



# City of Sierra Madre

Office of the City Clerk

232 W. Sierra Madre Blvd.,

Sierra Madre, CA

(626) 355-7135

THE BROWN ACT PROVIDES THE PUBLIC WITH  
AN OPPORTUNITY TO MAKE PUBLIC COMMENTS  
AT ANY PUBLIC MEETING.

THE FOLLOWING ARE COMMENTS RECEIVED  
FOR THIS MEETING

April 7, 2022

To: **Sierra Madre Planning Commission**  
232 W. Sierra Madre Boulevard, Sierra Madre, CA 91024.

From: Alex Arrieta  
[REDACTED] Edgeview Drive  
Sierra Madre, CA 91024  
[REDACTED]

Re: April 7, 2022 Planning Commission Meeting to begin discussions on the Meadows at Bailey Canyon EIR.

Thank you for the opportunity to submit comments on the 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 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.***

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.***

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.***

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.***

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.***

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.***

## 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 fire departments. ***Please indicate how the increased demand for SM Fire Department needs from servicing 42 homes would be met.***

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 result 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 Department 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.***

AESTHETICS, VIEWS: 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. P.115 - 4.1.3 Thresholds of significance. According to Appendix G of the CEQA Guidelines, a significant impact related 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 substantial adverse effect on a scenic vista.

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.***

## ZONING

Page 119 - The land on which the proposed project is based is currently zoned institutional 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 project 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?***

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, 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 being institutional.***

#### 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 implemented.***

Page 153 ‘Because construction of the proposed project would exceed the SCAQMD localized significance thresholds for PM10 and PM2.5, the potential health effects associated 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.***

#### 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.***

#### 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 development 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.***

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 canopy, 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 mitigation. 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.

**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.**



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.**

## 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.***

## 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.***

## 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.***

## 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.

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.

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.

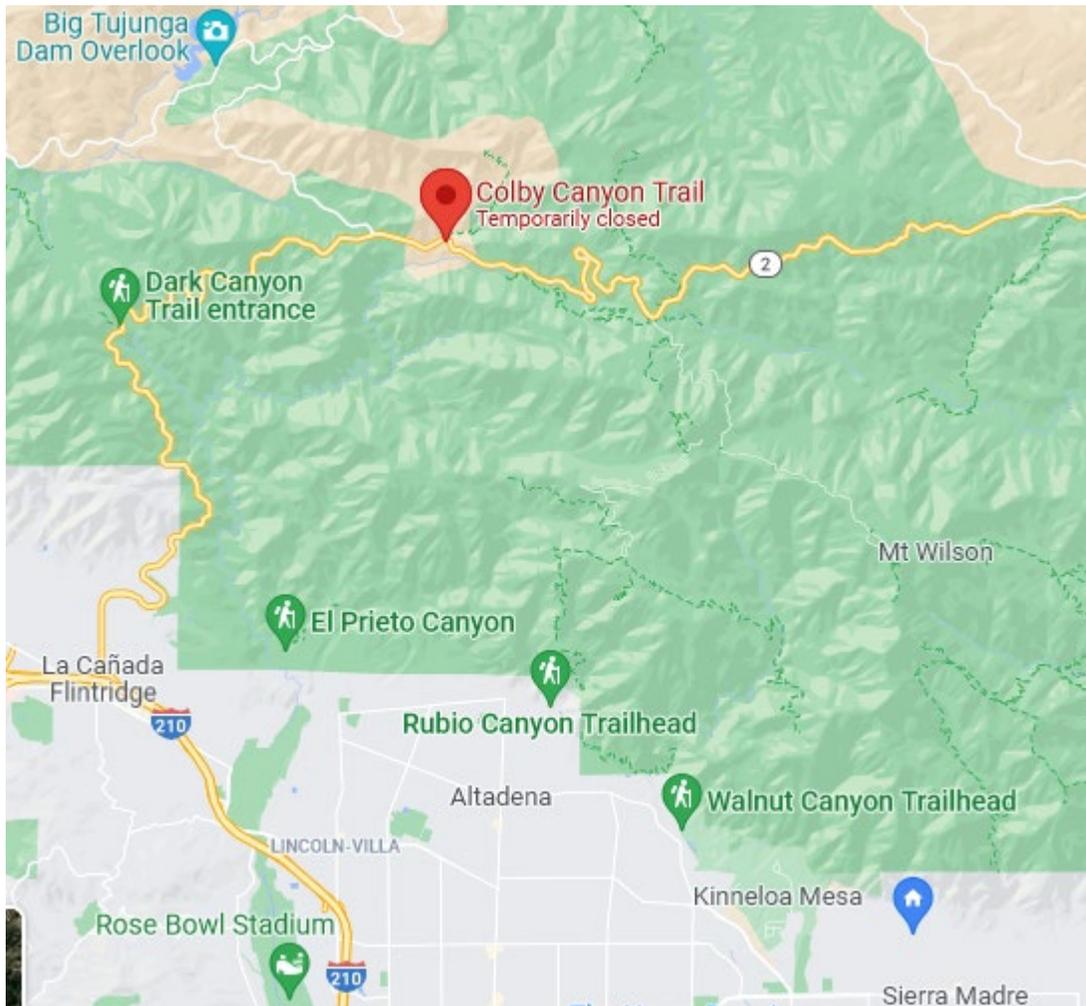
There are three standards that a project description must meet: it must be clear, stable, and finite. The project does not meet this standard because it is unclear, unstable, and not finite as set forth below.

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.

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.”



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-

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?

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).

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.

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.

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.

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.**

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.

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.

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?”

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.**

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.

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

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).

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.

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.

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.

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.

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.

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.

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?

## Jen Peterson

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**From:** Lou Losorelli [REDACTED]  
**Sent:** Thursday, April 7, 2022 11:51 AM  
**To:** Public Comment  
**Cc:** Gene Goss; Rachelle Arizmendi; Edward Garcia; Robert Parkhurst; Kelly Kriebs; Jose Reynoso; Vincent Gonzalez; Aleks Giragosian  
**Subject:** Please reject the Meadows at Bailey Canyon Proposal

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

To the Members of the City Council and Planning Commission:

Today, April 7, 2022, you will be holding a meeting to review the EIR regarding the proposed Meadows at Bailey Canyon project. As a resident of Sierra Madre for nearly 28 years, please let me register my absolute opposition to this development.

I am currently in the process of reviewing each and every word of the 1,300+ page EIR. I hope that incident to your execution of your duties as stewards of the City of Sierra Madre that you are doing the same.

The developer, New Urban West, has spent tens of thousands of dollars to advertise the purported benefits of this project, by way of their expensive half-page weekly ads in the Mountain Views News, countless mailings of glossy oversized circulars, and a host of other promotional activities.

Consider this - in all of the advertisements, mailings, and communications sponsored by New Urban West, why have we only seen one brief mention of the number of houses planned for this development? It is because the magnitude of this undertaking is without any doubt simultaneously the single most important and single most damning characteristic of the project. The developer knows this full well and for this reason has made a Herculean effort to throw public attention away from it.

We residents of Sierra Madre are depending upon you to protect our beloved community and to vote this project down.

Sincerely,

Lou Losorelli  
Sierra Madre Resident

**Jen Peterson**

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**From:** René Vellanoweth [REDACTED]  
**Sent:** Thursday, April 7, 2022 11:41 AM  
**To:** Public Comment  
**Subject:** Public Comments

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

Dear City Councilors -

My family and I have lived in Sierra Madre for the last fourteen years. We came from Northern California and felt a little intimidated moving to the big city of Los Angeles. But in Sierra Madre, we found a place that feels like a real small town, despite being surrounded by suburbia. We love that it is full of funky old neighborhoods which grew up organically over time. And, we really appreciate that Sierra Madre does **not** have the new giant stucco monstrosities you see in many nearby communities. The proposed development at the "Meadows at Bailey Canyon" would be a huge blight on this authentic town. The developer's plan to stick different pseudo-historic facade elements on the houses' faces will do nothing to disguise that they are giant cookie-cutter prestige homes. Having this development looming over town is going to change the entire feel of Sierra Madre and open the door to others seeking to redevelop modest historic homes into McMansions.

So, you can say I am just being a NIMBY who doesn't want anything to change and doesn't care about providing the housing which LA desperately needs. But, we are currently in the process of building a 750-square foot ADU in our backyard out of an old 3 car garage. So, literally, we are in favor of providing housing in our very own backyard. However, our ADU is not destroying mature trees, blocking our neighbors' views of the mountains, creating traffic nightmares, or posing a fire hazard. It's going to provide someone with a comfortable, modest home and let them be part of our community - but without destroying that community in the process. That's the kind of development I'd like to see in Sierra Madre.

You've heard over and over the many reasons why the "Meadows" is bad for Sierra Madre and creates numerous environmental problems. Supporters of the project like to play up property rights, but nothing gives them the absolute right to create all these negative impacts to their neighbors. You have to give them permission to do that. I sincerely hope you will stand up for our town and deny that permission.

Kind Regards,  
René Vellanoweth  
[REDACTED] N Sunnyside Ave.  
Sierra Madre, CA

**Jen Peterson**

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**From:** Maria Karafilis [REDACTED]  
**Sent:** Thursday, April 7, 2022 11:19 AM  
**To:** Public Comment; planningcommission@cityofsierramadre.com  
**Subject:** minutes of joint meeting

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

Please enter this comment into the public record and read it at the meeting. Thanks.

It is my understanding that the Planning Commission will be asked to approve the minutes of the Joint meeting. Those minutes list the names of all the speakers but no mention of their comments or if they spoke for or against the Bailey Meadows project.

As this meeting was purported to be one of the few chances for the citizens to pose their questions and concerns, the actual comments should be part of the official record. Please revise the minutes of the prior joint meeting to reflect the citizen comments and questions.

Maria Karafilis  
[REDACTED] Fairview Ave, Sierra Madre, CA 91024

## Jen Peterson

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**From:** deb sheridan [REDACTED]  
**Sent:** Thursday, April 7, 2022 10:24 AM  
**To:** Public Comment  
**Cc:** Vincent Gonzalez  
**Subject:** Action Item #1 on April 7 Planning Commission Agenda

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

Please forward to the Commissioners, and put into the record.

Dear Commissioners,

Over the past several years I have presented you with the facts regarding the Meadows project and the faulty EIR. As I talk to residents, many have expressed dismay and some believe there is a payoff under the table. My belief is that City staff, Commissioners, and City Council are scared of a lawsuit to the point of paralysis.

Tonight I'd like to give you a few facts about what is happening throughout California to give you courage to come to the right conclusion, as cities, fight back against Sacramento's harmful, ill-conceived laws, and the big developers:

1. Whittier's Planning Commission is taking another look at the proposal for a three story condo of 42 units, with tandem parking, vastly increased traffic, loss of privacy for neighbors.
2. Four cities, Redondo Beach, Wittier, Carson, and Torrance are suing the state over SB 9.

Livable California conducted a webinar on April 2. It is "a statewide nonpartisan group made up of elected officials, nonprofit and organization leaders and individuals. We are your voice in Sacramento." Presenters were Land Use Attorneys Stuart Flashman and Doug Carstairs, who are experts on CEQA, which was enacted in 1970. Here are the facts that were presented in the webinar:

1. Currently there have been attempts to weaken CEQA. This is the premiere law, and is *not* an impediment to building needed housing, does not interfere with housing production. It is the "Bill of Rights for Environmental Democracy." It is big money attempts to get barriers out of the way. *Every* elected official has a responsibility to understand CEQA. There has been an orchestrated attempt to undermine CEQA.
2. The EIR is a roadmap and environmental price tag. If you fail to plan well enough, you can blame this.
3. It is okay to cut down trees - *if* you can justify why. Allowing the trees to be cut down "exposes the values of the elected officials." We have already lost 3 billion birds in North America.
4. Vehicle Miles Travelled (VMT) is meant to confuse the issue, so that it is easier to ignore issues such as air pollution and interfering with necessary evacuations. VMTs can be manipulated to show no impact to the environment.
5. There is a bill in the legislature to limit building in high fire areas. Even city fire departments are under political pressure. Building in high fire zone standards are inadequate. Developers give money to the fire fighters union.

6. City staffs are understaffed and/or not interested enough to gather the facts. Having term limits doesn't help - our elected officials are "like substitute teachers, with little preparation or understanding of the laws." Big money often funds their campaigns.
7. Another lawyer on the call said the ballot is the only way to resolve these issues. The EIR process is designed to limit public participation.

As you evaluate the presentation, I urge you to consider the impact to our town forever. As always, I thank you for your tireless efforts,

Deb Sheridan

**Jen Peterson**

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**From:** m r [REDACTED]  
**Sent:** Thursday, April 7, 2022 10:39 AM  
**To:** Public Comment  
**Subject:** Public Comment for the ENVIRONMENTAL IMPACT REPORT: Stop Housing Project

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

Hi,

This question was also asked back in 1960.

What is the Environmental Impact of a housing project, to fund the Monastery operations?

And the answer back then, was to preserve the 20 acres of grassland, and have an Annual Festival to cover the annual costs for the Priests, Monks and Brothers. Mr. Kennedy and local residents whose back yards adjoins the fields, and Father Sweeney and the Brothers, agreed to save the open spaces and instead have the annual Festival with carnival rides and booths to fund their annual operating expenses..

We all remember this famous annual event in Sierra Madre at the Mater Dolorosa Monastery, their one weekend in Spring/Summer funding festival event!

**San Gabriel valley locals, as well as bus loads of people, came as far as San Francisco and San Diego, to participate in helping fund this famous Monastery. Cars and buses filled up both monastery fields. It was a great place to be for family and friends gathering for this once a year event. And it worked for over 50 years up until 2010.**

California has a water shortage. fire hazard, traffic, noise, urbanization, pollution, lets not add more of this.

Lets bring back this annual event and help save the last open space in Sierra Madre.

In 2022, the Environmental Impact of an Annual Weekend Festival is also preferred,

Regards,  
Mr. Randall

**Jen Peterson**

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**From:** Virginia Forest [REDACTED]  
**Sent:** Thursday, April 7, 2022 10:42 AM  
**To:** Public Comment  
**Subject:** Proposed Monastery Development

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

Dear Sierra Madre City Officials,

I am STRONGLY OPPOSED to the "Meadows" project that has been proposed by developers, for the following reasons:

I don't believe that there is sufficient reason for a change in zoning. The city should stick to the city plan as much as possible.

The project will destroy far too many mature trees, which would be a terrible loss to our community and environment.

I am outraged that this private project would encroach on Bailey Canyon Wilderness Preserve! That is unacceptable.

There would be too many houses too close together. The impact on Sierra Madre's air quality, water resources, traffic, safety, and city services would be overwhelming.

The project is properly in an area of high fire and earthquake risk.

We, the people of the City of Sierra Madre, do NOT have an obligation to the Passionists to make sacrifices to help them maximize profit on the sale of their land. They can and should follow existing rules to build something reasonable and less destructive, and make a reasonable profit. Property owners have rights, but communities have rights, too.

Thank you for representing us and protecting our wonderful city.

Sincerely,  
Virginia Forest  
[REDACTED] N Baldwin Ave  
Sierra Madre

## Jen Peterson

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**From:** Leslie Heald [REDACTED]  
**Sent:** Thursday, April 7, 2022 10:56 AM  
**To:** Public Comment  
**Subject:** comments regarding DEIR proposed "Meadows" project

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

Dear City Councilors -

My family and I have lived in Sierra Madre for the last fourteen years. We came from Northern California and felt a little intimidated moving to the big city of Los Angeles. But in Sierra Madre, we found a place that feels like a real small town, despite being surrounded by suburbia. We love that it is full of funky old neighborhoods which grew up organically over time. And, we really appreciate that Sierra Madre does **not** have the new giant stucco monstrosities you see in many nearby communities. The proposed development at the "Meadows at Bailey Canyon" would be a huge blight on this authentic town. The developer's plan to stick different pseudo-historic facade elements on the houses' faces will do nothing to disguise that they are giant cookie-cutter prestige homes. Having this development looming over town is going to change the entire feel of Sierra Madre and open the door to others seeking to redevelop modest historic homes into McMansions.

So, you can say I am just being a NIMBY who doesn't want anything to change and doesn't care about providing the housing which LA desperately needs. But, we are currently in the process of building a 750-square foot ADU in our backyard out of an old 3 car garage. So, literally, we are in favor of providing housing in our very own backyard. However, our ADU is not destroying mature trees, blocking our neighbors' views of the mountains, creating traffic nightmares, or posing a fire hazard. It's going to provide someone with a comfortable, modest home and let them be part of our community - but without destroying that community in the process. That's the kind of development I'd like to see in Sierra Madre.

You've heard over and over the many reasons why the "Meadows" is bad for Sierra Madre and creates numerous environmental problems. Supporters of the project like to play up property rights, but nothing gives them the absolute right to create all these negative impacts to their neighbors. You have to give them permission to do that. I sincerely hope you will stand up for our town and deny that permission.

Kind Regards,  
Leslie Heald  
[REDACTED] N Sunnyside Ave.  
Sierra Madre, CA

**Jen Peterson**

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**From:** Lynne Collmann [REDACTED]  
**Sent:** Thursday, April 7, 2022 10:47 AM  
**To:** Public Comment  
**Subject:** Comments on EIR impacts of Meadows Project  
**Attachments:** Final Draft EIR Submission to PC 4.2.22 LC.docx

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

Good Morning,

Please include the attached in the public record for the City's review of the proposed housing development at the Retreat Center.

Please also forward to the Planning Commission members for their review prior to today's meeting.

Thank you,

Lynne Collmann

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.

Project Impacts – It is the role of the Planning Commission and City Council 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, detailed information is presented that disproves this. A discussion of the Project Impacts follows:

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.

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.

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.

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.

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

to provide details on how it 'minimizes burdens on City's infrastructure' and 'minimizes impact on the environment'.

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.

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.

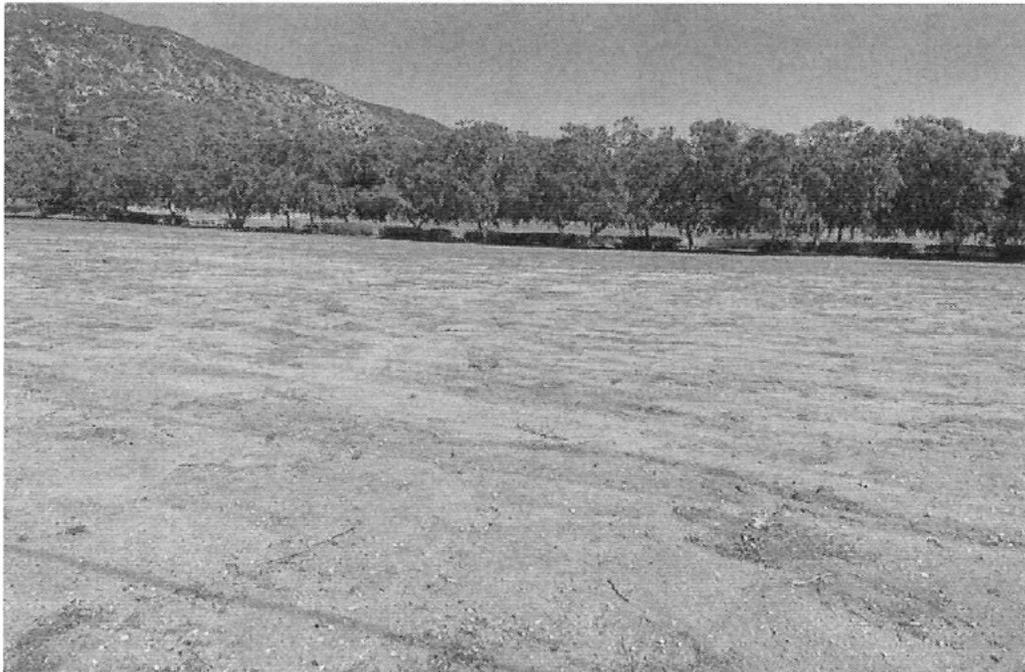
### **Biological Resources:**

#### ***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'.

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

uninhabitable wasteland. The pictures below show before and after the devastating impacts of destroying the food source and habitat of local wildlife.



It is not surprising that no wildlife or plant materials were found five months after the application of chemicals.

Further, the survey did not address seed bank or lasting roots of native plants that are found at this elevation all across the foothills.

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.

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)].

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

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.

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.

***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.

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.

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?***

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?***

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?***

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.

### **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.

### **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.

### **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.

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.

***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.

***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

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.

### 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'.

### 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.

### 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

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.

***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.

***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.

### **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.

## **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.



**Goal 3:** 'Ensure that development is done in harmony with its neighbourhood, and preserves and protects privacy and mountain views of neighbouring properties'.

*DraftEIR 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.

**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'.

*DraftEIR 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

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 L.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'

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.

**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.

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 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.

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.

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.

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.

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.

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 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.

## 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.

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.

### 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'.

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.

#### **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.

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**

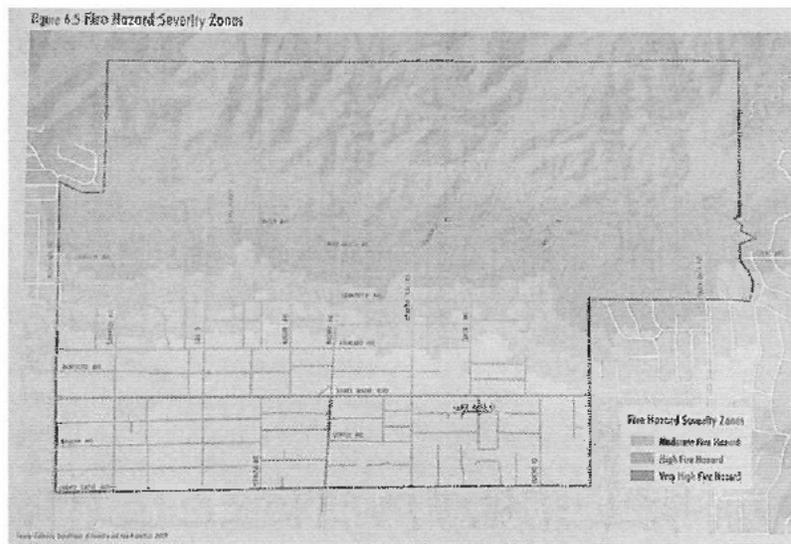
#### **Fire Safety/WILDFIRES**

**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.



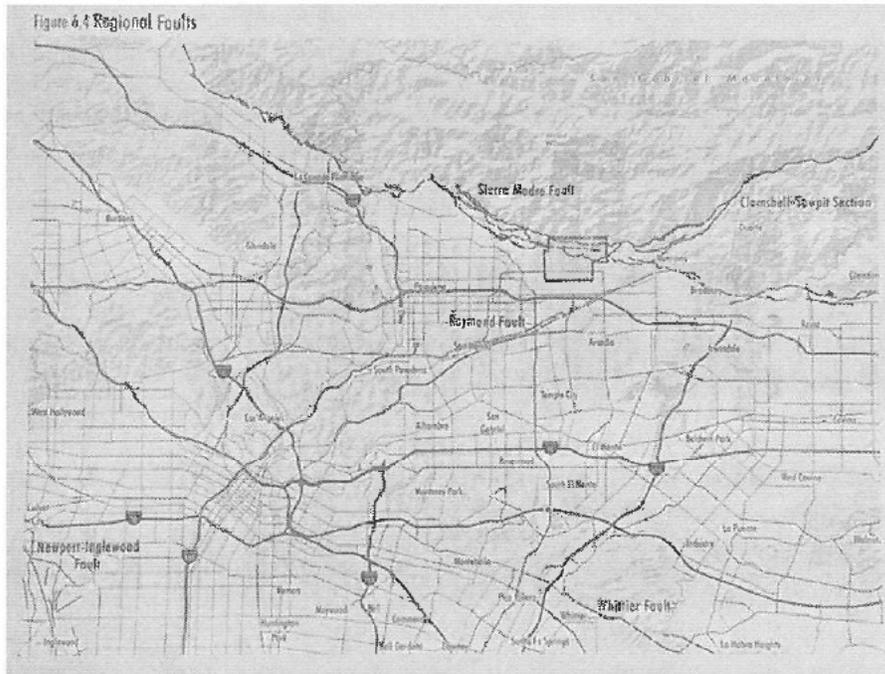
The LA County Sustainability Plan states that 'development should be limited in high climate-hazard areas, such as wildfire, flooding, extreme heat, and sea level rise. Climate science allows us to identify the areas that are most at risk, including urban-wildland interface at the edge of developed areas. 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:

**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.

**Seismic Safety:** The Project lies in the Sierra Madre earthquake fault zone as seen in the map below:



**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*.

#### **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.

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.

**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 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 basis. 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.

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 affect 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 are 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.

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.

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.

### **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.

**Jen Peterson**

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**From:** Derek Sample [REDACTED]  
**Sent:** Thursday, April 7, 2022 8:59 AM  
**To:** Public Comment  
**Subject:** STOP the Monastery Housing project

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

**We strongly stand against the Monastery project. Please include this email to be used tonight at the meeting April 7th.**

- **Traffic Impact:** expected to at least double from current levels
- **Fire Impact:** The proposed housing development of 42 large homes is in the highest fire risk area in the city. Fire retardant materials will not help. This defies common sense.
- **Devastating Water Drought:** Remember when new urban west was saying Net Zero Water Impact from this project. They're not saying that anymore because it's not true or feasible. Southern California is in the midst of the most severe mega-drought in the history of our state and further depleting already very limited water supplies does not make sense.
- **Earthquake Zone:** The proposed project is on an earthquake zone. The original monastery building was destroyed years ago from an earthquake. So, of course it makes complete sense to do it again, right?.
- **Destruction of 101 mature trees and devastation of the wildlife**
- **New plans to impact Bailey Canyon Wilderness Park**
- **Increased Air Pollution**

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Derek Sample  
[REDACTED] woodland drive  
sierra madre, ca 91024

**Jen Peterson**

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**From:** Todd Cranston-Cuebas [REDACTED]  
**Sent:** Thursday, April 7, 2022 9:10 AM  
**To:** Public Comment  
**Subject:** New developments should comply with our general plan

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

I wanted to voice my concern regarding the 42-home development that is being planned for the Monastery. My primary concern is simple, no developer, large or small, should be exempt from compliance with the planning rules and regulations that any other citizen in this city would be made to comply with. I am a firm believer in private property rights and believe that the Monastery has the right to build on their land (assuming it is in compliance with the zoning of that land and in compliance with our general plan). This is not the case for the proposed development which is asking for a special plan because they want to build a separate development within our city that is not in compliance with our general plan.

