in North Sunnyside Avenue, at the southwest portion of the site and ultimately conveys runoff to Arcadia Wash.

The second storm drain network would be located on the eastern portion of the site and would be composed of 18-inch and 24-inch RCPs. Streets A, B, and C would include two catch basins each, and would each capture and convey surface runoff to the east. The second storm drain network would extent along Carter Avenue and would also convey surface runoff captured by two catch basins, to be located directly to the northeast of the project site, within the Carter Avenue (see Figure 3-7). A 24-inch RCP would be located in the southeastern portion of the project site and would run in the east to west direction into the proposed retention gallery, within the proposed park. The proposed 63,500-cubic-foot retention storage gallery would consist of approximately 2,400 linear feet of 60-inch diameter perforated pipe surrounded by gravel bed. The retention storage gallery would be approximately 24 inches below ground and would promote water quality treatment through infiltration. Stormwater that is not retained in the underground storage gallery retention system or infiltrated into the ground would be routed to the southeast corner of the proposed park and exit to Crestvale Drive via a 24-inch surface culvert. Flows would then be conveyed via the MS4 to the receiving waters of Arcadia Wash, an open concrete lined channel located approximately 1 mile southeast of the project site. Therefore, through improvements of on-site stormwater drainage facilities, the project would not result in relocation or construction of new or expanded stormwater drainage facilities. Impacts are **less than significant**.

### **Electric Power, Natural Gas, and Telecommunications Facilities**

Dry utilities, such as electric, natural gas, and telecommunication infrastructure would be required to be installed to serve the proposed project. These dry utilities will be located within underground conduits in the public or private street corridors/rights-of-way, within the project site, in general conformance with the phasing of the Specific Plan. The project would include electric, gas, and telecommunication connections within North Sunnyside Avenue and Carter Avenue. The proposed project would be served by Southern California Edison for electricity, Southern California Gas Company for natural gas, and Charter and Frontier for telecommunication services (Dudek 2020). Prior to and during the final infrastructure/improvement plan stages, consultation with all appropriate utilities to determine the extent of the dry utilities needed to serve the project will be required prior to and during the final infrastructure/improvement plan stages. Therefore, impacts would be **less than significant**.

### **2. *Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?***

As discussed under Threshold 1, above, Tables 4.19-1 through 4.19-3 show that the City can expect to meet future demands for normal year, single dry years, and five consecutive drought years from 2025 through 2045. Per Table 3.19-3, the SMWD's water demands and supply for Years 2040 and 2045 during multiple dry years (fifth year)<sup>2</sup> would be 2,331 AF per day and 2,342 AF per day, respectively. The project would consume approximately ~~11.91~~26.30 AF of water per year of water use (8.26 AF of water per year of indoor water use and ~~18.04~~3.65 AF per year for outdoor water use). This number represents the maximum amount of water usage that the project would be allowed to use, per Chapter 15.60: Water Efficient Landscape Ordinance, of the Sierra Madre Municipal Code (SMMC). Water efficiency features such as the use drought tolerant and native landscape palate and compliance with the California Green Building Code would substantially reduce this number. Therefore, estimated water

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<sup>2</sup> Multiple dry year (fifth year) demand projections were chosen to provide a conservative analysis.

consumption of the proposed project would result in approximately 1.14% of SMWD's projected water demand and supply for Years 2025, 2030; 1.13% for Years 2035 and 2040; and 1.12% for Year 2045, during a fifth year of a multiple dry year. ~~0.51% of SMWD's projected water demand for both 2040 and 2045, during a fifth year of a multiple dry year.~~ As discussed under threshold a, above, the City's 2021 UWMP accounts for projected populations in the City's service area based on growth rate projections obtained by SCAG's 2020-2045 RTP/SCS, which accounts for an increase of 300 residents in the City between 2016 and 2045 (SCAG 2020). In addition, the City has indicated that the project was included as a contemplated project in the City's 2021-2029 Housing Element and has been included in order to provide a complete picture of potential housing growth in the community during the eight-year planning period (City of Sierra Madre 2021b). Thus, the growth associated with the proposed project has been accounted in City planning documents. Therefore, even during multiple dry years, SMWD would have sufficient available supplies to meet the water demand associated with the proposed project.

In addition, the project site would be developed in compliance with the California Green Building Code (which implements water efficiency standards for appliances and fixtures), which would further reduce project water usage. Further, to achieve a net-zero impact on local water supplies, the project Applicant will provide funds to the City to contribute to one of three programs: (1) to increase the City's water supply through the purchase of additional supplemental water from the SGVMWD; (2) creation of a lawn retrofit program, which would provide homeowners with a grant provided to replace their lawn with turf; and (3) improvements to existing water infrastructure, such as pipe leakage fixes. ~~If the City opts for purchase of supplemental water, the project Applicant will provide funds to the City to increase the City's water supply through the purchase of additional supplemental water from the SGVMWD.~~ The amount of supplemental water purchased from the SGVMWD would be equal to all anticipated indoor and outdoor water demands for the proposed residential units over a 50-year period (see PDF-UTL-1 in Sections 3.3.13 and 4.19.4). This purchase of additional supplemental water would offset the demand placed on existing supplies and would be in addition to the City's existing agreement with SGVMWD, which allows the City to purchase up to 2,500 AFY of supplemental water from SGVMWD. The additional supplemental water procured by the City as a result of the project would be stored in the Main San Gabriel Groundwater Basin and would be available to serve the public, as needed. Per SGVMWD UWMP, for a single dry year, ~~SGVMWD would have sufficient water supplies to meet demand for an average year, a single dry year, and multiple dry years.~~ Total water supply associated with SGVMWD in the year 2035 for a single dry year would be 16,704 AFY while the total demand would be 15,054 AFY. Therefore, SGVMWD would have an available supply of 1,650 AFY in excess of demand. Similarly, SGVMWD would have a supply of 16,704 AFY and demand of 15,345 AFY in the year 2040, which would result in 1,359 AFY of supply in excess of demand ~~is anticipated to be approximately 48,604 AFY (SGVMWD 2017/2020).~~ Thus, the proposed project's demand of ~~11.91-26.30 AFY~~ would equate to approximately ~~0.021-9%~~ 1.9% of SGVMWD's excess supplies. Therefore, SGVMWD would have sufficient supplies to accommodate the purchase of supplemental water, to be provided to the City during a normal year. ~~However, for a single dry year, and multiple dry years, supplemental water may not be available. In this case, and if supplemental water is not available for purchase, the applicant would provide funds to the City to support the creation of a lawn retrofit program or improvements to existing water infrastructure, which achieve a commensurate level of water reduction.~~ Lastly, if sufficient supplies are available for supplemental water purchase, because the amount of supplemental water purchased from the SGVMWD would be equal to all anticipated indoor and outdoor water demands for the proposed residential units (approximately ~~26.30-11.91 AFY~~), this additional water supply would ~~fall within~~ be in addition to the City's allowable purchase of 2,500 AFY of supplemental water from SGVMWD. ~~Therefore, the additional supplemental water procured by the City as a result of the project has been accounted for in SGVMWD's UWMP.~~ Therefore, because the proposed project would not result in a significant increase in demand of the SMWD's or SGVMWD's existing supplies, and because ~~both SMWD and SGVMWD have~~ sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years, impacts would be **less than significant.**



3. *Would the project result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?*

See discussion of sewer/wastewater under Threshold 1. Impacts would be **less than significant**.

4. *Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?*

As discussed in Section 4.19.1, solid waste management services for the City are provided by Athens Services. Refuse collection is conducted once a week for most residential and commercial customers. Some commercial and multi-unit properties may have service more frequently if needed. For residential customers, Athens Services provides a three-can system to separate waste from recyclable material and organic material. The City is a member of the Scholl Canyon Watershed, so the refuse produced by the City is taken to Scholl Canyon Landfill. This Scholl Canyon Landfill is allowed to receive 3,400 tons per day, has a maximum capacity of 58.9 million tons, and a remaining capacity of 9.9 million tons. It is anticipated that this Scholl Canyon Landfill will cease operation in 2030 (CalRecycle 2019). As such, the available capacity of the landfill would be able to accommodate development allowed under the project. Thus, impacts would be **less than significant**.

5. *Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?*

As previously discussed in Section 4.19.2, the project would comply with the California Integrated Waste Management Act (AB 939 and AB 341) which mandate a reduction of waste being disposed where jurisdictions were required to meet diversion goals of all solid waste through source reduction, recycling, and composting activities of 25% by 1995 and 50% by the year 2000 and the policy goal of the state that not less than 75% of solid waste generated be source-reduced, recycled, or composted by the year 2020 and annually thereafter. The City has also joined the Los Angeles Regional Agency with 17 Southern California cities, including the City of Los Angeles, to work cooperatively to increase diversion rates to the maximum extent possible. Public recycling containers are provided at Memorial Park, Sierra Vista Park, and a large roll-off bin is available to residents for recycling at the west side of Sierra Vista Park below the Sierra Madre Rose Float building. City staff provides recycling information outreach through various communication tools throughout the year, including a brochure available at City facilities, and also provides outreach at many City events, such as the Wistaria Festival and Public Works Open House. Diversion rates for the City have been at about 57% annually for the past 5 years, with the exception of a period following the 2012 windstorm event which caused a drop to approximately 54% (City of Sierra Madre 2015). Furthermore, the City has adopted the Household Hazardous Waste Element to eliminate household hazardous wastes from the City's waste stream. The City's residents are provided with opportunities to safely dispose of common household goods that are not allowed into the traditional waste stream. In addition, the City collects used batteries via a program with County of Los Angeles Libraries, and three local businesses have also signed up to be collection centers for used batteries through a San Gabriel Valley Council of Governments program. Used sharps needles, syringes, lancets, etc. are also considered hazardous waste, and the City provides approved containers and information on locations where these can be safely disposed. Finally, the City has partnered with the Cities of Bradbury and Monrovia to administer a used oil collection grant from CalRecycle to provide and publicize certified used oil collection centers in the area (City of Sierra Madre 2015).

The project would be in compliance with all federal, state, and local management and reduction statutes and regulations related to solid wastes. Therefore, impacts would be **less than significant**.

#### 4.19.6 Mitigation Measures

Impacts were found to be less than significant. No mitigation is required.

#### 4.19.7 Level of Significance After Mitigation

Impacts to utilities and service system would be **less than significant**. No mitigation is required.

## 4.20 Wildfire

This section of the Environmental Impact Report (EIR) describes the existing wildfire conditions within the vicinity of The Meadows at Bailey Canyon Specific Plan (project or proposed project) site, identifies associated regulatory requirements, evaluates potential impacts associated with wildfire and contribution to regional wildfire conditions, and identifies mitigation measures related to implementation of the proposed project. Fire protection services for the project are addressed in Section 4.15, Public Services, of this EIR. A Fire Protection Plan (FPP), which evaluated and identified potential fire risks associated with the project, was prepared for the project by Dudek in November 2020 and has been included as Appendix F2 of this EIR.

### 4.20.1 Existing Conditions

#### **Project Site**

Wildfire is a continuous threat in Southern California, and is particularly concerning in the wildland/urban interface (WUI), the geographic area where urban development either abuts or intermingles with wildland or vegetative fuels. The project site is located within the northwestern portion of the City of Sierra Madre (City), approximately 460 feet south of the base of the San Gabriel Mountains.

The northwestern portion of the project site borders the City of Pasadena, while the San Gabriel Mountains are located just north of the site. The site is bordered by Bailey Canyon, Bailey Canyon Debris Basin, and Bailey Canyon Wilderness Park to the east, existing single-family residential development to the south and west, and the Mater Dolorosa Retreat Center, which is primarily used to host religious and silent retreats and other activities, to the north. It should be noted that the Mater Dolorosa Retreat Center is on the same parcel as the project site and there are two access roads through the site to the Mater Dolorosa Retreat Center. However, the Mater Dolorosa Retreat Center is not a part of the project site.

The project site is located in a WUI area and an area statutorily designated a local responsibility area (LRA) very high fire hazard severity zone (VHFHSZ) by the California Department of Forestry and Fire Protection (CAL FIRE) and the Sierra Madre Fire Department (SMFD) (see Figure 4.9-2, Fire Hazard Severity Zones, in Section 4.9, Hazards and Hazardous Materials). SMFD is a single station department located at 242 W. Sierra Madre Boulevard, located approximately 0.7 miles south of the project site (Appendix F2).

#### **Topography**

Topography influences fire risk by affecting fire spread rates. Typically, steep terrain results in faster fire spread up-slope and slower fire spread down-slope in the absence of wind. Flat terrain tends to have little effect on fire spread, resulting in fires that are driven by wind.

The project site is just below the base of the San Gabriel Mountains, which are north of the site. The project site is relatively flat and gently sloping downward from north to south. Elevation at the site ranges from approximately 1,105 feet above mean sea level at the lower, southeastern portion of the site to 1,220 feet above mean sea level at the higher, northwestern portion of the site (Appendix F2).

A topographic feature that may present a fire spread facilitator is the adjacent canyon, which may serve to funnel or channel winds, thus increasing their velocity and potential for influencing wildfire behavior. Immediately to the east of the project site is Bailey Canyon and the Bailey Debris Basin. From a regional perspective, the alignment of

tributary canyons and dominant ridges are conducive to channeling and funneling wind, thereby increasing the potential for more extreme wildfire behavior in the region (Appendix F2).

### ***Vegetation Communities***

The vegetation on site is primarily disturbed habitat (mowed annual grasses) with scattered ornamental trees. With residential development to the west and south, the Mater Dolorosa Retreat Center to the north, and debris basin to the east, there is minimal native vegetation nearby the project site (Appendix F2).

The area of the project site proposed for development and within the project grading limits would be converted to roads, structures, and landscaped vegetation following project completion.

### ***Vegetation Dynamics***

Variations in vegetative cover type and species composition have a direct effect on fire behavior. Some plant communities and their associated plant species have increased flammability based on plant physiology (resin content), biological function (flowering, retention of dead plant material), physical structure (bark thickness, leaf size, branching patterns), and overall fuel loading. For example, non-native grass dominated plant communities become seasonally prone to ignition and produce lower intensity, higher spread rate fires. In comparison, sage scrub can produce higher heat intensity and higher flame lengths under strong, dry wind patterns, but does not typically ignite or spread as quickly as light, flashy grass fuels (Appendix F2).

A critical factor to consider is the dynamic nature of vegetation communities. Fire presence and absence at varying cycles or regimes disrupts plant succession, setting plant communities to an earlier state where less fuel is present for a period of time as the plant community begins its succession again. In summary, high-frequency fires tend to convert shrublands to grasslands or maintain grasslands, while fire exclusion tends to convert grasslands to shrublands, over time. In general, biomass and associated fuel loading would increase over time, assuming that disturbance (fire, or grading) or fuel reduction efforts are not diligently implemented (Appendix F2).

It is possible to alter successional pathways for varying plant communities through manual alteration. This concept is a key component in the overall establishment and maintenance of the proposed fuel modification zones on site. The fuel modification areas on this site would consist of irrigated and maintained landscapes that would be subject to regular maintenance and would not be allowed to accumulate excessive biomass (live or dead) over time, which results in reduced fire ignition, spread rates, and intensity (Appendix F2).

### ***Climate***

Climate at the project site, like much of Southern California, is influenced by the Pacific Ocean and a seasonal, migratory subtropical high-pressure cell known as the “Pacific High.” Wet winters and dry summers with mild seasonal changes characterize the Southern California climate. This climate pattern is occasionally interrupted by extreme periods of hot weather, winter storms, or dry, easterly Santa Ana winds. The average high temperature for the project area is approximately 74°F, with daily highs in the summer and early fall months (July–October) exceeding 95°F. Precipitation typically occurs between December and March with average rainfall of 18 inches (Appendix F2).

Throughout southern California, and specifically at the project site, climate has a large influence on fire risk. The climate of Los Angeles County is typical of a Mediterranean area, with warm, dry summers and cold, wet winters. Temperatures average (average annual) around 61°F and reach up to 100°F. Precipitation has been averaging

less than 16 inches and typically occurs between December and March. The prevailing wind is an on-shore flow between 7 and 11 miles per hour from the Pacific Ocean (Appendix F2).

Fires can be a significant issue during summer and fall, before the rainy period, especially during dry Santa Ana wind events. The seasonal Santa Ana winds can be particularly strong in the area of the project site as warm and dry air is channeled from the dry, desert land to the east. Although Santa Ana events can occur anytime of the year, they generally occur during the autumn months, although the last few years have resulted in spring (April through May) and summer events. Santa Ana winds may gust up to 75 miles per hour or higher. This phenomenon markedly increases the wildfire danger and intensity in the area of the project site by drying out and preheating vegetation (fuel moisture of less than 5% for 1-hour fuels is possible) as well as accelerating oxygen supply, and thereby, making possible the burning of fuels that otherwise might not burn under cooler, moister conditions (Appendix F2).

### ***Fire History***

As stated in the FPP, 74 wildfires have burned within 5 miles of the project site since the beginning of the historical fire data record (refer to Appendix F2). Recorded wildfires within 5 miles range from fewer than 5 acres to 160,000 acres, and the average fire size is approximately 4,500 acres. The 2020 Bobcat Fire (115,796 acres) is the most recent fire, excluding smaller fires of less than 10 acres (Appendix F2).

Based on an analysis of this fire history data set, specifically the years in which the fires burned, the wildfire-occurrence intervals ranged between 0 (multiple fires in the same year) to 15 years. The average interval between fires is 2 years. Based on this analysis, it is expected that there would be wildland fires within 5 miles of the project site on a regular to semi-regular basis, as observed in the fire history record. Based on fire history, wildfire risk for the project site is associated primarily with a Santa Ana wind-driven wildfire burning or spotting onto the site from the north or east. The proximity of the project to large expanses of open space to the north and northeast, and the terrain within the San Gabriel Mountains, including multiple sub-drainages and canyons, has the potential to funnel Santa Ana winds, thereby increasing local wind speeds and increasing wildfire hazard in the vicinity of the project site (Appendix F2).

## 4.20.2 Relevant Plans, Policies, and Ordinances

### **Federal**

#### ***National Fire Protection Association Codes, Standards, Practices, and Guides***

National Fire Protection Association codes, standards, recommended practices, and guides are developed through a consensus standards development process approved by the American National Standards Institute. This process brings together professionals representing varied viewpoints and interests to achieve consensus on fire and other safety issues. National Fire Protection Association standards are recommended guidelines and nationally accepted good practices in fire protection, but are not laws or codes unless adopted as such or referenced as such by the California Fire Code (CFC) or the local fire agency.

#### ***Federal Wildland Fire Management Policy***

The Federal Wildland Fire Management Policy was developed in 1995, updated in 2001, and again in 2009, by the National Wildfire Coordinating Group, a federal multiagency group that establishes consistent and

coordinated fire management policy across multiple federal jurisdictions. An important component of the Federal Wildland Fire Management Policy is the acknowledgement of the essential role of fire in maintaining natural ecosystems. The Federal Wildland Fire Management Policy and its implementation are founded on the following guiding principles, found in the Guidance for Implementation of Federal Wildland Fire Management Policy (National Wildfire Coordinating Group 2009):

- Firefighter and public safety is the first priority in every fire management activity.
- The role of wildland fire as an essential ecological process and natural change agent would be incorporated into the planning process.
- Fire management plans, programs, and activities support land and resource management plans and their implementation.
- Sound risk management is a foundation for all fire management activities.
- Fire management programs and activities are economically viable, based upon values to be protected, costs, and land and resource management objectives.
- Fire management plans and activities are based upon the best available science.
- Fire management plans and activities incorporate public health and environmental quality considerations.
- Federal, state, tribal, local, interagency, and international coordination and cooperation are essential.
- Standardization of policies and procedures among federal agencies is an ongoing objective.

### ***National Fire Plan***

The National Fire Plan, officially titled *Managing the Impacts of Wildfire on Communities and the Environment: A Report to the President In Response to the Wildfires of 2000*, was a presidential directive in 2000 as a response to severe wildland fires that had burned throughout the United States. The National Fire Plan focuses on reducing fire impacts on rural communities and providing assurance for sufficient firefighting capacity in the future. The plan addresses the following five key points: firefighting, rehabilitation, hazardous fuels reduction, community assistance, and accountability. The plan provides technical, financial, and resource guidance and support for wildland fire management across the United States. The U.S. Forest Service and the Department of the Interior are working to successfully implement the key points outlined in the plan (DOI and USDA 2000).

### ***International Fire Code***

Created by the International Code Council, the International Fire Code addresses a wide array of conditions hazardous to life and property, including fire, explosions, and hazardous materials handling or usage (although not a federal regulation, but rather the product of the International Code Council). The International Fire Code places an emphasis on prescriptive and performance-based approaches to fire prevention and fire protection systems. Updated every 3 years, the International Fire Code uses a hazards classification system to determine the appropriate measures to be incorporated to protect life and property (often times these measures include construction standards and specialized equipment). The International Fire Code uses a permit system (based on hazard classification) to ensure that required measures are instituted (ICC 2017).

### ***International Wildland–Urban Interface Code***

The International Wildland–Urban Interface Code is published by the International Code Council and is a model code addressing wildfire issues (ICC 2014).

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## State

### ***California Government Code***

Sections 51175–51189 of the California Government Code provide guidance for classifying lands in California as fire hazard areas and requirements for management of property within those lands. The California Department of Forestry and Fire Protection (CAL FIRE) is responsible for classifying fire hazard severity zones (FHSZs) based on statewide criteria, and makes the information available for public review. Further, local agencies must designate, by ordinance, Very High FHSZs within their jurisdiction based on the recommendations of CAL FIRE.

Section 51182 of the California Government Code sets forth requirements for maintaining property within fire hazard areas, such as defensible space, vegetative fuels management, and building materials and standards. Defensible space around structures in fire hazard areas must consist of 100 feet of fuel modification on each side of a structure, but not beyond the property line unless findings conclude that the clearing is necessary to significantly reduce the risk of structure ignition in the event of a wildfire. Clearance on adjacent property shall only be conducted following written consent by the adjacent owner. Further, trees must be trimmed from within 10 feet of the outlet of a chimney or stovepipe, vegetation near buildings must be maintained, and roofs of structures must be cleared of vegetative materials. Exemptions may apply for buildings with an exterior constructed entirely of nonflammable materials.

### ***California Code of Regulations***

#### ***Title 14 Natural Resources***

Title 14, Division 1.5, Chapter 7, Subchapter 3, Fire Hazard, also sets forth requirements for defensible space if the distances specified in Section 51182 of the California Government Code (outlined above) cannot be met. For example, options that have similar practical effects include noncombustible block walls or fences, 5 feet of noncombustible material horizontally around the structure, installing hardscape landscaping or reducing exposed windows on the side of the structure with a less than 30-foot setback, or additional structure hardening such as those required in the California Building Code, California Code of Regulations Title 24, Part 2, Chapter 7A.