The request for a special plan does impact our community. The size of homes relative to lot size, the cutting down of protected trees, the severe leveling and tiering of the land, and the lack of adequate ingress and egress, and a "net zero" water plan that is simply a misnomer and has massive implications for a region that is suffering an historic and potentially long-lasting drought.

I say that the net zero is a misnomer because... they will be using water, a development cannot become net zero by encouraging others in the city to use less water, and even if they pay ahead for water it is nonsensical to base that pre-purchase on current water costs and not take into account inflation as would be normal in any other business transaction. The impact on the community and our water resources is real and calling it net zero does not make it so.

Finally, I would like to voice my concern for the developer and monastery reaching out to residents in cities outside of Sierra Madre, providing misinformation (i.e., that the monastery would never be able to build if the petition succeeds and makes it to a ballot), and asks them to send emails to our city leaders. I believe strongly that this is a local matter and our own elected officials and paid staff should focus on the concerns of the citizens of this city. In fact, I would request that opinions, emails, commentary, etc. should be excluded from non-residents as this outreach campaign could influence the opinions of our leaders by the sheer volume of messages vs. hearing the opinions and desires of our own residents.

Todd Cranston-Cuebas  
[REDACTED]

[REDACTED] Fairview Avenue, Sierra Madre

**Jen Peterson**

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**From:** Preserve Sierra Madre [REDACTED]  
**Sent:** Wednesday, April 6, 2022 2:56 PM  
**To:** Public Comment  
**Subject:** Comments for Planning Commission Meeting  
**Attachments:** EIR Comments to PC 4.6.22.docx

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

Good Afternoon,

Attached please find our comments for inclusion into the public record for the first Planning Commission meeting on April 7th regarding the proposed 'Meadows' housing project.

Please distribute to the Commission members.

Thank you,

Preserve Sierra Madre

**Jen Peterson**

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**From:** Henry Leung [REDACTED]  
**Sent:** Wednesday, April 6, 2022 7:00 PM  
**To:** Public Comment  
**Subject:** Meadows at Bailey Canyon - Planning Commission Meeting April 7, 2022

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

To the Sierra Madre Planning Commission,

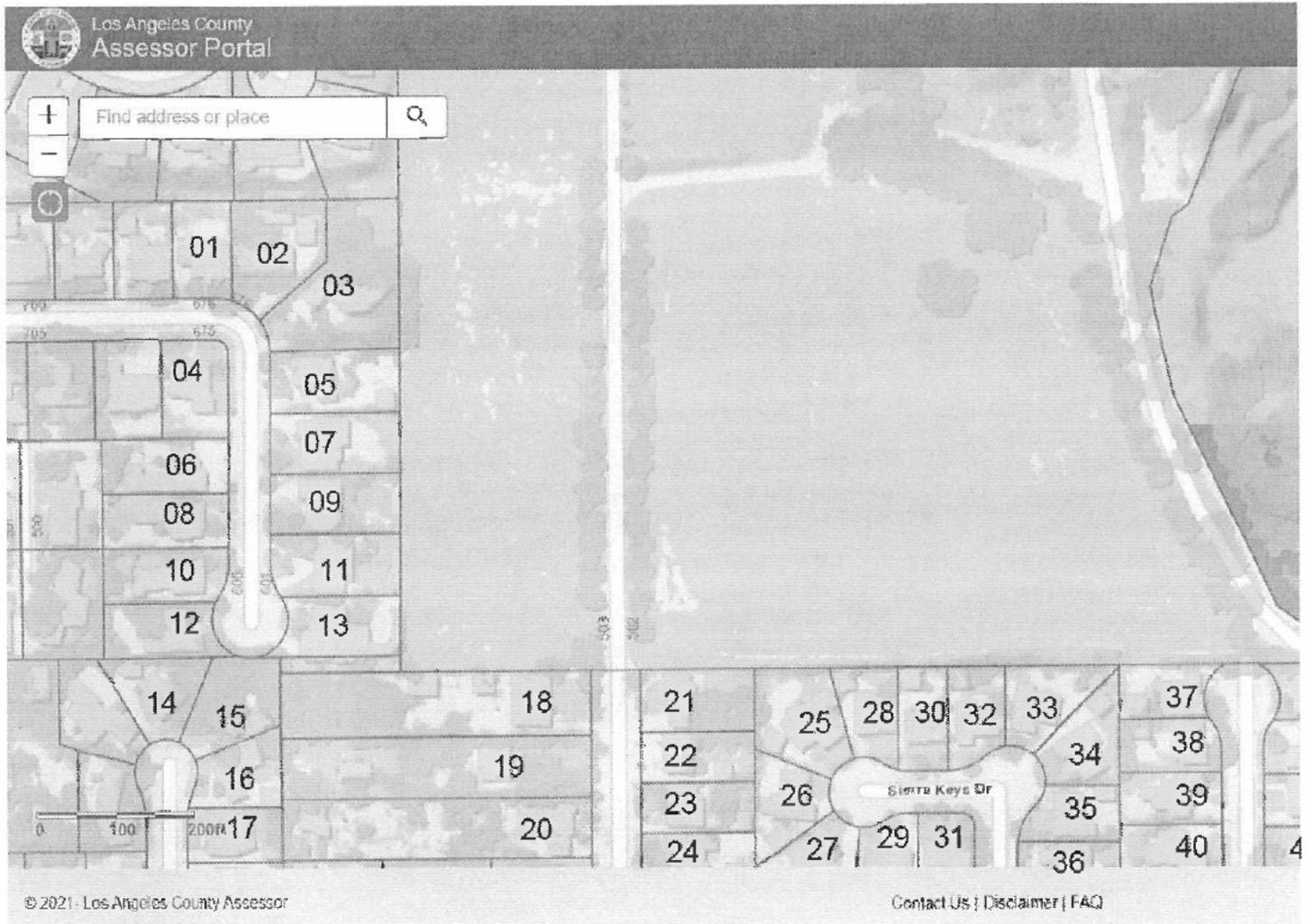
My name is Henry Leung. My family and I live at [REDACTED] North Sunnyside.

I have submitted these comments to the City before the March 1, 2022 meeting, but would like it on the record for your review.

After seeing that the Planning Application submitted by the developer did not include a Neighborhood Analysis, I decided to do it on my own.

I created a table of 50 houses that were within 300 feet on the Monastery property line, located on the west and south sides of the main property.

The houses were located on Edgeview, Gatewood, Sunnyside, Sierra Keys, Crestvale, Grove and Carter (see below aerial diagram):



Of the 50 existing houses, the average building square footage was 2008 sq.ft. and the median was 1918 sq.ft.

Only 5 of the 50 are two-stories which would be 10% of the total (see summary of results in table below):

Label	Address	Building Size (square feet)	Lot Size (square feet)	Number of Stories	Notes
1	675 Edgeview	1,819	9,046	1	5 Total two story houses 1,918 Median House Size 9,216 Median Lot Size
2	665 Edgeview	1,598	13,939	1	
3	655 Edgeview	2,451	22,651	1	
4	680 Edgeview	1,805	10,184	1	2,008 Average House Size 11,044 Average Lot Size
5	645 Edgeview	3,460	12,197	2	
6	670 Edgeview	2,641	10,808	1	
7	635 Edgeview	2,500	12,197	1	
8	660 Edgeview	3,071	10,790	2	
9	625 Edgeview	1,493	12,197	1	
10	650 Edgeview	2,352	10,387	2	
11	615 Edgeview	2,061	12,197	1	
12	640 Edgeview	1,846	9,747	1	
13	605 Edgeview	2,857	10,767	1	
14	495 Gatewood	1,749	9,612	1	
15	500 Gatewood	1,724	11,326	1	
16	490 Gatewood	1,782	8,617	1	
17	480 Gatewood	1,934	8,005	1	
18	501 Sunnyside	3,694	30,492	2	
19	481 Sunnyside	1,452	28,750	2	
20	471 Sunnyside	2,093	28,750	1	
21	500 Sunnyside	1,269	10,757	1	
22	490 Sunnyside	1,494	8,692	1	
23	480 Sunnyside	1,684	8,679	1	
24	470 Sunnyside	1,775	8,668	1	
25	523 Sierra Keys	2,880	12,632	1	
26	522 Sierra Keys	1,918	8,605	1	
27	516 Sierra Keys	2,166	7,902	1	
28	513 Sierra Keys	2,056	8,048	1	
29	510 Sierra Keys	1,918	8,385	1	
30	507 Sierra Keys	1,748	7,828	1	
31	504 Sierra Keys	1,918	7,876	1	
32	501 Sierra Keys	1,918	7,995	1	
33	496 Sierra Keys	2,166	9,153	1	
34	490 Sierra Keys	1,918	9,123	1	
35	484 Sierra Keys	1,940	7,622	1	
36	478 Sierra Keys	1,748	7,469	1	
37	501 Crestvale	1,936	7,246	1	
38	491 Crestvale	1,850	8,016	1	
39	481 Crestvale	1,583	8,025	1	
40	471 Crestvale	1,235	8,040	1	
41	502 Crestvale	1,543	9,278	1	
42	492 Crestvale	1,182	9,753	1	
43	472 Crestvale	2,128	9,814	1	
44	462 Crestvale	1,364	7,716	1	
45	501 Grove	2,036	9,006	1	
46	491 Grove	2,234	8,114	1	
47	481 Grove	1,582	8,047	1	
48	400 Carter	3,800	13,700	1	
49	500 Grove	1,895	13,503	1	
50	390 Carter	1,102	9,859	1	

I would ask how the developer proposed houses which are significantly larger than the existing average or median houses and claim to "blend with the neighborhood"?

I would also ask if more than 5 of the 42 of the proposed houses are two-story since that is unclear and would be 10% of the total.

If it is a yes to either question, then how were these both determined?

-Henry Leung

**Jen Peterson**

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**From:** sealgrl [REDACTED]  
**Sent:** Wednesday, April 6, 2022 7:35 PM  
**To:** Public Comment  
**Subject:** Housing Development at Monastery EIR COMMENT

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

**Dear Planning Commission:**

Please record my comment regarding the proposed housing development. I have grave concerns about the impact to our community, especially those who live in the immediate area.

**Traffic Impact:** I live on Sunnyside. I can attest to the current traffic situation. This neighborhood cannot handle 500 to 700 car trips per day. People already speed up and down the street. This is an extremely residential area with a ton of foot traffic. There are no sidewalks to accommodate walkers. This will be the primary entrance and exit from the site. Carter is too narrow, even with the proposed widening (not even brought up until late in the process). If this project is approved, the residents of Sunnyside will petition for speed bumps to slow the flow of traffic.

**Fire Impact:** The proposed housing development of 42 large homes is in a high fire hillside zone. It should be zoned as such, if a zoning change is approved.

**Water:** The Developers were trying to sell (and buy) the idea of Net Zero Water. We all understand that there may not even be water to buy 50 years in the future. That was a ridiculous statement to make. We should not be building homes that would increase our water consumption as a City. That is a inconsiderate disservice to the citizens that already live here.

The Monastery and especially New Urban West have not been transparent, as they say. It is extremely concerning that developers can come in and try to buy the citizens votes by spreading disinformation with expensive advertising and free dinners to the residents of this town. They are claiming that not supporting the project will impact their ability to minister to the spiritual needs of this region. I fail to see how building 42 mega homes will impact that ability. That feels like emotional manipulation that will prevent their followers from understanding the real, negative impacts of this large housing development.

Thank you for your time and for all you do for our lovely city.

Linda Hernandez  
[REDACTED] N Sunnyside Ave

## Jen Peterson

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**From:** Anna Leming [REDACTED]  
**Sent:** Wednesday, April 6, 2022 7:59 PM  
**To:** Public Comment  
**Subject:** Housing Project

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

I oppose this housing project. I am a neighbor to the west of the Monastery, but a Pasadena resident of 48 years. Here in Pasadena our homes are in a high danger fire zone and we are required to clear any trees and bushes near our home, or we are fined. These large homes will be in my backyard. Are the builders aware of how close the fires come to our homes. Can you imagine the danger of all those homes and a fire and all residents trying to leave the area? It was a nightmare for us on the west side to get out of our homes, cannot imagine 42 families, pets and all their belongings trying to get out of the fire danger.

What about all the helicopters that land here for search and rescue and also for water drops.

What about all the large buses and trucks that travel on Sunnyside to the Retreat Center, and all the additional traffic of 42 homes and their deliveries and visitors  
The wildlife will have no where to go. They have come into our yards more frequently because of what was sprayed on the field, Bears, deer and coyotes

What about the amphitheater? When they have events what do you think the residents of the new houses will tolerate? I have heard groups on this field with loud voices until way after 10.00 pm, but never complained

The building of these homes will affect our lives with all the dirt, noise for how many years? It affects our health with all that dirt and all the spraying on the field. I have a terrible gopher problem in my yard because the Monastery does not keep the grounds treated for this. My yard is ruined and I pay a monthly fee for gopher treatment.

They have used the land for parking and we have not complained about all the people and noise. In fact I enjoy all the events Good Friday the past Fiestas the masses held in the Ampitheater, I enjoyed walking to the church for Christmas Eve and enjoyed the singing of the group from Mexico.

Can't the Passionists think of a more pleasing environment for their land? The order in Chicago don't even know anything about this land and how beautiful it is and peaceful Just concerned about selling to benefit their order. They have maintained for all these years, now they want to sell and build 42 homes. Will the residents of the retreat center be safe if there is a fire? Will they be able to evacuate. What about their emergencies, the paramedics go right up on Sunnyside. How will all the emergencies vehicles, deliveries, and visitors reach the Retreat Center? Past the 42 homes?

Please stop the housing project of 42 large homes.

Thank you,

Anna Leming  
Pasadena resident  
West side of Monestary

**Jen Peterson**

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**From:** Maria Karafilis [REDACTED]  
**Sent:** Wednesday, April 6, 2022 9:03 PM  
**To:** Public Comment; planningcomission@cityofsierramadre.com  
**Subject:** Comment against the Bailey Meadows Project.

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

Please enter this comment into the public record and read it at the meeting.

As a 22-year resident of Sierra Madre, I register my profound opposition to the Bailey Meadows Project at the top of Sunnyside Ave. and urge the planning commission and city council to oppose this ill-conceived project as well. While I am not anti-development in general, this particular project should not be approved and a specific plan granting exemptions and dangerous exceptions to regulations and general plans is unethical and unacceptable.

Specifically, because of the extremely negative impact of significantly increased traffic, the building of 42 large homes in a severe fire zone (THIS ALONE SHOULD MAKE THIS PROJECT NON-VIABLE), the ongoing and devastating drought that makes water shortage another reason to oppose a development of this size, and the destruction of over 100 trees and wildlife that the project will cause, I urge the city council and planning commission to reject this proposal and seek alternatives that have more resident support and are more viable given the water, fire, and traffic implications, in addition to other reasons.

Please do the right thing and reject this proposal.

Sincerely,  
Maria Karafilis  
[REDACTED] Fairview Ave  
Sierra Madre CA 91024  
[REDACTED]

**Jen Peterson**

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**From:** Fan Qiu [REDACTED]  
**Sent:** Wednesday, April 6, 2022 9:05 PM  
**To:** Public Comment  
**Subject:** Meadows Project of 42

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

I oppose the project for the concerns of environmental health, local residents quality of life, and integrity of the surrounding nature.

Thank you,

Frances Qiu

Sent from my iPhone

**Jen Peterson**

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**From:** Nina Salerno [REDACTED]  
**Sent:** Wednesday, April 6, 2022 9:34 PM  
**To:** Public Comment  
**Subject:** Meadows Project

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

Unfortunately I can not attend the meeting tomorrow.

Please note I oppose the project as is.  
I live at [REDACTED] Brookside Lane  
Sierra Madre

Nina R Salerno  
[REDACTED]

*"In the dark times  
Will there also be singing?  
Yes, there will also be singing.  
About the dark times."*  
-Bertolt Brecht

**Jen Peterson**

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**From:** Your Planet [REDACTED]  
**Sent:** Thursday, April 7, 2022 1:28 AM  
**To:** Public Comment; Stop Housing Project; Peggy Dallas (Planning Commission); Bob Spears (Planning Commission); John Hutt (Planning Commission); Tom Denison (Planning Commission); William Pevsner (Planning Commission); Robert Parkhurst; Edward Garcia; Gene Goss; Kelly Kriebs  
**Subject:** The Reality Of Our Global Situation And Of Your Positions As City Officials Within It Applied To The Proposed Housing Project

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

Dear City Officials,

The following is the reality of our global situation and of your positions as city officials within it:

Fact 1: Humanity has never taken the stance humans vs nonhumans but rather life vs death.

Fact 2: Human civilization's destruction of the nonhuman is currently a threat to humanity's life. (Many climate scientists, for example, predict the potential collapse of human civilization by 2050, only 28 years from now. <https://youtu.be/W8bb2STkpd4>)

Fact 3: To not stand for both the human *and* the nonhuman where the former isn't at the expense of the latter and where the latter isn't at the expense of the former is to destroy humanity. (This applies just as much to any and all legal systems - and to their property laws - that refuse to or that fail to sufficiently bend their laws to these facts.)

Fact 4: The proposed housing project at the prairie is at the expense of trillions of nonhuman lives.

Fact 5: Ending the proposed housing project at the prairie would not be at the expense of the human (given the many alternative ways for the Passionists to get the money that they claim to need and given that housing of that kind isn't necessary at that location). (If the former is a matter of question, question the monastary with an EyeDetect, the most accurate lie detector on the market capable of producing evidence sufficient even for court.)

Fact 6: Those that would approve and carry out the proposed housing project at the prairie would only be destroying humanity.

Fact 8: Assuming that this legal system isn't one that wants to destroy humanity and, therefore, itself, it has the legal responsibility to end the proposed housing project. Otherwise, what ground does it have in the first place?

Again, this is the reality of our global situation and of your positions as city officials within it, *regardless of whether you or I like it or not*. As a resident of Sierra Madre, I expect that it be met with sufficient action; no less!

Thank you and sincerely,  
Syga

**Jen Peterson**

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**From:** Wanda Wong [REDACTED]  
**Sent:** Thursday, April 7, 2022 6:24 AM  
**To:** Public Comment  
**Subject:** Meadows Project

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

To Whom It May Concern,

My husband and I strongly oppose the Meadows Project as it currently stands. As homeowners on North Sunnyside for 45 years, we can not imagine the NEGATIVE impact the building of 42 large homes will have in our neighborhood.

This project is detrimental to the environment, wildlife, water usage, traffic pattern, and peace of the residents.

Please re-evaluate this project and create some alternatives that would be more of a compromise of what Sierra Madre represents. The development of 42 homes is NOT acceptable to the environment and our community.

Wanda and Bob Reefman  
[REDACTED] N. Sunnyside Ave.

Sent from Yahoo Mail on Android

**Jen Peterson**

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**From:** Lindsey Page [REDACTED]  
**Sent:** Thursday, April 7, 2022 6:42 AM  
**To:** Public Comment  
**Subject:** Opposition to The Meadows Project

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

To whom it may concern,

I'm a Sierra Madre resident who opposes the Meadows Project on The Monastery grounds as it stands. The building of 42 large homes does nothing to address the current affordable housing crisis we are in now. I might favor a smaller project geared towards affordable housing instead.

Thank you for your consideration.

Sincerely,

Lindsey Stocker  
[REDACTED] Brookside Lane  
Sierra Madre  
Sent from Yahoo Mail on Android

**Jen Peterson**

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**From:** Nancy Beckham [REDACTED]  
**Sent:** Wednesday, April 6, 2022 5:15 PM  
**To:** Public Comment  
**Subject:** Comments sent on the draft EIR of the Meadows Project  
**Attachments:** Updated Outline for Zoom 2 DEIR copy.docx; Where are the Sidewalks 2 .docx

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

To the City Planning Commission,

Over the last 9 months I have continually come to discuss my concerns regarding the Meadows Project. These are the concerns I wrote about in the draft EIR. They are the first two attachments. I also wrote concerns on the final, EIR, went to the public meeting on March 1, and voiced my concerns about the animals and the loss of their habitat. I was allowed to show a video on the endangered Townsend's Large-eared Bat which lives on the monastery land and in Bailey Canyon.

However, to have public land (maintained by the county in Bailey Canyon Wilderness Park) now to be used to widen Carter Ave and the county has yet to be approached or grant the developer that land is a total breach of honesty. But that is a part of the final EIR! How can this be? To lose an additional 17 more trees planted in Bailey Canyon Wilderness Park for the public's use so a developer can widen a piece of land to create a two lane street plus a sidewalk out of a land parcel not even considered a road is ludicrous. How can public land be used to help a developer make money on a housing project when the land outside of Bailey Canyon is not even part of the housing development land???

You can not let Carter be widened for the developer at the loss of additional demolition of mature trees and the people who use Bailey Canyon Wilderness Park for camping, hiking, and overnight scouting activities. Not one wildlife expert or biologist has gone to evaluate Bailey Canyon Wilderness Park because this street widening was added just before the final EIR was presented to the public. It was not part of the original draft EIR or someone would have evaluated that piece of land. Please stop this acceptance of the final EIR as it is terribly flawed.

Nancy Beckham

Updated Outline for Zoom 2 DEIR Created and sent Oct 7, 2021, 3:07 pm  
See additional Where are the Sidewalks? article submitted the same day.

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.

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 that 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.

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 are 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.

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????**

### **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 year's 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 cannot be purchased. .

### **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.

b. There are 5 protected types of trees in Sierra Madre of which three are Oak trees.

**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 FIG 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 Fig tree. Please do not let it get destroyed. It should be the signature for the entire housing development.** The same is true of the Coastal Oak trees. 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 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 fig tree 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 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.

#### **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.

#### 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.
  - 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 standards 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.

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

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?

3. Plan proposes ingress and egress of Carter to Baldwin with a right turn on Baldwin to get to town., and vice versa.

4. 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.

#### **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 not designed to accept more traffic than just the traffic generated from the residents of the street.

3. The street should be cull-de-sacked to protect it. It is just too narrow above Grandview. to be able to absorb additional traffic.

#### **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 the north side of 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 past the parked cars, rather one car works its 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.**

**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, generate new sales tax revenue, and fund ¾ of a policeman with their pensions paid for? That's it? Explain this please.....

Nancy Beckham

North Lima street,  
Sierra Madre, CA 91024

## 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

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.

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

Nancy Beckham

**Jen Peterson**

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**From:** Laura Joseph [REDACTED]  
**Sent:** Wednesday, April 6, 2022 4:41 PM  
**To:** Public Comment  
**Subject:** Action Item #1, Environmental Impact Report Certification

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

Planning Commission: I am writing to oppose the plan to develop a 42 unit subdivision in the field at the old monastery. This is one of the few open spaces remaining in Sierra Madre and adjacent to a wonderful park and hiking trails in Bailey Canyon. Developing the area will impact the use of that park for picnickers, hikers and nature lovers. Moreover, while the state and our region are experiencing a housing shortage, that lack is most serious in affordable housing. Any housing development should include a substantial percentage of units affordable for lower income and very low income households.

Last point: Is there a Project Labor Agreement for the project? In the absence of such an agreement, there is no guarantee that workers on the project will not be up to skills standard and there is no guarantee the project will be finished on time.

Laura Joseph

## Jen Peterson

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**From:** Stauff, Clyde [REDACTED]  
**Sent:** Wednesday, April 6, 2022 4:52 PM  
**To:** Public Comment  
**Subject:** Mater Dolorosa / New Urban West

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

The recent postcard mailing sponsored by New Urban West is disingenuous for the following reasons:

1. It implies that if you are not for the NUW development, then you are somehow against the monastery and the priests. That is not at all the case. The negative impact of the NUW development on the neighbors is the reason for the opposition. It has nothing to do with the welfare of the Catholic church or the priests.
2. There is a statement that if the NUW project is not approved, then there will be a severe impediment for the Passionists Order to continue their operations on site. That statement is not supported by any facts, it is only propaganda from NUW.

The flaws of this project have been pointed out by previous correspondence and many other residents. They continue to be:

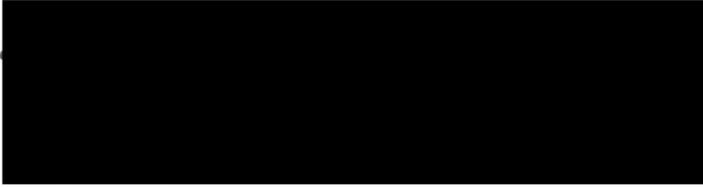
1. Pushing traffic to an overcapacity level on both Sunnyside and Carter (700-800 cars per day versus current counts under 200 cars per day).
2. The failure of the city planning commission and council to consider a more benign alternative use in the EIR (such as a senior assisted living center with 100-110 living units which would have far less impact). The 800-room multi-story hospital alternative presented in the EIR was not a realistic option, and was only presented to scare the residents.
3. The continued refusal for the city planning commission and council to consider the negative environmental impact of the NUW project including the following:
  - a. Traffic/noise
  - b. Water usage
  - c. Flat grading of natural slopes and the destruction of habitat and nature trees, regardless of hillside ordinances.
  - d. Fire and emergency ingress and egress.
  - e. Rezoning to R-1 which would allow for considerable additional density for assisted dwelling units (ADUs) and substandard sized lot splits as mandated by CA state law.
4. NUW continues deceptive lobbying tactics that include enlisting non-Sierra Madre residents for support as well as misrepresenting opposition to the NUW project as a "threat" to Mater Dolorosa.

This is all simply a grab for profit and fees based on overdeveloping a unique natural setting that should be protected. The endgame will be to include the adjacent 20 acres once residential zoning is obtained for the first phase so that there will be even more housing density and traffic. It is doubtful that the business representatives for the Catholic Church have any intention of maintaining the balance of the property as a retreat on a long-term basis given the limited amount of activity and the few residents on site. The motive is the \$25+ million pay day for the first NUW phase and the future \$25+ million payoff for the future phase.

There is a path for the monastery to be well compensated for their property with a less impactful project and the residents to be protected from an ill-conceived housing project. The City should work towards an alternative common ground that benefits both stakeholders and should deny the R-1 rezoning.