#### ***Title 24 California Building Standards Code***

##### ***California Building Code***

Part 2 of Title 24 of the California Building Standards Code contains the California Building Code (CBC). Chapter 7A of the California Building Code regulates building materials, systems, and/or assemblies used in the exterior design and construction of new buildings located within a fire hazard area. Fire hazard areas as defined by the California Building Code include areas identified as an FHSZ within a State Responsibility Area or a WUI fire area. The purpose of Chapter 7A is to establish minimum standards for the protection of life and property by increasing the ability of structures located in a fire hazard area to resist the intrusion of flames or burning embers projected by a wildfire, and to contribute to a systematic reduction in structural losses from a wildfire. New buildings located in such areas must comply with the ignition-resistant construction standards outlined in Chapter 7A.

##### ***California Fire Code***

Part 9 of Title 24 of the California Building Standards Code contains the CFC, which incorporates by adoption the International Fire Code with necessary California amendments. The purpose of the CFC is to establish the

minimum requirements to safeguard the public health, safety, and general welfare from the hazards of fire, explosion, or dangerous conditions in new and existing buildings, structures, and premises, and to provide safety and assistance to firefighters and emergency responders during emergency operations. Chapter 49 of the CFC contains minimum standards for development in the WUI and fire hazard areas.

The CFC and Office of the State Fire Marshal provide regulations and guidance for local agencies in the development and enforcement of fire safety standards. The CFC is updated and published every 3 years by the California Building Standards Commission. The 2016 CFC took effect on January 1, 2017, and the 2019 CFC took effect on January 1, 2020. The City adopted the 2016 CFC with local amendments in August 2018.

### ***California Public Resources Code***

California Public Resources Code Section 4290 requires minimum fire safety standards related to defensible space that are applicable to residential, commercial, and industrial building construction in State Responsibility Area lands and lands classified and designated as VHFHSZs. These regulations include road standards for fire apparatus access, standards for signs identifying roads and buildings, fuel breaks and green belts, and minimum water supply requirements. These regulations do not supersede local regulations, which are equal to or exceed minimum regulations required by the state.

California Public Resources Code Section 4291 requires a reduction of fire hazards around buildings located adjacent to a mountainous area, forest-covered lands, brush-covered lands, grass-covered lands, or land that is covered in flammable material. It is required to maintain 100 feet of defensible space around all sides of a structure, but not beyond the property line unless required by state law, local ordinance, rule, or regulations. Further, California Public Resources Code Section 4291 requires the removal of dead or dying vegetative materials from the roof of a structure, and trees and shrubs must be trimmed from within 10 feet of the outlet of a chimney or stovepipe. Exemptions may apply for buildings with an exterior constructed entirely of nonflammable materials.

### ***Fire Hazard Severity Zones***

CAL FIRE maps FHSZs based on fuel loading, slope, fire history, weather, and other relevant factors as directed by California Public Resources Code, Sections 4201–4204, and California Government Code, Sections 51175–51189. FHSZs are ranked from Moderate to Very High, and are categorized for fire protection within a Federal Responsibility Area, State Responsibility Area, or Local Responsibility Area under the jurisdiction of a federal agency, CAL FIRE, or local agency, respectively. The project site is within a WUI location within the LRA VHFSZ by the City and CAL FIRE (CAL FIRE 2009).

### ***California Strategic Fire Plan***

The 2019 Strategic Fire Plan for California reflects CAL FIRE's focus on fire prevention and suppression activities to protect lives, property, and ecosystem services, as well as natural resource management to maintain the state's forests as a resilient carbon sink to meet California's climate change goals and to serve as important habitat for adaptation and mitigation. The Strategic Fire Plan for California provides a vision for a natural environment that is more fire resilient, buildings and infrastructure that are more fire resistant, and a society that is more aware of and responsive to the benefits and threats of wildland fire, all achieved through local, state, federal, tribal, and private partnerships (CAL FIRE 2019). The Strategic Fire Plan goals include the following:

- Identify and evaluate wildland fire hazards and recognize life, property, and natural resource assets at risk, including watershed, habitat, social, and other values of functioning ecosystems. Facilitate the



collaborative development and sharing of all analyses and data collection across all ownerships for consistency in type and kind.

- Promote and support local land use planning processes as they relate to (a) protection of life, property, and natural resources from risks associated with wildland fire; and (b) individual landowner objectives and responsibilities.
- Support and participate in the collaborative development and implementation of local, county, and regional plans that address fire protection and landowner objectives.
- Increase fire prevention awareness, knowledge, and actions implemented by individuals and communities to reduce human loss, property damage, and impacts to natural resources from wildland fires.
- Integrate fire and fuels management practices with landowner/land manager priorities across jurisdictions.
- Determine the level of resources necessary to effectively identify, plan, and implement fire prevention using adaptive management strategies.
- Determine the level of fire suppression resources necessary to protect the values and assets at risk identified during planning processes.
- Implement post-fire assessments and programs for the protection of life, property, and natural resource recovery.

### ***Mutual Aid Agreements***

The California Disaster and Civil Defense Master Mutual Aid Agreement, as provided by the California Emergency Services Act, provides statewide mutual aid between and among local jurisdictions and the state. The statewide mutual aid system exists to ensure that adequate resources, facilities, and other supports are provided to jurisdictions whenever resources prove to be inadequate for a given situation. Each jurisdiction controls its own personnel and facilities, but can give and receive help whenever needed.

### **Local**

#### ***City of Sierra Madre Local Hazard Mitigation Plan***

The City is in the process of preparing a Local Hazard Mitigation Plan (LHMP) and a draft was released for public review in February 2020. The LHMP includes a broad range of activities designed to protect homes, schools, public buildings and critical facilities. The purpose of a LHMP is to reduce or eliminate long-term risk to people and property from natural hazards and their effects on the City. An updated and adopted Plan is required not only to reduce risk to the community, but to maintain eligibility for certain types of non-emergency, disaster mitigation funding from the Federal Emergency Management Agency (FEMA) under the Disaster Mitigation Act of 2000.

**Sierra Madre General Plan**

The following objectives and policies from the City of Sierra Madre General Plan (General Plan) are relevant to the project (City of Sierra Madre 2015). The proposed project’s consistency with these policies is provided in Table 4.11-1 in Section 4.11, Land Use and Planning.

**Objective Hz1:** Providing adequate service levels of fire protection that meets the needs of Sierra Madre residents, businesses and visitors.

**Policy Hz1. 2:** Promote public education about fire safety at home, in the community, and in the work place.

**Objective Hz2:** Providing adequate fire protection necessary for existing and future development.

**Policy Hz2.1:** Continue to require all existing and new development to install and maintain adequate smoke detection systems.

**Policy Hz2.2:** Continue to require all new development to install automatic fire sprinkler systems.

**Policy Hz2.3:** Continue to require review of building plans by a Fire Captain.

**Policy Hz2.8:** Develop vegetation management plans that manage chemise and chaparral to ensure adequate firebreaks, to provide adequate access for fire protection water systems, and access for firefighting.

**Objective Hz4:** Addressing emergency operations and disaster preparedness as a priority.

**Objective Hz5:** Limiting fire hazard through brush and weed abatement.

**Policy Hz5.1:** Mandate annual brush removal from April to June.

**City of Sierra Madre Municipal Code**

Title 15, Chapter 15.24 of the Sierra Madre Municipal Code (SMMC) contains the California Fire Code (CFC), 2019 Edition. The CFC shall be enforced by the bureau of fire prevention in the fire department of the City, which is established and which shall be operated under the supervision of the chief of the fire department. Local amendments to the 2019 CFC that shall be incorporated into the SMMC and serve as requirements for emergency planning and preparedness (Section 15.24.070).

**Fire Protection Plan**

A Fire Protection Plan (FPP) was prepared for the project in November 2020 (Appendix F2). The FPP evaluates and identifies the potential fire risk associated with the project’s land uses and identifies requirements for water supply, fuel modification and defensible space, emergency access, building ignition and fire resistance, fire protection systems, and wildfire emergency pre-planning, among other pertinent fire protection criteria. The purpose of the FPP is to generate and memorialize the fire safety requirements of the City along with project-specific measures based on the site, its intended use, and its fire environment. Compliance with these measures would be required under **PDF-WF-1** (see Section 4.20.4, Project Design Features).

### 4.20.3 Thresholds of Significance

The significance criteria used to evaluate the project impacts to wildfire are based on Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to wildfire would occur if the project would:

1. Substantially impair an adopted emergency response plan or emergency evacuation plan.
2. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.
3. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.
4. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

### 4.20.4 Project Design Features

The following project design feature (PDF) would be implemented as part of the proposed project and would be applicable to wildfire:

**PDF-WF-1** The proposed project shall comply with the requirements outlined in the Fire Protection Plan (FPP) (Appendix F2) during construction and operations.

### 4.20.5 Impacts Analysis

#### **1. *Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?***

The City has not adopted an emergency response plan or emergency evacuation plan. However, the City is in the process of preparing a Local Hazard Mitigation Plan (LHMP) and a draft was released for public review in February 2020 (City of Sierra Madre 2020). The purpose of a LHMP is to reduce or eliminate long-term risk to people and property from natural hazards and their effects on the City.

As stated in Section 4.20.1, Existing Conditions, the project site is within a WUI that is in an area statutorily designated an LRA VHFHSZ by CAL FIRE and the SMFD (Appendix F2). Additionally, as seen in Figure 4.9-2, Fire Hazard Severity Zones, the project site is designated by the City as a Very High Hazard area (City of Sierra Madre 2015). This designation does not indicate that development cannot occur safely, but does indicate that a higher level of ignition resistant construction must be implemented.

During construction of the project, a temporary increase in traffic on roadways surrounding the project site may occur due to increased truck loads or the transport of construction equipment to and from the project site during the construction period. However, all construction activities including staging would occur in accordance with City requirements (such as SMMC Chapter 17.30, which requires that streets be maintained free and clear during construction), which would ensure that adequate emergency access to the project site in the event of an emergency or evacuation order would be provided during construction of the project. The site is directly accessible by two existing roadways, North Sunnyside Avenue, a north/south road currently ending on the

southern side of the site, and Carter Avenue, an east/west road currently ending on the southeast corner of the site. However, the project would include reconfiguration of North Sunnyside Avenue, which would be moved farther to the west. In addition, the project would be improved to provide secondary egress and ingress access to the site, as well as provide internal circulation throughout the project site. Lastly, three additional streets that run east to west would be provided within the project site. This includes Streets A, B, and C (see Figure 3-2, Conceptual Site Plan, in Chapter 3, Project Description, of this EIR). The proposed street sections are shown in Figure 3-6, Proposed Street Sections, in Chapter 3. The proposed driveways and roadways (proposed and existing) providing access to the project site would comply with the City's roadway standards and the 2019 CFC Section 503. Additionally, all access roads would meet SMMC standards, requiring roadways to have a minimum 20-foot unobstructed width (30- and 36-foot-wide roadway surfaces are proposed) and a minimum 26-foot width within 25 feet of hydrants.

As discussed in the FPP, early evacuation for any type of wildfire emergency near the project site is the preferred method of providing for resident safety, consistent with the City's current approach. As such, each property owner would be individually responsible to adopt, practice, and implement a "Ready, Set, Go!" approach to site evacuation. The "Ready, Set, Go!" concept is widely known and encouraged by the state of California and most fire agencies. Pre-planning for emergencies, including wildfire emergencies, focuses on being prepared, having a well-defined plan, minimizing potential for errors, maintaining the site's fire protection systems, and implementing a conservative (evacuate as early as possible) approach to evacuation and site uses during periods of fire weather extremes. Implementation of these evacuation requirements, outlined in the FPP would ensure that residents of the proposed project and nearby land uses, including the Mater Dolorosa Retreat Center and nearby residential uses, would be able to properly evacuate in the event of wildfire. During wildfire evacuations, law enforcement and fire agencies would manage the evacuation event and provide downstream intersection control, as needed, to move persons within higher threat areas to lower threat areas. Because the project and Mater Dolorosa Retreat Center would respond to evacuation orders according to provided direction, and depending on the threat level, would be aided by downstream intersection control, it is not anticipated that substantial delays to the existing population would occur. Therefore, through compliance with existing regulations and implementation of **PDF-WF-1**, which requires compliance with the FPP (see Section 4.20.4, Project Design Features), the proposed project would not impair implementation of the LHMP once adopted. and because there is no officially adopted evacuation plan for the area, would therefore not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Impacts would be **less than significant**.

**2. Due to slope, prevailing winds, and other factors, would the project exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?**

As stated in Section 4.20.1, Existing Conditions, the project site is within a WUI that is in an area statutorily designated an LRA VHFHSZ by CAL FIRE and the SMFD (see Figure 4.9-2). As such, the project could result in an impact related to exacerbating wildfire risk that exposes project occupants to pollutant concentrations from a wildfire or the uncontrollable spread of a wildfire if it would increase the risk of a wildfire occurring and the climatic, topographic, vegetation, weather conditions, and other factors that aid in increasing the severity of such an occurrence.

### **Construction**

Construction of the project would introduce potential ignition sources to the project site, including the use of heavy machinery and the potential for sparks during welding activities or other work that uses fire- or spark-producing tools. However, the project would be required to comply with City and state requirements for activities

in hazardous fire areas, including fire safety practices, to reduce the possibility of fires during construction activities. As discussed in the FPP prepared for the project, prior to bringing lumber or combustible materials onto the site, site improvements within the active development area shall be in place, including utilities, operable fire hydrants, an approved, temporary roadway surface, and construction phase fuel modification zones established. These features would be approved by the fire department or their designee prior to combustibles being brought on site. Furthermore, vegetation management would be implemented as an interim fuel modification zone (FMZ) throughout the construction phase as there may be periods of time where structures are exposed to wildland fuels, consistent with the FPP (Appendix F2). Therefore, with adherence of the aforementioned vegetation management throughout construction, and implementation of **PDF-WF-1**, which requires compliance with the FPP (see Section 4.20.4), risk associated with exposure of pollutant concentrations would be reduced greatly. Additionally, construction activities that would potentially introduce potential ignition sources would be temporary. Therefore, impacts to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire would be **less than significant** during construction.

### Operational

As mentioned previously, the project site is located in an area statutorily designated as an LRA VHFHSZ (refer to Appendix F2). Thus, the project includes fire resistance-related measures that shall lessen the potential impact of the project exacerbating wildfire risk.

All new structures within the project site would be constructed to at least the California Fire Code standard. Each of the proposed buildings would comply with the enhanced ignition-resistant construction standards of the 2019 CBC (Chapter 7A) and Chapter 5 of the UWI code, except where buildings require enhanced ignition resistance as part of an alternative material and method proposal. These requirements were specifically developed to address structure vulnerabilities related to wildfire and address roofs, eaves, exterior walls, vents, appendages, windows, and doors and result in hardened structures that have been proven to perform at high levels (resist ignition) during the typically short duration of exposure to burning vegetation from wildfires. In addition, the project would include fire protection systems, including fire hydrants, automatic fire sprinkler system, fire alarm systems, and residential hazard detectors (see Appendix F2 and Section 4.9 for further details).

Per Chapter 17.52 of the SMMC, the City shall incorporate fire prevention and landscaping standards. Based on the conceptual site plan, the buildings on the project site have adequate on-site fuel modification, which consists of asphalt roadways and irrigated landscaping. There are no areas proposed within the project footprint that will have native vegetation in a natural or non-irrigated setting that may be subject to fuel modification; instead, all areas will either be developed, paved or landscaped and irrigated. Dudek's analysis of the project during preparation of the FPP determined that due to the fire environment, the enhanced building features, fire protection systems, and exterior site design layout, a traditional FMZ configuration is not necessary. Instead a Fuel Modification Area (FMA) would be implemented, that would take advantage of the project's setting and design layout.

While the eastern side of the project is most susceptible to wildfire, the adjacent Bailey Canyon Debris Basin is maintained free of vegetation providing an off-site fuel break. The FMA would be designated primarily for the eastern perimeter of the project, yet it would also apply to the irrigated landscaped areas and interior slopes throughout the project for maintenance purposes. The FMA would start from the edge of the developed pads to the boundary of the project and include the interior slopes, greenbelts, and park. Furthermore, per the FPP, vegetation management, i.e., assessment of fuel condition and removal of dead and dying and undesirable species, as well as thinning as necessary to maintain specified plant spacing and fuel densities, shall be

completed annually, and more often as needed for fire safety, as determined by the SMFD. The individual homeowners shall be responsible for all vegetation maintenance on their lots in compliance with the FPP and the SMFD requirements.

Therefore, impacts associated with slope, prevailing winds, and other factors, that would cause the project to exacerbate wildfire risks would be **less than significant**.

**3. *Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?***

Under the proposed project, the project site would be allowed to be developed with residential uses, with associated infrastructure and a proposed park. As such, the project would include installation and maintenance of associated infrastructure including driveways and roadways, connections to service utilities (e.g., water, wastewater, electric power, natural gas, and telecommunications services), water drainage and water quality improvements (e.g., biofiltration basins), and fuel breaks (e.g., fuel modification).

#### **Fuel Modification Area**

The proposed project would have adequate on-site fuel modification, which consists of asphalt roadways and irrigated landscaping. No areas of native vegetation in a natural or non-irrigated setting that may be subject to fuel modification would remain on site after implementation of the project; instead, all areas would either be developed, paved or landscaped and irrigated. Vegetation management would be implemented as an interim FMZ throughout the construction phase as there may be periods of time where structures are exposed to wildland fuels. Ongoing/as-needed fuel modification maintenance during the interim period while the project is built out, would include necessary measures for consistency with the FPP.

An important component of a fire protection system for the project is the provision for ignition-resistant construction and modified vegetation buffers. The structure ignition resistance requirements outlined in the Fire and Building codes would enable the structures to withstand the type of wildfire that may occur in the fuels outside the development footprint. As described under Threshold 2 above and determined by Dudek during preparation of the FPP, a traditional FMZ configuration would not be necessary during operations of the project due to the fire environment, the enhanced building features, fire protection systems, and exterior site design layout. Instead an FMA would be implemented, that would take advantage of the project's setting and design layout. The internal circulation system includes paved roadways along the eastern and northern sides of the project thereby providing over 40 feet of noncombustible defensible space in both locations. Irrigated greenbelts along the perimeter of the project, and an irrigated park along the southern side of the project, provide fire and ember resistant landscaping for additional protection and fuel modification zone equivalency. The combination of paved streets and irrigated greenbelt landscaping provides for at least 100 feet of FMA around all buildings. In addition, the project would include 200 feet of FMA on the southern side of the project, 62 to 100 feet of FMA on the eastern side, and over 100 feet of FMA on the northern side. Implementation of these FMAs would be required under the FPP (Appendix F2). West of the project is an existing residential development that provides FMA equivalent landscape.

#### **Vegetation Management**

Vegetation management, including the assessment of fuel condition and removal of dead and dying and undesirable species, as well as thinning as necessary to maintain specified plant spacing and fuel densities, shall be completed annually each year, and more often as needed for fire safety, as determined by the SMFD. The

individual homeowners shall be responsible for all vegetation maintenance on their lots in compliance with the FPP and the SMFD requirements.

Vegetation management requirements shall be implemented at project commencement and throughout the construction phases, as outlined in the FPP (Appendix F2). Vegetation management shall be performed pursuant to the direction of the SMFD on all building locations prior to the start of work and prior to any import of combustible construction materials. Adequate fuel breaks shall be created around all grading, site work, and other construction activities in areas where there is flammable vegetation.

## Roads

The project would include reconfiguration of North Sunnyside Avenue, located within the western portion of the site, which would be moved farther to the west. In addition, the project would result in improvements to Carter Avenue to provide secondary egress and ingress access to the site. Lastly, three additional streets that run east to west would be provided within the project site. This includes Streets A, B, and C (see Figure 3-2, Conceptual Site Plan, in Chapter 3). The proposed street sections are shown in Figure 3-6, Proposed Street Sections, in Chapter 3. The internal circulation system includes paved roadways along the eastern and northern sides of the project thereby providing over 40 feet of noncombustible defensible space in both locations. Project site access, including road widths and connectivity, would be consistent with the City's roadway standards and the 2019 CFC Section 503. Additionally, approved paved access roadways shall be installed prior to any combustibles being brought on site. Proposed roadway system designs would include roadways with a minimum 20-foot unobstructed width (30- and 36-foot-wide roadway surfaces) and a minimum 26-foot width within 25 feet of hydrants; hydrants installed along the roadways and within the project site itself; the existing Carter Avenue access improved to meet fire apparatus access road requirements; direct access provided to all structures within interconnecting driveways; and through roadways (hence, no designated fire department turnarounds would be required for the project site). Site access, including road widths and connectivity, would also comply with all City requirements and would include the following:

- Primary access to the project site would be provided from North Sunnyside Avenue. Carter Avenue would provide secondary egress and ingress access.
- All roads comply with access road standards of not less than 24 feet, unobstructed width and are capable of supporting an imposed load of at least 75,000 pounds.
- Roadways and/or driveways will provide fire department access to within 150 feet of all portions of the exterior walls of the first floor of each structure.
- Roadway design features (e.g., speed bumps, humps, speed control dips, planters, and fountains) that could interfere with emergency apparatus response speeds and required unobstructed access road widths will not be installed or allowed to remain on roadways.
- Access roads shall be completed and paved prior to issuance of building permits and prior to the occurrence of combustible construction.
- Developer will provide information illustrating the new roads, in a format acceptable to the SMFD for updating of Fire Department response maps.

## Utilities

As discussed in Section 4.19, Utilities and Service Systems, of this EIR, existing utility service lines are located within the vicinity of the project site, and connection to utility service lines would be implemented as part of the

project. Connections to utility service lines, including those for water, wastewater, electric power, natural gas, and telecommunications services, would be extended underground from their current locations nearby the project site to the proposed residential structures. Given that the activity of connecting utilities from their current locations (i.e., within Carter Avenue and North Sunnyside Avenue) to the project site would require ground disturbance and the use of heavy machinery associated with trenching, the installation of these utility service lines would introduce new potential sources of ignition to the site, such as the use of heavy machinery, welding, or other hot work. However, as previously discussed, vegetation management activities would occur throughout construction phases, which would reduce the likelihood of fire ignition during installation and connection of utilities.

Further, other than lateral connections to nearby utility mains, the project would not require or result in the relocation or construction of new or expanded service utilities facilities, the construction or relocation of which could exacerbate wildfire risk or cause significant environmental effects.

### Summary

Installation and maintenance of project roads, service utilities, fuel modification, drainage and water quality improvements, and other associated infrastructure would not exacerbate wildfire risks provided that the appropriate fire prevention and vegetation management activities are implemented as required by the FPP and SMMC.

Given that the activities involved with installation or maintenance of associated infrastructure would require ground disturbance and the use of heavy machinery associated with trenching, grading, site work, and other construction and maintenance activities, the installation of related infrastructure could potentially result in temporary or ongoing impacts to the environment. However, the project would be required to comply with all regulatory requirements such as the SMMC and the requirements of the FPP (see **PDF-WF-1** in Section 4.20.4, above).

Therefore, the installation and maintenance of associated infrastructure would not exacerbate wildfire risk or result in impacts to the environment beyond those already disclosed in this EIR, and impacts would be **less than significant**.

#### ***4. Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?***

The project would establish the Specific Plan, which would allow for the development of 42 detached single-family residential units and an approximately 3.04-acre dedicated neighborhood park, within the 17.30-acre project site, resulting in the addition of more impervious area to the site, which would result in more surface runoff. However, as part of project site improvements, the project would include a new 36-inch-diameter storm drain on the western portion of the site, which would run from the north to south. From the southern edge, the proposed storm drain would join an existing 36-inch-diameter storm drain located within North Sunnyside Avenue (see Figure 3-7, Proposed Drainage Plan, in Chapter 3). In addition, four proposed catch basins are proposed. This includes two catch basins proposed on either side of North Sunnyside Avenue within the project site, and two catch basins on either side of North Sunnyside Avenue just north of project site, to capture off-site flows before entering the project site. Flows would then be conveyed via the municipal separate storm sewer system (MS4) to the receiving waters of Arcadia Wash, an open concrete lined channel located approximately 1 mile southeast of the project site. In addition, a proposed 36-inch-diameter storm drain network would be constructed along Carter Avenue, and would consist of seven catch basins and captures and would convey street flow from proposed Streets A, B, and C to a proposed detention basin before being discharged to the MS4 (see Figure 3-7). The proposed detention basin would be 77 by 60 feet (4,260 square feet) and located in the southeastern portion of the project site. The proposed detention basin would assist in reducing runoff velocities generated by the project site.



Additionally, the project site is located in Zone X, an area of minimal flood hazard per the FEMA Flood Insurance Rate Map Panel 06037C1400F effective September 26, 2008 (FEMA 2020). This area is higher in elevation than the 0.2% annual chance flood (i.e., 500-year flood). Although internal drainage patterns would be somewhat altered as a result of project development, the project would maintain adequate stormwater conveyance as to not result in an increase of surface runoff that would result in flooding on or off site. Furthermore, due to the relatively flat topography of the site, there is low potential for landslides to occur. However, with compliance of the Los Angeles Region erosion and grading requirements of the city building official of Public Works, current seismic design specifications, current CBC standards, and other regulatory requirements, the potential for impacts associated with landslides would be further minimized.

In the event of a fire, the project site would potentially experience physical changes to the landscape which could result in increased risk of flooding or landslides. However, as previously discussed, under existing conditions the project has low risk for landslides and flooding. Additionally, proposed drainage improvements and adherence to the aforementioned CBC standards and regulatory requirements would further reduce potential impacts. Therefore, impacts associated with downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes would be **less than significant**.

### 4.20.6 Mitigation Measures

Impacts would be less than significant. No mitigation measures would be required.

### 4.20.7 Level of Significance After Mitigation

Impacts would be **less than significant**. No mitigation measures would be required.

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# 5 Cumulative Effects

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This section evaluates potential cumulative impacts of The Meadows at Bailey Canyon Specific Plan Project (project or proposed project) and identifies mitigation measures related to implementation of the proposed project. Information contained in this section is based on analysis contained within Sections 4.1 through 4.20 of this Draft Environmental Impact Report (EIR) and the list of related projects from the City of Sierra Madre (City). Other sources consulted are listed in Chapter 9, References.

## 5.1 Introduction

Although the environmental effects of an individual project may not be significant when that project is considered independently, the combined effects of several projects may be significant when considered collectively. Such impacts are cumulative impacts. Section 15355 of the California Environmental Quality Act (CEQA) Guidelines defines cumulative impacts as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.” Section 15130 of the CEQA Guidelines provides guidance for analyzing significant cumulative impacts in an EIR. According to this section of the CEQA Guidelines, the discussion of cumulative impacts “need not provide as great detail as is provided for the effects attributable to the project alone. The discussion should be guided by standards of practicality and reasonableness.” The discussion should also focus only on significant effects resulting from the project’s incremental effects and the effects of other projects. According to Section 15130(a)(1), “An EIR should not discuss impacts which do not result in part from the project evaluated in the EIR.”

Cumulative effects can occur from the interactive effects of a single project. For example, the combination of noise and dust generated during construction activities can be additive and can have a greater impact than either noise or dust alone. However, substantial cumulative effects more often result from the combined effect of past, present, and future projects located in proximity to the project under review. Therefore, it is important for a cumulative impacts analysis to be viewed over time and in conjunction with other related past, present, and reasonably foreseeable future developments whose impacts might compound or interrelate with those of the project under review.

## 5.2 Cumulative Methodology

Section 15130(b)(1)(A) of the CEQA Guidelines allows for the preparation of a list of past, present, and reasonably anticipated future projects as a viable method of determining cumulative impacts. This discussion uses the following approach: an initial list and description of all related (cumulative) projects is presented, followed by a discussion of the effects that the proposed project may have on each environmental category of concern, such as traffic, noise, etc. Consistent with CEQA (California Public Resources Code, Section 21000 et seq.), this discussion is guided by the standards of practicality and reasonableness.

## 5.3 Cumulative Projects

Other than air quality, greenhouse gas emissions, noise, and transportation/traffic, cumulative impacts for all other environmental issue areas are based on a list of projects within the proposed project’s study area that either have applications submitted or approved, are under construction, or have recently been completed. Based on

information provided by the City, three cumulative projects were considered in this analysis. In addition, one cumulative project in the City of Pasadena, located directly to the east of the site, was considered. The cumulative projects identified in the study area are listed in Table 5-1, and the numbers correspond to the numbers shown on Figure 5-1, Cumulative Projects.

**Table 5-1. Cumulative Projects List**

No.	Project Name	Location	Project Type	Status
1	Stonegate	600, 620, 630, and 638 Baldwin Court; 1, 7, and 15 Nathaniel Terrace, Sierra Madre, CA 91024	Construction of 29 single-family residences	Approved
2	Stonehouse	Approximately 600 feet north of East Grandview Avenue, between Valle Vista Drive and Lilliano Drive	Vesting Tentative Tract Map for a subdivision including 9 new lots	Pending
3	N/A	370 N. Grove Street, Sierra Madre	Single-Family Residence Accessory Dwelling Unit	Approved
4	N/A	3452 East Foothill Boulevard, Pasadena	Remodel an existing commercial building and the new construction of 258 residential units	Final Design Review

**Sources:** City of Pasadena 2020; City of Sierra Madre 2020  
See Figure 5-1 for related project locations.

## 5.4 Cumulative Impact Analysis

The discussion below evaluates the potential for the project to contribute to an adverse cumulative impact on the environment. For issues addressed in this EIR, the thresholds used to determine significance are those presented in each of the sections of Chapter 4, Environmental Analysis. For each resource area, an introductory statement is made regarding what would amount to a significant cumulative impact in that resource area. Discussion is then presented regarding the potential for the identified cumulative projects to result in such a cumulative impact, followed by discussion of whether the project's contribution to any cumulative impact would be cumulatively considerable.

### 5.4.1 Aesthetics

As described in Section 4.1, Aesthetics, the proposed project would result in less-than-significant impacts to scenic vistas, and no impacts to scenic resources, including, but not limited to, tress, rock outcroppings, and historic buildings within a state scenic highway. In addition, the proposed project would not conflict with the applicable zoning as the amendment to the zoning code and General Plan would be approved concurrently with the proposed project to allow for the changes in land use and zoning. Lastly, upon compliance with guidelines of The Meadows at Bailey Canyon Specific Plan (Specific Plan) (see **PDF-AES-1** and **PDF-AES-2** in Table 3-2, Project Design Features, in Chapter 3, Project Description, and Section 4.1, Aesthetics), new sources of lighting and glare associated with the proposed project would not result in adverse day or nighttime views in the area.

The list of cumulative projects in Table 5-1 consists of new residential projects and a remodel of one commercial building. Although the existing visual character of the project site would change as a result of the proposed project, the closest of these cumulative projects is located approximately 1,000 feet southeast of the project site and

consists of construction of a single-family residence. The next closest cumulative project is located 0.65 miles east of the project site and would consist of 29 single-family residences. Due to the small size of the first cumulative project and distance to other three cumulative projects from the project site, impacts on scenic views, including views of and from the San Gabriel Mountains, the proposed project, in combination with cumulative projects, would not contribute to a cumulative impact on scenic vistas. Additionally, similar to the proposed project, all cumulative projects would be required to comply with the zoning of their respective sites and applicable regulations governing scenic quality. Therefore, in combination with planning future development, the project would not result in a cumulatively considerable contribution to a cumulative impact to aesthetics.

Existing development in the vicinity of the project site includes sources of nighttime lighting in the form of interior and exterior security lighting and parking, architectural highlighting, and landscape lighting. In addition, automobile headlights streetlights and stoplights along the roadway network contribute to ambient nighttime lighting levels on the project site. The proposed project would contribute new sources of light to the surrounding area. The Specific Plan for the proposed project includes lighting performance standards to minimize the proposed projects contribution to nighttime lighting and light sources. The project would be required to comply with lighting regulations of the Specific Plan, as outlined in **PDF-AES-1** (see Table 3-2, Project Design Features, in Chapter 3, and Section 4.1, Aesthetics). Lighting would adhere to all applicable City standards and cumulative project would also be required to adhere to City standards. In addition, as outlined in **PDF-AES-2**, solar panels shall comply with requirements outlined in the Specific Plan, and shall be oriented to the south to maximize efficiency and establish visual consistency across buildings (see Section 4.1.4, Project Design Features). Future projects would be required to comply with existing lighting standards to reduce lighting and glare impacts. Therefore, in combination with all other cumulative projects, the proposed project would not considerably contribute to lighting and glare.

Therefore, for the reasons described above, impacts to aesthetics would not be cumulatively considerable.

## 5.4.2 Agriculture and Forestry Resources

As discussed in Section 4.2, Agriculture and Forestry Resources, there is no important farmland land, forest land, or timberland on the project site. Additionally, neither the project site, nor any lands within the City, are zoned or designated for agricultural or forestry uses. As such, the proposed project would result in no impacts to agriculture and forestry resources along with all other cumulative projects within the City. Thus, impacts to agriculture and forestry resources would not be cumulatively considerable.

## 5.4.3 Air Quality

See Threshold 2 in Section 4.3.5, for a discussion of the cumulative air quality impacts of the proposed project. As described in this section, air pollution is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development, and the South Coast Air Quality Management District (SCAQMD) develops and implements plans for future attainment of ambient air quality standards. Based on these considerations, project-level thresholds of significance for criteria pollutants are relevant in the determination of whether a project's individual emissions would have a cumulatively significant impact on air quality.

In considering cumulative impacts from the project, the analysis must specifically evaluate a project's contribution to the cumulative increase in pollutants for which the South Coast Air Basin (SCAB) is designated as nonattainment for the California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS). If a project's emissions would exceed the SCAQMD significance thresholds, it would be considered to have a cumulatively considerable contribution to nonattainment status in the SCAB. The basis for analyzing the project's cumulatively considerable contribution is if the project's contribution accounts for a

significant proportion of the cumulative total emissions (i.e., it represents a “cumulatively considerable contribution” to the cumulative air quality impact) and consistency with the SCAQMD 2016 AQMP, which addresses the cumulative emissions in the SCAB.

As discussed in Section 4.3.1.4.1, South Coast Air Basin Attainment Designation, the SCAB has been designated as a national nonattainment area for ozone (O<sub>3</sub>) and particles less than 10 microns in diameter (PM<sub>10</sub>) and a California nonattainment area for O<sub>3</sub>, PM<sub>10</sub>, and particles less than 2.5 microns in diameter (PM<sub>2.5</sub>). The nonattainment status is the result of cumulative emissions from various sources of air pollutants and their precursors within the SCAB, including motor vehicles, off-road equipment, and commercial and industrial facilities. Construction and operation of the project would generate volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) emissions (which are precursors to O<sub>3</sub>) and emissions of PM<sub>10</sub> and PM<sub>2.5</sub>. As indicated in Tables 4.3-8 and 4.3-9 in Section 4.3, Air Quality, of this EIR, project-generated construction and operational emissions would not exceed the SCAQMD emission-based significance thresholds for all criteria air pollutants.

Cumulative localized impacts would potentially occur if a construction project were to occur concurrently with another off-site project. Construction schedules for potential future projects near the project site are currently unknown; therefore, potential construction impacts associated with two or more simultaneous projects would be considered speculative. However, future projects would be subject to CEQA and would require air quality analysis and, where necessary, mitigation if the project would exceed SCAQMD thresholds. Criteria air pollutant emissions associated with construction activity of future projects would be reduced through implementation of control measures required by the SCAQMD. Cumulative PM<sub>10</sub> and PM<sub>2.5</sub> emissions would be reduced because all future projects would be subject to SCAQMD Rule 403 (Fugitive Dust), which sets forth general and specific requirements for all construction sites in the SCAQMD.

Based on the project-generated construction emissions of NO<sub>x</sub>, the project would not result in a cumulatively considerable contribution to air quality.

### 5.4.4 Biological Resources

The proposed project would result in less-than-significant impacts to special-status plant and wildlife species, federally or state protected wetlands. The proposed project would not have any direct or indirect impacts on adopted habitat conservation plans. The project would have potentially significant impacts on nesting birds, riparian habitat, wetlands, and local tree preservation ordinance. Compliance with mitigation measures identified in Section 4.4, Biological Resources, would reduce potentially significant to below a level of significance.

Cumulative projects that would occur on existing undeveloped land would be required to identify and mitigate any potentially significant impacts to biological resources. Projects that would occur on previously developed land or in a highly urbanized area would have less potential to significantly impact biological resources; however, there is a potential for nesting birds to be present in ornamental landscaping or on existing buildings. The combined construction of projects within the vicinity of the proposed project could deprive some species of a significant amount of habitable space. However, it is anticipated that species that are potentially affected by related projects would also be subject to the same requirements of CEQA as the project. These determinations would be made on a case-by-case basis and the effects of cumulative development on nesting birds would be mitigated to the extent feasible in accordance with CEQA and other applicable legal requirements.

Therefore, for the reasons described above, the project would not result in a cumulatively considerable contribution to biological impacts.

## 5.4.5 Cultural Resources

A cumulative impact, in terms of cultural resources, refers to the mounting aggregate effect upon cultural resources due to modern or recent historic land use, such as residential development, and natural processes, such as erosion, that result from human acts. The issue that must be explored in a cumulative impact analysis is the aggregate loss of information and the loss of recognized cultural landmarks and vestiges of a community's cultural history.

As discussed in Section 4.5, Cultural Resources, no historic sites, were identified during previous cultural resource investigations, records searches, or the field survey for the proposed project. Additionally, for the reasons discussed in Section 4.5, the Mater Dolorosa Retreat Center is not considered an historical resource. Therefore, construction and operation of the proposed project would not cause a substantial change in the significance of an historical resource as defined in CEQA Guidelines Section 15064.5. In addition, although no cultural resources have been identified or recorded within the project site, two historic-period archeological sites were identified within 1 mile of the project site. As such, there exists a potential to encounter previously unidentified subsurface cultural deposits during ground disturbing activities associated with project construction and impacts to archaeological resources would be potentially significant. The proposed project would implement mitigation measures **MM-CUL-1**, **MM-CUL-2**, and **MM-CUL-3** to reduce potentially significant impacts less than significant. In addition, in the event that human remains are discovered during project grading and construction, impacts would be potentially significant, and **MM-CUL-4** would reduce potentially significant impacts to less than significant.

The majority of cumulative projects in the area have centered on residential development, although one commercial building expansion is included as well (see Table 5-1). These projects would have the same potential as the proposed project to impact previously uncovered subsurface cultural deposits or human remains during ground disturbing activities associated with construction. As such, cumulative projects would be required to implement similar mitigation measures as the proposed project to reduce potential impact to previously undiscovered cultural resources or human remains. When considered with other foreseeable projects, cumulative impacts to cultural resources would not be cumulatively considerable. Therefore, the project would not result in a cumulatively considerable contribution to cultural impacts.

## 5.4.6 Energy

Implementation of the proposed project and cumulative development in the surrounding area would result in an increased energy demand at full buildout. A significant cumulative impact to energy resources would result if a project results in wasteful, inefficient, or unnecessary consumption of energy resource or conflicts with or obstructs a state or local plan for renewable energy or energy efficiency. As discussed in Section 4.6, Energy, the proposed project would be required to comply with existing regulations such as State Building Energy Efficiency Standards, embodied in Title 24 of the California Code of Regulations, which would reduce energy demand and consumption. The project's impacts to energy would be less than significant. Related projects would also have to comply with existing regulation and ensure that demand can be met by existing energy infrastructure. Because the project would not result in the wasteful or inefficient use of energy, and because there is adequate energy infrastructure to serve the proposed and cumulative projects, the project's contribution to a significant cumulative energy impact would not be cumulatively considerable.

## 5.4.7 Geology and Soils

Potential cumulative impacts on geology and soils would result from projects that combine to create geologic hazards, including unstable geologic conditions, or substantially contribute to coastal erosion. Most geology and soil hazards associated with development on surrounding projects would be site-specific and can be mitigated on a project-by-project basis. Such hazards include direct or indirect cause substantial adverse effects to rupture of an earthquake fault, liquefaction, landslides, unstable geologic units, and expansive soils. Individual project mitigation for these hazards would ensure that there are no residual cumulative impacts. As discussed in Section 4.7, Geology and Soils, due to the presence of artificial fill area present on site, the proposed project would result in potential impacts to seismic-related ground failure and unstable soils. However, **MM-GEO-1** would be implemented to remove and recompact all artificial soil present within the limits of proposed grading prior to commencement of construction. In addition, if the project is not properly constructed, impacts to the risk of loss, injury, or death involving rupture of a known earthquake fault; risk of loss, injury, or death involving strong seismic ground shaking; seismic-related ground failure; erosion during construction and operations; and expansive soils could potentially occur. However, the project would comply with **PDF-GEO-1** through **PDF-GEO-15**, which include specific project recommendations from the geotechnical investigation to ensure impacts would be less than significant. Since geologic hazards are site-specific and not cumulative in nature, the proposed project would not have a cumulatively considerable impact to geologic hazards.

In addition, the potential for impacting paleontological resources vary from site to site and are dependent on specific excavation requirements for each project. As discussed in Section 4.7, Geology and Soils, the proposed project has potential to yield paleontological resources during planned construction activities. Thus, the project shall implement **MM-GEO-2** to reduce potential impacts in the event paleontological resources are uncovered during construction activities. Incorporation of mitigation would ensure proper handling and recordation of any paleontological resources encountered, and all cumulative projects with potential to encounter paleontological resources would be subject to similar requirements. Therefore, the project would not result in a cumulatively considerable impact to paleontological resources.

## 5.4.8 Greenhouse Gas Emissions

Greenhouse gas (GHG) emissions and their contribution to climate change are widely recognized as a global problem, and California has acknowledged this phenomenon as a state concern. Climate change is a global phenomenon and as such, the analysis of the proposed project's impacts to climate change is cumulative in nature. Therefore, the information and analysis provided in Section 4.8, Greenhouse Gas Emissions, to determine project-level impacts, applies here and the project's contribution to global climate change would not be cumulatively considerable.

As discussed in Section 4.8, the estimated total GHG emissions during construction of would be approximately 1,160 metric tons of CO<sub>2</sub> equivalent (MT CO<sub>2</sub>e) over the construction period. Estimated project-generated construction emissions amortized over 30 years would be approximately 39 MT CO<sub>2</sub>e per year. As with project-generated construction criteria air pollutant emissions, GHG emissions generated during construction of the project would be short-term in nature, lasting only for the duration of the construction period, and would not represent a long-term source of GHG emissions. In addition, estimated annual project-generated GHG emissions would be approximately 794 MT CO<sub>2</sub>e per year as a result of project operations and amortized construction. This would be less than the significance threshold of 3,000 MT CO<sub>2</sub>e per year. Therefore, impacts related to GHG emissions associated with the project would be less than significant. In addition, the proposed project consistent with the



Scoping Plan, the City's General Plan, and SCAG's Connect SoCal, which all promote economic growth while achieving greater energy efficiency. The project would not conflict with any plans adopted with the purpose of reducing GHG emissions. Therefore, because the proposed project's impacts to climate change is cumulative in nature, the proposed project would not result in a cumulatively considerable impact to GHGs.

### 5.4.9 Hazards and Hazardous Materials

Cumulative impacts related to hazards and hazardous materials would result from projects that combine to increase exposure to hazards and hazardous materials. As discussed in Section 4.9, Hazards and Hazardous Materials, the proposed project would have less-than-significant impacts related to hazardous materials. Cumulative projects primarily consist of residential projects which would result in the use and transport of similar hazardous materials as the proposed project, including consumer products such as household cleaning products, landscaping chemicals and fertilizers, and other commonly used hazardous substances. Although these could be subject to accidental spillage, there is no quantifiable cumulative effect, since accidents are indiscriminate events, not related or contributory to one another. Provided that individual projects adhere to current laws governing storage, transportation, and handling of hazardous materials, no significant cumulative hazards or threats to human health and safety are anticipated.

Additionally, soils and soil vapor on the project site were evaluated due to previous agricultural uses on the project site and a former underground storage tank (UST) north of the northeast corner of the site. According to the Phase I and II Environmental Site Assessment (ESA) completed for the proposed project, no hazardous conditions related to soils or soil vapor were determined to exist due to the previous agricultural uses and former UST (Appendix F1). As such, no cumulative impacts would occur due to on-site soil conditions.

Finally, the proposed project would not exacerbate wildfire risk that could expose project occupants or structures to hazards from wildfires including pollutants or the uncontrollable spread of a wildfire. Although the project site is in a Very High Fire Hazard Severity Zone (VHFHSZ), a Fire Prevention Plan (FPP) was prepared for the proposed project to reduce wildfire risk and hazards. The proposed project would be required to comply with existing regulations related to fire protection and recommendations in the FPP, as outlined in **PDF-WF-1** (see Table 3-2, Project Design Features, in Chapter 3, Section 4.9, Hazards and Hazardous Materials, and Section 4.20, Wildfire). Cumulative projects would also be required to comply with existing regulations related to fire protection and would be required to prepare an FPP if also located within a VHFHSZ. Therefore, through compliance with existing regulations associated with wildland fires, impacts associated with wildfire would not be cumulatively considerable. Thus, the proposed project would not result in a cumulatively considerable impact to hazards and hazardous materials.