**Clyde F. Stauff, SIOR**

Senior Executive Vice President | Greater Los Angeles  
Stauff/Gan Industrial Team



**Jen Peterson**

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**From:** John Brosio [REDACTED]  
**Sent:** Wednesday, April 6, 2022 3:27 PM  
**To:** Public Comment  
**Subject:** Meadows project

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

This development is just too big for the set up.

And the water spin?!! I dont believe it.

Sent from my iPhone

**Jen Peterson**

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**From:** Rick Simpson [REDACTED]  
**Sent:** Wednesday, April 6, 2022 3:44 PM  
**To:** Public Comment  
**Subject:** opposed to "monastery" development

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

wildlife  
traffic  
water use

Rick & Margie Simpson  
Sierra Madre

**Jen Peterson**

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**From:** Andree OBrien [REDACTED]  
**Sent:** Tuesday, April 5, 2022 10:45 AM  
**To:** PlanningCommission  
**Subject:** The Meadows at Bailey Canyon

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

Honorable Planning Commission Members,

Please vote with your conscience on this pending development on the property of Mater Dolorosa Retreat Center. Don't let a small group of people who are discriminating against the Church, Mater Dolorosa and the religious community negatively influence your vote. This would be a WIN-WIN not only for Mater Dolorosa and Passionist Community, but also the residents who would have a beautiful new park, multi million property which will benefit the City with added revenue and much more benefit for the City of Sierra Madre.

Thank you for your consideration.

Andree O'Brien

**Jen Peterson**

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**From:** Gary Bacio [REDACTED]  
**Sent:** Tuesday, April 5, 2022 10:16 AM  
**To:** [REDACTED]  
**Cc:** Gene Goss; Rachelle Arizmendi; Edward Garcia; Robert Parkhurst; Kelly Kriebs; Jose Reynoso; Vincent Gonzalez; Aleks Giragosian; PlanningCommission  
**Subject:** Monastery Housing Project

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

Mr. Browning, Mr. Han and Mr. Frankel,

I am a resident of Sierra Madre and a member of Protect Sierra Madre. It has come to my attention that New Urban West has sent flyers to the homes of Sierra Madre neighbors in surrounding cities, including Pasadena urging them to send an email to the City Council to voice opposition to the Petition. As you are quite aware, the Petition and Ordinance to be placed on the ballot is to be signed and voted on by City residents only. Your attempts at garnering support from non-voting residents is deceitful and inappropriate.

The flyer also contains misinformation that the Monastery would not be able to expand their buildings and prevent the Passionists from serving the community. You know very well this is false and misleading. I would ask that you stop spreading this misinformation. Let's let residents of Sierra Madre and not others determine what is best for the City.

Gary A. Bacio Esq.  
[REDACTED]

**Jen Peterson**

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**From:** Dave Banis [REDACTED]  
**Sent:** Tuesday, April 5, 2022 8:32 PM  
**To:** Public Comment  
**Cc:** [REDACTED] Carly Keatts; Filippo Fanara  
**Subject:** Support for The Meadows at Bailey Canyon Project

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

Chair Pevsner and Commision Members:

My name is Dave Banis. I am a Sierra Madre resident.

I support individual rights. I support property rights. I support the Monastery.

**\*\*\*\*I support the Meadows at Bailey Canyon Project.\*\*\*\***

I do not support the Project Sierra Madre Petition/Initiative as it restricts individual and property rights.

Thank you.

Dave

**Jen Peterson**

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**From:** Robert Madura [REDACTED]  
**Sent:** Tuesday, April 5, 2022 2:16 PM  
**To:** Public Comment  
**Subject:** Meadows At Bailey Canyon Project

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

Hello, Regarding the public hearing April 7, 2022 regarding the proposed development project, ' The Meadows at Bailey Canyon', I voice my **opposition** to the project.

The project would permanently damage the fragile ecosystems at the proposed site, and provide nothing of value to the community at large.

I say that we must protect our quality of life for the future and not allow some developers to profit!

I have benefited from the positive environment at Mater Dolorosa Center many times over the decades. Let's leave it alone as is.

Thank you.

**Jen Peterson**

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**From:** Elsa Saldana [REDACTED]  
**Sent:** Monday, April 4, 2022 7:33 PM  
**To:** Public Comment  
**Subject:** Meadows project

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

Hello,

I am very disturbed by the proposed building of 42 homes on the Monastery property which is just East of my home on Gatewood Lane.

The loss on tranquility will be lost forever. The congestion of noise generated with 42 homes and it's occupants will impact the solace of the upper Northeast quadrant of our City.

Why not build fewer homes? Why so many homes in one area which brings so much disruption in so many ways?

Kind regards,  
Elsa Saldaña  
Gatewood Lane

Sent from my iPad

Sent from my iPad

**Jen Peterson**

---

**From:** [REDACTED]  
**Sent:** Monday, April 4, 2022 6:26 PM  
**To:** Public Comment  
**Cc:** [REDACTED]  
**Subject:** Public Comment - Planning Commission Meeting - Thursday, April 7, 2022

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

**FROM:** [REDACTED]  
**TO:** Public Comment – Planning Commission  
**SUBJ:** The Meadows Project – April 7, 2022 Meeting

Please:

- Do Not Certify the final EIR
- Do Not Amend the General Plan
- Do Not Amend the Zoning code
- Do Not Adopt the Specific Plan
- Do Not Approve the Development Agreement

This project will alter the charm and safety of our small town. I live on Orange Grove near Lima and this project will add more traffic to these streets along with Carter. I regularly walk on these streets with my dogs and observe children playing and riding bicycles in the street. There are no sidewalks on parts of these streets and the impacts will be felt by walkers, pets and children playing and on bicycles. The Draft EIR may say the impact will be insignificant but walkers, children and pets will feel the impact. Do Not allow this to happen to our small town.

It is quite clear that the availability of water in the west is declining. A few years ago Sierra Madre was talking about rationing water and the State of California is discussing this right now. The Draft EIR may say the Meadows Project will have Net Zero Water impact but when there is less water available in our environment, there is less water. We clearly should not be adding more homes with a discretionary project that requires amending our General Plan and is out of compliance with our Hillside Ordinance. Do Not imperil our already precarious water supply.

This project will clearly have a negative impact on the safety of our residents, especially our children, and our water resources. Please Do Not approve this discretionary project. If you do not approve it, you will not be infringing on the Passionist's existing rights.

Russ Guiney

**Jen Peterson**

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**From:** Christopher Wheelock [REDACTED]  
**Sent:** Monday, April 4, 2022 6:21 PM  
**To:** Public Comment  
**Subject:** Question about the housing project

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

Hi,

I have a question. How likely is it that the city would allow the proposed housing project at the prairie if, for whatever reason, Carter could not be expanded into a two-way street? Are there any existing rules that would prevent the project if that could not happen?

If it can't be answered here, may it please be addressed at the upcoming meeting on April 7th?

Thank you,  
Christopher Wheelock

**Jen Peterson**

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**From:** Bonner Meudell [REDACTED]  
**Sent:** Monday, April 4, 2022 5:03 PM  
**To:** Public Comment  
**Subject:** Please do NOT support the proposed housing development

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

To: Sierra Madre Planning Commission

I am sending this email to you because I have grave concerns about the proposed housing development in northwest Sierra Madre. I am requesting that you NOT support this effort.

The impact would be a significant increase in traffic, as well as increased fire risks. It would deplete our extremely limited water supply and would remove over 100 mature trees.

Although there is a need to provide more affordable housing, this effort is focused on large homes for wealthy people in order for wealthy developers to become even more wealthy.

Please do NOT support this proposed housing development.

Marcia Bonner Meudell  
Sierra Madre Resident

**Jen Peterson**

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**From:** Alison Snow [REDACTED]  
**Sent:** Monday, April 4, 2022 3:58 PM  
**To:** Public Comment  
**Subject:** Re: public comments for inclusion in April 7th City Council meeting

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

To whom it may concern:

Please see the email below where I request my public comments to be put into the record. I made a very stupid mistake! My comments are actually intended for the upcoming **April 7 Planning Commission**. Please make that correction for me and direct them to the **Planning Commission Agenda for 4/7/22**

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**From:** Alison Snow [REDACTED]  
**Date:** Monday, April 4, 2022 at 3:47 PM  
**To:** "PublicComment@CityofSierraMadre.com" <PublicComment@CityofSierraMadre.com>  
**Subject:** public comments for inclusion in April 7th City Council meeting

Please include my submission of public comment into the record for the upcoming **April 7<sup>th</sup> City Council meeting** addressing the New Urban West housing development at the Mater Dolorosa Retreat Center. These comments were spoken at the March 4th joint meeting of City Council & Planning Commission and due to my upcoming absence on 4/7/22, I would like my comments formally submitted into the record for this next meeting.

Thank you.

Alison Snow  
[REDACTED] W. Carter Ave.  
Sierra Madre

**Jen Peterson**

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**From:** Blonde and Brunette Productions [REDACTED]  
**Sent:** Thursday, March 31, 2022 4:43 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** New Urban West/Bailey Meadows Monastery Development Impacts on 501 Crestvale Drive, Sierra Madre 91024  
**Attachments:** 33122smpcltr.pdf; 32022LetterNew Urban West re Crestvale Drive.pdf; AppraisalPlat.pdf

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

VIA EMAIL AND CERTIFIED MAIL

Honorable Councilmembers, Commissioners and Mr. Frankel:

We request your consideration of the attached regarding the specific impacts on the above-referenced property directly abutting the southeast border of the proposed Meadows at Bailey Canyon Subdivision, based on New Urban West, Inc.'s plan presented at the March 1, 2022 Joint Study Session prior to finalization of the EIR. We ask that these concerns be addressed before or at the April 7, 2022 Planning Commission meeting.

We also request that the attached be made of record for the April 7, 2022 Planning Commission meeting.

We look forward to your response. I can also be reached during business hours at [REDACTED]

Sincerely,

Sally Shore

on behalf of Queenie Shore, Sally Shore, Natalie Shore Peterson and Jessica Shore Sarber

Sally Shore  
2219 W. Olive Avenue, #323  
Burbank, CA 91506

March 31, 2022

VIA EMAIL AND CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

City of Sierra Madre Planning Commission      Sierra Madre City Council  
232 W. Sierra Madre Blvd.  
Sierra Madre, CA 91024  
[planningcommission@cityofsierramadre.com](mailto:planningcommission@cityofsierramadre.com)

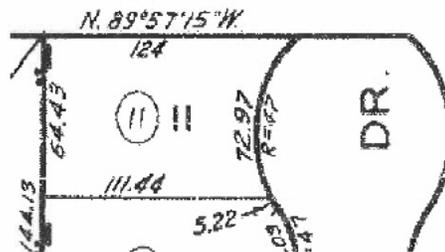
Jonathan Frankel  
Principal Project Manager

Re: Crestvale Drive, Sierra Madre 91024  
New Urban West/Bailey Meadows Monastery Development Impacts

Honorable Councilmembers, Commissioners and Mr. Frankel:

We are the daughters of Queenie Shore, resident of the above-referenced property (the "Residence") which directly abuts the southeast border of the proposed Meadows at Bailey Canyon Subdivision (the "Subdivision") located at 700 N. Sunnyside Ave. We have several concerns based on New Urban West, Inc.'s plan presented at the March 1, 2022 Joint Study Session. Our concerns relate to the direct impacts and potential easements the Subdivision will have on the Residence. Kindly note that, during the prior 6 years of planning the Subdivision, no one in our family has been contacted to discuss encroachments, easements and/or design of the Subdivision, the Subdivision's impact on the Residence's property value nor our mother's quiet enjoyment of the Residence. The attached generic March 2022 letter from the Subdivision does not address the below specific impacts on the Residence by the Subdivision.

Enclosed is the Plat Map showing the property line from the December 2019 assessment of the Residence, which includes the County's Tract Map for the Residence. It is our understanding that the northern border of the Residence extends beyond the retaining wall and into the proposed southern property line of the Subdivision, as follows:



As currently drafted and presented in the EIR, the Subdivision will encroach on the Residence. We request Setback that will adequately address encroachment on the Residence. The Residence's retaining wall abuts the Subdivision's proposed southern property line. The Residence's retaining wall cannot withstand the construction of the proposed 75-foot sewer line the Subdivision seeks to install directly bordering the Residence. The Residence is at the lowest elevation point of the development, so drainage damage could occur over a period of years. We request that, prior to finalizing the General Plan and Land Use Map, the sewer line be relocated and the Subdivision provide and pay for an independent civil engineer's assessment of the Retaining Wall and a written agreement to fully compensate for any and all damage to any part of the Residence caused by the Subdivision construction, any and all activity related to the Subdivision construction, and any and all future damage to the Residence caused by the Subdivision sewer line and drainage therefrom.

We also note that the addition of the parking lot directly bordering the Residence will negatively impact the Residence's property value. Previous iterations of the Subdivision indicated homes or a park would border the Residence. We request that the Subdivision parking lot and proposed park be removed, and replaced by a walking path set back to the northernmost edge of the buffer zone with low native landscaping to prevent blocking the view from the Residence.

We ask that the Subdivision's easements on the Residence be addressed with the undersigned prior to finalization of the EIR. We look forward to a response by April 5, 2022, to ensure these concerns are addressed in advance the April 7, 2022 Planning Commission meeting.

Sincerely,

*/s/Sally Shore*  
Sally Shore

*/s/Natalie Shore Peterson*  
Natalie Shore Peterson

*/s/Jessica Shore Sarber*  
Jessica Shore Sarber

Enclosures:  
2020 Assessment [REDACTED] Crestvale Drive  
[REDACTED] Crestvale Drive retaining wall evaluation

# Support the Monastery

THE MEADOWS AT BAILEY CANYON

Dear Neighbor,

The Meadows at Bailey Canyon is a proposed new community on a portion of the Mater Dolorosa Retreat Center. Over the last couple of years, we have worked with both the community and city staff to refine the plan and to minimize impacts to our neighbors as much as possible. One of our shared successes is ensuring that **there will be no modifications to the Crestvale cul-de-sac.**

We appreciate your ongoing feedback. If you have any questions about The Meadows or want to set up a group meeting with your neighbors, we welcome you to reach out to us so we can schedule a meeting or call.

Please contact Carly Keatts:

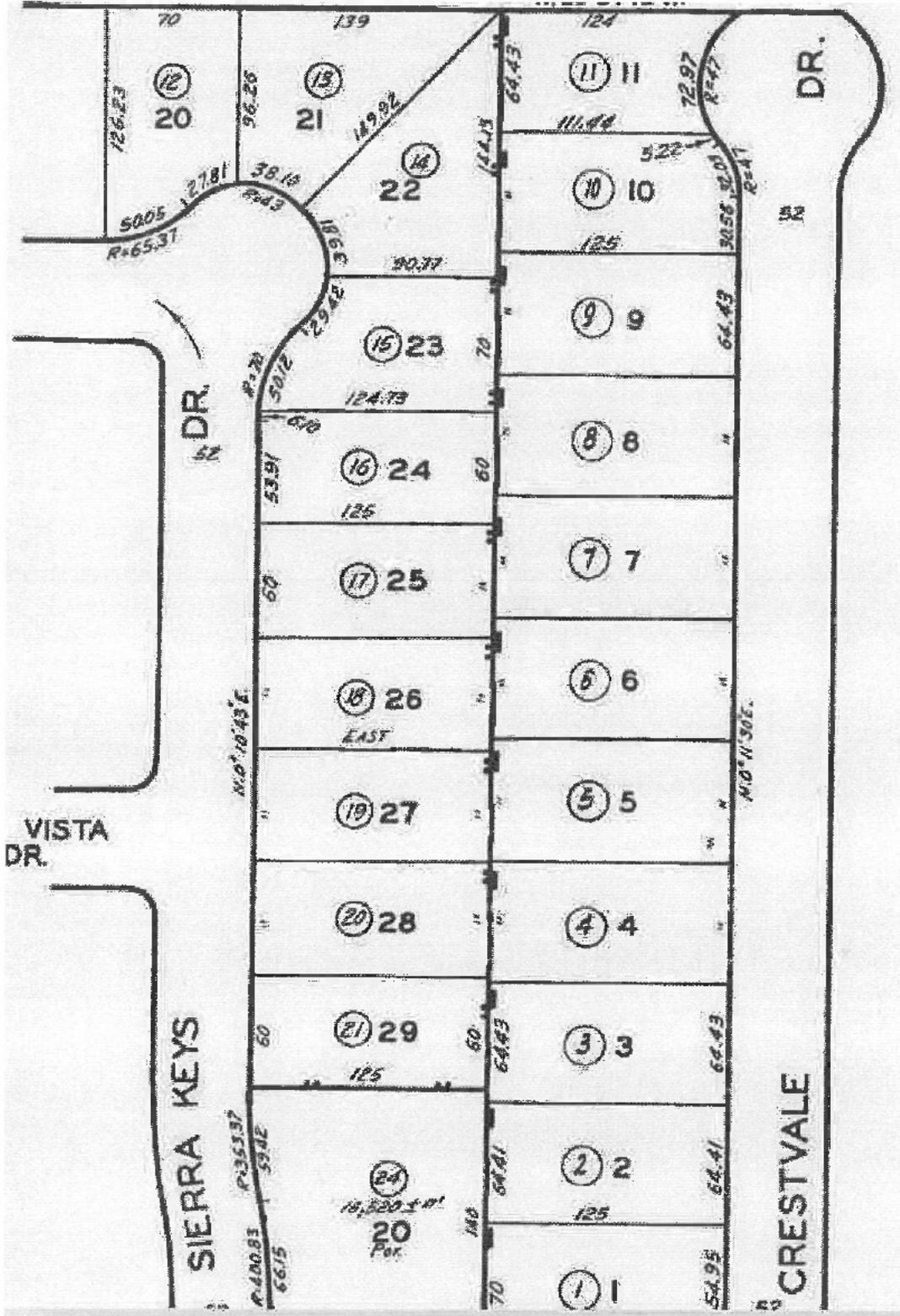


To learn more, visit our website at:  
**SupportTheMonastery.com** or scan the code ►



### Plat Map

Borrower	Shore Trust		
Property Address	[REDACTED]		
City	Sierra Madre	County	Los Angeles
Lender/Client	Shore Trust	State	CA
		Zip Code	91024



License



Business, Consumer Services & Housing Agency  
**BUREAU OF REAL ESTATE APPRAISERS**  
**REAL ESTATE APPRAISER LICENSE**

**John G. Durbin**

has successfully met the requirements for a license as a residential real estate appraiser in the State of California and is, therefore, entitled to use the title:

**"Certified Residential Real Estate Appraiser"**

This license has been issued in accordance with the provisions of the Real Estate Appraisers' Licensing and Certification Law.

**BREA APPRAISER IDENTIFICATION NUMBER: AR 019470**

**Effective Date: February 18, 2018**  
**Date Expires: February 17, 2020**

*Jim Martin*  
Jim Martin, Bureau Chief, BREA

3038876

THIS DOCUMENT CONTAINS A TRUE WATERMARK - HOLD UP TO LIGHT TO SEE "CHAIN LINK"

**From:** [bruce and alice elliot](#)  
**To:** [Public Comment](#)  
**Subject:** April 7th comment  
**Date:** Thursday, April 7, 2022 3:15:43 PM

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

We are residents of Sierra Madre. Our address is [REDACTED] Manzanita.

We are registering our opposition to the proposed development on the Mater Delorosa Property. The development would have a long term negative effect on the environment. Many trees would be removed which we need for the health of the ecosystem. Many more houses would translate into a significant increase in water usage. This development would also be located in the site of an earthquake fault. This would cause danger to anyone who would reside in these homes.

The rights of private property owners are noted but this is a situation where the common good must rule.

We are strongly opposed to the approval of this development.

Respectfully,  
Bruce and Alice Elliott

**From:** [Barbara Vellturo](#)  
**To:** [PlanningCommission](#); [Public Comment](#); [Barbara Vellturo](#)  
**Subject:** CDFW COMMENTS ON THE FEIR  
**Date:** Thursday, April 7, 2022 1:27:37 PM  
**Attachments:** [CDFW\\_response\\_The Meadows FEIR.pdf](#)

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

To the Planning Commissioners

A comment submitted by CDFW to the FEIR is attached

In their original comment on the DEIR, the California Department of Fish and Wildlife expressed serious concerns about what they found to be significant environmental impacts in the proposed development. Among other things they recommended that Studies be done, especially as to the protected Mountain Lion - AND THAT THE EIR SHOULD BE RECIRCULATED to the public with that information.

As with all other comments, the FEIR minimized their concerns, referring only to an absence of "natal dens" a small part of what is considered "habitat"

CDFW submitted an email to the City addressing the inadequate response to their comment. Since we don't know if Staff has provided that to you as part of the extensive items you need to study, it is attached.

While the CDFW is aware of the newly added "Off site Improvements" - the road widening of W Carter that would severely impact the flora and fauna of Bailey Canyon Wilderness Park, they are unable to comment until they have been provided notice of the project and are able to review all studies and analyses. They are aware of the fact that, despite the Arborist's statement that the land and trees to be impacted are a "City Park" they are in fact on land owned by LA County Flood Control District. The City of Sierra Madre has leased the Park area but does not own the land to be "aquired" by the developer. The County was not given notice of the planned impact to their Wilderness Park.

Representatives of CDFW did comment in a phone conversation that all of their comments on the Meadows project impacts would apply equally to construction and tree removal in the adjacent park.

As with the many deficiencies and discrepancies cited by our attorney, this letter should be added, to be considered in your decision whether to require that the FEIR be revised and recirculated.

(e) "A decision not to recirculate an EIR must be supported by substantial evidence in the administrative record."

Barbara Vellturo  
Protect Sierra Madre  
Stop the Housing Project

**From:** [Barbara Velturo](#)  
**To:** [Public Comment](#); [PlanningCommission](#); [Barbara Velturo](#)  
**Subject:** CHANGES IN THE FINAL EIR - WATER  
**Date:** Thursday, April 7, 2022 4:32:40 PM

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

To the Planning Commission

WATER - ONE OF THE MANY CHANGES IN THE FINAL EIR AFTER REVIEW BY THE CITIZENS - It must be recirculated so the City and the Citizens can have a true idea of the many impacts not shown in the Draft EIR

One of the very many changes in the "Final EIR" was to the very critical water supply and the impact of the development on our water supply .

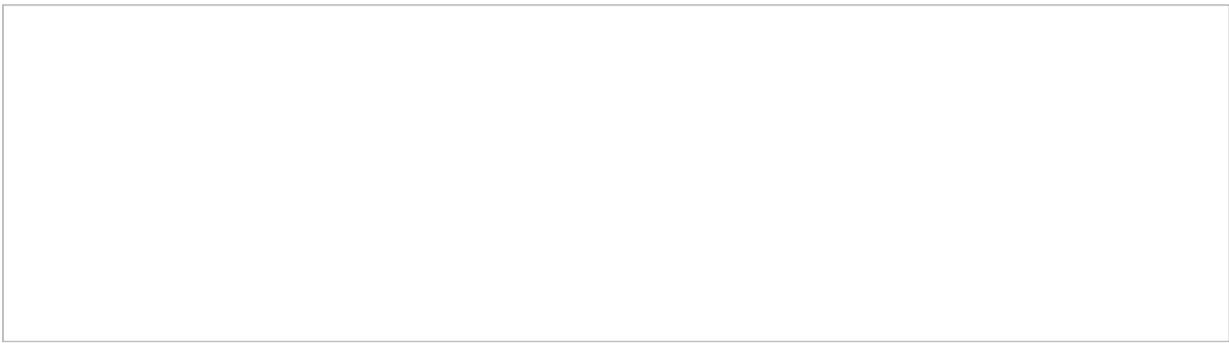
There was a very significant increase in the amount of water used by the project and a recognition that SGVMWD (San Gabriel Valley Municipal Water District) would NOT have sufficient water, even in normal years, to supply any surplus water to Sierra Madre. (SGVMWD had shown that trend even earlier in the year but it was not shown in the circulated document)

There is absolutely NO explanation as to the change in these numbers and why, with over a year to create the DEIR, this significant change was only discovered AFTER the Draft had been reviewed. Yet this is the version they are asking the Planning Commission to approve. Will they find yet another discrepancy after the approval. It must be explained - and to the people who will suffer if there is insufficient water.

In DEIR

As described in Section 4.19.5, the proposed project would result in an increased water demand of approximately 11.91 AFY, resulting in approximately 0.51% 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. As discussed in Section 4.19, Utilities and Services Systems, of this EIR, the project would not use groundwater during construction

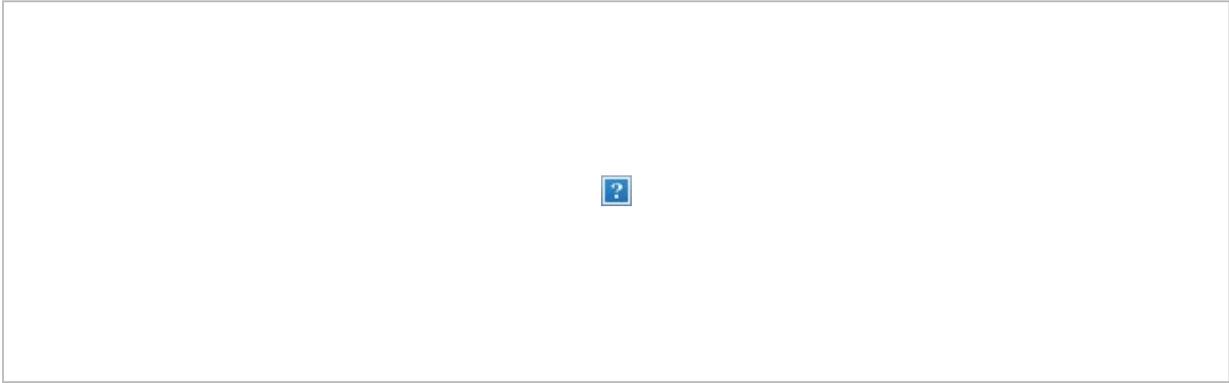
Volume II FEIR



(CHANGED - DOUBLED) THE PROJECTS WATER DEMAND - DID THEY CHANGE THE AMOUNT THEY WILL PAY TO OFFSET THE WATER USAGE? AND HOW WAS SUCH AN ERROR IN CALCULATION MADE)



(Has admitted that SGVMWD does NOT have sufficient water supplies. But does not do any analysis of how the alternative plans would be created and managed by the City and how they would offset the water used by the project)





**From:** [Shashi Narang](#)  
**To:** [Public Comment](#)  
**Cc:** [Sonia Narang](#); [Prem iPad Narang](#)  
**Subject:** Comments for Public Hearing on April 7, 2022 regarding proposed 42 lot residential subdivision  
**Date:** Thursday, April 7, 2022 2:07:28 PM

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

Dear Sierra Madre Planning Commission and City Council,

As a long-time Sierra Madre family who has lived here for over 50 years, we are very concerned about the negative impacts of the housing project on our community. Here are the main points we would like you to understand:

- (1) The property owned by the Congregation of the Passion, Mater Dolorosa Community needs to remain a housing-free zone to maintain the natural environment of Sierra Madre.
- (2) Building 42 homes on this property will lead to a tremendous increase in traffic, vehicle noise, and construction debris around the quiet residential streets of Sierra Madre.
- (3) This will have an effect on the physical and mental health of local residents, including those who have lived in Sierra Madre a very long time. These families, and especially elderly residents, will suffer due to a surge of noise pollution, along with increased traffic, and air quality impact.
- (4) This housing construction project and increased traffic will disturb the unique peace and quiet that drew many families to the quiet, village-like community of Sierra Madre years ago.
- (5) Public safety will also suffer from this excess traffic. We see children walking and riding their bikes on the side streets near the Monastery. The increase in traffic and construction trucks carrying heavy-duty building materials will cause havoc in the lives of these young children, their parents, as well as walkers, joggers, hikers, and senior citizens going for their daily walk.