### 5.4.10 Hydrology and Water Quality

Cumulative hydrology impacts also result from projects combining to alter the course of surface water flow or to increase flood hazards in a particular area, either through diverting floodways or constructing structures within the floodways. Cumulative water quality impacts result from projects that combine to either pollute or increase the turbidity of water. As stated in Section 4.10, Hydrology and Water Quality, during construction and operation, the proposed project has the potential to violate water quality standards. However, implementation of a Stormwater Pollution Prevention Plan, in accordance with the Statewide Construction General Permit, incorporation of water quality best management practices, and development of proposed drainage improvements to the project site, impacts would remain below a level of significance. In addition, per the Geotechnical Investigation prepared for the project (Appendix E), **PDF-GEO-7**, which requires that fill slopes are planted to avoid erosion, and **PDF-GEO-9**, which

requires erosion measures during grading and prior to the completion and construction of permanent drainage controls, would be incorporated into the design of the project to reduce the potential for erosion or siltation on or off-site (see Section 3.3.10, Grading Plan, in Chapter 3, Project Description, for details). Furthermore, because all surrounding projects are regulated under the same City and regional Water Quality Control Board standards, they too would be required to attenuate all drainage on site (to maintain pre development flow quantities) and to incorporate hydrology and water quality design features to prevent cumulative impacts to local drainage systems or water quality. Therefore, the proposed project would not contribute to a cumulatively considerable impact related to hydrology and water quality.

### 5.4.11 Land Use and Planning

Significant adverse cumulative land use impacts would result from projects that contribute to development that is inconsistent with applicable plans or incompatible with existing or planned uses or planned addition of incompatible uses.

As described in Section 4.11, Land Use and Planning, the proposed project would not physically divide an established community. In addition, with incorporation of mitigation measure **MM-BIO-3** the proposed project would be consistent with the City's General Plan, the Community Forest Management Plan, and the City's Tree Preservation and Protection Ordinance. The project would be consistent with all objectives and goals of the City's General Plan, as detailed in Section 4.11.5. Further, upon approval, the proposed project would be consistent with the General Plan land use designations of the project site because the Specific Plan would be amended the General Plan prior to development of the proposed project, to allow for the proposed land uses. The proposed project would also be consistent with the Parkland Dedication Ordinance, Parks and Recreation Master Plan, and Community Forest Management Plan.

Additionally, all cumulative projects would be subject to similar criteria as the proposed project, which would ensure compliance with existing applicable land use plans with jurisdiction over the project site. Analysis of individual projects as they are submitted to the City will ensure compatibility with applicable plans and policies. Since all current and future projects would be analyzed for compatibility and compliance with land use regulations, the proposed project would not result in a cumulatively considerable impact.

### 5.4.12 Mineral Resources

As discussed in Section 4.12, Mineral Resources, the project site is located within an area mapped as MRZ-3. The City, including the project site, is located in areas mapped as MRZ-3 and MRZ-4, which are areas of undetermined mineral resource significance and areas where available information is inadequate for assignment to any other MRZ zone, respectively. As such, there are no locations in the City zoned or designated for mineral resource extraction, which would include all the cumulative projects listed in Table 5-1. Therefore, neither the proposed project nor any cumulative projects would result in the loss of availability of known or locally important mineral resources. Cumulative impacts would not be cumulatively considerable.

### 5.4.13 Noise

Related projects considered in the cumulative scenario consist of those listed in Section 5.3, Cumulative Projects. The nearest related project, identified as Number 3 in Table 5-1 and Figure 5-1, is located approximately 1,000 feet (0.19 miles) south-southeast of the proposed project site. The next-nearest related project, identified as

Number 1 (Stonegate) in Table 5-1, is located approximately 3,000 feet (0.57 miles) to the east. The two other related projects are located approximately 1.5 miles or more from the project site.

### Noise in Excess of Standards

The proposed project and related projects would all be subject to applicable noise standards (descriptions of the standards applicable within the City are described throughout Section 4.13.2 in Section 4.13, Noise). The proposed project would incorporate mitigation measures **MM-NOI-1** and **MM-NOI-2**, as described in Section 4.13.6 to ensure compliance with applicable noise standards. With the incorporation of the mitigation measures described in Section 4.13.6, the proposed project would not contribute to cumulative exceedances of noise standards, and its incremental effect is not cumulatively considerable.

### Temporary/Periodic Increases in Ambient Noise Levels

The proposed project would result in temporary noise increases during the approximately 16-month construction period, as discussed in Chapter 3, Project Description. The proposed project's construction period would have the potential to overlap with the related projects' construction periods. The nearest related project, involving the construction of one single-family residence with an accessory dwelling unit located at 370 North Grove Street in the City of Sierra Madre, is located approximately 0.2 miles south-southeast of the proposed project site, with intervening numerous structures in between. The next nearest related project is located approximately 0.57 miles to the east, also with numerous structures, as well as vegetation and terrain, in between. Due to the decrease in noise levels with distance and the presence of physical barriers, the related projects would not combine with the proposed project to produce a cumulative noise effect during construction. Additionally, all projects would be required to comply with applicable local noise ordinances to limit noise hours during construction. The mitigation measures described in Section 4.13.6, **MM-NOI-1** and **MM-NOI-2**, along with the requirement to comply with the applicable noise regulations, would reduce the proposed project's incremental effect, ensuring that impacts are not cumulatively considerable.

### Vibration

Construction-related vibration from the proposed project was addressed in Section 4.13.5. Other foreseeable projects within the vicinity of the project site would not be close enough to create a combined excessive generation of groundborne vibrations; the nearest such project would be located approximately 0.2 miles west of the project site. Therefore, cumulative impacts associated with excessive groundborne vibrations are not cumulatively considerable.

### Permanent Increase in Ambient Noise Levels

**Stationary Sources.** Noise generated from the proposed project would be limited to those typical of residential uses/neighborhood park. This type of noise is generally described as "nuisance noise." Nuisance noise is intermittent or temporary neighborhood noise from sources such as amplified music, barking dogs, and landscape maintenance equipment that may be disturbing to other residents. Compliance with the County's noise control ordinance for residential and related land uses would limit exposure to excessive nuisance noise. Similarly, the related projects would be required to comply with the noise standards applicable to the jurisdictions in which they would be located (the Cities of Sierra Madre and Pasadena). Compliance with the County's Noise Control Ordinance would reduce the proposed project's operational noise so that its incremental effect is not cumulatively considerable.

### Off-Site Traffic Noise

The proposed project and related projects would generate off-site traffic noise. When calculating future traffic impacts, the traffic data prepared by Fehr & Peers for the proposed project included traffic from the related projects in the future year traffic volumes (Fehr & Peers 2020). Recent pending and approved projects in the project area were included in the traffic model. Thus, the future traffic results with and without the proposed project already account for the cumulative impacts from the list of related projects contributing to traffic increases. Since the noise impacts are generated directly from the traffic analysis results, the Future without Project Noise Level and Future with Project Noise Levels described herein already reflect cumulative impacts. As described herein, the noise level increases associated with both of these scenarios (Future without Project and Future with Project) would generate a noise level increase of 3 dB or less along the studied roadways in the vicinity of the proposed project site. As such, increases would be below the significance threshold of 6 dB (in the City of Sierra Madre) or 5 dB (in the City of Pasadena). With or without the proposed project, traffic noise would not be substantially increased in the project vicinity. As such, the incremental effect of the proposed project on off-site traffic noise is not cumulatively considerable.

### 5.4.14 Population and Housing

Planned projects identified in Table 5-1 could combine to create substantial population growth in the City. However, as stated in Section 4.14, Population and Housing, construction employment would not induce substantial population growth in the area. In addition, while the project would result in a new residential population to the local and regional area, the housing growth caused by the project falls well within current projections for household growth in the City and Los Angeles County. For these reasons, the proposed project would not induce substantial unplanned population growth, and impacts would be less than significant. Therefore, it is not anticipated that the proposed project, in combination with other future foreseeable projects, would create a cumulatively considerable impact.

### 5.4.15 Public Services

As detailed in Section 4.15, Public Services, the proposed project would establish the Specific Plan, which would allow for development of a residential community on the currently undeveloped project site. More specifically, the project would allow for construction of new residences as well as a public park to serve City residents; however, the project would not induce substantial unplanned population growth as discussed in Section 4.14, Population and Housing. The proposed project could increase demand for fire and police protection services, as well as generate demand for school, and library facilities.

The proposed project would be subject to the payment of developer fees, which would be used exclusively for future public facility improvements necessary to ensure that the development contributes its fair share of the cost of facilities and equipment determined to be necessary to adequately accommodate new development in the City. The fee amount is determined through evaluation of the need for new public service facilities as it relates to the level of service demanded by new development, which varies in proportion to specific land uses.

Regarding schools, the proposed project would not result in the need for new or physically altered school facilities, and the project would be required to pay school fees pursuant to State Bill (SB) 50, which would constitute full mitigation for any impacts should they occur, impacts related to school facilities would be less than significant. Lastly, implementation of the proposed public park would ensure that impacts to parks are less than significant.

The cumulative projects identified above in Table 5-1 would also be required to contribute a fair share contribution of the cost of facilities and equipment determined to be necessary to adequately accommodate new development in the City based on the projected demand each project would have on public services and facilities. Therefore, since each project would be required to contribute developer fees, or expand or construct new facilities, if determined to be necessary, impacts would not be cumulatively considerable.

#### 5.4.16 Recreation

As stated in Section 4.16, Recreation, the proposed project would not result in the increased demand for or use of existing parks or recreational facilities such that new or physically altered park facilities would be required. The proposed project would be required to provide 0.5 acres of parkland on-site. As mentioned in Section 4.16, the project would include 3.04 acres for a neighborhood public park, which is more than the required amount of parkland, in compliance with the Sierra Madre Municipal Code. Thus, inclusion of the proposed public park would ensure that impacts to parks are less than significant.

Similarly, the cumulative projects identified above in Table 5-1 would be required to provide adequate park space or contribute to a fair share contribution of the cost of facilities based on standards such as the minimum parkland-to-population ratio developed by the City. Impacts associated with the construction and operation of potential new recreational facilities would be analyzed within each cumulative project's CEQA review. As such, since each project would be required to contribute to developer fees, or expand or construct new facilities, if determined to be necessary, impacts would not be cumulatively considerable.

#### 5.4.17 Transportation

As discussed in Section 4.17, Transportation, the project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. In addition, the proposed project would be screened out using the Low Vehicle Miles Traveled (VMT) Area Screening criteria and can be presumed to have a less than significant VMT impact and would therefore be consistent with CEQA Guidelines Section 15064.3(b). Lastly, the project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment) or result in inadequate emergency access. It is anticipated that all cumulative projects included in Table 5-1 would be required to implement mitigation or design features to reduce or avoid potential impacts, if required. In addition, it is anticipated that cumulative projects included in Table 5-1 would implement access and circulation features that would ensure projects would not result in an increase in hazards or inadequate emergency access. Therefore, cumulative impacts related to transportation would not be cumulatively considerable.

#### 5.4.18 Tribal Cultural Resources

As discussed in Section 4.18, Tribal Cultural Resources, ground-disturbing activities associated with construction of the proposed project could result in the unanticipated discovery of previously uncovered tribal cultural resources (TCRs). To mitigate any potential impacts to cultural resources resulting from ground-disturbing activities, **MM-TCR-1** shall be implemented. **MM-TCR-1** requires that a Native American monitor be present during activities interpreted as having the potential to encounter unknown TCRs, to ensure impacts would be less than significant. The majority of cumulative projects in the area have centered on residential development, although one commercial building expansion is included as well (see Table 5-1). These projects would have the same potential as the proposed project to impact previously uncovered TCRs during ground disturbing activities associated with construction. Compliance

with Assembly Bill 52, which requires consultation with tribes that have a cultural affiliation to the project site and surrounding area, would also be required for future development projects. As such, cumulative projects would be required to implement similar mitigation measures as the proposed project to reduce potential impact to TCRs. When considered with other foreseeable projects, cumulative impacts to cultural resources would not be cumulatively considerable. Therefore, the project would not result in a cumulatively considerable contribution to TCRs impacts.

#### 5.4.19 Utilities and Service Systems

Cumulative impacts to utilities and services systems would result when projects combine to increase demand for utilities and service systems such that additional facilities must be provided or expanded. This would usually result from incremental addition of people occupying an area or incremental construction of new or larger buildings requiring public services provision. As discussed in Section 4.19, Utilities and Services Systems, with implementation of utility infrastructure associated with the project, the proposed project would not result in relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities or expansion of existing facilities. Considering existing and estimated future water demand, as described in the City's 2020 Urban Water Management Plan, it is reasonably foreseeable that the City would have sufficient supplies to serve the proposed project and reasonably foreseeable future development during normal, dry, and multiple dry years. The City's 2021 UWMP accounts for projected populations in the City's service area based on growth rate projections obtained by SCAG's 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The 2020-2045 RTP/SCS assumed a 2016 population of 11,000 residents and a 2045 population of 11,300 residents. Therefore, the forecasted population growth for the City is estimated to increase by 300 people between 2016 and 2045 (SCAG 2020). As discussed in Section 4.14, the project's proposed 42 residential units would generate a population increase of approximately 134 persons. Therefore, the increase in growth generated by the proposed project would be accounted for in the growth anticipated in the 2020 RTP/SCS and therefore in the assumptions of the City's 2021 UWMP. As shown in Section 5.3, cumulative projects in the City include development of 29 single-family residences and one single-family residence within the City, and 258 residential units within the City of Pasadena. Using SCAG's average household size in the SCAG region of 3.2 persons per household in 2018 (SCAG 2019), cumulative projects within the City would result in the introduction of approximately 96 residents in the City. With the proposed project, additional cumulative growth in the City would account for 230 residents, which is within the City's projected population growth. In addition, to achieve a net-zero impact on local water supplies, the project applicant will provide funds to the City for one of three programs: (1) to purchase supplemental water from the San Gabriel Valley Municipal Water District (SGVMWD) in an amount equal to the anticipated total indoor and outdoor water demand of each residential unit over a 50-year period; (2) the creation of a lawn retrofit program, which would provide homeowners with a grant provided to replace their lawn with turf; and (3) improvements to existing water infrastructure, such as pipe leakage fixes. If the City opts for purchase of supplemental water- (see **PDF-UTL-1** in see Table 3-2, Project Design Features, in Chapter 3). The supplemental water is purchase would be in addition to the City's existing agreement with SGVMWD providing for the purchase of supplemental imported water. As discussed in Section 4.19 and per the Per SGVMWD UWMP, for a single dry year, and multiple dry years, supplemental water may not be available. In this case, the applicant would provide funds to the City to support the creation of a lawn retrofit program or improvements to existing water infrastructure, which achieve a commensurate level of water reduction. Further, the project site would be redeveloped in compliance with the California Green Building Code (which implements water efficiency standards for appliances and fixtures), which would further reduce project water usage; thus, water demand as a result of the project would be minimal. While the City is a built-out community with just a handful of vacant parcels, any cumulative projects in the surrounding area would be developed with the same building standards to optimize water efficiency. In addition, adequate wastewater treatment would be available to serve the proposed project and cumulative projects.

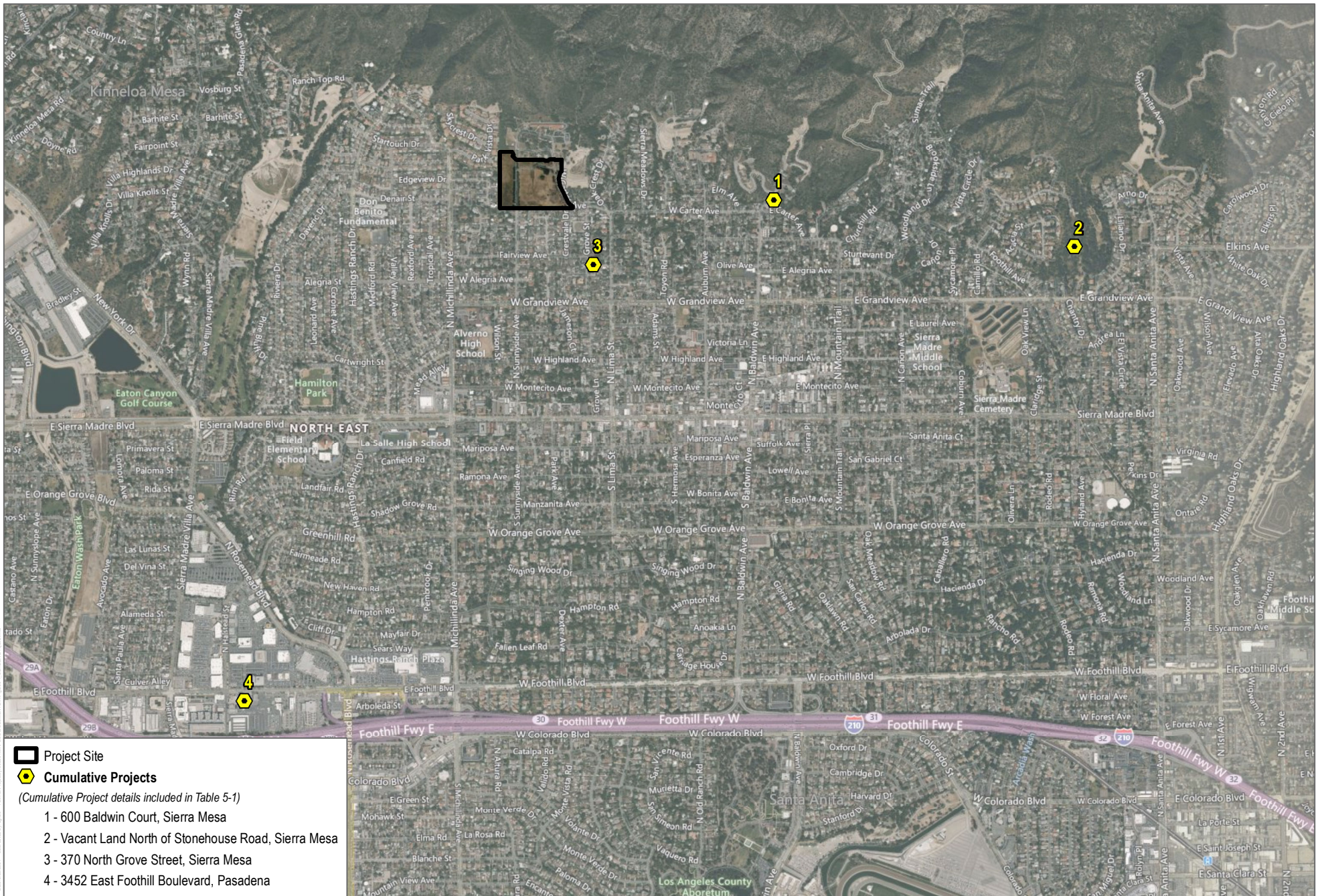
Lastly, solid waste generated under the proposed project would not exceed state or local standards, or capacity of local infrastructure. Cumulative projects would be required to perform similar analyses, in accordance with CEQA, to ensure projects would have sufficient utilities. Solid waste management services for the City are provided by Athens Services. For residential customers, Athens Services provides a three-can system to separate waste from recyclable material and organic material. The City is a member of the Scholl Canyon Watershed, so the refuse produced by the City is taken to Scholl Canyon Landfill. Total permitted capacity at the Scholl Canyon Landfill is approximately 58.9 million tons, and the landfill has a remaining capacity of approximately 17%, or 9.9 million tons (CalRecycle 2019). As such, the available capacity of the landfill would be able to accommodate the project and cumulative projects. The waste collection procedures and programs for all planned and proposed developments would be required to comply with the municipal requirements for recycling and collection of solid waste. All planned and proposed projects would be required to be consistent with all applicable statutes and regulations, and would therefore not have cumulatively considerable impacts with respect to solid waste collection and management.

#### 5.4.20 Wildfire

With regard to wildfire hazards, as discussed in Section 4.20, Wildfire, the project site is located within a wildland-urban interface (WUI) location that is in an area statutorily designated Local Responsibility Area VHFHSZ by CAL FIRE and the Sierra Madre Fire Department (Appendix F2). Additionally, as seen in Figure 3-1, Fire Hazard Severity Zone Map, of the General Plan, the project site is designated by the City as a Very High Hazard area (City of Sierra Madre 2015). However, the project would be required to comply with requirements such as the Sierra Madre Municipal Code and the FPP prepared for the project (Appendix F2), as outlined in **PDF-WF-1** (see Table 3-2, Project Design Features, in Chapter 3, Section 4.9, Hazards and Hazardous Materials, and Section 4.20, Wildfire). Per Chapter 17.52 of the Sierra Madre Municipal Code, the City shall incorporate fire prevention and landscaping standards. As stated in the FPP, a Fuel Modification Area would be implemented, that would take advantage of the project's setting and design layout. Vegetation management, including the assessment of fuel condition and removal of dead and dying and undesirable species, as well as thinning as necessary to maintain specified plant spacing and fuel densities, shall be completed annually each year, and more often as needed for fire safety, as determined by the Sierra Madre Fire Department. Cumulative projects would be required to also prepare FPPs, to evaluate and identify potential fire risks associated with the project. As such, through compliance with existing regulations and similar project design features, as applicable, cumulative impacts to wildfire would not be cumulatively considerable.

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SOURCE: County of Los Angeles 2020; Bing Maps

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# 6 Growth Inducement

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Section 15126.2(e) of the California Environmental Quality Act (CEQA) Guidelines requires a discussion of how the potential growth-inducing impacts of the project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Induced growth is distinguished from the direct employment, population, or housing growth of a project (14 CCR Section 15000 et seq.). If a project has characteristics that “may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively,” then these aspects of the project must be discussed as well. Induced growth is any growth that exceeds planned growth and results from new development that would not have taken place in the absence of the proposed project. Typically, the growth-inducing potential of a project would be considered significant if it stimulates population growth or a population concentration above what is assumed in local and regional land use plans, or in projections made by regional planning authorities, such as the Southern California Association of Governments (SCAG).

The CEQA Guidelines also indicate that growth should not be assumed to be either beneficial or detrimental (14 CCR Section 15126.2[d]). According to Section 15126.2(e) of the CEQA Guidelines, a project is defined as growth inducing when it directly or indirectly:

1. Fosters population growth;
2. Fosters economic growth;
3. Includes the construction of additional housing in the surrounding environment;
4. Removes obstacles to population growth;
5. Taxes existing community service facilities, requiring construction of new facilities that could cause significant environmental effects; and/or
6. Encourages or facilitates other activities that could significantly affect the environments, either individually or cumulatively.