We strongly urge you not to make any changes to the current zoning – this change would have a massive negative impact on the well-being of your city's dedicated residents. We do not support the building of 42 new homes at the Mater Dolorosa Monastery.

Thanks for listening to the concerns of long term Sierra Madre residents.

Best Wishes,  
The Narang Family, Sierra Madre

**From:** [Amy Wasson](#)  
**To:** [Public Comment](#)  
**Subject:** Comments for 04/07/2022 Planning Commission Meeting  
**Date:** Thursday, April 7, 2022 2:57:11 PM

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

To: Sierra Madre Planning Commission

I wanted to voice some of my concerns for the proposed project at the Retreat Center property.

1. Although the traffic study did not report impact on traffic, I believe that is because the formula is flawed. This development will have a huge impact on numerous streets, particularly Sunnyside. This increase in traffic will have a negative impact on our neighborhood.
2. We need to push the developer to present us with a better project. There are options for a development that will allow many of the trees to be saved.
3. I don't care how much money they pay the city in advance for water, there are no guarantee it will be there in the future. a water efficient home may have less impact, but it still has impact.
4. The fire danger is real, and we need to start taking this seriously.

Regards,

Amy Wasson  
[REDACTED] W. Sierra Madre Blvd

**From:** [Alexander Arrieta](#)  
**To:** [PlanningCommission](#); [Public Comment](#)  
**Subject:** Comments For April 7 2022 Meeting  
**Date:** Thursday, April 7, 2022 4:45:13 PM

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

Please place the public comment below on the record for the Planning Commission meeting on April 7 and forward to the Commissioners.

Thank you.  
Alex Arrieta

It's anticipated that New Urban West has invited people that live outside Sierra Madre to attend the meeting tonight. Please indicate at the outset of the meeting, as is done at City Council meetings, that any speakers must provide their home address to confirm they are residents of Sierra Madre.

## Crotch's Bumble Bee | Xerces Society

*Bombus crotchii*



(Photo: bugguide.net)

U.S. State

California

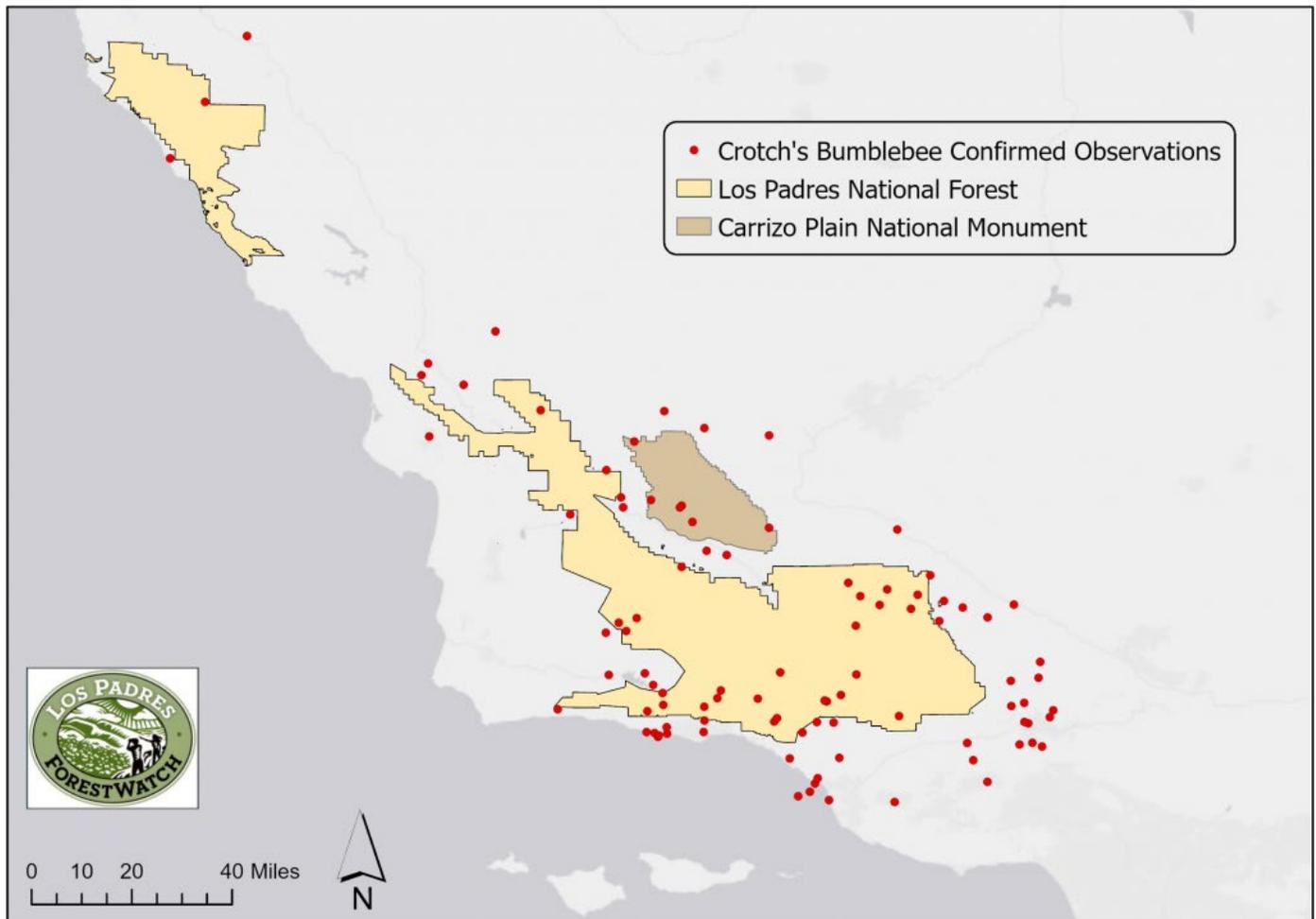
Nevada

Description

This species occurs primarily in California, including the Mediterranean region, Pacific Coast, Western Desert, Great Valley, and adjacent foothills through most of southwestern California. It has also been documented in southwest Nevada, near the California border.

Conservation Status: Endangered as of 2014 under the IUCN Red List

Analysis suggests sharp declines in both relative abundance and persistence over the last ten years. This species was historically common in the Central Valley of California, but now appears to be absent from most of it, especially in the center of its historic range. Current range size relative to historic range: 74.67%. *Bombus crotchii*, commonly called Crotch's bumblebee, is a species of bumblebee named after the entomologist George Robert Crotch. The Crotch's bumblebee can be distinguished by its square-shaped face and rounded ankle on the midleg. Queens and workers (females) have a black head and face and display black color on their mid and bottom thorax and between their wing bases. The appearance of drones (males) varies slightly from queens and workers; drones display yellow hair on their faces, and a black stripe mid thorax. The front of the drone abdomen should have a yellow coloring, and the rest of their abdomen is expected to be predominantly black and red. Workers are active from April to August and queen bees are active for only two months from March until May.



It is classified as endangered due to the impacts of pesticides, climate change, and human development.



**From:** [Gerd Parker](#)  
**To:** [Public Comments](#)  
**Subject:** environmental impact report meeting on April 6 2022  
**Date:** Thursday, April 7, 2022 2:08:03 PM

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

Hi All,

I'm very sorry that I can't make the meeting tonight, but I have a few things I like bring up again !

Since I live the last block before entering 700 Sunnyside Ave. we will be impacted with a lot traffic from day1.(costruction workers)

Water shortage (Where will they get water in their catch basins, if we don't get any more rain than we have in last few years ?)

We are very close to a earthquake fault !

And what about all the mature trees they plan to remove, we need more trees, not less !!!

This is just a few things that needs brought up, there many, many more

I have lived in the same house since on Sunnyside since 1976 and it is very sad to see what's happening to our UNIK LITTLE TOWN

Sincerely

Gerd Parker

**From:** [Matthew Bryant](#)  
**To:** [Public Comment](#)  
**Cc:** [Rachelle Arizmendi](#); [Gene Goss](#); [Edward Garcia](#); [Kelly Kriebs](#); [Robert Parkhurst](#)  
**Subject:** from Matt Bryant re: Project at the Meadows  
**Date:** Thursday, April 7, 2022 4:54:16 PM

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

Dear Planning Commissioners:

I am adamantly opposed to the housing project at "The Meadows" which will actually be destroyed if they were to get approval.

This project has a number of fatal defects:

1. It will result in a dangerous increase in traffic throughout an area that does not have sidewalks. The neighbors on Sunnyside have complained in the past just about the traffic coming from the Retreat Center. If you add to that the increased traffic from 42 homes, visitors, deliveries and a public park, it will simply be too much for that neighborhood. Likewise, the other ingress/egress point at Carter and Bailey Park just doesn't work. The Bailey Park area is a mess particularly on weekends. There is always overflow parking that spills over going down Grove often to Fairview and beyond. Because there are no sidewalks, people have to walk on the street to get up or down from the park.. With cars parked on both sides of the street, it's impossible for cars going south on Grove or north on Grove up to the park to pass each other at the same time. One car has to find a place to pull over so the other car can pass and perhaps dodge a few pedestrians in the process. And that's the conditions right now. If you add the traffic from 42 additional homes, visitors, deliveries and another park, you will only increase the congestion. This city has been put on notice about what would be an accident waiting to happen because cars and pedestrians don't mix. This would be an ongoing liability issue for the City.

2. The project will further exacerbate our diminishing water supply. We are going into one of the worst droughts in the state's history and its only projected to get worse. The drought conditions are worse than the conditions that stopped the project in 2014 when the water meter moratorium was enacted. If that moratorium was needed back in 2014, then it's really needed now. It's only empty promises to assume you can buy water in the future. It may not be available and we can't take that chance. Net Zero Water use is a farce and a gimmick. Every resident will be impacted by rate increases and rationing were this project to get approved.

3. More than 100 mature trees will be destroyed and the wildlife that currently inhabit the "meadows" will be displaced. Most cities love open space. The last large open space in Sierra Madre would be gone forever.

5. The immediate neighbors will have their views, privacy and property values severely impacted by a project of this magnitude and it is all contrary to provisions in the General Plan that protect neighbors from such impacts. After all this time, Mater Dolorosa and their developer still can't even commit to 1-story homes on the west side or south side of the projected development. They have said for the last 10 years that they will listen to their neighbors and build a project that will take the neighbor's concerns into account. Well, they must have done something wrong because almost every neighbor is against the project.

Finally, the Planning Commission and City Council have no obligation legal or otherwise to approve a bad project that will have so many negative impacts on the residents of Sierra Madre. I get that Mater Dolorosa and their Santa Monica developer want to maximize their profit and build the biggest most impactful project they can. But they can't do it at our expense. The same way I can't re-zone my property and put up a 10-story skyscraper, they shouldn't be able to re-zone their property and do whatever they want with a Specific Plan that violates our General Plan and Municipal Code.

I have every confidence in this Planning Commission, who's members don't reside in Santa Monica but in Sierra Madre, will do the right thing, scrutinize every detail of this project and ultimately come to the same conclusion as your fellow neighbors that this is the wrong project for this location.

Thank you.

Matt Bryant  
█ Edgeview Drive  
Sierra Madre, CA

April 7, 2022

Planning Commissioners  
City of Sierra Madre  
232 W. Sierra Madre Blvd.  
Sierra Madre, CA 91024

RE: Monastery Development

Dear Sierra Madre Planning Commissioners:

I am reaching out to you to express my opposition to the proposed 42-home development project referred to as "The Meadows at Bailey Canyon." There are countless reasons to deny this project, it seems, and only one to support it: obscene profiteering at the expense of the entire community.

You indicated in the Notice of Public Hearing that the intent is to rezone the subject property, if this application is approved, from institutional to residential low-density; 42, 3,800 square-foot homes built on a 17-acre parcel, with the potential development of an additional 42 ADUs (one per lot) is **NOT** "low density." That would equate to up to six homes per acre, with very little space between them, which makes a joke of the name of the proposed project, since there will be absolutely no "meadows" remaining. The proposed project specific plan is calling for setback waivers to allow the developer to squash as many houses as possible onto the subject parcel. You also directed residents to contact the Planning and Community Preservation Department for further information on this subject. How is the massive overdevelopment of our hillsides even remotely conducive to "Community Preservation??!"

When hillside zoning was implemented in town several years ago, the monastery was supposed to be rezoned to "Hillside/Institutional" in the process of defining the zoning of other hillside properties located above Grandview Avenue; the monastery must have pulled in some favors at the time, because they refused to be included in that land-use definition and the city gave them a pass. This current project violates Sierra Madre building code and zoning ordinance. It is diametrically opposed to the sentiments memorialized in the last General Plan update to hold further development in town to those standards in order to retain the small-town ambience we cherish – an update in which Sierra Madre residents were actively engaged for years, working hard together to anchor those sentiments in a rational guiding document. The monastery's proposed project does not adhere to that guidance in any way. I question their particular sense of entitlement to seek this kind of development of their property; property rights are, after all, generally subject to local building ordinance for a reason.

This massive overdevelopment will negatively impact Sierra Madre residents due to: a) greatly increased traffic not only in the immediate vicinity of the proposed project, but throughout town (try driving along the main east-west and north-south arteries – Orange Grove, Grandview, Sierra Madre, Mountain Trail, Baldwin, Lima, Sunnyside and Michillinda – during high peak traffic times in the morning and late afternoon now); b) severe pressure exerted on our already beleaguered water resources (the developer's claim of "net zero" water usage during this historic drought in California is a blatant lie); c) wholesale displacement of the wildlife that has browsed that meadow area for hundreds of years – wildlife that Sierra Madre pledged to protect via Resolution 72-62 self-proclaiming the city as a wildlife sanctuary; d) decimation of over 100 trees on the subject property to clear the land for building; e) the phenomenally increased fire risk to the rest of the community posed by such dense development in the hillside area; f) the threat of reduction of Bailey Canyon Park, with even more tree removals, for street-widening of Carter Avenue to accommodate egress on the eastern edge of the subject property; and g) the inescapable increased noise and air pollution that would result from such a massive housing development.

It's interesting how the monastery fathers have shifted their focus from being "stewards" of the land to being its plunderers. I expect it would not be long before they sell the remaining acreage since there can be no "retreat" where 42 to 84 homes litter the landscape fronting the retreat house. It's painfully disconcerting that our so-called city leaders have so abandoned their constituency by attempting to fast track to fruition this obviously unacceptable overdevelopment. As you of course know, Sierra Madre is a rather small town – three and a half square miles of a relatively peaceful, calm and quiet mix of residences, institutions (schools and churches, primarily), and businesses. which we happily cohabitate with various species of wildlife. The proposed project on the monastery grounds would disrupt this calm permanently. I would not have invested my labor and financial resources into a home here 30 years ago if I had known that our city would irresponsibly, illogically and seriously entertain such building proposals.

I am pleading with you – our Planning Commissioners and perhaps our last and best defense against such overdevelopment, since our city council members don't seem to care much about the community's long-term welfare – to make the necessary findings to reject this project and protect Sierra Madre now for both its current and future residents. Thank you for your attention.

Sincerely,

Shirley Moore  
Resident/Homeowner, Sierra Madre

cc: Stop Housing Project

**From:** [Karin D.](#)  
**To:** [Public Comment](#)  
**Subject:** Monastery Development Proposal  
**Date:** Thursday, April 7, 2022 4:12:32 PM

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

Dear Public Comments,

I am writing today to “voice” my disappointment in how this whole process has been handled. The last time we were in such dire straights where water was concerned a moratorium was enacted with regards to new construction/water meters. This time around the water situation is much, much more dire (a literal water emergency) and yet the city is taking no action to protect the interests of its existing citizenry and our properties; putting our future water (perhaps lives) at risk. Why is that? I am horrified at the way this is being handled. The city is asking its citizens to conserve water and then out of the other side of its mouth it is saying we have plenty of water to build 42 McMansions in our water threatened town, not to mention the myriad other ways this project will negatively impact our daily lives. The magical water that was touted as Net-Zero (a misleading term if ever there was one and which has now been dropped, essentially admitting the lie, for some other likewise magical, misleading terminology). I hear no mention of these facts and legitimate concerns from any members of the Planning Commission or City Council. If I’m incorrect about this, please let me know. Please let me know if any one of you have spoken out in public about your concern over the jeopardy this project will put our existing population in as our water grows scarcer with each passing year. As I write this the temperature is nearing 100 degrees and it’s only the beginning of April! Does that mean anything to any of you? Do you have children? Do you have grandchildren? What will be left for them?

I wonder how aware any of you are as to the underhanded, misleading, disinformation (aka lying) going on by the developer? Are you aware they are recruiting people from other towns with offers of free meals in order to stack tonight’s audience with out-of-towners posing as proponents of this project in \*our\* town? It’s shameful. Disgraceful. Immoral.

The Monastery says their religious freedoms are being infringed upon. This has nothing to do with religion. It is another untruth by the developer and the Monastery. Playing that card is totally disingenuous and mean spirited. Being against this project has to do with legitimate, heartfelt concerns by our citizens for our very small, very vulnerable, very precious, unique home. It’s so offensive and so disappointing, especially coming from an institution that has been supported by this community for the entirety of its existence.

Where is your concern? I would like to hear it. Why did we think that you serve on this commission/council to protect our interests and preserve our precious treasure of Sierra Madre?

In closing, please correct me if I have gotten something wrong here. I would truly appreciate it.

Sincerely,  
Karin Delman

**From:** [Barbara Vellturo](#)  
**To:** [PlanningCommission](#); [Public Comment](#); [Barbara Vellturo](#)  
**Subject:** Planning Commission Rezoning and Variances  
**Date:** Thursday, April 7, 2022 3:23:42 PM

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

To the Planning Commission and City Council Members

The documents you are being asked to evaluate are voluminous - the DEIR, the FEIR, Volume 1 (an amendment to the FEIR to respond to several dozen pages of comments from 4 individuals and 2 organizations that the City somehow "overlooked" - and there was never any announcement to the citizens that any amendment to the "FINAL" Deir was on the City Website) And Volume 11 (apparently a comprehensive "FINAL" EIR with helpful underlines and strikeouts to show the MANY changes - no notice given to the Citizens of that document either) Thousands of pages of documents, some with conflicting facts.

However, the basic decisions you are being asked to make are simple and familiar to the commission members. And have long ago been established as the standards we will adhere to.

The first and essential issue that may be before the Planning Commission will be whether to rezone the property from Institutional to a Specific Plan Zone (or a residential zone, Specific Plan overlay). That is a prerequisite for the project to take place.

The Sierra Madre Ordinance on rezoning, based on an application from a property owner says:

17.64.050 - Decision.

A. After conducting a hearing on any proposed amendment, the commission, based upon its decision as to whether the public interest, convenience and necessity so require, shall take one of the following courses of action:

However, in order to determine whether the "public interest, convenience and necessity" require the rezoning of the Meadows property from Institutional, the Planning Commission needs to be aware of the many impacts the rezoning would have on the community. Even those impacts that have been mitigated (or that the developer claims have been mitigated) are impacts nevertheless.

It may also require a comparison between those impacts and ones that would occur in an Institutional Development - IF A DEVELOPER WAS REQUIRED TO ADHERE TO THE ZONING, CONDITIONAL USE AND

MASTER PLAN REQUIREMENTS of that zone. Such a comparison would show that the Huge Buildings shown in the Developer's presentations and included as "Alternatives" in the EIR would never be allowed by our City. IF OUR ORDINANCES WERE ADHERED TO - we have no doubt at all that the owner and developer would also seek to override those restrictions if required to develop under the Institutional Zoning.

Obviously UNLESS the Planning Commission finds that "the public interest, convenience and necessity" REQUIRE the suggested development, they should deny the rezoning.

The second issue before the Planning Commission is the adoption of the presented Specific Plan. That plan would set its own zoning regulations. Essentially what they ask for in seeking approval of the Specific Plan is VARIANCES from the ordinances which regulate all other Single Family Housing in Sierra Madre. They are seeking variances from house sizes and lot coverage, as well as set backs. The Plan also allows many changes after the plan is adopted (up to 20% in some cases) with only the approval of the Director of Planning.

If the City's standards for approving Variances is applied to these Single Family Homes, the basis for approving or denying the plan that enacts these variations rather than our carefully crafted ordinances is clear.

## **Chapter 17.60 - VARIANCES AND DISCRETIONARY PERMITS**

- **17.60.010 - Variances.**

- When practical difficulties, unnecessary hardships or results inconsistent with the general intent and purpose of this chapter occur by reason of the strict and literal interpretation of any of its provisions, a zone variance may be granted in the manner hereinafter set forth in this chapter.

- 

- Any variance granted shall be subject to such conditions as will assure that the adjustment thereby authorized shall not constitute a grant of special privileges inconsistent with the limitations upon other properties in the vicinity and zone in which such property is situated.

- 

- A variance shall not be granted for a parcel of property which authorizes a use or activity which is not otherwise expressly authorized by the zone regulation governing the parcel of property.

- 

- **17.60.020 - Variances—Burden of proof.**

- Before any zone variance is granted, the applicant shall show, to the

reasonable satisfaction of the body hearing such matter, that there are special circumstances applicable to the property involved, such as size, shape, topography, location or surroundings, which do not generally apply to other adjacent properties included in the same zone as the subject property, which make the granting of the zone variance necessary in order to facilitate a reasonable use of the property involved.

The deliberate use of the word "shall" means that the rezoning can not be granted unless the applicant can show that there is no reasonable use of the property unless it is rezoned.

"In the context of statutes, cases such as this one from California, explain that "settled principles of statutory construction direct that courts ordinarily construe the word 'may' as permissive and the word 'shall' as mandatory, particularly when a single statute uses both terms." <https://www.law.cornell.edu/wex/shall#>

Although there are MANY factors to be considered in coming to a decision in this matter, our existing Ordinances do simplify the appropriate standards to apply when granting a single applicant property rights that are unavailable to any others in Sierra Madre whose property is within the Single Family Residential property Zone.

**From:** [Meg Cranston-Cuebas](#)  
**To:** [Public Comment](#)  
**Subject:** Please Preserve Sierra Madre  
**Date:** Thursday, April 7, 2022 2:30:11 PM

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

Dear Members of the City Council and Members of the Planning Commission,

As a longtime Sierra Madre resident, I am writing to express my deep concern regarding any plans to allow New Urban West to build a large housing development on institutionally zoned land.

The benefits of the proposed project to New Urban West are clear, but do we really want to sell our town so that a developer can make more money?  
Are the opinions of other cities' residents even relevant to a discussion about the future of Sierra Madre?

Please consider that the residents of Sierra Madre all chose to live in a city that has a long history of protection against overdevelopment.

We all chose to live in a city that has a history of working to protect the physical and natural environment.

We all chose to live in a city that has a history of looking forward in order to maintain a sustainable community.

Large developers such as New Urban West have razed much of California. Must they do it in Sierra Madre?

As residents, we respect the city regulations designed to protect mature trees.

Why should a wealthy developer be permitted to get around those restrictions and destroy **101 mature trees** in order to maximize personal profit?

As residents, we respected a building moratorium and continue to work hard to reduce our environmental impact by restricting water usage during the ongoing **drought**.

Why should we allow a wealthy developer to flaunt those attempts in order to build multi-million dollar homes to maximize personal profit?

I urge you to listen to the residents of our beloved town.

Please allow a ballot measure regarding the issues related to this proposed housing development so that all Sierra Madre *residents* can be heard.

Respectfully,

Margaret Cranston-Cuebas

**From:** [Preserve Sierra Madre](#)  
**To:** [Public Comment](#)  
**Subject:** Comments for Planning Commission Meeting  
**Date:** Wednesday, April 6, 2022 2:56:24 PM  
**Attachments:** [EIR Comments to PC 4.6.22.docx](#)

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

Good Afternoon,

Attached please find our comments for inclusion into the public record for the first Planning Commission meeting on April 7th regarding the proposed 'Meadows' housing project.

Please distribute to the Commission members.

Thank you,

Preserve Sierra Madre

## EIR Comments

Preserve Sierra Madre, a group of citizen volunteers, appreciates the opportunity to present the results of our review of the Meadows at Bailey Canyon EIR and Specific Plan. The proposed Meadows development will create 42 large, luxury homes on currently open space adjoining the Angeles National Forest and the Mater Dolorosa Retreat Center.

### We have several serious concerns.

The proposed Meadows development will create 42 new homes on currently open space adjoining the Angeles National Forest, the Mater Dolorosa Retreat Center, and current neighborhoods along Sunnyside, Carter, and Lima streets. At current housing prices this represents well over \$200 Million in income for the developers. There will be a \$55k city fee for each house, which would total around \$2.3 Million. This is a one-time infusion of funds. Once the units are sold, the developers are done and the city has at least 42 individual new residential units to serve forever. The question is whether the \$2.3M in fees adequately remediates the lifetime impacts to the people of Sierra Madre, as assessed in this DraftEIR.

Some of us were members of the Sierra Madre General Plan Steering Committee, which worked from 2010 to 2015 to produce the current General Plan (GP). The GP was the result of door to door surveys, town hall meetings, and neighborhood meetings with groups from all over Sierra Madre. The resulting General Plan reflects the desires of the majority of residents of our community, and was reviewed, approved, and adopted by the Planning Commission and the City Council.

The proposed Meadows plan and DraftEIR violates dozens of key goals, objectives, and policies of the General Plan, in spite of its overwhelming claims to be consistent with it.

The DraftEIR for the most part is written from the perspective of the Project and its residents only, not on the city as a whole and the neighboring residents.

The greatest concerns are summarized here and detailed in the body of this document:

**Zoning Change:** The change of zoning from institutional to residential, contrary to what the developer states, is not consistent with adjacent land uses, and, in fact, sets up a new zone subject to different policies than the General Plan!

The proposed Specific Plan creates a new residential zone not subject to the provisions of Sierra Madre's regulations.. to wit: "Whenever the Specific Plan contains provisions that establish regulations....which are different from, or more restrictive or permissive than would be allowed pursuant to the provisions of the Sierra Madre Municipal Code, the Specific Plan shall prevail and supersede the applicable provisions of the SMMC."

**Circulation and Traffic:** The impact of increased traffic (300-600trips a day) on residents of Sunnyside, Carter, Grove, and Lima streets is substantial, and violates several of the goals and policies of the General Plan. The Specific Plan and the DraftEIR erroneously state they are in compliance and do not mitigate or adequately address this, and, in fact, mostly addresses the internal layout of the development.

**Water Use:** The impact on the city’s water system, which the developers claim will have a “net zero impact” without explaining how or at what impact to the quality and availability of water to the rest of the city, especially as we are in a long term drought. This has not been subject to any public analysis, or explanation and is therefore highly suspect. Especially when the city cannot buy any extra water at this time.

**Biological Resources:** The removal of 100 mature trees is an area the project admits is inconsistent with the General Plan. The plan to mitigate also is inconsistent with the General Plan. And does not cover other negative impacts on the property.

**Geology and Soils:** The DraftEIR ignores the effects of the 1991 Sierra Madre earthquake on this exact area, and the potential for substantial adverse effects on potential new residents. No mitigation of earthquake effects is described.

**Population, Land Use and Housing:** The proposed development violates several specific policies and Guiding Principles in the General Plan. “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”

**Law Enforcement:** The DraftEIR states it is compliant; however, the SMPD stated the development would affect response times and service ratios. The impact to the police force; likely one additional officer would be needed at a cost likely to exceed the \$2.3M over 10 years.

**Fire Services:** The EIR states no impact. However, the development is being built in an extreme very high fire hazard severity zone. This does violate the General Plan. It states in the DraftEIR that the Fire Department needs a 50% increase in sworn personnel.

## **LAND USE AND PLANNING**

“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)”

Appendix G of the CEQA Guidelines states a significant impact related to land use and planning would occur if the project would “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.”

Although the DraftEIR lists several of its aspects as “consistent” with the General Plan, they are evaluated from the point of view of the project itself, not of its impact on the surrounding community.

In contrast with the statements and conclusion regarding the project’s conflicts with the General Plan, the plan is inconsistent with the General Plan in several areas. In addition to requiring amendment of the General Plan and the various zoning codes and maps simply to redesignate the area as residential rather than industrial, the project is “inconsistent” with the General Plan the in the following policies, in spite of marking them as “Consistent,” as we will describe.

## **AIR QUALITY**

**Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard?**

Developer response: Less than significant.

According to Brian Sheridan, Director of Development, Clean Air Coalition, pollutants are getting worse for several reasons. The major polluter is vehicles. Building 42 houses that will result in 300-400+ (and possibly more) car trips per day through two narrow streets will exacerbate this. So will the 16 months of heavy equipment usage while construction is going on, and afterward, with 42 large houses, UPS, Fed Ex, landscapers, housekeepers and pool maintenance workers will be driving into the area. No study was conducted to determine how many of these vehicles would pass into a neighborhood, such as this one, that is up against the mountainside where the air is trapped.

### **Would the project expose sensitive receptors to substantial pollutant concentrations?**

Developer response: Less than significant.

Building 42 homes, that will take approximately 16 months will result in major problems in air quality. Our area is part of the South Coast Air Basin, the most polluted in the nation, substantially because the sea breezes push the pollutants toward the mountains, which trap them. Short term air pollution comes from equipment and dust generated during grading and site preparation. The EPA estimates that construction activities of a large development can add 1.2 tons of fugitive dust per acre of soil distributed per month of activity. Where will the water come from? Will it be part of the "net zero" water usage? Also, there are no plans to use reclaimed water to control fugitive dust. The developer says they can use Tier 4 materials "if available." There is no plan to encourage the use of electric cars, such as adding charging stations either in garages of the homes or next to the parking spaces at the three acre park. Nor is there a plan to add 220 voltage in the garages for the car chargers, which are purchased with the electric vehicles.

### **Would the project have a cumulative effect on air quality resources?**

Developer response: Less than significant.

Air quality standards are health based. Residents of the cities along the 710 freeway, nicknamed the Cancer Corridor by health officials, and particularly children have a much higher level of respiratory problems than those in other cities. While this project is certainly much smaller than a freeway, the homes will be 2700 to 4000 square feet. They will most certainly be more than two person households (estimate 3.2persons), resulting in how many cars, and how many trips per day? 300-400+ per day. According to Brian Sheridan, Director of Development, Clean Air Coalition, vehicles are the number one source of pollution (90%). Adding to that will be stationary polluters, such as landscapers with their leaf blowers and lawn mowers. The cost of these homes may be \$3 M - \$5 M, resulting in daily deliveries, especially if the pandemic continues. Particulates from trucks are the most dangerous health wise. With an addition of so many vehicles going through the previously quiet neighborhoods along Sunnyside, Carter, Lima, and Grove Streets, this presents a greater pollution danger for those residents. There has not been a study conducted of how many trucks – moving, UPS, FedEx, landscapers, food deliveries, and pool service would pass into a neighborhood, such as this one, which is up against the mountainside where the air is trapped.

The General Plan Policies it violates are:

L51.2 – Limit the development of new roadways or expansion of existing roadways.

The project is inconsistent with the General Plan because it adds two new roadways, and will expand two existing roads, Sunnyside and Carter.

L51.4 – Explore the development of new facilities for bicyclists, pedestrians and transit users. Encourage and support the use of nonautomotive travel throughout the City.

This would help with air quality with limited use of vehicles, but there is no plan to do so.

## **BIOLOGICAL RESOURCES**

**Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?**

As noted in the DraftEIR, ‘the removal of 10 protected trees onsite would result in potentially significant impacts that will be less than significant after mitigation measures.

Our Response: 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. 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.

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. Here’s the analysis from a Junior at UC Davis, studying trees and plants:

- 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.
- 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.

In addition, 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. Although these oaks 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.

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. 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 the 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. 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. 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.

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.

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.

**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.**

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. Cooper Ecological Monitoring, Inc, prepared a report for the Watershed Conservation Authority regarding the watershed area from Sierra Madre to Claremont. Page 41 of the Cooper Ecological Monitoring, Inc., WCA property assessment lists in Figure 14, of Sierra Madre, Monrovia Subregion, the Mater Dolorosa area states, “The largely undeveloped ‘Mater Dolorosa Retreat Center’ (red arrow; APN 5761-002-008) supports a surprisingly large area of undeveloped land, including open/cleared oak woodland that could be restored to more native habitat.”

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.”

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.

The developer states that the 10 trees would be subject to a five year monitoring effort by and independent third 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, Section 21081.6(b); CEQA Guidelines, Sections 15126.4, 15041). A public agency shall provide the measures that are fully enforceable through permit conditions, agreements, or other measures (Pub. Resources Code, Section 21081.6). CDFW recommends that the City prepare mitigation measures that are specific, detailed (i.e., responsible party, timing, specific actions, locations), and clear in order for a measure to be fully enforceable and implemented successfully via a mitigation monitoring and/or reporting program (CEQA Guidelines, Section 15097; Pub. Resources Code, Section 21081.6).

**Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or plans, policies or regulations, or by the California Department of Fish and Game or US Fish and Wildlife Service?**

The Project does note that there are potentially significant impacts to nesting birds if vegetation clearing is undertaken during the breeding season and the following mitigation measures 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. Level of Significance after Mitigation: Less than significant.

**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’.

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 uninhabitable wasteland. The pictures below show before and after the devastating impacts of destroying the food source and habitat of local wildlife.



It is not surprising that no wildlife or plant materials were found five months after the application of chemicals.

Further, the survey did not address seed bank or lasting roots of native plants that are found at this elevation all across the foothills.

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.

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)].

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 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.

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. According to Cooper Ecological Monitoring, Inc: WCA property assessment dated July 22, 2021, Table 4 “Summary of high counts of selected migratory bird species from eBird “Hotspots” with the study area of Bailey Canyon are:

Western Wood-pewee 1;	Pacific-slope Flycatcher 10;	Orange-crowned Warbler 2
Nashville Warbler 2;	Black-throated Gray Warbler 4;	Wilson’s Warbler 2;
Western Tanager 2;	Black-headed Grosbeak 4	

We believe These species will be adversely affected with the impact of the loss of trees.

## CIRCULATION

### Table ES – 1. Summary of Project Impacts

**Goal 1: A balanced transportation system which accommodates all modes of travel including automobiles, pedestrians, bicycles, and transit users.**

The project is labelled ‘Consistent’. However, the balanced transportation system only addresses vehicular and pedestrian travel with roads and sidewalks and on-street parking. There are no plans for bicycle lanes. The word ‘system’ implies connectivity with the surrounding neighborhoods, but there is no pedestrian linkage as the surrounding streets do not have sidewalks. The project is oddly isolated and self serving.

**Goal 2: Safe and well-maintained streets.**

The project is labelled ‘Consistent’. As we cannot comment on how well the streets will be maintained, as it is unknown; we can comment on ‘Safe’ streets. The ‘consistency’ 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 safety and maintenance due to the additional 300-400+ car trips on the streets and 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 neighboring community. Two areas need clarification:

Clarify how the project would implement street sections that slow traffic.

Clarify the difference between the main Sunnyside entrance and the ingress/egress secondary access road, Carter Avenue.

**Goal 3: Preservation of quiet neighborhoods with limited thru traffic.**

The project is labelled 'Consistent' by repeating the same responses for above two goals. In reality, the project does nothing to preserve quiet surrounding neighborhoods 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 100%. 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.

Once again, the response only addresses traffic within the project itself and not its impact on the community.

**Table 4.11.1 Project's Consistency With The City of Sierra Madre's General Plan Goal and Policies**

**Goal 1: "A balanced transportation system which accommodates all modes of travel including automobiles, pedestrians, bicycles, and transit users."**

The project only allows for automobiles and sidewalks. There is no practical access to transit systems.

Objective L51: Developing a balanced and multimodal transportation system to serve the needs of all roadway users, including motorists, public transit patrons, pedestrians, and cyclists.

The project is labelled 'Consistent'. The project is inconsistent as it does nothing to address cyclists or pedestrians in their 'circulation system' as there is no connectivity from the project into the community at large.

The project is so far out of range of public transportation that it is not a viable option. The EIR responds with the same sentence and descriptions of the existing bus stops which will be much farther away for the new residents, who will be affluent people, not likely to use mass transit, rather they will drive their cars thru existing neighborhoods.

**Policy L51.2: Limit the development of new roadways or the expansion of existing roadways.**

The project is again labelled 'Consistent' even though it fails both objectives and is inconsistent with the City's general plan. See paragraph above. It creates 3 new roadways and expands 100 % of the existing roads in the project, and increases the thru traffic by 300-400 car trips a day. No mention is given of the delivery trucks, landscapers, and other service people who usually travel to neighborhoods such as this upper middle class one. 'However, because the additions and expansions are within the boundaries of project site', the project is labelled 'consistent' by Dudek. But if 'the proposed project would result in expansion of these roadways

beyond the boundaries of the project site, it would then be inconsistent'. Some clarification of this confusing statement is required.

**Policy L51.5: Encourage and support the use of non-automotive travel throughout the City.**

The project is labelled 'Consistent'. 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.

**Policy L51.6: Encourage City staff, employees, residents and visitors to walk and bicycle as often as possible.**

The project is labelled 'Consistent', but is inconsistent as it does nothing to address non-vehicular travel.

Clarify how a buffer along existing adjacent homes encourages residents to walk and bicycle.

**Policy L51.7: Utilize non-automotive transportation solutions as a tool to further goals related to environmental sustainability and economic development.**

The project is labelled 'Inconsistent'. Agree, as the project does nothing to implement this goal.

**Objective L52: Improving streets to maintain levels of service, vehicular, cyclist and pedestrian safety.**

The project is labelled 'Consistent, but it is inconsistent for its failure to maintain levels of safety to vehicles, cyclists and pedestrians. Once again, this 'consistent' label applies only to the streets within the project and not those surrounding it and impacted heavily by it. It is stated that 'the proposed project would not result in transportation related hazards including to cyclists and pedestrians'. In addition, the proposed project would improve both North Sunnyside Avenue and Carter Avenue. Again, the project is only 'consistent' within the project boundary and not the adjacent neighborhood. The proposed project is likely to result in transportation related hazards to both cyclists and pedestrians. The surrounding neighborhood streets that feed into the project were not designed to handle an increase in traffic. It is also stated that the project would not result in impacts to existing levels of service at any nearby intersection. That is a misstatement. 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: 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.**

Inconsistent. 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: Explore the possibility of sidewalk continuity where feasible.

The project is labelled as 'Consistent'. However, again, only within the project boundaries. There is no continuity with existing neighborhoods. 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 this policy.

Objective L53: Protecting residential neighborhoods from the intrusion of through traffic.

The project is labelled as 'Consistent', but should be re-labelled as inconsistent as it fails to protect local neighborhoods from through traffic. It does protect its future residents from through traffic - as the project is a stand-alone U-shaped community, but has tremendous impact on its residential neighbors. Interestingly, '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'. Again, for the project residents only and as stated 'these proposed circulation improvements (on Sunnyside north and Carter north) would be used to serve the proposed project residents and would also allow access to the Mater Dolorosa Retreat Center'.

Unbelievably, there is no discussion of the increased traffic (300-400 vehicle trips daily) caused by project residents on the surrounding residential neighborhoods and how they will be protected from this intrusion of through traffic on Lima, Sunnyside south, Carter east and Grove. This is an unacceptable analysis of Objective L53.

## **GEOLOGY AND SOILS**

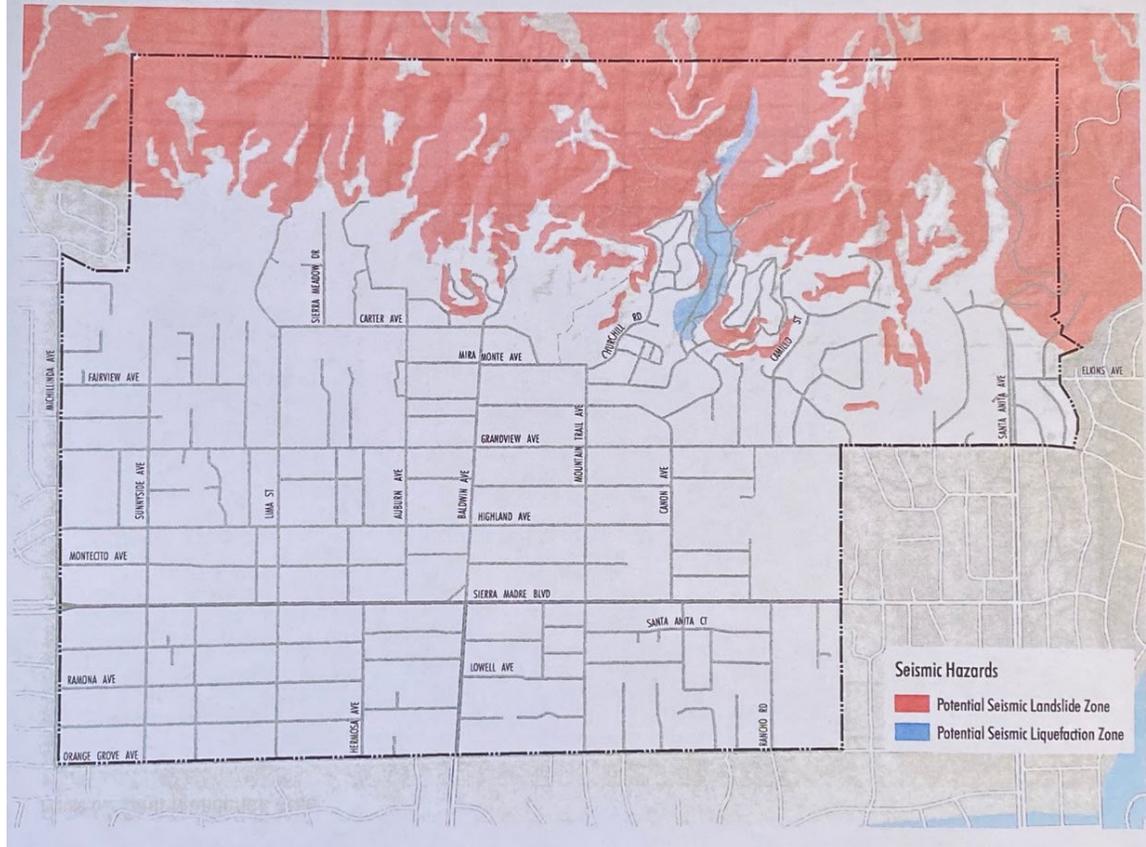
**Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss injury or death involving rupture of a known earthquake fault.**

Developer response: Less than significant.

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 it was torn down. 22 homes in the proximity of Sunnyside were condemned, with damage to 403 structures, resulting in \$12.5

million in damages.

Figure 6-3 Seismic Hazards



## POPULATION AND HOUSING

**Would the project induce substantial unplanned population growth in an area, either directly (for example, but proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?**

Developer response: Less than significant.

This violates Vision and Guiding Principle #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. The Specific Plan states that the houses will be 2700 to 4000 square feet on a minimum lot of size of 7800 square feet. These houses are significantly larger than the average homes on the surrounding streets, Gatewood, Sunnyside, Carter, Oak Crest, Fairview, Sierra Keys, Crestvale. Sierra Madre’s municipal code states that new construction of homes over 3500 square feet requires a Conditional Use Permit, to be authorized by the Planning Commission. According to The Meadows Specific Plan, “Whenever the Specific Plan contains provisions that establish regulations....which are different from, or more restrictive or permissive than would be allowed pursuant to the provisions of the Sierra Madre Municipal Code, the Specific Plan shall prevail and supersede the applicable provisions of the SMMC.”

Policy 2.5: **“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 proposed plan is consistent with this, however the assessed impacts of traffic, etc., do not consider the additional load that these added housing units would cause. New State laws such as SB 9 may impact this as well, allowing for lot splitting.

**Policy 5.3: “Promote the use of alternative energy sources such as solar energy...”**

In the proposed plan 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 L6.3 – Ensure new and remodeled structures in residential neighborhoods to minimize placement of windows and decks with direct lines of sight inside neighboring homes and back yards.**

The four different cookie cutter type housing plans also call for balconies in the back, which will overlook existing neighboring properties, decreasing their right to privacy.

The character of the town is an eclectic mixture of homes (houses, apartments, condos, skilled nursing facility), ages and income levels. These houses may sell for \$3-\$5 million per house, with no plans to make any of them in the lower income category.

Policy L6.1 – Require that all adjoining neighbors of new or expanded existing structures in residential areas be notified and be made aware of the appeal process for any new construction that will exceed one story in height or significantly increase the volume and/or footprint of the overall structure.

The Specific Plan states “The City of Sierra Madre Municipal Code Chapter 17.04, Section 17.04.120, Community Redevelopment Plans-Specific Plans, establishes that any standards relating to land usage shall be determined by the adopted Specific Plan. Therefore, the Specific Plan will serve as the zoning code for the Plan area.” This violates Policy L6.1.

Policy L7.3 – Limit the height of new buildings to reflect the prevailing height patterns on the street and within the Sierra Madre community.

As can be seen by the aerial map below of the surrounding neighborhood, there are **51 one story** and only **4 two story** houses. There is nothing in the Specific Plan as to how many two story and how many one story houses will be built. Two story homes will command a greater selling price, so it is not a stretch to believe this project would have all or mostly two story homes.



**Policy L5.1 – Prohibit the use of cul-de-sacs and require through streets in new subdivisions except when no other is physically feasible due to property ownership, parcel location or other physical features.**

Developer response: Consistent. The Specific Plan incorporates a Mobility Plan that is designed in grid pattern typical of Sierra Madre’s existing grid pattern. Although the grid pattern will be maintained inside the project, this is the ultimate cul-de-sac, in that there is one main way in, Sunnyside, and one secondary access, Carter. In essence, this project is walled off, away from City life – the Monastery is to the north, with its fence (or wall, to be built) and locked gate, Bailey Canyon Park, and another fence, to the east, walls cutting off the Sunnyside homes to the south, and another fenced in, no access area, cutting off Gatewood to the west.

**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.**

This violates our General Plan, in that these homes are larger than those in the surrounding neighborhoods, which consist of 47 one story and 4 two story homes. We have asked several times how many and where the one story (if any) homes will be, without an answer, as stated above.

Per State law, the City must build a certain percentage of housing that is considered for lower and middle income. This does not comply.

## **PUBLIC SERVICES**

**WILDFIRES** - 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 not build in a very high fire zone.

**Objective Hz5.a – “Limit risk of wildfire through public education and development planning.”**

Development planning would be to stay out of a high fire zone, rather than build 42 large homes.

**Objective Hz7 – “Avoid expanding development into undeveloped areas in a Very High Fire Severity 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.

Our Bobcat Fire occurred just a year ago, and some residents north of Grand View were evacuated. Wildfires are increasing in frequency and intensity.

In 2020, in California, there were 9,639 total fires. The fires destroyed 10,488 homes, charred 4.4 million acres, and resulted in a cost of \$12 billion. Most importantly, and tragically, 31 people lost their lives, which you can’t put a price on. Annual, re-occurring wildfires across Southern and Northern California even resulted in former California Attorney General Xavier Becerra (now Secretary of Health and Human Services), stating in March 2021, “devastating wildfires have become the norm in recent years, with dozens of deaths and whole towns forced to evacuate.” “That’s why local governments must address the wildfire risks associated with new developments at the front end.” In 2020, in San Diego County, where several devastating fires occurred **in 2020**, there were ten housing development projects proposed in very high-risk fire areas, they were all stopped either by prudent local government action or lawsuits. In September several streets north of Grand View were evacuated.

### **2008 Sierra Madre Fire**

That fire, originating in the Angeles National forest, which runs right into our foothills, grew to 400 acres and forced the evacuation of 1,000 people from their homes.



## The 2003 Southern California Fires

Going back almost twenty years, the fall of 2003 marked the most destructive wildfire season in California history up to that point. In a ten day period, 12 separate fires raged across Southern California in Los Angeles, Riverside, San Bernardino, San Diego and Ventura counties. The massive “Cedar” fire in San Diego County alone consumed 2,800 homes and burned over a quarter of a million acres.

## What is Susceptible to Wildfire?

### Growth and Development in the Interface

The hills and mountainous areas of Sierra Madre are considered to be interface areas (geographical point where the wilderness and urban area meets). **The development of homes and other structures is encroaching onto the wildlands and is expanding the wildland/urban interface.** (pulled directly from the City of Sierra Madre website). The interface neighborhoods are characterized by a diverse mixture of varying housing structures, development patterns, ornamental and natural vegetation and natural fuels.

In the event of a wildfire, vegetation, structures and other flammables can merge into unwieldy and unpredictable events. Factors important to the fighting of such fires include access, firebreaks, proximity of water sources, distance from a fire station and available firefighting personnel and equipment. Reviewing past wildland/urban interface fires shows that many structures are destroyed or damaged for one or more of the following reasons:

- Combustible roofing material

- Wood construction Structures with no defensible space

- Fire department with poor access to structures, such as would be the case, if 42 homes are built on the Monastery property

- Subdivisions located in heavy natural fuel types

Structures located on steep slopes covered with flammable vegetation. While these proposed 42 homes won't be on steep slopes, they will back up nearly to the edges of these slopes, which are even too steep for hiking trails.

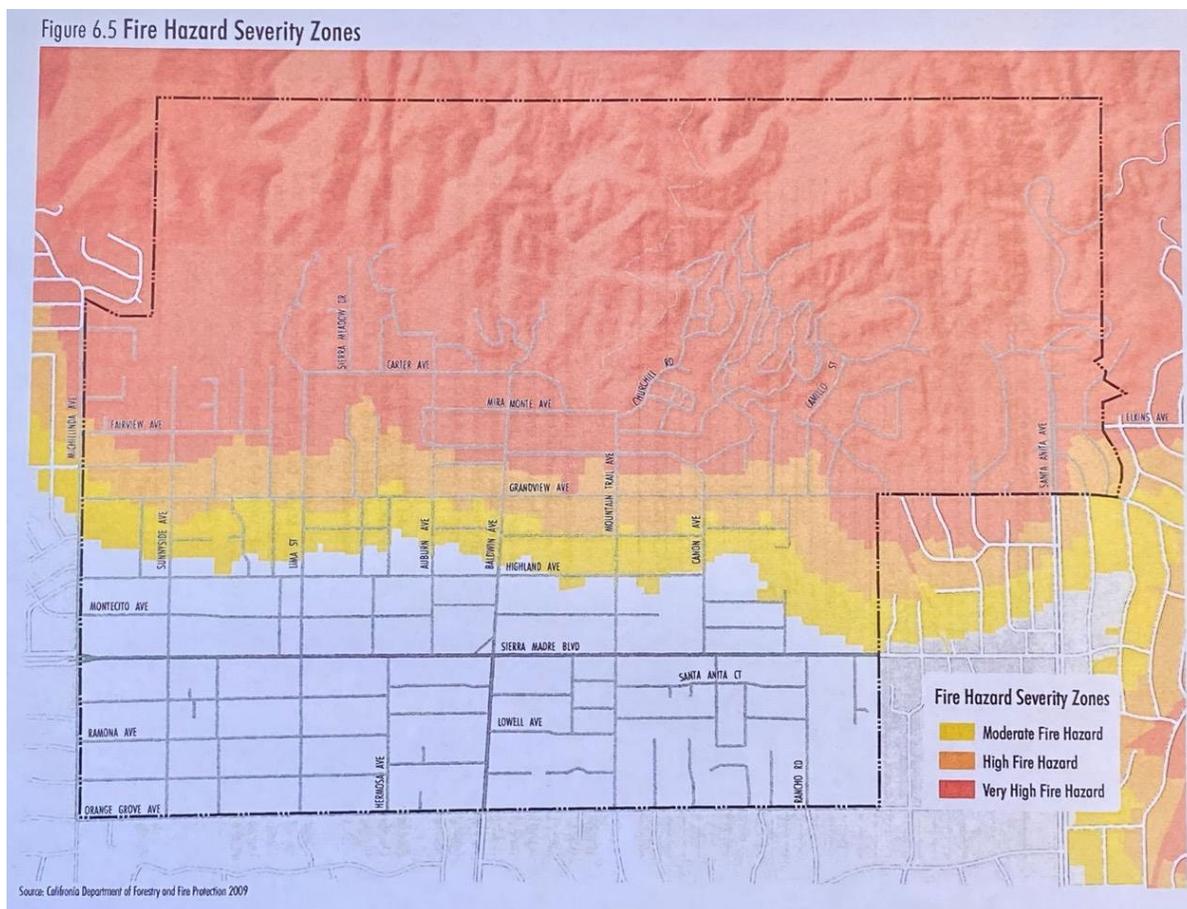
Limited water supply. Of course, this is going to be further exacerbated by the extreme drought conditions California is already experiencing.