## 6.1 Growth Inducement Due to Population Growth

As discussed in Section 4.14, Population and Housing, of this Environmental Impact Report (EIR), The Meadows at Bailey Canyon Specific Plan Project (project or proposed project) would directly contribute to population growth in the City of Sierra Madre (City). The proposed project would allow for the development of 42 detached single-family homes. The proposed project would directly contribute to population growth in the area through the development of these dwelling units. According to SCAG’s Connect SoCal Program EIR, the average household size in the SCAG region was 3.2 persons per household in 2018 (SCAG 2019). Using the 2018 average as a guide, 3.2 persons per household for the project’s proposed 42 residential units could result in a residential population of approximately 134 persons. The project site currently has a zoning and land use designation of Institutional Land, which allows for public and private uses which provide public services to the community, including communal residential facilities, churches, museums, and schools (City of Sierra Madre 2015, 2017). The General Plan and Zoning Code amendments would change this land use designation to Specific Plan, which would allow for low-density residential and open space uses on the project site. As such, the proposed project could result in unplanned population growth due to the change in land use compared to some land uses allowed under the Institutional zoning and land use designation. However, as discussed in Section 4.14, SCAG has projected that the City will undergo an increase of 300 people from 2016 to 2045. The population growth anticipated to occur as a result of the project (134 residents) represents 45% of the City’s projected population

growth for 2016 to 2045, and 0.008% of the County’s projected population growth in the same time period. Therefore, the project would contribute to and is projected to be within the anticipated population growth for the City, nor would it exceed the population growth projections for the surrounding County. Although the proposed project would result in greater population inducement, development of the uses allowed under the proposed project would be under the City’s growth projections.

Overall, the project would directly stimulate population growth through the addition of new residents. However, the growth would be consistent with household growth envisioned in local and regional land use plans and in projections made by regional planning authorities, since the planned growth of the project site and its land use intensity have been factored into the underlying growth projections of the SCAG’s Connect SoCal, also known as the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (SCAG 2020a).

## 6.2 Growth Inducement Due to Economic Growth

An increase in population would foster economic growth by increasing demand for regional and local goods and services. It is expected that future residents would demand a variety of goods and services from the existing and future commercial uses within the surrounding area. The proposed project would not provide services on site and therefore would not generate direct employment opportunities for residents. As the project proposes to allow for the development of 42 residences, a dedicated neighborhood park, and open space, the project is not expected to result in substantial growth inducement associated with economic growth.

## 6.3 Growth Inducement Due to Additional Housing

The proposed project would establish The Meadows at Bailey Canyon Specific Plan (Specific Plan), which would establish the zoning and development standards to guide future development of 42 detached single-family residential units and an approximately 3.04-acre dedicated neighborhood park, within the 17.30-acre project site. As such, the project would propose new housing and therefore result in a direct increase in population. According to SCAG’s Connect SoCal Program EIR, the average household size in the SCAG region was 3.2 persons per household in 2018 (SCAG 2019). Using the 2018 average as a guide, 3.2 persons per household for the project’s proposed 42 residential units could result in a residential population of approximately 134 persons. As discussed in Section 4.14, Population and Housing, of this EIR, the project is not expected to result in household growth above the City’s General Plan forecasts. According to SCAG, the City is anticipated to increase from 4,800 households in 2016 to 5,000 households in 2045, an increase of 200 households. Based on SCAG’s growth projections for housing, the project’s 42 dwelling units would represent 21% of the 200 households projected to be added to the City between 2016 and 2045.

As discussed in Section 4.14, Population and Housing, SCAG recently completed developing the 6th Cycle Regional Housing Needs Assessment (RHNA) allocation plan, which was approved in March 2021, and will be in effect from 2021 through 2029. The 6th Cycle RHNA states that the allocation for the City is 204 housing units (SCAG 2021). As discussed in Chapter 3, Project Description, of this EIR, the project’s anticipated construction schedule is anticipated to conclude in May 2025, which would result in the anticipated housing growth to be accounted for in the City’s 6th Cycle RHNA allocation. Therefore, the project would not stimulate housing growth above what is assumed in local and regional land use plans, or in projections made by regional planning authorities.

## 6.4 Growth Inducement Due to Removal of Obstacles

Indirect growth can also occur by a project installing infrastructure that can support further growth. The surrounding area is developed and supported by existing road and utility infrastructure. The project would include connections to existing utilities and infrastructure and would not result in the extension of infrastructure or roads into an undeveloped area leading to substantial population growth. Therefore, indirect growth inducement as a result of the extension of these facilities into a new area would not occur.

Improvements to transportation, utilities, and public service infrastructure as part of the proposed project would accommodate the direct growth induced by the proposed project. These improvements would not open up new areas to development because they would connect to existing transportation and utility infrastructure (including water and sewer) adjacent to the project site. Furthermore, these improvements would provide access and utility service solely to the proposed project. Areas of the project site outside of the development area would remain as under existing conditions. Therefore, the project site would not be capable of supporting future development due to these transportation and utility improvements.

The proposed project would also include a storm drain system which would be designed to address peak flows and to integrate water quality features needed to comply with the requirements for water quality under Title 7 (Stormwater Pollutant Elimination) of the Sierra Madre Municipal Code. The project proposes the creation of two independent storm drain pipe networks that convey site runoff to the Municipal Separate Storm Sewer System. One network is proposed on the western portion of the site and consists of a new storm drain which would run north south and join an existing storm drain at North Sunnyside Avenue. The second proposed storm drain network would be constructed under Carter Avenue on the site's eastern edge. This network would capture sheet flow from the project site to a proposed detention basin before being discharged into the City's stormwater system. As such, the proposed storm drain system would accommodate the proposed project and would not be capable of supporting future growth or development.

Public services such as schools, police, and fire services would be provided by existing and planned surrounding facilities. As discussed above and in Section 4.15, Public Services, of this EIR, payment of developer fees would ensure the proposed project would not significantly impact public services and facilities. Additionally, as discussed in Section 4.16, Recreation, of this EIR, the proposed project would include a 3.04-acre neighborhood public park, in compliance with Title 16 (Subdivision), Chapter 16.44 (Regulations for Dedication of Land for Park and Recreation Land) of the Sierra Madre Municipal Code, to fulfill parkland obligation requirements for population induced by the proposed project and ensure the proposed project would not significantly impact parks and recreational facilities.

The proposed project would not provide surplus infrastructure capacity that would induce growth in surrounding areas, but would, rather, accommodate the proposed project during operations. Therefore, the proposed project would not result in growth inducement due to the removal of obstacles.

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# 7 Significant Irreversible Changes

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The California Environmental Quality Act (CEQA) Guidelines (14 CCR Section 15000 et seq.) require an Environmental Impact Report (EIR) to address any significant irreversible environmental changes that would result from a project should it be implemented. Pursuant to Section 15126.2(d) of the CEQA Guidelines, significant irreversible environmental impacts could involve any of the following:

- Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely.
- The primary and secondary impacts of the project would generally commit future generations of people to similar uses.
- Irreversible damage from environmental accidents associated with the project.
- The proposed consumption of resources is not justified (e.g., the project results in wasteful use of energy).

Determining whether a project could result in significant and irreversible effects requires a determination of whether key resources would be degraded or destroyed in such a way that there would be little possibility of restoring them.

Implementation of The Meadows at Bailey Canyon Specific Plan Project (project or proposed project) would involve consumption of limited, slowly renewable, and non-renewable resources. This consumption would occur during the construction phase of the project and would continue throughout its operational lifetime. The project would require a commitment of resources that would include building materials, fuel and operational materials/resources, and the transportation of goods and people to and from the project site.

Construction of the project would require the consumption of resources that are not renewable or that may renew so slowly as to be considered non-renewable. These resources would include the following construction supplies: certain types of lumber and other forest products; aggregate materials used in concrete and asphalt such as sand, gravel, and stone; metals such as steel, copper, and lead; petrochemical construction materials such as plastics; water; and fossil fuels such as gasoline and oil.

The resources that would be committed during operation of the project would include water for potable uses (personal and household consumption) and landscape irrigation, and fossil fuels for electricity, natural gas, and transportation. Fossil fuels would represent the primary energy source associated with construction and ongoing operation of the project, and the existing, finite supplies of these natural resources would be incrementally reduced. However, as discussed in Section 4.6, Energy, of this EIR, the project would result in less-than-significant impacts related to the potential wasteful, inefficient, or unnecessary consumption of energy resources during project construction and operation.

Additionally, the project would involve an unquantifiable, but limited, use of potentially hazardous materials typical of residential uses, including cleaning solvents and fertilizers and pesticides for landscaping. These materials would be contained, stored, and used on site in accordance with manufacturers' instructions and applicable standards and regulations. Compliance with regulations would serve to protect against a significant and irreversible environmental change that could result from the accidental release of hazardous materials.

Furthermore, the project would result in direct permanent impacts to nesting bird habitats and protected trees. Permanent project impacts would consist of vegetation clearing, grading, and residential development, including houses, parks and open space, and roadways. Permanent impacts to nesting bird habitats and protected trees would be considered potentially significant under CEQA and would require implementation of mitigation measures, as outlined in Section 4.4, Biological Resources, to reduce impacts to a level below significance.

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# 8 Alternatives

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## 8.1 Introduction

Pursuant to the California Environmental Quality Act (CEQA) Guidelines, Environmental Impact Reports (EIRs) are required to “describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives” (14 CCR Section 15126.6[a]). This EIR “must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation” (14 CCR Section 15126.6[a]). The alternatives discussion is required even if these alternatives “would impede to some degree the attainment of the project objectives, or would be more costly” (14 CCR Section 15126.6[b]).

The inclusion of an alternative in an EIR does not constitute definitive evidence that the alternative is in fact “feasible.” The final decision regarding the feasibility of alternatives lies with the decision maker for a given project who must make the necessary findings addressing the potential feasibility of reducing the severity of significant environmental effects (California Public Resources Code, Section 21081; see also 14 CCR Section 15091).

## 8.2 Project Objectives

Following are the objectives of the proposed The Meadows at Bailey Canyon Specific Plan (project or proposed project):

1. Provide for orderly planning and long-range development of the project site to ensure community compatibility with the distinctive small-town character unique to the Sierra Madre community through adoption of a specific plan that establishes zoning and development standards.
2. Ensure new uses are compatible with the existing community by establishing comprehensive development standards and architectural guidelines through adoption of a specific plan that will guide future development.
3. Provide above-moderate income housing, in accordance with the 6th Cycle Regional Housing Needs Assessment (RHNA).
4. Develop a high-quality single-family residential community that is sensitively sited within the existing natural topography of the site and its surroundings and serves to minimize traffic impacts to adjacent streets.
5. Preserve the hillside open space area by ~~dedicating~~ conserving approximately 35 acres north of the Mater Dolorosa Retreat Center to the City, in order to preserve a portion of ~~Bailey Canyon~~ and the ~~Bailey Canyon~~ Canyon Trail, which would be used by wildlife for movement up and down slope; preserve native vegetation communities and drainages; and preserve land adjacent to the ~~Bailey Canyon~~ Canyon stream.
6. Provide street improvements to facilitate safe and efficient access to the site from North Sunnyside Avenue.
7. Achieve a net-zero impact on local water supplies to minimize burdens on existing City infrastructure and the impact on the environment.
8. Provide public benefits and amenities to the neighboring community, through a development agreement with the City, including a neighborhood public park and enhanced connectivity to the Bailey Canyon Wilderness Park and trail system

## 8.3 Significant Impacts

As discussed throughout Chapter 4, Environmental Analysis, of this EIR, implementation of the proposed project would not result in any significant and unavoidable impacts on the environment. Prior to mitigation, the proposed project would result in potentially significant impacts related to biological resources, cultural resources, geology and soils, land use and planning, and noise. However, with implementation of mitigation measures provided in Table ES-1, Summary of Project Impacts, of Chapter ES, Executive Summary, all potentially significant impacts would be mitigated to below a level of significance.

## 8.4 Alternatives Considered but Rejected

State CEQA Guidelines Section 15126.6(c) provides guidance in selecting a range of reasonable alternatives for the project. The EIR should also identify any alternatives that were considered by the lead agency but were rejected during the planning or scoping process and briefly explain the reasons underlying the lead agency's determination. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts. State CEQA Guidelines Section 15126.6(c) provides the following guidance in selecting a range of reasonable alternatives for the project. There are many factors that may be taken into account when addressing the feasibility of range of potential alternatives for the project, such as site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent). The alternatives discussion shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should also identify any alternatives that were considered by the lead agency but were rejected during the planning or scoping process and briefly explain the reasons underlying the lead agency's determination.

The EIR need not discuss every alternative to the project. A range of alternatives that are "reasonable" for analysis have been evaluated and are discussed below in Section 8.5, Alternatives Under Consideration. The following describes other alternatives considered by the City of Sierra Madre (City) but dismissed from further evaluation in this EIR, and a brief description of the reasons for their rejection.

### 8.4.1 Alternative Location

Pursuant to Section 15126.6(f)(2) of the CEQA Guidelines, the City considered the potential for alternative locations to the project. The City is mostly developed, with the exception of the San Gabriel Mountains located within the northern portion. Therefore, there are very limited areas of approximately equivalent size to the project site that could be developed or redeveloped with a residential project. In addition, the project applicant does not control another site within the City of comparable land area that is available for development of the proposed project. One of the factors for feasibility of an alternative is "whether the proponent can reasonably acquire, control or otherwise have access to the alternative site." Because the City is highly urbanized and is largely built out, obtaining another site of a similar size in a similar location is not considered feasible. It should also be noted that the project site is surrounded on all sides by development. As such, an alternative location was ultimately rejected from further analysis in the EIR.

## 8.4.2 Reduced Intensity Institutional

The City also considered a reduced intensity alternative that would be consistent with the existing Institutional zoning and General Plan land use designation of the project site. More specifically, this assumes development of a communal residential facility, including group homes, developmentally disabled, or senior care facilities, consistent with the existing Institutional zoning and General Plan land use designation of the project site, but at a reduced development intensity. Per CEQA Section 15126.6(f)(1), among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability and economic viability. Due to the decreased intensity associated with this alternative, it is not reasonably foreseeable that a future applicant will develop the project site at this scale, or that development at a reduced intensity would be economically viable for future development of the site. More importantly, however, one of the purposes of an alternatives analysis is to identify alternatives that could avoid or substantially lessen one or more of the significant effects of the project. The EIR considers two alternatives that are similar to the Reduced Intensity Institutional alternative suggested. The EIR analyzes two alternatives: Alternative 2, Existing Zoning and Land Use Designation; Communal Residential Facility; and Alternative 3, Existing Zoning and Land Use Designation: Private School – albeit at greater intensity of development (see Table 8-1, below). With respect to being capable of substantially lessening the significant impacts of the project, neither Alternative 2 nor Alternative 3 would avoid or substantially lessen the significant impacts of the project, and both would create new and greater impacts in some areas, such as aesthetics, recreation, greenhouse gas emissions, and transportation, as compared to the proposed project. While a reduced intensity alternative would reduce these impacts, there is nothing to indicate that it would avoid or substantially lessen the significant impacts of the proposed project or would be substantially different in terms of impacts as compared to the alternatives already addressed in this section. In conclusion, because the reduced intensity institutional alternative would not substantially lessen one or more of the significant effects of the project, as compared to the alternatives included in this section, which have been analyzed in detail below, a reduced intensity institutional alternative was ultimately rejected from further analysis in the EIR.

## 8.5 Alternatives Under Consideration

Section 15126.6 of the CEQA Guidelines states that the EIR shall “describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.”

The range of alternatives evaluated in an EIR is governed by the “rule of reason” that requires the EIR set forth only those alternatives necessary to permit a reasoned choice. An EIR need not consider an alternative whose effects cannot be reasonably ascertained and whose implementation is remote and speculative (Section 15126.6[a] of the CEQA Guidelines).

In developing the alternatives to be addressed in this EIR, the potential alternatives were evaluated in terms of their ability to meet the basic objectives of the project, while reducing or avoiding the environmental impacts of the project identified in Chapter 4, Environmental Analysis, of this EIR.

In determining what alternatives should be considered in the EIR, it is important to acknowledge the objectives of the project, the project’s significant effects, and unique project considerations. These factors are crucial to the development of alternatives that meet the criteria specified in California Code of Regulations (CCR) Section 15126.6(a). Although, as noted above, EIRs must contain a discussion of “potentially feasible” alternatives, the ultimate determination as to whether an alternative is feasible or infeasible is made by the lead agency’s decision-making body, the Sierra Madre City Council (see PRC Section 21081[a][3]).

This chapter discusses alternatives to the proposed project, including the No Project/No Build Alternative. The No Project/No Build Alternative is a required element of an EIR pursuant to Section 15126.6(e) of the CEQA Guidelines that examines the environmental effects that would occur if the project were not to proceed. The alternatives addressed in this chapter are listed below, followed by a more detailed discussion of each:

1. Alternative 1: No Project/No Build Alternative
2. Alternative 2: Existing Zoning and Land Use Designation: Communal Residential Facility Alternative
3. Alternative 3: Existing Zoning and Land Use Designation: Private School Alternative
4. Alternative 4: Reduced Development Alternative

## 8.6 Alternatives Impact Summary

### 8.6.1 Alternative 1: No Project/No Build Alternative

CEQA Guidelines Section 15126.6 requires the inclusion of a No Project/No Build Alternative (Alternative 1) to be analyzed. Under Alternative 1, no development would occur on the project site. Accordingly, the site characteristics of this alternative would be equivalent to the existing conditions for each category analyzed in Chapter 4, Environmental Analysis, of this EIR.

#### **Comparison to Proposed Project**

##### ***Aesthetics***

Alternative 1 would not result in any changes to the existing visual character, views, or lighting and glare. The site would remain as undeveloped land. Although the proposed project would result in less-than-significant impacts associated with aesthetics, no impacts would occur under Alternative 1 because no development would occur on the project site. Therefore, the project's already less-than-significant impacts would be reduced under Alternative 1.

##### ***Agriculture and Forestry Resources***

Alternative 1 would not result in any development on the project site and the site would remain as undeveloped land. However, no important farmland, land zoned for agriculture, forest land, or timber land exists on the project site. As such, the proposed project would result in no impacts to agriculture and forestry resources. Alternative 1 would also result in no impacts to agriculture and forestry resources because no development would occur. Therefore, impacts would be similar to the proposed project under Alternative 1.

##### ***Air Quality***

There would be no direct construction or operational air quality impacts associated with Alternative 1, since the site would remain in its current, undeveloped state and no construction would occur. Although the proposed project would result in less-than-significant impacts associated with air quality, no impacts would occur under Alternative 1 because no development would occur on the project site. Therefore, the project's already less-than-significant impacts would be reduced under Alternative 1.

***Biological Resources***

Alternative 1 would not result in any changes to the currently undeveloped project site. The site would remain zoned and designated Institutional and undeveloped. Therefore, Alternative 1 would not result in any impacts to biological resources. In contrast, the proposed project would result in potentially significant impacts to protected trees and nesting birds if vegetation clearing is undertaken during the breeding season. Although the proposed project would mitigate impacts to biological resources to less than significant, no construction including vegetation clearing would occur under Alternative 1. Therefore, the project's already less-than-significant impacts would be avoided under Alternative 1.

***Cultural Resources***

Alternative 1 would not result in excavation of soils that may contain significant cultural resources; therefore, the project's already less-than-significant impacts to cultural resources would be reduced under Alternative 1.

***Energy***

Alternative 1 would not result in the use of energy as no changes to the currently undeveloped project site would occur. Although the proposed project would result in less-than-significant impacts associated with energy, including the wasteful, inefficient, or unnecessary consumption of energy resources, no impacts would occur under Alternative 1 because no energy consumption would occur. Therefore, the project's already less-than-significant impacts would be reduced under Alternative 1.

***Geology and Soils***

Alternative 1 would not result in any changes to the currently undeveloped project site. Although the proposed project would result in less-than-significant impacts with mitigation associated with geologic hazards, Alternative 1 would not exacerbate the potential for geologic hazards on the project site so no impacts would occur. Additionally, as compared to the proposed project, Alternative 1 would not result in excavation of soils that may contain significant paleontological resources. Therefore, the project's impacts to geology and soils and paleontological resources, impacts would be reduced under Alternative 1.

***Greenhouse Gas Emissions***

There would be no direct construction or operational greenhouse gas emission impacts associated with Alternative 1 since the site would remain in its current state and no development would occur. Although the proposed project would result in less-than-significant impacts associated with greenhouse gas emissions, no impacts would occur under Alternative 1 because no development would occur on the project site. Therefore, the project's already less than significant impacts would be reduced under Alternative 1.

***Hazards and Hazardous Materials***

As no construction would occur, Alternative 1 would not result in any potential impacts associated with hazards or hazardous materials. Compared to the proposed project, Alternative 1 would not introduce future residents to potential hazards or hazardous materials during operation, including wildfires, because no development would occur. Therefore, although impacts to hazards and hazardous materials would be less than significant under the proposed project, impacts associated with hazards and hazardous materials, including wildfire hazards, would be reduced under Alternative 1.

### ***Hydrology and Water Quality***

Alternative 1 would not result in any direct impacts related to hydrology or water quality since no construction would occur and there would be no increase in runoff from the site. No construction or development activities would take place that could generate potential pollutants. Although the proposed project would result in less-than-significant impacts associated with hydrology and water quality, no impacts would occur under Alternative 1. Therefore, the project's already less-than-significant impacts would be reduced under Alternative 1.

### ***Land Use and Planning***

No changes to the existing zoning or land use designations would occur under Alternative 1 as the project site would remain undeveloped. Although, with implementation of Mitigation Measure ~~(MM)~~BIO-3, the proposed project would result in less-than-significant impacts associated with land use and planning, Alternative 1 would not require amendments to the zoning code or General Plan and no impacts would occur under Alternative 1. Therefore, the project's impacts would be reduced under the Alternative 1.

### ***Mineral Resources***

Alternative 1 would not result in any development on the project site and the site would remain as undeveloped land. There are no known or locally important mineral resources existing on the project site and the proposed project would result in less-than-significant impacts to mineral resources. Alternative 1 would result in no impacts to mineral resources because no development would occur. Therefore, the project's already less-than-significant impacts would be slightly reduced under Alternative 1.

### ***Noise***

Alternative 1 would not result in any construction-related noise since no construction would occur. Additionally, Alternative 1 would not contribute to an increase in ambient noise levels as no development would be introduced on the project site. Although the proposed project would mitigate all noise impacts to less than significant, no impacts would occur under Alternative 1. Therefore, the project's already less-than-significant impacts would be reduced under Alternative 1.

### ***Population and Housing***

No impacts related to population growth would occur under Alternative 1 because the project site would remain undeveloped. No residential or economic growth would occur, and no infrastructure would be developed on the project site, which could induce population growth on the site. Although the proposed project would include new residential, directly inducing population growth on the project site, the proposed project would result in less-than-significant impacts associated with population and housing. However, due to no construction, no impacts to population and housing would occur under Alternative 1. Therefore, the project's already less-than-significant impacts would be reduced under Alternative 1.