Winds over 30 miles per hour

Road access would be problematic, and dangerous because Sunnyside, the road that leads up to the monastery, would quickly become congested, limiting the access for emergency vehicles.

### Water Supply

This would be very problematic with the increasing drought conditions in California. For the reasons above, we strongly believe it is not in the public interest of Sierra Madre to exacerbate fire risk in the highest designated "extreme" fire risk area in Sierra Madre. New Urban West will argue that they will use fire retardant building supply materials. As everyone has seen, there have been many new housing developments built in Southern California (including many of the over 10,000 homes burnt and lost in California in 2020) and across our state with "fire retardant" materials, and the communities still went up in smoke and ash.



**HYDROLOGY AND WATER QUALITY 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?**

Developer Response: Less than significant. The developer is guaranteeing 50 years of net zero water usage payment, to be paid upon approval of the project.

This violates Objective R12 Optimizing the use of water and water resources.

It also violates 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.

We would argue that there is no way to predict "net zero" into 50 years in the future.

As the project argues the value of its "net zero" water usage, the project will have doubled 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 in many cities. It is just a matter of time before the "public opinion driven" 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.

The Project fails to implement the strategies established by the Department of Energy in the 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, stormwater, sump-pump (foundation) water

- Graywater

- Air-cooling condensate

- Rejected water from water purification systems

- 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 building closes the loop on the water system by returning water to the original water source. Wastewater can be treated and recharged. Stormwater can also recharge the original water source.

According to Jane Tsong, Project Manager for the Watershed Conservation Authority (WCA), imported water is not as sustainable. Building structures (such as 42 large homes) will compromise the ability to sustain the water. Reducing the amount of land and increasing the amount of stormwater if this water has to be imported, will have to be cleaned, which is expensive for the taxpayers.

**Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?**

Developer response: Less than significant.

There does not seem to be a plan to capture groundwater when (if) it rains. Landscaping takes up the biggest residential use of water. The developer does not seem to have a plan regarding lawns or swimming pools, equally high in water usage. The Specific Plan is to use “low water use plants” but “in areas where high water use plants are needed they should be limited in number, grouped together in adjacent areas to simplify irrigation strategies....” Why would “high irrigation plants” be needed anywhere? The roadways through the project could be made of permeable materials, rather than tar or asphalt, which exacerbates runoff. There is no mention of that either.

Jane Tsong, Project Manager for the Watershed Conservation Authority in her letter to City Council, dated September 28, 2021 said: “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.”

Again, quoting Ms Tsong, when consulted about the water issues, if the project goes through, the biodiversity will be disturbed. Experts have pointed out that this is a successful restoration site. This site is uniquely situated, in that it is next to protected lands which will be distressed. There is no other parcel like this between Sierra Madre and Claremont, on an alluvial fan. The springs that used to provide water have disappeared. There is a focus on restoration of the LA River and the San Gabriel River, which begin in the foothills, anywhere that water can sink into the ground. This will be disturbed with the addition of 42 large homes and road infrastructure.

**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.**

There is a retention storage gallery underneath the proposed park of three acres. There will be a problem if it floods. There is no reason to believe we will have more water in the future, per Ms Tsong.

**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. . 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.

**Policy Hz2.2.5 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.**

Governor Newsom has requested everyone cut back their water usage by 15%, and when one expert on NPR was asked how it could be done, because Southern California residents have already installed low flow toilets, put in drought tolerant landscaping, the expert said we may already be there. Increasing the hardscape by 138,600 square feet, (42 homes times the median of 2700-4000 sq ft) plus roads, less 100 mature trees (or 90 if the Oaks are replanted properly) for the canopy *in a high fire zone*, is not only foolhardy, it is dangerous.

## **CONCLUSION**

In conclusion, the addition of 42 luxury homes as planned in the Meadows project is an inappropriate use of Sierra Madre resources, violates the will of the people of Sierra Madre as codified in the General Plan, and further takes advantage of the people of Sierra Madre for decades for the short term profit of the Mater Dolorosa and their hired developers.

We believe the project as proposed and its DraftEIR fails to properly assess the impact to the Sierra Madre community and so fails to justify the conversion of the zone from institutional to residential and especially the establishment of an area separate and contrary to the guidelines in the Sierra Madre General Plan and the will of the people of Sierra Madre.

On behalf of Preserve Sierra Madre and its followers.

**From:** [Denise Veich](#)  
**To:** [Public Comment](#)  
**Subject:** proposed adoption of general plan amendments and approval of EIR on development  
**Date:** Thursday, April 7, 2022 12:47:48 PM

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

Dear Planning Commission Members:

What was the point of all the work done in 1996 to protect our city from damaging hillside development? And what was the point of the measures to limit development (moratorium) in light of drought, which continues, a few years back? And now, on a technicality, you are considering changing an institutional zone into an overdeveloped residential zone just maybe because no one had the foresight to think that the monastery was going to sell out in the future?

Well, the future is now. The fiasco that was 1 Carter looks to repeat itself. Finally it is being built upon, but I see in the real estate sales a home that is over 4000 sq ft is going to be built, in gross opposition to the fights you had with developers in the past. And the point is, that lovely open space should never have been built upon. And what is going on/the plan at Stonegate, some of which, could be built upon? Now we have the monastery land. Since it is zoned institutional, now you have a loophole, cause it wasn't included in the Hillside Ordinance Plan and now it has to be added to land covered by the Hillside Ordinance in order to be saved from conveniently being changed to residential. When in my opinion, and many others, it needs to remain institutional or changed to be covered by the hillside ordinance. I read the draft EIR. and it too, is oh so convenient. For objective observers, it may seem that since the land is within city limits and below the monastery buildings and surrounded by other homes, well what's the big deal? And with the preference it seems now for homes too big and shoved close together, why not? And, oh, we have an affordable housing crisis.

Here are some of the problems which I am sure I am reiterating by many.

1, Even Pasadena does not want it. Their fiasco of trying to build above Kinnaloe Mesa isn't working and the La Vina plan didn't work out that well. Since the drought and further energy issues and the cost of housing in California, more expensive developments are not the answer. Just doesn't improve tax revenues when you have no one able to buy. Empty big houses wasting energy and eyesores, think Arcadia, not very profitable.

2. Drought is still with us and likely will be. Importation/ buying "all the water they need" ahead of time so as to not impact city residents sounds kind of farcical. All cities may eventually have to import water, no residents will be shielded from tax burdens, unless unnecessary, overlarge development is curtailed. And, of course, if Mother Nature cooperates.

The proposed size of houses to be built is 2700 - 3400 sq.ft. And 42 of them on about 17 acres because there is going to be this lovely 3 acre park. Too many houses, too big in size, too small of a park. 35 acres above the monastery is very uphill, not usable for a park. If to remain institutional, a hospice home, elderly home, etc, would be a MUCH better use.

3. I've been here since 1984 as a resident, lived nearby before that. Remember watching the houses pop from fire in the canyon from my workplace down the hill in 1978. Remember my husband staying home to hose down our house when we lived on Sunnyside below SM blvd in 1993. The fire got down to Eaton Canyon Dam 1/2 mile west of us. The fire crews raced up our street all day and made a stand at the monastery, keeping the flames to within 10 feet. The whole day the winds were blowing. There have been subsequent fires, and more drought. We need that space to stay open. All the surrounding residents will be glad. The draft EIR is inadequate to address this safety concern. The city does not need the liability for the potential lawsuits. Have some foresight.

In short, do not approve the EIR. Propose to keep the land as currently zoned, or change to be included under the Hillside ordinance. Do not approve 42 too large homes on too little land. Should there be absolutely no recourse, decrease the number of homes approved at least by half and decrease the square footage. It would be wonderful if you would have the foresight to actually allow our city to have one of the last remaining open spaces for our children and others to enjoy. Turn your attention to the new SR legislation passed that will change all our residential zoning laws and think ingeniously how to use current other unused properties into more affordable, efficient housing. Thank you for your consideration.

Denise Veich and Gregory Nelson



**From:** [Deborah Ross](#)  
**To:** [Public Comment](#)  
**Subject:** Protect Sierra Madre  
**Date:** Thursday, April 7, 2022 2:59:18 PM

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

Dear City Council Members,  
This letter I hope will squeak in to you before today's 3:00 deadline.

I am in agreement with all of the items that Protect Sierra Madre represent:

But in addition I'd like to say We are up against the Monastery needing to come up with income.

What more conventional method than Residential Real estate.

I say no!

Please seriously consider the substantial issues that are being presented to persuade the City to refuse to be steam rolled into this project.

Sincerely,  
Deborah Ross

- **Traffic Impact:** expected to at least double from current levels
- **Fire Impact:** The proposed housing development of 42 large homes is in the highest fire risk area in the city. Fire retardant materials will not help. This defies common sense.
- **Devastating Water Drought:** Remember when new urban west was saying Net Zero Water Impact from this project. They're not saying that anymore because it's not true or feasible. Southern California is in the midst of the most severe mega-drought in the history of our state and further depleting already very limited water supplies does not make sense.
- **Earthquake Zone:** The proposed project is on an earthquake zone. The original monastery building was destroyed years ago from an earthquake. So, of course it makes complete sense to do it again, right?.
- **Destruction of 101 mature trees and devastation of the wildlife**
- **New plans to impact Bailey Canyon Wilderness Park**
- **Increased Air Pollution**

**From:** [Colette Monell](#)  
**To:** [Public Comment](#)  
**Subject:** Public Comment  
**Date:** Thursday, April 7, 2022 4:42:36 PM

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

Hello,

As a resident of Sierra Madre that would be directly impacted by the development, I recommend that the Planning commission issue a denial of the Meadows at Bailey Canyon application. The open space that is currently below the retreat center will be lost forever when the homes are built. Open space throughout Los Angeles County is becoming less and less and the open space should be preserved. There are other alternatives that should be considered by the Planning. The developer team is only stating that there are no alternatives due to profit margins.

One such alternative that the Sierra Madre's Planning Commission and Council should consider is looking something similar that was done in a neighboring community, City of Monrovia's Open Space Element:

<https://www.cityofmonrovia.org/your-government/community-development/planning/general-plan/open-space-element>

Beginning with the hillside planning process in the 1990s, through the 2000s with an aggressive acquisition plan, and the development and ultimate adoption of the Hillside Wilderness Preserve Resource Management Plan (RMP) in 2012, Monrovia has been engaged in a three-decade long conversation about open space in the community. Throughout these processes, there has been a considerable amount of input and feedback from Monrovians.

Based on direction from the City Council, the Community Services Commission began work on a Park Master Plan to guide future decisions related to the City's public parks. This process has incorporated a substantial amount of public input. As this is directly related to the goals and policies of the Open Space Element of the General Plan, it seemed like a great opportunity to update the Element concurrently.

The City Council approved the Park Master Plan and the Open Space Element at their meeting on April 17, 2018.

During the previous joint public meeting held on March 1, 2022, it was mentioned several times that the retreat center has been around for 100 years and has supported the community and the retreat center would like to be around for another 100 years. However, almost all the past public meetings about this development were held during a COVID-19 (also a 100 year pandemic), when most residents were either quarantined to their homes or

sick from either illness and/or stress.

It is irresponsible for the City's Planning Commission and Council to move forward with the development during time while most residents were unable to attend the public meeting in person or virtually due to the pandemic. As such, additional public outreach and time is needed regarding the development. I recommend additional community meetings for public comment.

Thank you,  
Colette

City of Sierra Madre  
Planning Commission

Re: Support for The Meadows at Bailey Canyon, April 7 Planning Commission Hearing. Public Comment

Dear Planning Commissioners,

As an attorney, author and longtime homeowner and resident of the western portion of Sierra Madre I'm writing to express my strong support for The Meadows at Bailey Canyon proposal. The Meadows is a detailed, well-considered plan that will substantially benefit the community and sustain the Passionists who own the property and operate Mater Dolorosa. The alternatives such as the high likelihood of protracted litigation, the potential for much more intense development such as a school, large skilled nursing facility, or high-intensity low income housing would have a negative effect on Sierra Madre. In contrast, the sustainability features of the project including groundwater recharge, all-electric homes, fire-resistant construction, a fully-funded city park, shifting the cost of the City's maintenance obligations for an adjoining portion of Bailey's Canyon Park and the net-zero water commitment will provide obvious benefits for our City. This is a responsible, sustainable, and collaborative project.

The Passionists Monastery has been model community members for the past 100 years. They have generously shared their lands and spaces with all Sierra Madre residents. During the pandemic they provided thousands of meals through their food ministry program. They have a growing need to monetize some of their property in order take care of their older members who have sacrificed so much over the years. As a litigator I believe the Passionists have exercised unusual forbearance and it is my hope that their patience bears fruit.

Some voices in our city in opposition to the project want no development at all, or to delay it indefinitely, which is simply not tenable under current law. Others hope to turn the property into a park or tree preserve. Those would be nice if there were some way to pay the Passionists, but that is not currently possible. The people who oppose the project justifiably question the impact of construction activity, but that is temporary, and steps can be taken to mitigate the negative aspects including noise, dust and construction vehicles. If this project turns out like other projects of this developer, the homes in the surrounding neighborhood will become significantly more valuable than they would be otherwise.

I am confident that the Councilmembers are carefully considering and analyzing the options available to the Passionists and will conclude that The Meadows proposal would best balance the rights and the interests of all Sierra Madre residents and stakeholders. We can welcome 42 new families and enhance the character of our community.

I respectfully request that the City Council approve The Meadows project and support sustainable development in Sierra Madre.

Sincerely,

John C. Doyle, JD

██████████

91024

City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Re: Public Comment Submittal for April 7 Hearing on The Meadows

Dear City Council & Planning Commission,

As a resident of the Upper Canyon of Sierra Madre, I am very aware of both water and wildlife needs.

I support the Meadows at Bailey Canyon because it is a balanced plan that protects open spaces, preserves land for wildlife and offers a sustainable water infrastructure.

I understand that the project will permanently preserve over 30 acres of hillside open space that serves as an important area for wildlife movement.

I am very interested in the addition of the park that will provide a quiet and peaceful place of sanctuary. It would be wonderful to have a labyrinth there for the whole community to enjoy. This park space will be constructed and maintained at no cost to existing residents or the City.

As a person who plans to live in Sierra Madre long term, I would like to see the benefit of living in this wonderful town extended to new neighbors. This project values our way of life and provides sustainable practices that will be good for both future and existing residents. I hope you will vote to advance this project.

Sincerely, Peggy Burt

[REDACTED]

Re: Support for The Meadows at Bailey Canyon, April 7 Planning Commission Hearing. Public Comment

I am writing to express my support for The Meadows at Bailey Canyon proposal. The Meadows is a thoughtful plan that delivers significant community benefits while supporting the Mater Dolorosa Monastery. The sustainability features The Meadows offers is the direction all new developments should follow and the net-zero water commitment is unprecedented in our City.

The Passionists have been a fixture of Sierra Madre for nearly 100 years and The Meadows supports keeping the this historic landmark and organization in place for the next 100+ years.

The Meadows demonstrates that we can provide new community benefits and preserve our community's character. Please approve The Meadows plan and support sustainable change in Sierra Madre.

Personally--This is not about the Passionists from my perspective. It is about the community and serious long term enhancement on several scales. I believe the tangible rewards of this endeavor far outweigh the fears of the possible and probable minor negative impacts upon the nearby citizens as well as the entire city population. This development will indeed put a stake in the ground for improvement within controlled reasonable boundaries and further set Sierra Madre apart as a leading city in the SGV. Review of the cost-benefit analyses indicates benefits lasting for decades with costs to be absorbed primarily within the framework of the project itself, well considered and communicated in advance by the developers. Their reputation indicates quality and integrity--a very good team!!!. My approach would be proceed with optimism to execute the plans for the positive outcome which has been clearly defined and reviewed with wisdom. Make it happen!!!

Please execute the plan with vigor and continuing capable leadership thus far exemplified by all parties.

Blake Axelrod



Ref: The Meadows at Bailey Canyon, Public Comment

Dear City Clerk,

I am submitting my public comment in support of The Meadows at Bailey Canyon.

The plan is environmentally-conscious, thoughtful of the existing retreat center, and mindful of surrounding neighbors.

1. There are many components of the plan that are sustainable. Removing any new water demand on the City's water supply. Using sustainable building materials and design elements. Preserving land for natural habitat.
2. The Retreat Center has been serving our community for nearly 100 years. This plan allows them to remain and provide that service and serenity. Without this plan, they could go away, which would be a HUGE loss for our city.
3. Many discussions have been made with neighbors resulting in some homes being only one-story. The homes are similar sizes to others in our town and will be in 4 different styles, which should match our community character.

This is a good fit for our community. Please support The Meadows at Bailey Canyon like I and many of our residents do.

Thank you.

John Loftus



City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Re: Support for The Meadows at Bailey Canyon, April 7 Planning Commission Hearing. Public Comment

Dear Planning Commission,

I am writing to express my support for The Meadows at Bailey Canyon proposal. The Meadows is a thoughtful plan that delivers significant community benefits while supporting the Mater Dolorosa Monastery. The sustainability features The Meadows offers is the direction all new developments should follow and the net-zero water commitment is unprecedented in our City.

The Passionists have been a fixture of Sierra Madre for nearly 100 years and The Meadows supports keeping the this historic landmark and organization in place for the next 100+ years.

The Meadows demonstrates that we can provide new community benefits and preserve our community's character. Please approve The Meadows plan and support sustainable change in Sierra Madre.

Sincerely,

David Loera  
Sierra Madre Resident

[REDACTED]

City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Re: Support for The Meadows at Bailey Canyon, April 7 Planning Commission Hearing. Public Comment

Dear City Clerk,

My family and I have been residents of Sierra Madre for years. As renters, we want more opportunities to buy homes in this community so that we can continue to stay, give back to the community, and raise our 3 children here. I support The Meadows at Bailey Canyon proposal because it responsibly provides more opportunities for families to settle in this wonderful community. Not only that but it provides a new community park at no cost to current residents and makes significant commitments to sustainability that will make this plan the most energy-efficient community in the history of Sierra Madre. A new public park would reopen what we used to have access to, and will allow us to walk through and enjoy these lands with our kids and pets. We look forward to using this serene land again while preserving the monastery and the natural habitat above it.

The Meadows is a strong, sustainable plan and is deserving of your support.

Please vote to approve The Meadows project.

Kelsey Egan



Re: Support for The Meadows at Bailey Canyon, April 7 Planning Commission Hearing. Public Comment

Dear Planning Commission & City Clerk,

As a proud resident of Sierra Madre for 64 years, I would like to offer thoughts regarding the Mater Dolorosa property. Much like my own longstanding love of our town, the local Passionists have called this their cherished home for nearly 100 years. On older maps, you will find the area designated as Mt. Oliva Passionist Fathers Home. They have been good neighbors, and their peaceful presence here has been a blessing for generations of faithful who have experienced retreats, and for countless others attending programs benefiting the local community.

With this background in mind, I hope that some of our citizens will not make it their mission to draw battle lines with Mater Dolorosa. The large front portion of this private land has been vacant for so long that in many minds it is a public nature reserve that can never be touched. Now, reasonable and well-balanced proposals have been put forth for its eventual use.

Providing a peaceful environment for reflection has always been an integral part of the Passionist's retreat ministry, and will continue to be in the future. They have made efforts to craft a plan that minimizes impacts to the community. Gifting a sizable part of this land for protected open space and a park is a thoughtful act of goodwill by the Passionists, and the park provides public access that isn't currently available.

Consideration for their neighbors is evident, because the new park being offered has been placed in the southern portion, providing a green zone to separate the proposed development from existing neighbors. This is a very generous gesture, considering that if such an area had instead been placed to the north it could have provided more quiet isolation for the Retreat Center itself.

The development will help provide needed funding for Passionist ministries, and to care for aging priests and brothers who have dedicated their lives for the spiritual care of others. Some people who oppose the development plan might also bear in mind that this was once a larger tract of property, and portions of it that were sold years ago may have provided the land that their own homes now sit on.

We all realize that changing things we are used to can be painful and unwanted. In my years here in town I have certainly seen many changes, but the unique spirit of this community always remains. I sincerely support the Passionists and their plans for the Mater Dolorosa development project, and I know that in whatever way this finally gets accomplished, the spirit of Sierra Madre will continue to remain.

Thank you for time,

William Cosso



City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Re: Support for The Meadows at Bailey Canyon, April 7 Planning Commission Hearing. Public Comment

I am writing to express my support for The Meadows at Bailey Canyon proposal. The Meadows is a thoughtful plan that delivers significant community benefits while supporting the Mater Dolorosa Monastery. The sustainability features The Meadows offers is the direction all new developments should follow and the net-zero water commitment is unprecedented in our City.

The Passionists have been a fixture of Sierra Madre for nearly 100 years and The Meadows supports keeping the this historic landmark and organization in place for the next 100+ years.

The Meadows demonstrates that we can provide new community benefits and preserve our community's character. Please approve The Meadows plan and support sustainable change in Sierra Madre.

Sincerely,

Sara Law



**Re: Public Comment, April 7**

**Dear Planning Commission,**

I am writing regarding the housing project called The Meadows at Bailey Canyon which would be located on the monastery grounds of the Mater Dolorosa Passionist Retreat Center.

The monastery has been a good owner of the property since 1924. They have a partnership with the City of Sierra Madre via a food ministry to provide meals to local vulnerable residents, the homebound and homeless in the San Gabriel Valley. They provide for local jobs. They also have retreats for families and individuals providing for inspirational and moral guidance. During the Easter season, they allow for more than 3000 people to visit their grounds and walk the Stations of the Cross. As a good neighbor, they allowed people to walk their grounds with their dogs. How many of you would allow your neighbors to meander through your yard to walk their dogs?

This is private, not public property and having property rights, they have a sell their property in order to plan for their future retirement just as anyone does. The decision to hire a firm to develop 42 beautiful homes on their grounds, I feel, is a wise decision.

California is facing a housing crisis. To put themselves in a better position to achieve homeownership, many Californians (more than 1.3 million) have left the state and still we have a housing shortage! Without enough homes on the market to meet the demand, prices are driven up and the California affordability index has dropped to 27% because of the shortage. There are more people who want to buy homes than there is inventory of homes for sale. This creates for competitive multiple offers on homes for sale. On one home for sale in Sierra Madre recently, there were 43 offers on a fixer upper house. That means that 42 other buyers who wanted to live in Sierra Madre lost out. This is simple economics and homeownership is one proven vehicle for wealth creation in the United States. Building homes provides for jobs and an increase in city tax revenue.

California is not building enough housing which is why Governor Newsom has stated that 3.5 million housing units need to be built in California by 2025. In 2020, for the 15th consecutive year, California fell short of its housing production targets. The shortage is why the state has promoted the building of ADU's on larger lots and also why proposition 19 was passed.

The idea of building good quality homes, in my opinion, is better than having either a school or some other institution built on the monastery property. School buses and parents busing children driving up and down the streets creates more congestion and noise than what the neighbors would want. A hospital or nursing home would create the same problem. Even more so with ambulance noise. Plus, as a bonus the neighbors and the city would be getting a present of a beautiful park that would not need to be maintained by them.

We have lived on Park Vista Drive for 18 years, and as a neighbor of the monastery on its west side, I would welcome the housing project as it would only increase other neighbor's property values, not diminish them. Also, I have been an active Realtor working in the area for the last 33 years. I know the situation and the area well. I see this project of the Meadows at Bailey Canyon as the best alternative to solving the housing shortage, increasing the city tax base and beautifying the area.

Thank you,

Christina Dreyer

City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Re: Support for The Meadows at Bailey Canyon, April 7 Planning Commission Hearing, Public Comment

Dear City Clerk,

I write to express my support for the Meadows at Bailey Canyon.

The Meadows serves as a model for sustainable development and demonstrates a commitment to reducing the impacts of climate change through the inclusion of 100% electric homes.

Further, the project includes a wide variety of water saving features, including drought tolerant landscaping, high efficiency fixtures, and green stormwater infrastructure that recharges our local groundwater supply.

I believe the negative impacts of the residential development provides is very low. The traffic studies need to be explained to the common citizen in terms they can understand, i.e: "The traffic predictions would be similar to what other streets? Canon and Laurel at school drop off time or Laurel and Lima at anytime of day." The 700 trips sounds like a huge event. When the numbers may be true, let's explain them so others can understand what other intersections have similar traffic numbers to compare with.

I believe the zoning change to SFR is a better choice than the development of institutional use. Sierra Madre can have another neighborhood similar in density to many other other blocks in town. I appreciate the diverse architectural styles proposed. The construction schedule though intense for a few years, will be done and over with. The developer building many at one time, can hopefully achieve the discounts of bulk ordering to extend the price discounts to the sale price. The residential development allows for the retreat center to be a compatible historic neighbor and use their partial land sale as an asset to continue their mission of service.

I understand from talking with Marc Blain, a Senior Wildlife Biologist with PSOMAS environmental group, the property designated for development as SFR would create substantially more wildlife habitat than if preserved as is.

I support adding a Labyrinth to the proposed Meadows public park as a gesture to a spiritual path the Father's walk and a recognition of their generosity and service. I believe it will be well suited for this type of quieter park versus a sport type of park. Even more so if it could be built with low maintenance for wide pathways for accessibility to those in a chair, walker or needing to have assistance. I personally have training in the construction of labyrinths as such public benefits and would be happy to share my knowledge.

Development is the property owner's right. I appreciate their sensitivity to the residents to consider what is best a win-win solution. I support sustainable projects like the Meadows and hope you will represent the voice of the community membership along with your knowledge of the the visions of a Sierra Madre Community Development for future generations to continue being proud to live and be from Sierra Madre.

Even when we have different ideas of what the future looks like, perhaps what we have in common is the use of "Mother Nature" as a VERB .

With respect,

Cole Butler

Dear Esteemed City Council Members and Residents of Sierra Madre,

I live on Sierra Madre Blvd and have been a resident of Sierra Madre for 9 years. I fully support re-zoning to accommodate the proposed project named "The Meadows at Bailey's Canyon". I do so for 3 reasons:

1. Under current zoning laws, the Passionist Priests would be well within their right to develop the property in ways much more detrimental to city of Sierra Madre in terms of allowing high density use for schools, retirement living communities, and affordable multi-unit housing projects. The proposed project is a much preferred alternative: it is environmentally sound, with designs consistent with existing architecture and promotes family living. It is preferable that Sierra Madre retain control of the type of housing that is built rather than be mandated by State and Federal laws to follow designs and density of their choosing.
2. The Passionists have been excellent community partners who have a moral responsibility to take care of their own and to do so using the means available to them. Retreats alone will not support the care needs of retired religious people. They cannot generate income from bare land. They have always kept the grounds open for all of us, have not enforced significant encroachments on their property by homes surrounding the retreat center and have remained flexible in how they served the community during the pandemic and other crises.
3. The project includes additional benefits and protections for all residents of Sierra Madre including a new park which will be maintained by the 42 homeowners of that development, preservation of the land behind the monastery and improvement to the existing Bailey Canyon park and trails.

The Passionists have been here for the community of Sierra Madre, it is time that the community of Sierra Madre is there for them.

Respectfully submitted,  
Mary Doyle

City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Re: Support for The Meadows at Bailey Canyon, April 7 Planning Commission Hearing. Public Comment

Dear City Clerk,

I am writing to express my support for sustainable, smartly planned neighborhoods like the Meadows at Bailey Canyon. The Meadows is a creative solution providing much needed homes for new families while embracing a sustainable and environmentally conscious Sierra Madre.

The new housing opportunities provided by the Meadows are more than just homes, they actively protect and improve upon our community. Neighborhoods designed with protected open space, solar to reduce carbon emissions, and drought-tolerant landscaping to help protect our water supply should be the future for all of Sierra Madre.

Additionally, new housing creates move-up opportunities elsewhere in our community, allowing for young families to find the perfect starter home and enjoy both the new public park and our City's rich history.  
Please support environmentally conscionable housing opportunities in Sierra Madre.

Thank you for your time,

Gary Rapkin



City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Re: Support for The Meadows at Bailey Canyon, April 7 Planning Commission Hearing. Public Comment

City Clerk & Planning Commission,

I am writing to express my support for The Meadows at Bailey Canyon proposal. The Meadows is a thoughtful plan that delivers significant community benefits while supporting the Mater Dolorosa Monastery. The sustainability features The Meadows offers is the direction all new developments should follow and the net-zero water commitment is unprecedented in our City.

The Passionists have been a fixture of Sierra Madre for nearly 100 years and The Meadows supports keeping the this historic landmark and organization in place for the next 100+ years.

The Meadows demonstrates that we can provide new community benefits and preserve our community's character. Please approve The Meadows plan and support sustainable change in Sierra Madre.

Jesse Hathaway

  
91024

City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Re: Support for The Meadows at Bailey Canyon, April 7 Planning Commission Hearing. Public Comment

I support The Meadows at Bailey Canyon proposal because it provides a new community park at no cost to current residents and makes significant commitments to sustainability that will make this plan the most energy-efficient community in the history of Sierra Madre. A new public park would reopen what we used to have access to, and will allow us to walk through and enjoy these lands with our kids and pets. We look forward to using this serene land again while preserving the monastery and the natural habitat above it. The Meadows is a strong, sustainable plan and is deserving of your support.

Please vote to approve The Meadows project.

Jonah Austria

Resident

City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Re: Support for The Meadows at Bailey Canyon, April 7 Planning Commission Hearing. Public Comment

Dear City Clerk,

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Sincerely,

William and Julie Rosenthal

City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Re: Support for The Meadows at Bailey Canyon, April 7 Planning Commission Hearing. Public Comment

Dear City Hall,

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Sincerely,

Samuel Pedersen

A solid black rectangular redaction box covering the signature area.

City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Re: Support for The Meadows at Bailey Canyon, April 7 Planning Commission Hearing. Public Comment

To City Clerk, Planning Commission:

Bailey canyon is an important place for our community and I'm grateful that the beautiful land we have the privilege of knowing is being made accessible to more people.

I think that developing this land and making it an example for sustainable living to confront the ecological crises in our planet is a great opportunity as well as a responsibility.

Land is one of the greatest resources we have to teach and inspire people to actively solve the climate crisis.

I also believe that some part of this newly occupied land should be dedicated to the original indigenous people of this land.

If the meadows at Bailey canyon is committed to these responsibilities, I support them wholeheartedly.

Tim Aan't Goor



City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Re: Support for The Meadows at Bailey Canyon, April 7 Planning Commission Hearing. Public Comment

To Planning Commissioners:

I am writing to express my support for The Meadows at Bailey Canyon proposal. The Meadows is a thoughtful plan that delivers significant community benefits while supporting the Mater Dolorosa Monastery. The sustainability features The Meadows offers is the direction all new developments should follow and the net-zero water commitment is unprecedented in our City.

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Sincerely,

Manuel Briones

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City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Re: Support for The Meadows at Bailey Canyon, April 7 Planning Commission Hearing. Public Comment

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Sincerely,

Michaeline Roach



City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Re: Support for The Meadows at Bailey Canyon, April 7 Planning Commission Hearing. Public Comment

Dear City Hall,

I support The Meadows at Bailey Canyon proposal because it provides a new community park at no cost to current residents and makes significant commitments to sustainability that will make this plan the most energy-efficient community in the history of Sierra Madre. A new public park would reopen what we used to have access to, and will allow us to walk through and enjoy these lands with our kids and pets. We look forward to using this serene land again while preserving the monastery and the natural habitat above it. The Meadows is a strong, sustainable plan and is deserving of your support.

Please vote to approve The Meadows project.

Sincerely,

Joy Barry



City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Re: Support for The Meadows at Bailey Canyon, April 7 Planning Commission Hearing. Public Comment

Dear Planning Commission:

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Thank you,

Margaret Fullinwider



City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Re: Support for The Meadows at Bailey Canyon, April 7 Planning Commission Hearing. Public Comment

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Thank you,

Jon Fullinwider



City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Re: Support for The Meadows at Bailey Canyon, April 7 Planning Commission Hearing. Public Comment

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Sincerely,

Jesse Hathaway

City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Re: Support for The Meadows at Bailey Canyon, April 7 Planning Commission Hearing. Public Comment

I support The Meadows at Bailey Canyon proposal because I prefer the City to have more of a say in its development than the State. The State has shown that it will move if we, the City, don't.

Please vote to approve The Meadows project.

Dave Banis

Resident

City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Re: Support for The Meadows at Bailey Canyon, April 7 Planning Commission Hearing. Public Comment

Dear Planning Commission,

I am writing to express my support for The Meadows at Bailey Canyon proposal. The Meadows is a thoughtful plan that delivers significant community benefits while supporting the Mater Dolorosa Monastery. The sustainability features The Meadows offers is the direction all new developments should follow and the net-zero water commitment is unprecedented in our City.

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Sincerely,

Gena Beierschmitt

Neighbor

City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Re: Support for The Meadows at Bailey Canyon, April 7 Planning Commission Hearing. Public Comment

To City Clerk:

I support The Meadows at Bailey Canyon proposal because it provides a new community park at no cost to current residents and makes significant commitments to sustainability that will make this plan the most energy-efficient community in the history of Sierra Madre. A new public park would reopen what we used to have access to, and will allow us to walk through and enjoy these lands with our kids and pets. We look forward to using this serene land again while preserving the monastery and the natural habitat above it. The Meadows is a strong, sustainable plan and is deserving of your support.

Please vote to approve The Meadows project.

Thank you,

Thomas Hand

City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Re: Support for The Meadows at Bailey Canyon, April 7 Planning Commission Hearing. Public Comment

To City Hall:

I am writing to express my support for The Meadows at Bailey Canyon proposal. The Meadows is a thoughtful plan that delivers significant community benefits while supporting the Mater Dolorosa Monastery. The sustainability features The Meadows offers is the direction all new developments should follow and the net-zero water commitment is unprecedented in our City.

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The Meadows demonstrates that we can provide new community benefits and preserve our community's character. Please approve The Meadows plan and support sustainable change in Sierra Madre.

Sincerely,

Kristen Annes

Neighbor

City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

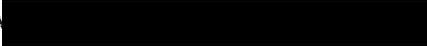
Re: Support for The Meadows at Bailey Canyon, April 7 Planning Commission Hearing. Public Comment

I am writing to express my support for The Meadows at Bailey Canyon proposal.

Adding much-needed housing stock while balancing the environmental, wildfire, water & neighbor's concerns is a seemingly impossible task, yet I feel this development project has been carefully planned out to address these issues.

Sincerely,

Mark Abernathy



City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Re: Support for The Meadows at Bailey Canyon, April 7 Planning Commission Hearing. Public Comment

I am writing to express my support for The Meadows at Bailey Canyon proposal. The Meadows is a thoughtful plan that delivers significant community benefits while supporting the Mater Dolorosa Monastery. The sustainability features The Meadows offers is the direction all new developments should follow and the net-zero water commitment is unprecedented in our City.

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The Meadows demonstrates that we can provide new community benefits and preserve our community's character. Please approve The Meadows plan and support sustainable change in Sierra Madre.

Sincerely,

Charles Frey

Neighbor

City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Re: Support for The Meadows at Bailey Canyon, April 7 Planning Commission Hearing. Public Comment

I believe that The Meadows would be wonderful for Sierra Madre and all concerned. I am writing to express my support for The Meadows at Bailey Canyon proposal. That land will be used somehow and this would be the most fortunate for us. This could be a feather in the city's cap.

The Passionists have been here before most of us.

Please enhance and preserve our community's character. Please approve The Meadows plan and support sustainable change in Sierra Madre.

Sincerely,

Phil Jackson



City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Re: Support for The Meadows at Bailey Canyon, April 7 Planning Commission Hearing. Public Comment

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Sincerely,

Vickie Shackett

Neighbor

City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Re: Support for The Meadows, April 7 Planning Commission Hearing. Public Comment

Dear City Council & Planning Commission,

I support The Meadows at Bailey Canyon proposal because it provides a new community park at no cost to current residents and makes significant commitments to sustainability that will make this plan the most energy-efficient community in the history of Sierra Madre. A new public park would reopen what we used to have access to, and will allow us to walk through and enjoy these lands with our kids and pets. We look forward to using this serene land again while preserving the monastery and the natural habitat above it. The Meadows is a strong, sustainable plan and is deserving of your support.

Please vote to approve The Meadows project.

Thank you,

Selene Kownatzki

City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Re: Public Comment - Support for The Meadows at Bailey Canyon, April 7 Planning Commission Hearing

I am writing to express my support for The Meadows at Bailey Canyon proposal. The Meadows is a thoughtful plan that delivers significant community benefits while supporting the Mater Dolorosa Monastery. The sustainability features The Meadows offers is the direction all new developments should follow and the net-zero water commitment is unprecedented in our City.

The Meadows would add needed supply to ease California's housing shortage that has driven up Sierra Madre's home prices and rents, and do so in a way that is compatible with our City's character. Without developments such as The Meadows it will likely remain impossible to afford a home in our City, and increasingly likely residents will be driven out as rents become unsustainable.

The Meadows demonstrates that we can provide new community benefits, housing, and preserve our community's character. Please approve The Meadows plan and support sustainable change in Sierra Madre.

Paul Unger



City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Re: Support for The Meadows at Bailey Canyon, April 7 Planning Commission Hearing. Public Comment

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Sincerely,

Jesse Hathaway

Neighbor

City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Re: Support for The Meadows at Bailey Canyon, April 7 Planning Commission Hearing, Public Comment

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Sincerely,

Jane Podrebarac

Neighbor

City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

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Please vote to approve The Meadows project,

Marisa Rose  
Sierra Madre Resident



Re: Support for The Meadows at Bailey Canyon, April 7 Planning Commission Hearing. Public Comment

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Sincerely,

Mike Lee

Resident

City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

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The Passionists have been a fixture of Sierra Madre for nearly 100 years and The Meadows supports keeping the this historic landmark and organization in place for the next 100+ years.

The Meadows demonstrates that we can provide new community benefits and preserve our community's character. Please approve The Meadows plan and support sustainable change in Sierra Madre.

Additionally, it will bring much needed tax revenues.

Sincerely,  
Michaeline Roach

City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Re: Support for The Meadows at Bailey Canyon, April 7 Planning Commission Hearing. Public Comment

I support The Meadows at Bailey Canyon proposal because it provides a new community park at no cost to current residents and makes significant commitments to sustainability that will make this plan the most energy-efficient community in the history of Sierra Madre. A new public park would reopen what we used to have access to, and will allow us to walk through and enjoy these lands with our kids and pets. We look forward to using this serene land again while preserving the monastery and the natural habitat above it. The Meadows is a strong, sustainable plan and is deserving of your support.

Please vote to approve The Meadows project.

Thank you,

Teresa Loera

City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Re: Support for The Meadows at Bailey Canyon, April 7 Planning Commission Hearing. Public Comment

I am writing to express my support for The Meadows at Bailey Canyon proposal. The Meadows is a thoughtful plan that delivers significant community benefits while supporting the Mater Dolorosa Monastery. The sustainability features The Meadows offers is the direction all new developments should follow and the net-zero water commitment is unprecedented in our City.

The Passionists have been a fixture of Sierra Madre for nearly 100 years and The Meadows supports keeping the this historic landmark and organization in place for the next 100+ years.

The Meadows demonstrates that we can provide new community benefits and preserve our community's character. Please approve The Meadows plan and support sustainable change in Sierra Madre.

Sincerely,

David Loera

Neighbor

City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Re: Support for The Meadows at Bailey Canyon, April 7 Planning Commission Hearing. Public Comment

Dear Planning Commission,

I am writing to express my support for The Meadows at Bailey Canyon proposal. The Meadows is a thoughtful plan that delivers significant community benefits while supporting the Mater Dolorosa Monastery. The sustainability features The Meadows offers is the direction all new developments should follow and the net-zero water commitment is unprecedented in our City.

The Passionists have been a fixture of Sierra Madre for nearly 100 years and The Meadows supports keeping the this historic landmark and organization in place for the next 100+ years.

The Meadows demonstrates that we can provide new community benefits and preserve our community's character. Please approve The Meadows plan and support sustainable change in Sierra Madre.

Sincerely,

Mike Lee

Neighbor

City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Re: Support for The Meadows at Bailey Canyon, April 7 Planning Commission Hearing. Public Comment

Dear Planning Commission,

I support the Meadows at Bailey Canyon because it is a balanced plan that protects open spaces and adds important parkland to our City.

The project will permanently preserve over 30 acres of hillside open space that serves as an important area for wildlife movement. Plus, a new 3-acre public park will provide residents with a wonderful new recreational amenity that will serve to complement the existing Bailey Canyon Wilderness Park. Better yet, this park space will be constructed and maintained at no cost to existing residents or the City.

It is critical that any new development provide public benefits and addresses impacts. This project does exactly that. It is good for both future and existing residents and I hope you will vote to advance this project.

Thank you,  
Michael Cunningham

City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Re: Support for The Meadows at Bailey Canyon, April 7 Planning Commission Hearing. Public Comment

I support the fact that The Meadows is proposing to bring a new public park to our community. The current location of the proposed park is fenced off and no longer easy to access. Supporting the Meadows means that Sierra Madre can enjoy a safe, beautiful park that would offer a variety of spaces that encourages people to live active lives and enjoy the scenery of our cherished neighborhood.

The Meadows makes great use of its expansive 3 acre park space with a landscaped path that weaves through active kids play areas, serene picnic benches, abundance of trees and even a small bridge.....I believe this will elevate the entire well being of the citizens and improve the culture of the great city..... Progress is positive and to an extent necessary when thought out so thoroughly by creditable and highly qualified experts with the experience of these stakeholders.

We have a creative plan before us, one that respects the history of Sierra Madre while making strides to welcome new residents to call Sierra Madre home. I support The Meadows and urge you to vote YES on The Meadows.

Sincerely,

Phil Cannon

City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Re: Support for The Meadows at Bailey Canyon, April 7 Planning Commission Hearing. Public Comment

Dear City Hall:

I support the Meadows at Bailey Canyon because it is a balanced plan that protects open spaces and adds important parkland to our City.

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It is critical that any new development provide public benefits and addresses impacts. This project does exactly that. It is good for both future and existing residents and I hope you will vote to advance this project.

Thank you,

Cameron Thornton

City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Re: Support for The Meadows at Bailey Canyon, April 7 Planning Commission Hearing. Public Comment

Dear City Clerk,

I am writing to express my support for sustainable, smartly planned neighborhoods like the Meadows at Bailey Canyon. The Meadows is a creative solution providing much needed homes for new families while embracing a sustainable and environmentally conscious Sierra Madre.

The new housing opportunities provided by the Meadows are more than just homes, they actively protect and improve upon our community. Neighborhoods designed with protected open space, solar to reduce carbon emissions, and drought-tolerant landscaping to help protect our water supply should be the future for all of Sierra Madre.

Additionally, new housing creates move-up opportunities elsewhere in our community, allowing for young families to find the perfect starter home and enjoy both the new public park and our City's rich history. Please support environmentally conscionable housing opportunities in Sierra Madre.

Thank you for your time.

Thomas Mason

City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Re: Support for The Meadows at Bailey Canyon, April 7 Planning Commission Hearing. Public Comment

To City Clerk:

I support the fact that The Meadows is proposing to bring a new public park to our community. The current location of the proposed park is fenced off and no longer easy to access. Supporting the Meadows means that Sierra Madre can enjoy a safe, beautiful park that would offer a variety of spaces that encourages people to live active lives and enjoy the scenery of our cherished neighborhood.

The Meadows makes great use of its expansive 3 acre park space with a landscaped path that weaves through active kids play areas, serene picnic benches, abundance of trees and even a small bridge.

We have a creative plan before us, one that respects the history of Sierra Madre while making strides to welcome new residents to call Sierra Madre home. I support The Meadows and urge you to vote YES on The Meadows.

Kimberly Virgin

City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Re: Support for The Meadows at Bailey Canyon, April 7 Planning Commission Hearing. Public Comment

**To City Clerk:**

I support the fact that The Meadows is proposing to bring a new public park to our community. The current location of the proposed park is fenced off and no longer easy to access. Supporting the Meadows means that Sierra Madre can enjoy a safe, beautiful park that would offer a variety of spaces that encourages people to live active lives and enjoy the scenery of our cherished neighborhood.

The Meadows makes great use of its expansive 3 acre park space with a landscaped path that weaves through active kids play areas, serene picnic benches, abundance of trees and even a small bridge.

We have a creative plan before us, one that respects the history of Sierra Madre while making strides to welcome new residents to call Sierra Madre home. I support The Meadows and urge you to vote YES on The Meadows.

**Linda Binkley**

City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Re: Support for The Meadows at Bailey Canyon, April 7 Planning Commission Hearing. Public Comment

**Dear City Clerk,**

I write to express my support for the Meadows at Bailey Canyon. The Meadows serves as a model for sustainable development and demonstrates a commitment to reducing the impacts of climate change through the inclusion of 100% electric homes. Further, the project includes a wide variety of water saving features, including drought tolerant landscaping, high efficiency fixtures, and green stormwater infrastructure that recharges our local groundwater supply. Achieving "net zero" water usage at the project through increasing our local water supply and providing funds for homeowners to retrofit their lawns with native landscapes benefits all Sierra Madre residents. I hope you will join me in supporting sustainable projects like the Meadows.

**Korie Beth Equality Brown**

City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Re: Support for The Meadows at Bailey Canyon, April 7 Planning Commission Hearing. Public Comment

Dear City Hall,

I support the Meadows at Bailey Canyon because it is a balanced plan that protects open spaces and adds important parkland to our City.

The project will permanently preserve over 30 acres of hillside open space that serves as an important area for wildlife movement. Plus, a new 3-acre public park will provide residents with a wonderful new recreational amenity that will serve to compliment the existing Bailey Canyon Wilderness Park. Better yet, this park space will be constructed and maintained at no cost to existing residents or the City.

It is critical that any new development provide public benefits and addresses impacts. This project does exactly that. It is good for both future and existing residents and I hope you will vote to advance this project.

Sincerely,

Theresa Evans



City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Re: Support for The Meadows at Bailey Canyon, April 7 Planning Commission Hearing. Public Comment

The Retreat Center has been a landmark for 100 years in our community. The Monastery has provided services to our city, our neighbors and surrounding communities. We remember a time where we could access the land and utilize the beauty every day while still allowing the Retreat Center to host their tranquil events.

I support The Meadows at Bailey Canyon as it will help keep the Monastery active, but will give our community a renewed connection to The Retreat Center.

Without this project, we risk losing the historic building, preserved land, and the community benefits the Retreat Center brings. Please don't let this jewel disappear and vote yes The Meadows at Bailey Canyon.

Thank you,

Steven Katz

City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

**To City Clerk:**

I support the fact that The Meadows is proposing to bring a new public park to our community. The current location of the proposed park is fenced off and no longer easy to access. Supporting the Meadows means that Sierra Madre can enjoy a safe, beautiful park that would offer a variety of spaces that encourages people to live active lives and enjoy the scenery of our cherished neighborhood.

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We have a creative plan before us, one that respects the history of Sierra Madre while making strides to welcome new residents to call Sierra Madre home. I support The Meadows and urge you to vote YES on The Meadows.

**Mike Lucille McDonald**



City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Re: Support for The Meadows at Bailey Canyon, April 7 Planning Commission Hearing. Public Comment

**Dear Planning Commission,**

I support the Meadows at Bailey Canyon because it is a balanced plan that protects open spaces and adds important parkland to our City.

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It is critical that any new development provide public benefits and addresses impacts. This project does exactly that. It is good for both future and existing residents and I hope you will vote to advance this project.

**Sincerely,**

**Dave and Mina**



City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

I support the fact that The Meadows is proposing to bring a new public park to our community. The current location of the proposed park is fenced off and no longer easy to access. Supporting the Meadows means that Sierra Madre can enjoy a safe, beautiful park that would offer a variety of spaces that encourages people to live active lives and enjoy the scenery of our cherished neighborhood.

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Thank you,

Kim Brandstater

City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Re: Support for The Meadows at Bailey Canyon, April 7 Planning Commission Hearing. Public Comment

**Dear City Clerk,**

I support the fact that The Meadows is proposing to bring a new public park to our community. The current location of the proposed park is fenced off and no longer easy to access. Supporting the Meadows means that Sierra Madre can enjoy a safe, beautiful park that would offer a variety of spaces that encourages people to live active lives and enjoy the scenery of our cherished neighborhood.

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We have a creative plan before us, one that respects the history of Sierra Madre while making strides to welcome new residents to call Sierra Madre home. I support The Meadows and urge you to vote YES on The Meadows.

**Thank you,**

**Tracy Hammond**

City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Re: Support for The Meadows at Bailey Canyon, April 7 Planning Commission Hearing. Public Comment

Dear Planning Commission,

I support the fact that The Meadows is proposing to bring a new public park to our community. The current location of the proposed park is fenced off and no longer easy to access. Supporting the Meadows means that Sierra Madre can enjoy a safe, beautiful park that would offer a variety of spaces that encourages people to live active lives and enjoy the scenery of our cherished neighborhood.

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We have a creative plan before us, one that respects the history of Sierra Madre while making strides to welcome new residents to call Sierra Madre home. I support The Meadows and urge you to vote YES on The Meadows.

Sincerely,

Tuesday Bassen

City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Re: Support for The Meadows at Bailey Canyon, April 7 Planning Commission Hearing. Public Comment

**Dear City Clerk,**

I support the fact that The Meadows is proposing to bring a new public park to our community. The current location of the proposed park is fenced off and no longer easy to access. Supporting the Meadows means that Sierra Madre can enjoy a safe, beautiful park that would offer a variety of spaces that encourages people to live active lives and enjoy the scenery of our cherished neighborhood.

The Meadows makes great use of its expansive 3 acre park space with a landscaped path that weaves through active kids play areas, serene picnic benches, abundance of trees and even a small bridge.

We have a creative plan before us, one that respects the history of Sierra Madre while making strides to welcome new residents to call Sierra Madre home. I support The Meadows and urge you to vote YES on The Meadows.

Sincerely,

Sakura Pottery



City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Re: Support for The Meadows at Bailey Canyon, April 7 Planning Commission Hearing. Public Comment

I am writing to you in support of a proposed housing development called The Meadows at Bailey Canyon which is located at the Mater Dolorosa Passionist Retreat Center owned by The Passionists of Holy Cross Providence. Religious retreats have been held on the premises since 1926 and various ecumenical groups and recovery programs also come to Mater Dolorosa. The Mater Dolorosa staff also operates a Food Ministry, preparing, packaging and delivering over 1,400 meals to people in Sierra Madre and neighboring communities who had previously received meals from programs that have been suspended due to COVID-19.