### ***Public Services***

Under Alternative 1, there would be no increase in demand for public services, as would occur under the proposed project. Therefore, although the proposed project would result in less-than-significant impacts associated with public services, impacts to public services would be reduced under Alternative 1.

**Recreation**

Under Alternative 1, there would be no increase in demand for parks and recreation facilities or the development of new or expanded parks and recreation facilities, as would occur under the proposed project. Therefore, although the proposed project would result in less-than-significant impacts associated with recreation, impacts associated with recreation would be reduced under Alternative 1.

**Transportation**

Alternative 1 would not generate any new traffic that would affect the local roadway network or result in an increase in vehicle miles traveled (VMT). Although transportation impacts would be less than significant under the proposed project, no transportation impacts would occur under Alternative 1. Therefore, the project's already less-than-significant impacts would be reduced under Alternative 1.

**Tribal Cultural Resources**

Alternative 1 would not result in excavation of soils that may contain significant tribal cultural resources. Although impacts to tribal cultural resources would be less than significant under the proposed project, no impacts to tribal cultural resources would occur under Alternative 1. Therefore, the project's already less-than-significant impacts to tribal cultural resources would be reduced under Alternative 1.

**Utilities and Service Systems**

Under Alternative 1, there would be no increase in demand for public utilities and service systems. Although impacts to public utilities and service systems would be less than significant under the proposed project, no impacts to public utilities and service systems would occur under Alternative 1. Therefore, the project's already less-than-significant impacts to public utilities and service systems would be reduced under Alternative 1.

**Wildfire**

As no construction would occur, Alternative 1 would not result in any potential impacts associated with wildfire hazards. Compared to the proposed project, Alternative 1 would not introduce future residents to potential wildfires hazards, because no development would occur. Therefore, the project's already less-than-significant impacts associated with wildfire hazards would be reduced under Alternative 1.

**Relation to Project Objectives**

Alternative 1 would not meet any of the project objectives.

## 8.6.2 Alternative 2: Existing Zoning and Land Use Designation: Communal Residential Facility Alternative

The Existing Zoning and Land Use Designation: Communal Residential Facility Alternative (Alternative 2) assumes development of group homes, developmentally disabled, or senior care facilities, consistent with the existing Institutional zoning and General Plan land use designation of the project site. Therefore, no rezone or General Plan Amendment would be required under this alternative. Alternative 2 would be developed on the same approximately 17.30-acre project site as the proposed project. Based on the 35% maximum lot coverage required by the zoning code, the maximum allowable footprint based on existing zoning would allow for development of approximately

275,000 square feet. This alternative would not include a publicly accessible neighborhood park, which is a component of the proposed project. Carter Avenue would be improved similar to the proposed project and would be used as secondary egress and ingress access to the site. North Sunnyside Avenue would remain a private street under this alternative.

## **Comparison to Proposed Project**

### ***Aesthetics***

Alternative 2 would result in development of a communal residential facility consistent with the existing Institutional zoning and General Plan land use designation of the project site. However, development of a communal living facility would introduce greater bulk and scale associated with the facility buildings, which would be larger than the individual residential houses associated with the proposed project. No neighborhood park would be developed along the southernmost portion of the project site. Thus, Alternative 2 would be more visible from the south than the proposed project as there would be no public park to provide visual screening. Although the communal living facility would introduce greater bulk and scale than the proposed project, the San Gabriel Mountains would still be substantially greater in elevation than buildings associated with Alternative 2 and views of the mountains would not be obstructed from south of the project site, similar to the proposed project. However, views of the project site from the trails within the San Gabriel Mountains and from Bailey Canyon would appear less congruent with the surrounding land uses under Alternative 2, as the communal living facility would be more distinguishable from the surrounding residential land uses than the proposed project. As such, scenic views from the San Gabriel Mountains would be more impacted under Alternative 2.

Alternative 2 would also introduce new sources of lighting and glare to the currently undeveloped project site. This alternative would be required to comply with applicable rules and regulations concerning lighting, glare, and scenic quality, including project design feature **(PDF)-AES-1** and **PDF-AES-2**, similar to the proposed project. Finally, due to the same location of the project site as the proposed project, this alternative would not impact a state scenic highway because none are located in the vicinity of the project site. Therefore, due to the greater bulk and scale of Alternative 2 and no screening provided by inclusion of a neighborhood park, impacts related to aesthetics would be greater as compared to the proposed project.

### ***Agriculture and Forestry Resources***

Alternative 2 would still result in new development on the currently undeveloped project site. However, no important farmland, land zoned for agriculture, forest land, or timber land exists on the project site. As such, similar to the proposed project, Alternative 2 would also result in no impacts to agriculture and forestry resources. Therefore, impacts would be similar to the proposed project under Alternative 2.

### ***Air Quality***

California Emissions Estimator Model (CalEEMod) User's Guide Version 2016.3.2 was used to estimate air quality emissions for construction and operation of Alternative 2. According to CalEEMod estimates, Alternative 2 would result in greater construction and operational emissions of criteria air pollutants than the proposed project, and specifically would exceed the South Coast Air Quality Management District (SCAQMD) threshold for volatile organic compound (VOC) emissions during both construction and operation. Per the CalEEMod User's Guide, development of an approximately 275,000 square foot communal living facility would result in 86.36 pounds per day of VOC emissions during construction and 79.74 pounds per day of VOC emissions during operation. By comparison, the proposed project would result in 54.40 pounds per day of VOC emissions during construction and 15.20 pounds



per day of VOC emissions during operation. The proposed project would not exceed SCAQMD thresholds for any criteria air pollutants and would result in less than significant air quality impacts. However, construction activities would generate emissions in excess of site-specific localized significance thresholds for fine particulate matter 10 microns in diameter (PM<sub>10</sub>) and fine particulate matter 2.5 microns in diameter (PM<sub>2.5</sub>); therefore, localized construction impacts during construction of the project would be potentially significant. **MM-AQ-1** would be required to reduce impacts to less than significant. However, as shown in the calculations above, development of a communal living facility under Alternative 2 would result in greater emissions of criteria air pollutants and a potentially significant impact related to construction and operational VOC emissions. As such, Alternative 2 would result in greater air quality impacts compared to the proposed project, and would require mitigation to reduce impacts to less than significant, if such mitigation were feasible. If mitigation were not feasible, impacts would be significant and unavoidable.

### ***Biological Resources***

Alternative 2 would result in a similar development footprint as the proposed project. As such, Alternative 2 would still result in new development on the project site, which would impact protected trees and could impact nesting birds if vegetation clearing occurred during breeding season, similar to the proposed project. Alternative 2 would result in the same impacts to biological resources as the proposed project and would require similar mitigation for nesting bird avoidance and protected tree replacement. Therefore, impacts would be similar to the proposed project under Alternative 2.

### ***Cultural Resources***

Alternative 2 would result in new development on the currently undeveloped project site. As such, the potential to impact archaeological resources or human remains would still remain and the same mitigation would be required for Alternative 2 as the proposed project. Therefore, impacts would be similar to the proposed project under Alternative 2.

### ***Energy***

Alternative 2 would increase demand for energy on the project site, similar to the proposed project. The proposed project would result in electricity usage of 344,748 kilowatt-hours per year (Appendix B). In addition, the proposed project would result in natural gas usage of 1,153,930 kilo-British Thermal Units per year (Appendix B). CalEEMod User's Guide Version 2016.3.2 was used to estimate energy usage associated with this alternative. Per the CalEEMod User's Guide, development of an approximately 275,000 square foot communal living facility would result in electricity usage of 1,113,205 kilowatt-hours per year and natural gas usage of 3,683,950 kilo-British Thermal Units per year (CAPCOA 2017). Therefore, impacts related to energy usage would be increased under Alternative 2.

### ***Geology and Soils***

Alternative 2 would introduce new development to the project site associated with the communal living facility. The proposed project would result in less-than-significant impacts to geology and soils, with implementation of **PDF-GEO-1** through **PDF-GEO-15**, as well as **MM-GEO-1** and **MM-GEO-2**. Alternative 2 would result in similar impacts associated with geologic hazards because this alternative would be developed on the same site as the project and construction of Alternative 2 would be required to comply with the same existing regulations and similar mitigation measures and PDFs. Alternative 2 still has the potential to impact paleontological resources because ground disturbing activities associated with construction would still occur. As such, Alternative 2 would require the same

mitigation as the proposed project for potential impacts related geology and soils and inadvertent disturbance of paleontological resources. Therefore, compared to the proposed project, the Alternative 2 would result in similar impacts as the proposed project regarding geology and soils.

### ***Greenhouse Gas Emissions***

CalEEMod User's Guide Version 2016.3.2 was used to estimate greenhouse gas emissions for construction and operation of Alternative 2. According to CalEEMod estimates, Alternative 2 would result in slightly less greenhouse gas emissions than the proposed project during construction. However, Alternative 2 would also result in significantly greater operational greenhouse gas emissions than the proposed project. Per the CalEEMod User's Guide, development of an approximately 275,000 square foot communal living facility would result in 27.76 metric tons of carbon dioxide equivalent (MT CO<sub>2e</sub>) per year during construction and 1859.98 MT CO<sub>2e</sub> per year during operation. By comparison, the proposed project would result in 36.91 MT CO<sub>2e</sub> per year during construction and 791.88 MT CO<sub>2e</sub> per year during operation. Neither the proposed project nor Alternative 2 would exceed the significance thresholds for greenhouse gas emissions. However, since operational emissions are significantly greater under Alternative 2 and would be long-term, impacts would be greater under Alternative 2 as compared with the proposed project.

### ***Hazards and Hazardous Materials***

The proposed project would result in less-than-significant impacts associated with hazards and hazardous materials, including wildfire hazards. Under the Alternative 2, the potential for hazards and hazardous materials related impacts on the project site would be similar to the proposed project as the location would remain the same. These would include potential impacts associated with previous agricultural uses on the project site and existence of a former underground storage tank north of the northeast corner of the project site. However, both of these conditions were determined to result in less-than-significant impacts through preparation of the Phase I and II Environmental Site Assessment (ESA) for the proposed project, included as Appendix F1. Additionally, although the land use type would be different under Alternative 2, hazardous materials used for operation of the communal living facility would consist of consumer products such as household cleaning products, landscaping chemicals and fertilizers, and other commonly used hazardous substances similar to the proposed project. However, landscaping chemicals and fertilizers associated with maintenance of the neighborhood park would not be required under Alternative 2 because no public park would be included under this alternative.

Similar to the proposed project, Alternative 2 would also introduce people and structures to the project site, which is within a Very High Fire Hazard Severity Zone (VHFHSZ). However, Alternative 2 would also be required to prepare a Fire Protection Plan (FPP) due to the site's location within a VHFHSZ and would be required to comply with existing regulations related to fire protection, similar to the proposed project. Therefore, the Alternative 2 would result in similar impacts as the proposed project regarding hazards and hazardous materials.

### ***Hydrology and Water Quality***

The proposed project would have less-than-significant impacts related to hydrology and water quality on the project site. Alternative 2 would result in a similar footprint as the proposed project. As such, the potential for hydrology and water quality related impacts on the project site would be the same as the proposed project. However, this alternative would still require similar development permits as the proposed project, preparation of a Stormwater Pollution Prevention Plan (SWPPP), and incorporation of best management practices, due to the introduction of new development to an undeveloped site. When compared to the proposed project, the Alternative 2 would result in similar impacts to hydrology and water quality.

### ***Land Use and Planning***

Under Alternative 2, there would be no amendments to the zoning code or General Plan as this alternative would comply with the existing Institutional zoning and land use designation. However, with implementation of **MM-BIO-3**, the proposed project would not result in any environmental impacts due to conflicts with relevant plans, policies, or regulations, including the zoning code and General Plan which would be amended concurrently with approval of the proposed project, if approved. Although Alternative 2 would not require the same discretionary actions as the proposed project including amendments to the zoning code and General Plan, with implementation of **MM-BIO-3**, the inclusion of these discretionary actions under the proposed project would not result in any land use and planning impacts. It is anticipated that Alternative 2 would also result in removal of trees and thus implementation of **MM-BIO-3** would still be required. Therefore, Alternative 2 would result in similar impact as the proposed project.

### ***Mineral Resources***

Alternative 2 would still result in new development on the currently undeveloped project site. However, the project site is located in areas of undetermined mineral resource significance and there are no locally important mineral resource recovery sites in the City. As such, similar to the proposed project, Alternative 2 would also result in less-than-significant impacts to mineral resources. Therefore, impacts would be similar to the proposed project under Alternative 2.

### ***Noise***

Similar to the proposed project, Alternative 2 would also result in construction activities on the currently undeveloped project site that would result in potentially significant temporary noise impacts when construction takes place near the project boundaries, due to the surrounding residential land uses. As such, Alternative 2 would require noise reduction mitigation measures during construction, similar to the proposed project. Additionally, Alternative 2 would also include heating, ventilation, and air conditioning (HVAC) systems for the communal living facility, similar to the proposed project. Operational noise from HVAC systems could result in potentially significant operational noise impacts depending on the noise emission level of the selected HVAC systems. Alternative 2 would also require similar mitigation as the proposed project to ensure HVAC systems do not exceed the applicable noise standards. Therefore, impacts would be similar to the proposed project under Alternative 2.

### ***Population and Housing***

Alternative 2 would introduce new residences on the project site associated with the communal living facility. As such, this alternative would induce population growth on the project site which is currently undeveloped. However, a communal living facility is permitted under the existing zoning and General Plan land use designation. As such, the growth induced by development of a communal living facility would not be considered substantial unplanned growth and would not result in a significant impact. Therefore, impacts under Alternative 2 would be similar to the proposed project.

### ***Public Services***

As identified in Section 4.15, Public Services, of this EIR, the proposed project would increase the demand for public services in the City but would not result in any significant impacts on the environment associated with these increases in demand. Under Alternative 2, demand for public services would also increase associated with the communal living facility. Demand for emergency medical services, provided by the Sierra Madre Fire Department, may result in additional increases compared to the proposed project, due to the age of potential residents under Alternative 2. Nonetheless, the increase in demand under this alternative would be similar to that of the proposed project. Therefore, compared to the proposed project, Alternative 2 would result in similar impacts associated with public services.

### **Recreation**

Alternative 2 would not include a neighborhood park but would also be required to fulfill parkland dedication requirements, per the Sierra Madre Municipal Code Chapter 15.52, because new communal living facility housing would be developed. As such, Alternative 2 would be required to pay in-lieu fees to satisfy the parkland dedication requirements. Although in-lieu fees would be paid to satisfy parkland dedication requirements, it is assumed that people introduced to the project site by development of Alternative 2 would use existing parks in the area, which could result in accelerated physical deterioration of existing parks. Therefore, Alternative 2 would result in slightly greater impacts than the proposed project because no neighborhood park would be developed.

### **Transportation**

The proposed project would result in less-than-significant impacts related to transportation. Alternative 2 would include development of a communal living facility which would increase traffic on the local street network, similar to the proposed project. Emergency access to the site would be the similar to the proposed project. The communal living facility would include traffic generated from employees working at the facility, in addition to any traffic generated by residents of the facility. As discussed in Section 4.17, Transportation, the proposed project would be screened out from further VMT analysis using the Low VMT Area Screening criteria (see Section 4.17 for an overview of VMT screening criteria). Similar to the proposed project, Alternative 2 can be screened out from further VMT analysis using the Project Type Screening criteria (Fehr & Peers 2020). As such, it is assumed that Alternative 2 would result in similar traffic generation as the proposed project. Therefore, Alternative 2 would result in similar impacts than the proposed project.

### **Tribal Cultural Resources**

Alternative 2 would still result in new development on the currently undeveloped project site. As such, the potential to impact tribal cultural resources or human remains would still remain and the same mitigation would be required for Alternative 2 as the proposed project. Therefore, impacts would be similar to the proposed project under Alternative 2.

### **Utilities and Service Systems**

Alternative 2 would increase demand for utilities and service systems on the project site, similar to the proposed project. As discussed in Section 4.19.5, the proposed project would result in a total water demand of approximately ~~11.94~~26.30 acre feet per year (AFY) and wastewater generation of approximately 2.74 million gallons per year (Appendix B). In addition, the proposed project would result in a generation of approximately 49.5 tons of solid waste per year (Appendix B). CalEEMod User's Guide Version 2016.3.2 was used to estimate utility and service system usage associated with this alternative. Per the CalEEMod User's Guide, development of an approximately 275,000 square foot communal living facility would result a total water demand of approximately 22.92 million gallons per year (or 70.33 AFY), wastewater generation of approximately 17.92 million gallons per year, and solid waste generation of approximately 250.94 tons per year (CAPCOA 2017). Therefore, impacts to utilities and service systems would be increased under Alternative 2.

### **Wildfire**

The proposed project would result in less-than-significant impacts associated with wildfire risk and hazards. Similar to the proposed project, Alternative 2 would also introduce people and structures to the project site, which is within a VHFHSZ. However, Alternative 2 would also be required to prepare a FPP due to the site's location within a VHFHSZ and would be required to comply with existing regulations related to fire protection, similar to the proposed project. Therefore, the Alternative 2 would result in similar impacts as the proposed project regarding wildfire hazards.

### Relation to Project Objectives

Alternative 2 would meet Objective 2 because development of a communal living facility would constitute orderly planning and long-range development of the project site. Additionally, Alternative 2 would meet Objective 5 because development of the communal living facility would still achieve a net-zero impact on local water supplies. Finally, Alternative 2 would meet Objective 7 because North Sunnyside Avenue would still be improved to facilitate safe and efficient access to the site.

Alternative 2 would not meet Objectives 1 or 8 because no single-family residential community would be developed. Similarly, Alternative 2 would not meet Objectives 3 and 6 because no neighborhood park would be developed. Finally, Alternative 2 would not meet Objective 4 because the bulk and scale of the buildings associated with the communal living facility would not be entirely compatible with the surrounding residential developments.

### 8.6.3 Alternative 3: Existing Zoning and Land Use Designation: Private School Alternative

The Existing Zoning and Land Use Designation: Private School Alternative (Alternative 3) would include development of a private school, consistent with the existing Institutional zoning and General Plan land use designation of the project site. Therefore, no rezone or General Plan Amendment would be required under this alternative. Based on the 35% lot coverage required by the zoning code, the maximum allowable footprint based on existing zoning would allow for development of approximately 275,000 square feet. No neighborhood park would be developed under this alternative. Carter Avenue would be improved similar to the proposed project and would be used as secondary egress and ingress access to the site. North Sunnyside Avenue would remain a private street under this alternative.

### Comparison to Proposed Project

#### *Aesthetics*

Alternative 3 would result in development of a private school consistent with the existing Institutional zoning and General Plan land use designation within a similar footprint as the proposed project. However, development of a private school would introduce greater bulk and scale associated with the facility buildings, which would be larger than the individual residential houses associated with the proposed project. Although the private school would introduce greater bulk and scale than the proposed project, the San Gabriel Mountains would still be substantially greater in elevation than buildings associated with Alternative 3 and views of the mountains would not be obstructed from south of the project site, similar to the proposed project. However, views of the project site from the trails within the San Gabriel Mountains would appear less congruent with the surrounding land uses under Alternative 3, as the private school would be more distinguishable from the surrounding residential land uses than the proposed project. As such, scenic views from the San Gabriel Mountains would be more impacted under Alternative 3.

Alternative 3 would also introduce new sources of lighting and glare to the currently undeveloped project site. This alternative would be required to comply with applicable rules and regulations concerning lighting, glare, and scenic quality, including **PDF-AES-3**, similar to the proposed project. Finally, due to the same location of the project site as the proposed project, this alternative would not impact a state scenic highway because none are located in the vicinity of the project site. Therefore, due to the greater bulk and scale of Alternative 3, impacts would be greater as compared to the proposed project with regard to aesthetics.

### ***Agriculture and Forestry Resources***

Alternative 3 would still result in new development on the currently undeveloped project site. However, no important farmland, land zoned for agriculture, forest land, or timber land exists on the project site. As such, similar to the proposed project, Alternative 3 would also result in no impacts to agriculture and forestry resources. Therefore, impacts would be similar to the proposed project under Alternative 3.

### ***Air Quality***

CalEEMod User's Guide Version 2016.3.2 was used to estimate air quality emissions for construction and operation of Alternative 3. According to CalEEMod estimates, Alternative 3 would result in greater construction and operational emissions of criteria air pollutants than the proposed project, and specifically would exceed the SCAQMD threshold for VOC emissions during construction. Per the CalEEMod User's Guide, development of an approximately 275,000 square foot private school would result in 127.72 pounds per day of VOC emissions during construction. By comparison, the proposed project would result in 54.40 pounds per day of VOC emissions during construction. The proposed project would not exceed SCAQMD thresholds for any criteria air pollutants and would result in less than significant air quality impacts, but would result in emissions in excess of site-specific localized significance thresholds PM<sub>10</sub> and PM<sub>2.5</sub>; therefore, localized construction impacts during construction of the project would be potentially significant. Mitigation measure **MM-AQ-1** would be required to reduce impacts to less than significant. However, as shown in the calculations above, development of a private school under Alternative 3 would result in greater emissions of criteria air pollutants and a potentially significant impact related to construction VOC emissions. As such, Alternative 3 would result in greater air quality impacts compared to the proposed project, and would require mitigation to reduce impacts to less than significant, if such mitigation were feasible. If mitigation were not feasible, impacts would be significant and unavoidable.

### ***Biological Resources***

Alternative 3 would result in a similar development footprint than the proposed project. However, Alternative 3 would still result in new development on the project site which would potentially impact protected trees, and nesting birds if vegetation clearing occurred during breeding season, similar to the proposed project. Alternative 3 would result in the same impacts to biological resources as the proposed project and would require similar mitigation for nesting bird avoidance and protected tree replacement. Therefore, impacts would be similar to the proposed project under Alternative 3.

### ***Cultural Resources***

Alternative 3 would still result in new development on the currently undeveloped project site. As such, the potential to impact cultural resources, including historic and archaeological resources or human remains, would still remain, and the same mitigation would be required for Alternative 3 as the proposed project. Therefore, impacts would be similar to the proposed project under Alternative 3.

### ***Energy***

Alternative 3 would increase demand for energy on the project site, similar to the proposed project. The proposed project would result in electricity usage of 344,748 kilowatt-hours per year (Appendix B). In addition, the proposed project would result in natural gas usage of 1,153,930 kilo-British Thermal Units per year (Appendix B). CalEEMod User's Guide Version 2016.3.2 was used to estimate energy usage associated with this alternative. Per the

CalEEMod User's Guide, development of an approximately 275,000 square foot private school would result in electricity usage of 1,628,000 kilowatt-hours per year and natural gas usage of 2,860,000 kilo-British Thermal Units per year (CAPCOA 2017). Therefore, impacts related to energy usage would be increased under Alternative 3.

### ***Geology and Soils***

Alternative 3 would introduce new development to the project site associated with the private school. However, the proposed project would result in less-than-significant impacts to geology and soils, with implementation of **PDF-GEO-1** through **PDF-GEO-15**, as well as mitigation measures **MM-GEO-1** and **MM-GEO-2**, which would be implemented to reduce impacts to impacts related to geology and soils and paleontological resources to less than significant. Alternative 2 would result in similar impacts associated with geologic hazards because this alternative would be developed on the same site as the project and construction of Alternative 2 would be required to comply with the same existing regulations and similar mitigation measures. Therefore, compared to the proposed project, the Alternative 3 would result in similar impacts as the proposed project regarding geology and soils.

### ***Greenhouse Gas Emissions***

CalEEMod User's Guide Version 2016.3.2 was used to estimate greenhouse gas emissions for construction and operation of Alternative 3. According to CalEEMod estimates, Alternative 3 would result in slightly less greenhouse gas emissions than the proposed project during construction. However, Alternative 3 would also result in significantly greater operational greenhouse gas emissions than the proposed project. Per the CalEEMod User's Guide, development of an approximately 275,000 square foot private school would result in 26.12 MT CO<sub>2e</sub> per year during construction and 4899.37 MT CO<sub>2e</sub> per year during operation. By comparison, the proposed project would result in 36.91 MT CO<sub>2e</sub> per year during construction and 791.88 MT CO<sub>2e</sub> per year during operation. The proposed project would result in less-than-significant impacts related to greenhouse gas emissions. However, development of a private school would exceed the significance threshold of 3,500 MT CO<sub>2e</sub> per year during operation of the private school, resulting in a potentially significant impact. As such, impacts under Alternative 3 would be greater as compared with the proposed project.

### ***Hazards and Hazardous Materials***

The proposed project would result in less-than-significant impacts associated with hazards and hazardous materials, including wildfire hazards. Under the Alternative 3, the potential for hazards and hazardous materials related impacts on the project site would be similar to the proposed project as the location would remain the same. These would include potential impacts associated with previous agricultural uses on the project site and existence of a former underground storage tank north of the northeast corner of the project site. However, both of these conditions were determined to result in less-than-significant impacts through preparation of the Phase I and II ESA for the proposed project, included as Appendix F1. Additionally, although the land use type would be different under Alternative 3, hazardous materials used for operation of the private school would consist of consumer products such as household cleaning products, landscaping chemicals and fertilizers, and other commonly used hazardous substances similar to the proposed project. However, landscaping chemicals and fertilizers associated with maintenance of the neighborhood park would not be required under Alternative 3 because no public park would be included under this alternative. Similar to the proposed project, Alternative 3 would also introduce people and structures to the project site, which is within a VHFHSZ. However, Alternative 3 would also be required to prepare a FPP due to the site's location within a VHFHSZ and would be required to comply with existing regulations related to fire protection, similar to the proposed project. Therefore, the Alternative 3 would result in similar impacts as the proposed project regarding hazards and hazardous materials.

### ***Hydrology and Water Quality***

The proposed project would have less-than-significant impacts related to hydrology and water quality on the project site. Alternative 3 would result in a similar footprint as the proposed project. As such, the potential for hydrology and water quality related impacts on the project site would be the same as the proposed project. However, this alternative would still require similar development permits as the proposed project, preparation of a SWPPP, and incorporation of best management practices, due to the introduction of new development to an undeveloped site. When compared to the proposed project, the Alternative 3 would result in similar impacts to hydrology and water quality.

### ***Land Use and Planning***

Under Alternative 3, there would be no amendments to the zoning code or General Plan as this alternative would comply with the existing Institutional zoning and land use designation. However, with implementation of **MM-BIO-3**, the proposed project would not result in any environmental impacts due to conflicts with relevant plans, policies, or regulations, including the zoning code and General Plan which would be amended concurrently with approval of the proposed project, if approved. Although Alternative 3 would not require the same discretionary actions as the proposed project including amendments to the zoning code and General Plan, with implementation of **MM-BIO-3**, the inclusion of these discretionary actions under the proposed project would not result in any land use and planning impacts. It is anticipated that Alternative 3 would also result in removal of trees and thus implementation of **MM-BIO-3** would still be required. Therefore, Alternative 3 would result in similar impact as the proposed project.

### ***Mineral Resources***

Alternative 3 would result in new development on the currently undeveloped project site. However, the project site is located in areas of undetermined mineral resource significance and there are no locally important mineral resource recovery sites in the City. As such, similar to the proposed project, Alternative 3 would also result in less-than-significant impacts to mineral resources. Therefore, impacts would be similar to the proposed project under Alternative 3.

### ***Noise***

Similar to the proposed project, Alternative 3 would also result in construction activities on the currently undeveloped project site which would result in potentially significant temporary noise impacts when construction takes place near the project boundaries, due to the surrounding residential land uses. As such, Alternative 3 would require noise reduction mitigation measures during construction, similar to the proposed project. Additionally, Alternative 3 would also include HVAC systems for the communal living facility, similar to the proposed project. Operational noise from HVAC systems could result in potentially significant operational noise impacts depending on the noise emission level of the selected HVAC systems. Alternative 3 would also require similar mitigation as the proposed project to ensure HVAC systems do not exceed the applicable noise standards. Therefore, impacts would be similar to the proposed project under Alternative 3.

### ***Population and Housing***

Alternative 3 would not introduce new residential uses on the project site. Alternatively, a private school would be developed. Development of a private school could result in population growth in the area associated with the employees and students at the school. However, it is assumed that the school would serve the existing community and potential employees would already be located in the area. Some employees may move to the City to work at the school. However, population induced by development of a private school would be less than the population



induced by development of residential land uses associated with the proposed project. As such, the growth induced by development of a private school would not be considered substantial unplanned growth and would not result in a significant impact, similar to the proposed project. However, because population growth would be reduced under Alternative 3, impacts under Alternative 3 would be slightly reduced, compared to the proposed project.

### ***Public Services***

As identified in Section 4.15, the proposed project would increase the demand for public services in the City but would not result in any significant impacts on the environment associated with these increases in demand. Under Alternative 3, demand for public services would also increase associated with the private school. However, the increase in demand under this alternative would be less than that of the proposed project. Primarily, the increase in demand for existing schools would not occur as would happen with the proposed project because Alternative 3 would develop a private school rather than housing. Additionally, the school would only operate during daytime hours which would limit demand on police and fire service. Therefore, compared to the proposed project, Alternative 3 would result in less demand and reduced impacts associated with public services.

### ***Recreation***

Alternative 3 would not include a neighborhood park but would also be required to fulfill parkland dedication requirements per the Sierra Madre Municipal Code Chapter 15.52. As such, Alternative 3 would be required to pay in-lieu fees to satisfy the parkland dedication requirements. However, it is assumed that students and teachers introduced to the project site by development of Alternative 3 would use parks and open spaces within the proposed school. However, students and teachers introduced on site under Alternative 3 would still use existing parks, which could result in accelerated physical deterioration of existing parks. Therefore, Alternative 3 would result in slightly greater impacts than the proposed project because no neighborhood park would be developed.

### ***Transportation***

The proposed project would result in less-than-significant impacts related to transportation. Alternative 3 would include development of a private school which would increase traffic on the local street network, similar to the proposed project. Emergency access to the site would be the same as the proposed project. The private school would also include traffic generated from students and employees working at the school. This traffic generation would also be primarily peak hour traffic in the AM, mid-day, during drop off and pick up times for the students. As discussed in Section 4.17, the proposed project would be screened out from further VMT analysis using the Low VMT Area Screening criteria (see Section 4.17 for an overview of VMT screening criteria). However, Alternative 3 cannot be screened out from further VMT analysis using the Low VMT Area Screening criteria since this alternative is not similar to the existing land uses in the low VMT area. In addition, Alternative 3 cannot be screened out using the Project Type Screening criteria since private school is not considered to be a local serving facility. Lastly, similar to the proposed project, Alternative 3 cannot be screened out using the transit-priority area screening criteria as the site is not located within a transit-priority area (Fehr & Peers 2020). Therefore, additional analysis would be required to analyze VMT, and, because VMT cannot be screened out, it is assumed that Alternative 3 would result in greater impacts to transportation. Therefore, Alternative 3 would result in greater impacts than the proposed project.

### ***Tribal Cultural Resources***

Alternative 3 would still result in new development on the currently undeveloped project site. As such, the potential to impact tribal cultural resources or human remains would still remain and the same mitigation would be required for Alternative 3 as the proposed project. Therefore, impacts would be similar to the proposed project under Alternative 3.

### **Utilities and Service Systems**

Alternative 3 would increase demand for utilities and service systems on the project site, similar to the proposed project. As discussed in Section 4.19.5, the proposed project would result in a total water demand of approximately ~~11.91 acre~~26.30 feet per year (AFY) and wastewater generation of approximately 2.74 million gallons per year (Appendix B). In addition, the proposed project would result in a generation of approximately 49.5 tons of solid waste per year (Appendix B). CalEEMod User's Guide Version 2016.3.2 was used to estimate utility and service system usage associated with this alternative. Per the CalEEMod User's Guide, development of an approximately 275,000 square foot private school would result a total water demand of approximately 28.48 million gallons per year (or 85.40 AFY), wastewater generation of approximately 7.97 million gallons per year, and solid waste generation of approximately 357.50 tons per year (CAPCOA 2017). Therefore, impacts to utilities and service systems would be increased under Alternative 3.

### **Wildfire**

The proposed project would result in less-than-significant impacts associated with wildfire risk and hazards. Similar to the proposed project, Alternative 3 would also introduce people and structures to the project site, which is within a VHFHSZ. However, Alternative 3 would also be required to prepare a FPP due to the site's location within a VHFHSZ and would be required to comply with existing regulations related to fire protection, similar to the proposed project. Therefore, the Alternative 3 would result in similar impacts as the proposed project regarding wildfire hazards.

### **Relation to Project Objectives**

Alternative 3 would meet Objective 2 because development of a private school would constitute orderly planning and long-range development of the project site. Additionally, Alternative 3 would meet Objective 5 because development of the private school would still achieve a net-zero impact on local water supplies. Finally, Alternative 3 would meet Objective 7 because North Sunnyside Avenue would still be improved to facilitate safe and efficient access to the site.

Alternative 3 would not meet Objectives 1 or 8 because no single-family residential community would be developed. In addition, Alternative 3 would not meet Objectives 3 and 6 because no neighborhood park would be developed. Finally, Alternative 3 would not meet Objective 4 because the bulk and scale of the buildings associated with the private school would not be very compatible with the surrounding residential developments.

## 8.6.4 Alternative 4: Reduced Development/No Park Alternative

The Reduced Development Alternative (Alternative 4) would include development of 34 detached single-family residential units on the same approximately 17.30-acre project site, representing an approximately 20% reduction from the proposed project. Alternative 4 would require the same discretionary actions as the proposed project to change the existing Institutional zoning and General Plan land use designation to allow for development of residential uses. Under the proposed project, the proposed public park would be maintained by a landscape maintenance district or similar public maintenance entity. Because of reduced number of units under this alternative, there would not be enough funds to maintain a public park in accordance with City standards. Therefore, Alternative 4 would not include a neighborhood park. Although fewer units would be developed under this alternative, the lot size of each residential unit would be increased. Similar to the proposed project, the Reduced Development Alternative would also result in reconfiguration of North Sunnyside Avenue and improvements to Carter Avenue. Primary access to the project site would be provided by North Sunnyside Avenue, which would be publicly accessible. Carter Avenue would be improved similar to the proposed project and would be used as secondary egress and ingress access to the site.

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## Comparison to Proposed Project

### *Aesthetics*

Alternative 4 would include 34 detached single-family residential units on the same project footprint as the proposed project. Although fewer units would be developed under this alternative, the lot size of each residential unit would be increased. Any views of Alternative 4 from public vantage points south of the project site or from trails within the San Gabriel Mountains would be similar to the project as the land use type and development footprint would remain the same.

Alternative 4 would also introduce new sources of lighting and glare to the currently undeveloped project site. This alternative would be required to comply with applicable rules and regulations concerning lighting, glare, and scenic quality, similar to the proposed project. Finally, due to the same location of the project site as the proposed project, this alternative would not impact a state scenic highway because none are located in the vicinity of the project site. Therefore, impacts would be similar to the proposed project under Alternative 4.

### *Agriculture and Forestry Resources*

Alternative 4 would still result in new development on the currently undeveloped project site. However, no important farmland, land zoned for agriculture, forest land, or timber land exists on the project site. As such, similar to the proposed project, Alternative 4 would also result in no impacts to agriculture and forestry resources. Therefore, impacts would be similar to the proposed project under Alternative 4.

### *Air Quality*

Alternative 4 would include 34 detached single-family residential units on the same project site rather than the 42 units proposed under the project. Additionally, Alternative 4 would not include a neighborhood park. As such, Alternative 4 would result in less overall construction and therefore less emissions due to the reduction in development. Operation of Alternative 4 would also result in less emissions as no public park would require ongoing maintenance and less population would be induced on the project site. Therefore, the project's already less-than-significant impacts would be reduced under Alternative 4.

### *Biological Resources*

Alternative 4 would result in a similar development footprint as the proposed project with less residential units and larger lot sizes. As such, Alternative 4 could still potentially impact protected trees, similar to the proposed project. Therefore, Alternative 4 would require similar mitigation for nesting bird avoidance and protected tree replacement. Therefore, impacts would be similar to the proposed project under Alternative 4.

### *Cultural Resources*

Alternative 4 would include less residential units than the proposed project. However, the lot sizes of each unit would be increased. As such, the development footprint would be similar to the proposed project so Alternative 4 would still have the potential to impact archaeological resources or human remains. As such, the same mitigation would be required for Alternative 4 as the proposed project. Therefore, impacts would be similar to the proposed project under Alternative 4.

### ***Energy***

Alternative 4 would result in a lower energy consumption during construction as compared to the proposed project due to the reduction in residential units developed and shortened construction period. Additionally, energy consumption would be reduced under this alternative because the slightly smaller development footprint would require less groundwork. Furthermore, with less population induced on the project site, operational energy use would also be reduced under Alternative 4. Although the proposed project would result in less-than-significant impacts associated with energy, including the wasteful, inefficient, or unnecessary consumption of energy resources, Alternative 4 would result in slightly reduced construction and operational energy consumption. Therefore, the project's already less-than-significant impacts would be slightly reduced under Alternative 4 when compared to the proposed project.

### ***Geology and Soils***

Alternative 3 would introduce new development to the project site associated with the private school. However, the proposed project would result in less-than-significant impacts to geology and soils, with implementation of **PDF-GEO-1** through **PDF-GEO-15**, as well as **MM-GEO-1** and **MM-GEO-2**, which would be implemented to reduce impacts to impacts related to geologic hazards and paleontological resources to less than significant. Alternative 2 would result in similar impacts associated with geologic hazards because this alternative would be developed on the same site as the project and construction of Alternative 2 would be required to comply with the same existing regulations and similar mitigation measures. As such, Alternative 3 would require the same mitigation as the proposed project. Therefore, compared to the proposed project, the Alternative 3 would result in similar impacts as the proposed project regarding geology and soils.

### ***Greenhouse Gas Emissions***

Alternative 4 would include 34 detached single-family residential units on the same project site rather than the 42 units proposed under the project. Additionally, Alternative 4 would not include a neighborhood park. As such, Alternative 4 would result in less overall construction and therefore less greenhouse gas emissions due to the reduction in development. Operation of Alternative 4 would also result in less greenhouse gas emissions as no park would require ongoing maintenance and less population would be induced on the project site. Therefore, the project's already less-than-significant impacts would be reduced under Alternative 4.

### ***Hazards and Hazardous Materials***

The proposed project would result in less-than-significant impacts associated with hazards and hazardous materials, including wildfire hazards. Under the Alternative 4, the potential for hazards and hazardous materials related impacts on the project site would be similar to the proposed project as the land use and location would remain the same. These would include potential impacts associated with previous agricultural uses on the project site and existence of a former underground storage tank north of the northeast corner of the project site. However, both of these conditions were determined to result in less-than-significant impacts through preparation of the Phase I and II ESA for the proposed project, included as Appendix F1.

Additionally, hazardous materials used for operation of Alternative 4 would consist of consumer products such as household cleaning products, landscaping chemicals and fertilizers, and other commonly used hazardous substances same as with the proposed project. However, landscaping chemicals and fertilizers associated with maintenance of the neighborhood park would not be required under Alternative 4 because no park would be included under this alternative. Therefore, the Alternative 4 would result in similar impacts as the proposed project regarding hazards and hazardous materials.

### ***Hydrology and Water Quality***

The proposed project would have less-than-significant impacts related to hydrology and water quality on the project site. Alternative 4 would result in a similar footprint as the proposed project. As such, the potential for hydrology and water quality related impacts on the project site would be the same as the proposed project. However, this alternative would still require similar development permits as the proposed project, preparation of a SWPPP, and incorporation of best management practices, due to the introduction of new development to an undeveloped site. When compared to the proposed project, the Alternative 4 would result in similar impacts to hydrology and water quality.

### ***Land Use and Planning***

Alternative 4 would require all the same discretionary actions listed in Chapter 3, Project Description, because the project site is not currently zoned or designated for residential development. This would include amendments to the zoning code and General Plan. However, with implementation of **MM-BIO-3**, the proposed project would not result in any environmental impacts due to conflicts with relevant plans, policies, or regulations, including the zoning code and General Plan which would be amended concurrently with approval of the proposed project, if approved. It is anticipated that Alternative 4 would also result in removal of trees and thus implementation of **MM-BIO-3** would still be required. Therefore, Alternative 4 would result in similar impacts related to land use and planning as the proposed project.

### ***Mineral Resources***

Alternative 4 would still result in new development on the currently undeveloped project site. However, the project site is located in areas of undetermined mineral resource significance and there are no locally important mineral resource recovery sites in the City. As such, similar to the proposed project, Alternative 4 would also result in less-than-significant impacts to mineral resources. Therefore, impacts would be similar to the proposed project under Alternative 4.

### ***Noise***

Similar to the proposed project, Alternative 4 would also result in construction activities on the currently undeveloped project site which would result in potentially significant temporary noise impacts when construction takes place near the project boundaries, due to the surrounding residential land uses. As such, Alternative 4 would require noise reduction mitigation measures during construction, similar to the proposed project. Additionally, Alternative 4 would also include HVAC systems for the communal living facility, similar to the proposed project. Operational noise from HVAC systems could result in potentially significant operational noise impacts depending on the noise emission level of the selected HVAC systems. Alternative 4 would also require similar mitigation as the proposed project to ensure HVAC systems do not exceed the applicable noise standards. Therefore, impacts would be similar to the proposed project under Alternative 4.

### ***Population and Housing***

Alternative 4 would result in the development of 34 residential units, which is 8 fewer than the proposed project, thereby resulting in less induced growth in the area as compared to the proposed project. As discussed in Section 4.14, Population and Housing, the growth induced by the proposed project would not be considered substantial and impacts would be less than significant. With less growth induced under this alternative due to the reduction in units, impacts would also be less than significant and impacts under Alternative 4 would be slightly reduced when compared to the proposed project.

***Public Services***

As identified in Section 4.15, Public Services, the proposed project would increase the demand for public services in the City but would not result in any significant impacts on the environment associated with these increases in demand. Under the Alternative 4, demand for public services would still increase with development of the project site. However, the induced population would be smaller than the proposed project due to the reduction in residential units developed. Thus, the increase in demand for public services would be less under this alternative. When compared to the already less-than-significant impacts of the proposed project, Alternative 4 would result in reduced impacts associated with public services.

***Recreation***

The proposed project would result in less-than-significant impacts associated with parks and recreation facilities because the proposed project would include a neighborhood park which would fulfill parkland dedication requirements. Alternative 4 would not include a neighborhood park but would also be required to fulfill parkland dedication requirements, per the Sierra Madre Municipal Code Chapter 15.52, because this alternative would include development of 34 new residential units. As such, Alternative 4 would be required to pay in-lieu fees to satisfy the parkland dedication requirements. Although in-lieu fees would be paid to satisfy parkland dedication requirements, it is assumed that people introduced to the project site by development of Alternative 4 would use existing parks in the area, which could result in accelerated physical deterioration of existing parks. Therefore, Alternative 4 would result in greater impacts than the proposed project because no neighborhood park would be developed.

***Transportation***

Alternative 4 would result in less traffic trips associated with both construction and operation due to the reduction in residential units. Emergency access to the site would be the same as the proposed project. As discussed in Section 4.17, the proposed project would be screened out from further VMT analysis using the Low VMT Area Screening criteria (see Section 4.17 for an overview of VMT screening criteria). As defined by the City, a low VMT zone has VMT per service population 15% or more below the Northwest Region Baseline VMT. Alternative 4 would still satisfy the screening criteria based upon the Origin-Destination (OD) method and can be screened out from VMT assessment, similar to the proposed project. Therefore, impacts would be similar under Alternative 4.

***Tribal Cultural Resources***

Alternative 3 would still result in new development on the currently undeveloped project site. As such, the potential to impact tribal cultural resources would still remain and the same mitigation would be required for Alternative 3 as the proposed project. Therefore, impacts would be similar to the proposed project under Alternative 3.

***Utilities and Service Systems***

Alternative 4 would increase demand for utilities and service systems on the project site, similar to the proposed project. However, due to the reduction in residential units and reduced population inducement on the project site, the demand for public utilities and service systems would be less than under the proposed project. Therefore, the project's already less-than-significant impacts would be reduced under Alternative 4.

## Wildfire

The proposed project would result in less-than-significant impacts associated with wildfire risk and hazards. Similar to the proposed project, Alternative 4 would also introduce people and structures to the project site, which is within a VHFHSZ. However, Alternative 4 would also be required to prepare a FPP due to the site’s location within a VHFHSZ and would be required to comply with existing regulations related to fire protection, similar to the proposed project. Therefore, the Alternative 4 would result in similar impacts as the proposed project regarding wildfire hazards.

## Relation to Project Objectives

Alternative 4 would meet Objective 1 because a high-quality single-family residential community would be still be developed. Additionally, Alternative 4 would meet Objective 2 because development of a reduced residential community would constitute orderly planning and long-range development of the project site. Alternative 4 would also meet Objective 4 because development standards and architectural guidelines would be developed for the reduced residential community to provide compatibility with surrounding development and Objective 5 because development of the reduced residential community would still achieve a net-zero impact on local water supplies. Alternative 4 would meet Objective 7 because North Sunnyside Avenue would still be improved to facilitate safe and efficient access to the site. Finally, Alternative 4 would meet Objective 8 because above-moderate income housing would still be developed in accordance with the 6th Cycle Regional Housing Needs Assessment.

Alternative 3 would not meet Objectives 3 and 6 because no neighborhood park would be developed.

## 8.7 Environmentally Superior Alternative

The No Project Alternative would result in the least environmental impacts and would be the environmentally superior alternative. However, Section 15126.6(e)(2) of the CEQA Guidelines states that if the environmentally superior alternative is the No Project Alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. In this case, the environmentally superior alternative is the Reduced Development Alternative. The Reduced Development Alternative would meet most of the project objectives, but to a lesser degree than the proposed project while reducing impacts resulting from greater population growth of the proposed project. The project’s impacts are compared to each alternative’s impacts in Table 8-1.

**Table 8-1. Alternatives Impact Summary**

Environmental Issue	Proposed Project Impacts Prior to Mitigation	Proposed Project Impacts with Mitigation	No Project/ No Build Alternative	Existing Zoning: Communal Residential Facility Alternative	Existing Zoning: Private School	Reduced Development Alternative
Aesthetics	LTS	LTS	▼	▲	▲	—
Agriculture and Forestry Resources	N	N	—	—	—	—
Air Quality	LTS	LTS	▼	▲	▲	▼
Biological Resources	PS	LTS	▼	—	—	—
Cultural Resources	PS	LTS	▼	—	—	—
Energy	LTS	LTS	▼	▲	▲	▼
Geology and Soils	PS	LTS	▼	—	—	—

Table 8-1. Alternatives Impact Summary

Environmental Issue	Proposed Project Impacts Prior to Mitigation	Proposed Project Impacts with Mitigation	No Project/ No Build Alternative	Existing Zoning: Communal Residential Facility Alternative	Existing Zoning: Private School	Reduced Development Alternative
Greenhouse Gas Emissions	LTS	LTS	▼	▲	▲	▼
Hazards and Hazardous Materials	LTS	LTS	▼	—	—	—
Hydrology and Water Quality	LTS	LTS	▼	—	—	—
Land Use and Planning	PS	LTS	▼	—	—	—
Mineral Resources	LTS	LTS	▼	—	—	—
Noise	PS	LTS	▼	—	—	—
Population and Housing	LTS	LTS	▼	—	▼	▼
Public Services	LTS	LTS	▼	—	▼	▼
Recreation	LTS	LTS	▼	▲	▲	▲
Transportation	LTS	LTS	▼	—	▲	—
Tribal Cultural Resources	PS	LTS	▼	—	—	—
Utilities and Service Systems	LTS	LTS	▼	▲	▲	▼
Wildfire	LTS	LTS	▼	—	—	—
<i>Meet Project Objectives</i>	Yes	Yes	No	No	No	No

**Notes:**

- ▲ Alternative is likely to result in greater impacts to issue when compared to proposed project.
- Alternative is likely to result in similar impacts to issue when compared to proposed project.
- ▼ Alternative is likely to result in reduced impacts to issue when compared to proposed project.

N = No impact.

LTS = Less-than-significant impact.

PS = Potentially significant impact.

SU = Significant and unavoidable impact.



# 9 References

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## Executive Summary

No references were cited in this section.

## Chapter 1: Introduction

No references were cited in this section.

## Chapter 2: Environmental Setting

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# 10 EIR Preparers

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## 10.1 NUWI Sierra Madre LLC

Jonathan Frankel, VP Forward Planning

## 10.2 Dudek

Carey Fernandes, Principal

Iulia Roman, Environmental Planner

Joe Harrison, Environmental Analyst

Brandon Whalen-Castellanos, Environmental Analyst

Lilli Renier, Environmental Analyst

Jennifer Sucha, Senior Planner

Erin Lucett, Environmental Analyst

Madison Brown, Environmental Analyst

Daniel Hoffman, Environmental Analyst

Michael Greene, INCE Bd. Cert., Noise Specialist/Acoustician

Adam Poll, Senior Technical Air Quality Specialist

Samantha Wang, Air Quality Specialist

Michael Cady, Senior Biologist

Ryan Allen, Urban Forester

Kate Kaiser, MSHP, Architectural Historian

Sarah Corder, MFA, Senior Architectural Historian

Samantha Murray, MA, Historic Built Environment Lead

Linda Kry, Archaeologist

Heather McDaniel McDevitt, RPA, Archaeologist

Michael Huff, Principal Fire Protection Planner

Andrew Greis, GIS Specialist

Rachel Dobrolenski, Publications Specialist

Chelsea Ringenback, Publications Specialist

## 10.3 Subconsultants

### **Geosoils Consultants Inc.**

Rudy F. Ruberti

Karen L. Miller

### **Stantec**

Alicia Jansen, Associate Scientist

James DeWoody, Senior Scientist

Kyle Emerson, CEG, PG, Managing Principal Geologist

### **Fehr & Peers**

Biling Lui, Transportation Engineer

Steven J. Brown, PE

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# Mitigation Monitoring and Reporting Program

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California Public Resources Code, Section 21081.6, requires that, upon certification of an Environmental Impact Report, “the public agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment. The reporting or monitoring program shall be designed to ensure compliance during project implementation.”<sup>1</sup>

This Mitigation Monitoring and Reporting Program has been developed in compliance with Section 21081.6 of the California Public Resources Code and Section 15097 of the California Environmental Quality Act Guidelines,<sup>2</sup> and includes the following information:

- A list of mitigation measures
- The timing for implementation of the mitigation measures
- The party responsible for implementing or monitoring the mitigation measures
- The date of completion of monitoring

The City of Sierra Madre must adopt this Mitigation Monitoring and Reporting Program, or an equally effective program, if it approves the proposed Meadows at Bailey Canyon Specific (project) with the mitigation measures that were adopted or made conditions of project approval.

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<sup>1</sup> California Public Resources Code, Sections 21000–21189. California Environmental Quality Act (CEQA), as amended.

<sup>2</sup> 14 CCR 15000–15387 and Appendices A–N. Guidelines for Implementation of the California Environmental Quality Act, as amended.

**Table 1. Mitigation Monitoring and Reporting Program**

Mitigation Measure	Implementation Timing	Party Responsible for Implementation and Monitoring	Date of Completion
<i>Air Quality</i>			
<p><b>MM-AQ-1</b> Prior to the City’s issuance of the demolition and grading permits for the Project, the Applicant shall demonstrate to the satisfaction of the Planning Division that its construction contractor will use a construction fleet wherein all 50 horsepower or greater diesel-powered equipment is powered with California Air Resources Board (CARB)-certified Tier 4 Interim engines or equipment outfitted with CARB verified diesel particulate filters.</p> <p>An exemption from this requirement may be granted if: (1) the Applicant documents equipment with Tier 4 Interim engines are not reasonably available, and (2) functionally equivalent diesel PM emission totals can be achieved for the project from other combinations of construction equipment (Tier 3 with level 3 diesel particulate filter, electric, compressed natural gas, hydrogen, etc.). For example, if a Tier 4 Interim piece of equipment is not reasonably available at the time of construction and a lower tier equipment is used instead (e.g., Tier 3), another piece of equipment could be upgraded to a Tier 4 Final or replaced with an alternative-fueled (not diesel-fueled) equipment to offset the emissions associated with using a piece of equipment that does not meet Tier 4 Interim standards. Before an exemption may be granted, the Applicant’s construction contractor shall: (1) demonstrate that at least two construction fleet owners/operators in Los Angeles County were contacted and that those owners/operators confirmed Tier 4 Interim equipment could not be located within Los Angeles County during the desired construction schedule; and (2) the proposed replacement equipment has been evaluated using the California Emissions Estimator Model (CalEEMod) or other industry standard emission estimation method, and documentation provided to the Planning Division confirms that necessary project-generated functional equivalencies in the diesel PM emissions level are achieved.</p>	<p>Prior to issuance of demolition and grading permits</p>	<p>City of Sierra Madre Planning Division</p>	

Table 1. Mitigation Monitoring and Reporting Program

Mitigation Measure	Implementation Timing	Party Responsible for Implementation and Monitoring	Date of Completion
<i>Biological Resources</i>			
<p><b>MM-BIO-1 Nesting Bird Avoidance.</b> Initiation of construction activities (i.e., initial vegetation clearing) should avoid the migratory bird nesting season (January 1 through September 15), to reduce any potential significant impact to birds that may be nesting on the project site. If construction activities must be initiated during the migratory bird-nesting season, an avian nesting survey of the project site and contiguous habitat within 500 feet of all impact areas must be conducted for protected migratory birds and active nests. The avian nesting survey shall be performed by a qualified wildlife biologist within 72 hours prior to the start of construction in accordance with the Migratory Bird Treaty Act and California Fish and Game Code.</p> <p>If an active bird nest is found, the nest shall be flagged and mapped on the construction plans along with an appropriate no disturbance buffer, which shall be determined by the biologist based on the species' sensitivity to disturbance (typically 50 feet for common, urban-adapted species, 300 feet for other passerine species, and 500 feet for raptors and special-status species). The nest area shall be avoided until the nest is vacated and the juveniles have fledged. The nest area shall be demarcated in the field with flagging and stakes or construction fencing. A qualified biologist (with the ability to stop work) shall serve as a construction monitor during those periods when construction activities will occur near active nest areas to ensure that no inadvertent impacts on these nests occur.</p>	Prior to and during construction	City of Sierra Madre Planning Division; qualified biologist	
<p><b>MM-BIO-2 Invasive Species.</b> The use of invasive plant species listed in the California Invasive Plant Council's Inventory as having a rating of Limited, Moderate, or High shall not be allowed for landscaping purposes.</p>	During construction and operations	City of Sierra Madre Planning Division	

Table 1. Mitigation Monitoring and Reporting Program

Mitigation Measure	Implementation Timing	Party Responsible for Implementation and Monitoring	Date of Completion
<p><b>MM-BIO-3 Protected Tree Replacement.</b> The City’s Tree Preservation and Protection Ordinance (Chapter 12.20) identifies tree replacement requirements for tree removal associated with a development project. In total, ten protected trees may be removed. As such, they shall be replaced at a minimum with a 24-inch box tree, on a 1:1 basis with a like species. The specific location of individual mitigation tree plantings on site would be addressed in the mitigation planting plan or landscape design plan prepared for the site.</p> <p>In addition, all mitigation tree plantings shall be subject to a 5-year monitoring effort by an independent third-party certified arborist. The monitoring effort shall consider growth, health, and condition of the subject trees to evaluate success. The monitoring effort may result in a recommendation of remedial actions, such as replacing trees that are not thriving, should any of the tree plantings exhibit poor or declining health. In addition, because the project will have direct impacts to trees, an arborist would be required to be present on-site during the proposed widening of Carter Avenue, per the City’s Tree Preservation and Protection Ordinance.</p>	<p>During and through five years post construction</p>	<p>City of Sierra Madre Planning Division</p>	
<b>Cultural Resources</b>			
<p><b>MM-CUL-1 Workers Environmental Awareness Program.</b> All construction personnel and monitors who are not trained archaeologists shall be briefed regarding unanticipated discoveries prior to the start of ground disturbing activities. A basic presentation shall be prepared and presented by a qualified archaeologist, in coordination with the Gabrieleño Band of Mission Indians-Kizh Nation, to inform all personnel working on the project about the archaeological sensitivity of the area. The purpose of the WEAP training is to provide specific details on the kinds of archaeological materials that may be identified during construction of the project and explain the importance of and legal basis for the protection of significant archaeological resources.</p>	<p>Prior to construction</p>	<p>City of Sierra Madre Planning Division; qualified archaeologist</p>	



**Table 1. Mitigation Monitoring and Reporting Program**

Mitigation Measure	Implementation Timing	Party Responsible for Implementation and Monitoring	Date of Completion
<p>Each worker shall also be instructed on the proper procedures to follow in the event that cultural resources or human remains are uncovered during ground-disturbing activities. These procedures include work curtailment or redirection, and the immediate contact of the on-call archaeologist and if appropriate, Tribal representative. Necessity of training attendance should be stated on all project site plans intended for use by those conducting the ground disturbing activities.</p>			
<p><b>MM-CUL-2 On-Call Archaeological Construction Monitoring.</b> A qualified archaeologist shall be retained and on-call to respond and address any inadvertent discoveries identified during ground disturbing activities. A qualified archaeological principal investigator, meeting the Secretary of the Interior’s Professional Qualification Standards, shall oversee and adjust all monitoring efforts as needed (increase, decrease, or discontinue monitoring frequency) based on the observed potential for construction activities to encounter cultural deposits or material as well as determine, for purposes of Native American monitoring, when initial ground disturbing activities are complete. The archaeological monitor shall be responsible for maintaining daily monitoring logs for those days monitoring is required. If monitoring is ultimately required, an archaeological monitoring report shall be prepared within 60 days following completion of ground disturbance. This report shall document compliance with approved mitigation and all monitoring efforts as well as include an appendix with copies of all daily monitoring logs. The final report shall be submitted to the South Central Coastal Information Center (SCCIC).</p>	<p>Prior to the issuance of grading permits (retention of qualified archaeologist) and during construction (monitoring)</p>	<p>City of Sierra Madre Planning Division; qualified archaeologist</p>	
<p><b>MM-CUL-3 Unanticipated Discovery of Archaeological Resources.</b> In the event that potential archaeological resources (sites, features, or artifacts) are exposed during construction activities involving ground disturbance for the proposed project, all construction work occurring within 50feet of the find shall immediately stop until a qualified archaeologist can evaluate the</p>	<p>During construction</p>	<p>City of Sierra Madre Planning Division; Project’s qualified archaeologist</p>	

**Table 1. Mitigation Monitoring and Reporting Program**

Mitigation Measure	Implementation Timing	Party Responsible for Implementation and Monitoring	Date of Completion
<p>significance of the find and determine whether additional study is warranted. This avoidance buffer may be adjusted following inspection of this area by the qualified archaeologist. Depending upon the significance of the find under CEQA (14 CCR 15064.5[f]; PRC Section 21082), the archaeologist may simply record the find and allow work to continue. If the discovery proves significant under CEQA, additional work, such as preparation of an archaeological treatment plan, testing, or data recovery may be warranted.</p>			
<p><b>MM-CUL-4 Unanticipated Discovery of Human Remains.</b> In accordance with Section 7050.5 of the California Health and Safety Code, if human remains are found, the county coroner shall be immediately notified of the discovery. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains, <u>and no less than 100 feet from are of discovery</u>, shall occur until the county coroner has determined, within 2 working days of notification of the discovery, the appropriate treatment and disposition of the human remains. If the county coroner determines that the remains are, or are believed to be, Native American, he or she shall notify the Native American Heritage Commission (NAHC) in Sacramento within 24 hours. In accordance with California Public Resources Code, Section 5097.98, the NAHC must immediately notify those persons it believes to be the most likely descendant from the deceased Native American. The most likely descendant shall complete his/her inspection within 48 hours of being granted access to the site. The designated Native American representative would then determine, in consultation with the property owner, the disposition of the human remains.</p>	<p>During construction</p>	<p>City of Sierra Madre Planning Division; County Coroner; NAHC; designated Native American representative</p>	
<p><b>Geology and Soils</b></p>			
<p><b>MM-GEO-1 Removal and Recompaction of Artificial Soil.</b> Prior to the commencement of any construction activity on site, the project contractor shall remove and recompact all artificial soil present within the limits of proposed grading, as deep as 18 feet bgs.</p>	<p>Prior to construction</p>	<p>City of Sierra Madre Planning Division; Project contractor</p>	

**Table 1. Mitigation Monitoring and Reporting Program**

Mitigation Measure	Implementation Timing	Party Responsible for Implementation and Monitoring	Date of Completion
<p><b>MM-GEO-2 Paleontological Monitoring and Resource Treatment.</b>                      Prior to the commencement of any grading activity on site, the project applicant shall retain a Qualified Paleontologist meeting the Society of Vertebrate Paleontology (SVP) standards and guidelines, subject to the review and approval of the City of Sierra Madre’s Planning Department. The paleontologist shall prepare a Paleontological Resources Impact Mitigation Program (PRIMP) for the proposed project. The PRIMP shall be consistent with the guidelines of the SVP. The Qualified Paleontologist shall attend the pre-construction meeting and their representative, the Qualified Monitor, shall be on site during all rough grading and other significant ground-disturbing activities at depths greater than 5 feet below the ground surface. In the event that paleontological resources (e.g., fossils) are unearthed during grading, the Qualified Monitor shall temporarily halt and/or divert grading activity to allow recovery of paleontological resources. The area of discovery shall be roped off with a 50-foot-radius buffer. Once documentation and collection of the find is completed, the Qualified Monitor shall remove the rope and allow grading to recommence in the area of the find.</p>	<p>Prior to the issuance of grading permits (retention of Qualified Paleontologist and preparation of PRIMP) and during construction (monitoring)</p>	<p>City of Sierra Madre Planning Division; Project’s qualified paleontologist</p>	
<b>Noise</b>			
<p><b>MM-NOI-1</b> The City of Sierra Madre (City) and/or its Construction Contractor shall implement the following noise reduction measures during all construction activities:</p> <ul style="list-style-type: none"> <li>• A temporary noise barrier shall be constructed along the project site’s southern, and western boundaries. The construction noise barrier shall be a minimum of 8 feet in height. The barrier may be constructed of 3/4-inch Medium Density Overlay (MDO) plywood sheeting, or other material of equivalent utility having a surface weight of 2 pounds per square foot or greater. Alternatively, prefabricated acoustic barriers are available from various vendors. When barrier units are joined together, the mating surfaces of the barrier sides should be flush or overlap with one another. Gaps</li> </ul>	<p>During construction</p>	<p>City of Sierra Madre Planning Division; Construction contractor</p>	

**Table 1. Mitigation Monitoring and Reporting Program**

Mitigation Measure	Implementation Timing	Party Responsible for Implementation and Monitoring	Date of Completion
<p>between barrier units, and between the bottom edge of the barrier panels and the ground, should be closed with material that will completely fill the gaps, and be dense enough to attenuate noise.</p> <ul style="list-style-type: none"> <li>• Construction noise reduction methods such as shutting off idling equipment; installing temporary acoustic barriers around stationary construction noise sources; and, where feasible, use of electric air compressors and similar power tools, rather than diesel equipment, shall be employed.</li> <li>• Equip all construction equipment (fixed or mobile) with properly operating and maintained mufflers, consistent with or exceeding manufacturers' standards.</li> <li>• Ensure that construction equipment engine enclosures and covers as provided by manufacturers shall be in place during operation.</li> <li>• Place all stationary construction equipment so that the equipment is as far as feasible from noise-sensitive receptors and so that the emitted noise is directed away from the noise-sensitive receptors.</li> <li>• Locate equipment and materials staging in areas that will create the greatest distance between staging area noise sources and noise-sensitive receptors during project construction.</li> <li>• Ensure that construction equipment is shut down when not in use.</li> <li>• Limit haul truck deliveries to the same hours specified for the operation of construction equipment.</li> </ul>			
<p><b>MM-NOI-2</b> In order to ensure that the project's HVAC systems do not result in an exceedance of applicable noise standards (i.e., an increase of more than 6 dBA in the City of Sierra Madre, the HVAC system for each residence shall have a maximum noise level specification not to exceed 72 dBA sound power level (equivalent to a sound pressure level of 47 dBA at a measured distance of 25 feet [7.6 meters]) over a reflecting plane.</p>	<p>Prior to issuance of certificates of occupancy</p>	<p>City of Sierra Madre Planning Division; Project Applicant</p>	

Table 1. Mitigation Monitoring and Reporting Program

Mitigation Measure	Implementation Timing	Party Responsible for Implementation and Monitoring	Date of Completion
<i>Tribal Cultural Resources</i>			
<p><b>MM-TCR-1 Native American Monitoring.</b> Prior to the commencement of any ground disturbing activity at the Project site, with a minimum of 30 days advance written notice, the project applicant shall retain a Native American Monitor approved by the Gabrieleño Band of Mission Indians-Kizh Nation (Consulting Tribe on this project pursuant to Assembly Bill A52). A copy of the executed contract shall be submitted to the City of Sierra Madre Planning and Building Department prior to the issuance of any permit necessary to commence a ground-disturbing activity. The applicant will inform the Gabrieleño Band of Mission Indians-Kizh Nation of the day, time, and location of the Workers Environmental Awareness Program (WEAP) preconstruction meeting, with a minimum of 5 days advance written notice, as well as make provisions for participation in the training. The Tribal monitor will only be present on-site during the construction phases that involve initial ground-disturbing activities. Initial ground-disturbing activities is defined as initial mass grading and associated movement of sediments from their place of last deposition prior to commencement of the Project. (Initial ground disturbing activities includes but is not necessarily limited to, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.) As it pertains to Native American monitoring, this definition excludes movement of sediments after they have been initially disturbed or displaced by Project-related construction.</p> <p>The Tribal Monitor will complete daily monitoring logs that will provide descriptions of the day’s activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when the qualified archaeologist has determined, and in good faith consultation with the Gabrieleño Band of Mission Indians-Kizh Nation, that all initial ground-disturbing activities on the Project Site (as defined above) are</p>	<p>Prior to ground disturbing activities and during construction</p>	<p>City of Sierra Madre Planning Division; Native American Monitor approved by the Gabrieleño Band of Mission Indians-Kizh Nation; Project’s qualified archaeologist; County Coroner (if applicable)</p>	

**Table 1. Mitigation Monitoring and Reporting Program**

Mitigation Measure	Implementation Timing	Party Responsible for Implementation and Monitoring	Date of Completion
<p>completed, or when the qualified archaeologist and Tribal Representatives/Monitor have indicated that all upcoming ground-disturbing activities at the Project Site have little to no potential for impacting Tribal Cultural Resources (whichever defined threshold is met first). Upon discovery of any Tribal Cultural Resources, construction activities shall cease in the immediate vicinity of the find and a buffer of 50 feet will be established where no ground disturbing work will be allowed to occur until the find can be assessed and if required, treated according to CEQA requirements. All Tribal Cultural Resources unearthed by project activities shall be evaluated by the qualified archaeologist retained on-call and Tribal monitor approved by the Consulting Tribe. If the resources are Native American in origin, the Consulting Tribe will retain it/them in the form and/or manner the Tribe deems appropriate, for educational, cultural and/or historic purposes. If human remains and/or grave goods are discovered or recognized at the Project Site, all ground disturbance shall immediately cease within 100 feet of the find and suspected extent of human remains as determined by the qualified archaeologist retained on-call and Tribal monitor approved by the Consulting Tribe. The county coroner shall be notified per Public Resources Code Section 5097.98, and Health &amp; Safety Code Section 7050.5. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2). Work may continue on other parts of the Project Site (outside the 100-foot buffer) while evaluation and, if necessary, mitigation takes place (CEQA Guidelines Section 15064.5[f]).</p>			