Funds generated by the Meadows at Bailey Canyon housing project will be used for the care of its senior priests and brothers, who now have an average, age of 77. The decision to hire a firm to develop 42 beautiful homes on their grounds, it seems is a wise decision. This is private property, and The Passionists of the Holy Cross have all rights to sell a portion of the property in order to plan their future retirement!

The proposed project will provide much-needed residences in order to shorten the housing crisis as the State of California faces now. Our support of this project is critically needed, and I'm looking to the leadership of the City of Sierra Madre to help correct the current imbalance in housing. I have friends who are looking to move to Sierra Madre and cannot find a house to buy.

In September, Governor Newsom signed The California Comeback Plan which invests an unprecedented \$22 billion in housing which will lead to the creation of over 84,000 new affordable homes for Californians, including over 44,000 new housing units. This Plan marks the most significant investment in housing in California's history with \$10.3 billion proposed for housing and over \$12 billion for the unhoused.

While there has been a great deal of opposition to this project, and to the question of increased housing, in general, I urge the City Board to consider of the advantages of this upscale housing for the benefit of the community as the whole.

First, The Meadows at Bailey Canyon project is situated close to public transportation and the city's amenities so that its residents' vehicles will be less likely to add to the growing congestion of local streets and highways. Second, in my humble opinion the idea of building good quality homes is better than having either a school or some other institution built on the monastery property. School buses and parents busing children driving up and down the streets create more congestion and noise than what the neighbors would want.

I hope you agree that increase in good quality housing is for the benefits of local home owners, and that providing appropriate housing is the only way to insure that we remain a healthy and thriving community.

Please support this much-needed project – your positive vote and leadership are critically important in this matter.

Sincerely,

Stephen Biskup



City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Re: Support for The Meadows at Bailey Canyon, April 7 Planning Commission Hearing. Public Comment

The Meadows at Bailey Canyon makes sense for our city. The project has a thoughtful design that meets what the City has outlined as requirements for the project.

We need more housing. We need more public parks. We need to preserve land for wildlife and natural habitat. We need historic landmarks to remain.

It is very rare to find a plan to addresses all of these "needs". This is the right plan for Sierra Madre. Please support The Meadows at Bailey Canyon.

Roses Bennett

City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Re: Support for The Meadows at Bailey Canyon, April 7 Planning Commission Hearing. Public Comment

**Dear Planning Commission,**

Both Mater Dolorosa and the Meadows team have been very open about the project plans and the design approach. This ongoing communication between the two groups have been helpful as the community learns more about The Meadows project. As someone who wants to protect the Retreat Center experience, I like that The Meadows could raise funds to ensure that the retreats would not be impacted and would provide funds to care for the retreat center's priests and brothers.

Aside from its positive impacts to the Retreat Center, The Meadows would provide a public park, preserve over half of its site to open space, and bring in low-density housing which conforms to the existing character in Sierra Madre. All the while, the project would generate revenue for our city through development fees, tax revenues, and property tax.

This is the right decision for Sierra Madre, no matter your involvement with the Retreat Center, although it is a very significant community benefit that The Meadows offers that no other project has, which is to protect the Mater Dolorosa Retreat Center, a historical landmark and entity.

Sincerely,

Charles W. Mason



City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Re: Support for The Meadows at Bailey Canyon, April 7 Planning Commission Hearing. Public Comment

**City Clerk:**

Mater Dolorosa has been a part of our community for decades. They have provided shelter and guidance to those who are most in need from all of over the world. Their work has reached the corners of our earth, but so much of what they accomplish is right here in Sierra Madre.

Their food ministry program has a focus on alleviating the most critical food insecurities to those around us. In years past, they allowed residents to roam their lands to find their own peace. They have always been a good neighbor to all around.

We ask that the city continue this ""good neighbor"" way and allow Mater Dolorosa to build according to the plan they have worked on with the developer. This is the right plan for them to continue these works in Sierra Madre. Please do the neighborly thing and vote yes.

**Thank you,**

**Bruce Borggreve**

City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Public Comment for The Meadows, Mater Dolorosa

Dear Planning Commission,

The Passionists and the Mater Dolorosa Retreat League have sponsored retreats, days of prayer and other spiritual programs to enable anyone who seeks refuge to find it. They have been good neighbors in Sierra Madre and I stand with them as they support The Meadows at Bailey Canyon.

The Meadows proposes a plan to permanently protect the foothills of Mt. Wilson. Of all the things that the Meadows proposes, I support the protection of open space and the inclusion of a public park as it allows people to experience the great outdoors, whether it be in natural space or in a public park. We need more projects that give back as part of their development, and The Meadows has struck the perfect balance between the two.

Sincerely,

Jill Borggeve

City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Public Comment for The Meadows, Mater Dolorosa

**To City Hall,**

The Passionists are beloved in our community. They work to restore the hearts of the broken and provide a safe space to connect with Christ. I support The Meadows because it will allow the Mater Dolorosa Retreat Center to continue their ministry. The proposed plan for The Meadows has been vetted by the community, including the Passionists, and will allow the Retreat Center to invite more people without significant changes to the surrounding areas.

Please voice yes on The Meadows and allow the Retreat Center to continue its mission in our community.

**Sherm Railsback**

City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Dear Planning Commission & City Council,

The Meadows at Bailey Canyon project is a sure way to allow the Monastery to continue its ministry in Sierra Madre for many, many years while protecting the Mater Dolorosa Retreat Center experience. As the world continues to encourage and incentivize forms of burnout, we need to be more vigilant about preserving healing spaces like the Mater Dolorosa Retreat Center – this includes the land that surrounds it as well.

I support The Meadows at Bailey Canyon because it will support the continuation of the Monastery's mission, surrounded by an environment very similar to what it has been used to over the last 100 years: single-family homes, natural space and a park space that is open to the public.

Sincerely,

Andrew Thornton

City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Public Comment for The Meadows, Mater Dolorosa

Dear Planning Commission & City Council,

I have always supported how the Monastery aims to restore nature and healing in our community. While there are many reasons to support The Meadows, I particularly like how the project carries this conviction in its own way, specifically through water conservation.

The addition of new homes understandably means that there will be new demand for water, but the way that The Meadows addresses this should be the new standard for developments moving forward. The project incorporates drought-tolerant landscaping, water-conserving fixtures, capturing stormwater to recharge our aquifer, upgraded irrigation systems to reuse water for landscape irrigation, ultimately resulting in net zero water use for new homes. This means that existing residents do not need to worry about new residents burdening the already scarce water supply. This is a huge step for us to accommodate new residents while making smart design choices to restore our community's resources and consequently, our public health.

Now is the time to support The Meadows. I urge you to join me to support this project.

Thank you,

Kimberly Thornton

City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Public Comment for The Meadows, Mater Dolorosa

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Now is the time to support The Meadows. I urge you to join me to support this project.

Thank you,

Dale Edgington



City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Public Comment for The Meadows, Mater Dolorosa

City Hall,

The Meadows plan best meets the Province's needs, protects the retreat experience while having the least amount of impact on neighbors. The Meadows plan successfully blends with the existing land uses near the retreat center and its home designs reflect the character of Sierra Madre. Additionally, the plan respects nature through its protection of open space and will open a new public park for the community.

The development of The Meadows ensures that the vacant land will remain true to the existing community character. This would not be achievable through an institutional development. I highly urge you to move this plan forward.

Thank you,

Trevor Cole



City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Public Comment for The Meadows, Mater Dolorosa

Dear Planning Commission,

The Passionists are beloved in our community. We work to restore the hearts of the broken and provide a safe space to connect with Christ. I support The Meadows because it will allow the Mater Dolorosa Retreat Center to continue our ministry. The proposed plan for The Meadows has been vetted by the community, including us, and will allow the Retreat Center to invite more people without significant changes to the surrounding areas.

Please voice yes on The Meadows and allow the Retreat Center to continue our mission in this community.

Fr. Michael Higgins, C.P.

City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Public Comment for The Meadows, Mater Dolorosa

Dear City Hall:

The Mater Dolorosa Retreat Center is more than a historic landmark in Sierra Madre; it represents hospitality and compassion for all people. Having the Monastery in our City is extremely important, and that's why I support The Meadows at Bailey Canyon.

The Meadows is the preferred choice for the Monastery because it will extend what we love so much about Sierra Madre: open space, park/recreation areas, and a place for families to live. The Meadows achieves all three of these elements while incorporating sustainable building practices to benefit future generations.

Thank you,

Dana & Greg Brooks

City of Sierra Madre

Re: Support for The Meadows at Bailey Canyon, April 7 Planning Commission Hearing. Public Comment

Planning Commissioners:

The Meadows at Bailey Canyon project is a sure way to allow the Monastery to continue its ministry in Sierra Madre for many, many years while protecting the Mater Dolorosa Retreat Center experience. As the world continues to encourage and incentivize forms of burnout, we need to be more vigilant about preserving healing spaces like the Mater Dolorosa Retreat Center – this includes the land that surrounds it as well.

I support The Meadows at Bailey Canyon because it will support the continuation of the Monastery's mission, surrounded by an environment very similar to what it has been used to over the last 100 years: single-family homes, natural space and a park space that is open to the public.

Thank you,

Brian Seaman



City of Sierra Madre

Re: Support for The Meadows at Bailey Canyon, April 7 Planning Commission Hearing. Public Comment

Dear City Council & Planning Commission,

The Meadows plan successfully blends with the existing land uses near the retreat center and its home designs reflect the character of Sierra Madre. Additionally, the plan respects nature through its protection of open space and will open a new public park for the community.

The development of The Meadows ensures that the vacant land will remain true to the existing community character. This would not be achievable through an institutional development. I highly urge you to move this plan forward.

Thank you,

Loretta Pehanich

Re: Public Comment Submittal for April 7 Hearing on The Meadows

Dear Planning Commission,

Mater Dolorosa has been a part of our community for decades. They have provided shelter and guidance to those who are most in need from all of over the world. Their work has reached the corners of our earth, but so much of what they accomplish is right here in Sierra Madre.

Their food ministry program has a focus on alleviating the most critical food insecurities to those around us. In years past, they allowed residents to roam their lands to find their own peace. They have always been a good neighbor to all around.

We ask that the city continue this ""good neighbor"" way and allow Mater Dolorosa to build according to the plan they have worked on with the developer. This is the right plan for them to continue these works in Sierra Madre. Please do the neighborly thing and vote yes.

Sincerely,

Greg Brooks

City of Sierra Madre

Re: Support for The Meadows at Bailey Canyon, April 7 Planning Commission Hearing. Public Comment

Dear City Hall:

The Meadows plan best meets the Province's needs, protects the retreat experience while having the least amount of impact on neighbors. The Meadows plan successfully blends with the existing land uses near the retreat center and its home designs reflect the character of Sierra Madre. Additionally, the plan respects nature through its protection of open space and will open a new public park for the community.

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Sincerely,

Kate Robinson

City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Re: Support for The Meadows at Bailey Canyon, April 7 Planning Commission Hearing. Public Comment

Dear City Hall,

I have always supported how the Monastery aims to restore nature and healing in our community. While there are many reasons to support The Meadows, I particularly like how the project carries this conviction in its own way, specifically through water conservation.

The addition of new homes understandably means that there will be new demand for water, but the way that The Meadows addresses this should be the new standard for developments moving forward. The project incorporates drought-tolerant landscaping, water-conserving fixtures, capturing stormwater to recharge our aquifer, upgraded irrigation systems to reuse water for landscape irrigation, ultimately resulting in net zero water use for new homes. This means that existing residents do not need to worry about new residents burdening the already scarce water supply. This is a huge step for us to accommodate new residents while making smart design choices to restore our community's resources and consequently, our public health.

Now is the time to support The Meadows. I urge you to join me to support this project.

DAVID MUHS

City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Re: Support for The Meadows at Bailey Canyon, April 7 Planning Commission Hearing. Public Comment

Dear Planning Commission:

I support The Meadows at Bailey Canyon because it will support the continuation of the Monastery's mission, surrounded by an environment very similar to what it has been used to over the last 100 years: single-family homes, natural space and a park space that is open to the public.

John Van Dyke

City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Re: Support for The Meadows at Bailey Canyon, April 7 Planning Commission Hearing. Public Comment

Dear City of Sierra Madre,

The Meadows plan best meets the Province's needs, protects the retreat experience while having the least amount of impact on neighbors. The Meadows plan successfully blends with the existing land uses near the retreat center and its home designs reflect the character of Sierra Madre. Additionally, the plan respects nature through its protection of open space and will open a new public park for the community.

The development of The Meadows ensures that the vacant land will remain true to the existing community character. This would not be achievable through an institutional development. I highly urge you to move this plan forward.

Thank you,

John Robinson



City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Public Comment for The Meadows, Mater Dolorosa

**Dear Planning Commission,**

I support the fact that The Meadows is proposing to bring a new public park to our community. The current location of the proposed park is fenced off and no longer easy to access. Supporting the Meadows means that Sierra Madre can enjoy a safe, beautiful park that would offer a variety of spaces that encourages people to live active lives and enjoy the scenery of our cherished neighborhood.

The Meadows makes great use of its expansive 3 acre park space with a landscaped path that weaves through active kids play areas, serene picnic benches, abundance of trees and even a small bridge.

We have a creative plan before us, one that respects the history of Sierra Madre while making strides to welcome new residents to call Sierra Madre home. I support The Meadows and urge you to vote YES on The Meadows.

Sincerely,

**Christina Shymkovich Dreyer**



City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Re: Support for The Meadows at Bailey Canyon, April 7 Planning Commission Hearing. Public Comment

Dear City Council & Planning Commission,

The Meadows at Bailey Canyon project is a sure way to allow the Monastery to continue its ministry in Sierra Madre for many, many years while protecting the Mater Dolorosa Retreat Center experience. As the world continues to encourage and incentivize forms of burnout, we need to be more vigilant about preserving healing spaces like the Mater Dolorosa Retreat Center – this includes the land that surrounds it as well.

I support The Meadows at Bailey Canyon because it will support the continuation of the Monastery's mission, surrounded by an environment very similar to what it has been used to over the last 100 years: single-family homes, natural space and a park space that is open to the public.

Sincerely,

Roy Baron

City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Re: Public Comment Submittal for April 7 Hearing on The Meadows

Dear Planning Commissioners and City Council Members,

The Meadows at Bailey Canyon makes sense for our city. The project has a thoughtful design that meets what the City has outlined as requirements for the project.

We need more housing. We need more public parks. We need to preserve land for wildlife and natural habitat. We need historic landmarks to remain.

It is very rare to find a plan to addresses all of these "needs". This is the right plan for Sierra Madre. Please support The Meadows at Bailey Canyon.

Sincerely,  
Roses Bennett



City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Re: Public Comment Submittal for April 7 Hearing on The Meadows

### The Meadows at Bailey Canyon

I support the fact that The Meadows is proposing to bring a new public park to our community. The current location of the proposed park is fenced off and no longer easy to access. Supporting the Meadows means that Sierra Madre can enjoy a safe, beautiful park that would offer a variety of spaces that encourages people to live active lives and enjoy the scenery of our cherished neighborhood.

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We have a creative plan before us, one that respects the history of Sierra Madre while making strides to welcome new residents to call Sierra Madre home. I support The Meadows and urge you to vote YES on The Meadows.

Sincerely,

Christina Shymkovich Dreyer

City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Re: Public Comment Submittal for April 7 Hearing on The Meadows

Dear City Hall:

The Meadows at Bailey Canyon makes sense for our city. The project has a thoughtful design that meets what the City has outlined as requirements for the project.

We need more housing. We need more public parks. We need to preserve land for wildlife and natural habitat. We need historic landmarks to remain.

It is very rare to find a plan to addresses all of these "needs". This is the right plan for Sierra Madre. Please support The Meadows at Bailey Canyon.

Thank you,

Maureen Manocchio

City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Re: Public Comment Submittal for April 7 Hearing on The Meadows

Dear City Council & Planning Commission,

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We have a creative plan before us, one that respects the history of Sierra Madre while making strides to welcome new residents to call Sierra Madre home. I support The Meadows and urge you to vote YES on The Meadows.

Sincerely,

Dorothy Hyon

City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Re: Public Comment Submittal for April 7 Hearing on The Meadows

Dear Planning Commission,

I support the Meadows at Bailey Canyon because it is a balanced plan that protects open spaces and adds important parkland to our City.

The project will permanently preserve over 30 acres of hillside open space that serves as an important area for wildlife movement. Plus, a new 3-acre public park will provide residents with a wonderful new recreational amenity that will serve to complement the existing Bailey Canyon Wilderness Park. Better yet, this park space will be constructed and maintained at no cost to existing residents or the City.

It is critical that any new development provide public benefits and addresses impacts. This project does exactly that. It is good for both future and existing residents and I hope you will vote to advance this project.

Thank you,  
Michaeline Roach

City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Re: Public Comment, April 7, Meadows

Dear Planning Commission,

I support the Meadows at Bailey Canyon because it is a balanced plan that protects open spaces and adds important parkland to our City.

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It is critical that any new development provide public benefits and addresses impacts. This project does exactly that. It is good for both future and existing residents and I hope you will vote to advance this project.

Sincerely,

Thomas Clark



City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Re: Public Comment, April 7, Meadows

Dear City Hall,

While I support The Meadows at Bailey Canyon proposal and think the developer has done an excellent job of creating the sort of sustainable neighborhood we need, I can understand that some in town are NIMBYs and do not wish to open the doors of Sierra Madre to any new families. However, I cannot understand why they would try to stop The Meadows by threatening the future of a religious institution that has done nothing but good here for nearly 100 years.

Consider this: Mater Dolorosa has worked with the City to provide 24,000 meals to the elderly, sick and home-bound since the COVID pandemic hit. If you fail to approve The Meadows plan and the initiative passes, it will become illegal to expand their kitchen to meet a growing need for this good Christian service to others.

Please support The Meadows plan when it comes before you, and don't be silent as Stop the Housing Project's few supporters try to gather signatures for their discriminatory petition. Tell the people who elected you that the initiative would be a terrible mark on the good character of our City of Sierra Madre!

Thank you,

Taffy Bishara

City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Re: Public Comment, April 7, Meadows

Dear City Council & Planning Commission,

I am submitting my public comment in support of The Meadows at Bailey Canyon.

The plan is environmentally-conscious, thoughtful of the existing retreat center, and mindful of surrounding neighbors.

1. There are many components of the plan that are sustainable. Removing any new water demand on the City's water supply. Using sustainable building materials and design elements. Preserving land for natural habitat.

2. The Retreat Center has been serving our community for nearly 100 years. This plan allows them to remain and provide that service and serenity. Without this plan, they could go away, which would be a HUGE loss for our city.

3. Many discussions have been made with neighbors resulting in some homes being only one-story. The homes are similar sizes to others in our town and will be in 4 different styles, which should match our community character.

This is a good fit for our community. Please support The Meadows at Bailey Canyon like I and many of our residents do.

Thank you.

Manuel Briones

City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Re: Public Comment, April 7, Meadows

Dear City Council & Planning Commission,

I have attended retreats at Mater Dolorosa for many years.- Over 40 years!- and I am grateful to the Passionists community for all of the inspiration, spiritual enrichment and hospitality that the Retreat center has provided. I am writing you now to express my support for the Meadows at Bailey Canyon plan.

The Retreat Center has brought peace and spiritual growth to many in our community and throughout Southern California.

The Meadows plan supports the work of the Passionists, allowing them to provide care and providing the message of Jesus to many in need here and throughout the world.

Your evaluation of the project must be driven by other concerns-of course. Fortunately, the Meadows plan addresses all its environmental impacts and will be a very sustainable neighborhood in Sierra Madre.

Now looks like your approval may not be enough, though. Those who want to close off Sierra Madre to others have put forth a discriminatory, anti-property rights initiative that would make it impossible for Mater Dolorosa to continue to meet growing community needs, as it has for nearly a century.

Please speak out against it!!

Patrick Wickhem



City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Re: Public Comment, April 7, Meadows

Dear Planning Commission & City Council,

I support the Meadows at Bailey Canyon because it is a balanced plan that protects open spaces and adds important parkland to our City.

The project will permanently preserve over 30 acres of hillside open space that serves as an important area for wildlife movement. Plus, a new 3-acre public park will provide residents with a wonderful new recreational amenity that will serve to complement the existing Bailey Canyon Wilderness Park. Better yet, this park space will be constructed and maintained at no cost to existing residents or the City.

It is critical that any new development provide public benefits and addresses impacts. This project does exactly that. It is good for both future and existing residents and I hope you will vote to advance this project.

Sincerely,

David Loera

Neighbor

City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Re: Public Comment - Meadows

Dear City Council & Planning Commission,

The Retreat Center has been a landmark for 100 years in our community. The Monastery has provided services to our city, our neighbors and surrounding communities. We remember a time where we could access the land and utilize the beauty every day while still allowing the Retreat Center to host their tranquil events.

I support The Meadows at Bailey Canyon as it will help keep the Monastery active, but will give our community a renewed connection to The Retreat Center.

Without this project, we risk losing the historic building, preserved land, and the community benefits the Retreat Center brings. Please don't let this jewel disappear and vote yes The Meadows at Bailey Canyon.

Sincerely,

Tito Corona

City of Sierra Madre  
Planning Commission  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

Re: Public Comment - Meadows

I support the Meadows at Bailey Canyon because it is a balanced plan that protects open spaces and adds important parkland to our City.

The project will permanently preserve over 30 acres of hillside open space that serves as an important area for wildlife movement. Plus, a new 3-acre public park will provide residents with a wonderful new recreational amenity that will serve to complement the existing Bailey Canyon Wilderness Park. Better yet, this park space will be constructed and maintained at no cost to existing residents or the City.

It is critical that any new development provide public benefits and addresses impacts. This project does exactly that. It is good for both future and existing residents and I hope you will vote to advance this project.

Thank you,

Thomas Clark

rt  
adows at  
Canyon

MICHAEL  
First Name

KEFALAS  
Last Name

\_\_\_\_\_  
Title

THE ONLY PLACE IN TOWN  
Company/ Business Name

\_\_\_\_\_  
Street

W. SIERRA MADRE BL.

S.M., CA 91024  
Address - City, Zip

\_\_\_\_\_  
Email

\_\_\_\_\_  
Phone

x   
Signature

I want my voice to be heard by...

- Being listed as a supporter
- Writing a support letter to the City  
Scan the code on the back
- Hosting my neighbors for a coffee meeting
- Attending a public meeting  
in-person or virtually
- Speaking at a public meeting



Yes!

I Support  
The Meadows at  
Bailey Canyon

Marc A Sullivan

First Name

Last Name

Title

Company Business Name

Address - Street

Address - City, Zip

Email

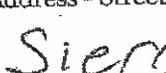
Signature

I want my voice heard by...

- Being listed supporter
- Writing a submission to the City  
Scan the code
- Hosting my for a coffee
- Attending a meeting in-person or via video
- Speaking at meeting



W CARTER



Sierra Madre

CA 91024



Email

Marc A Sullivan



Yes!

I Support

The Meadows at

Bailey Canyon

Tom

First Name

Clark

Last Name

PRESIDENT

Title

HAYNES AND OAKLEY ARCHITECTS

Company/ Business Name

Address - Street

SIERRA MADRE CA 91024

Address - City, Zip

Email

Phone

x

Signature

I want my voice to be heard by...



Being listed as a supporter



Writing a support letter to the City  
Scan the code on the back



Hosting my neighbors for a coffee meeting



Attending a public meeting  
in-person or virtually



Speaking at a public meeting

Teri

First Name

Loera

Last Name

[Redacted Address]

Address

Sierra Madre

City

91024

Zip Code

[Redacted Phone]

Phone

[Redacted Email]

Email

I support the Monastery

I want to show my support by...

Writing a support letter to the City

Attending a public meeting

Speaking at a public meeting



SupportTheMonastery.com

Candice

First Name

Neill

Last Name

[Redacted Address]

Address

Sierra Madre

City

91024

Zip Code

[Redacted Phone]

Phone

[Redacted Email]

Email



I support the Monastery

I want to show my support by...



Writing a support letter to the City



Attending a public meeting



Speaking at a public meeting



[SupportTheMonastery.com](https://SupportTheMonastery.com)

Christine Parushra

First Name

Last Name

[Redacted Address]

Address

SM

City

Zip Code

Phone

[Redacted Email]

Email

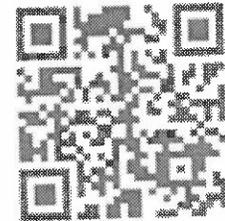
I support the Monastery

I want to show my support by...

Writing a support letter to the City

Attending a public meeting

Speaking at a public meeting



SupportTheMonastery.com

Lugh

First Name

Kelly

Last Name

[Redacted Address]

Address

Sierra Madre

City

91024

Zip Code

[Redacted Phone]

Phone

[Redacted Email]

Email

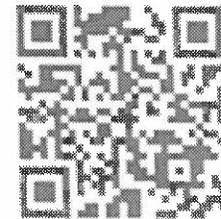
I support the Monastery

I want to show my support by...

Writing a support letter to the City

Attending a public meeting

Speaking at a public meeting



SupportTheMonastery.com

Justin

First Name

Slosky

Last Name

[Redacted Address]

Address

Sierra Madre

City

91024

Zip Code

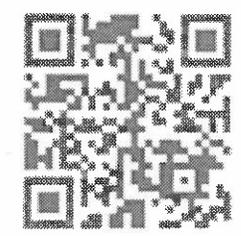
[Redacted Phone]

Phone

[Redacted Email]

Email

- I support the Monastery
- I want to show my support by...
- Writing a support letter to the City
- Attending a public meeting
- Speaking at a public meeting



SupportTheMonastery.com

Celeste

First Name

Wright

Last Name

[Redacted Address Line]

Address

Sierra Madre 91024

City

Zip Code

Phone

[Redacted Address Line]

Email

I support the Monastery

I want to show my support by...

Writing a support letter to the City

Attending a public meeting

Speaking at a public meeting



SupportTheMonastery.com

LUPE

ROSENBLUM

First Name

Last Name

Address

City

Zip Code

Phone

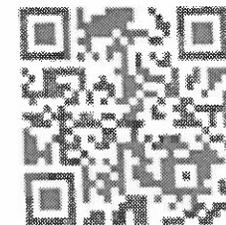


Email

I support the Monastery *Went to events*

I want to show my support by...

- Writing a support letter to the City
- Attending a public meeting
- Speaking at a public meeting



[SupportTheMonastery.com](https://SupportTheMonastery.com)

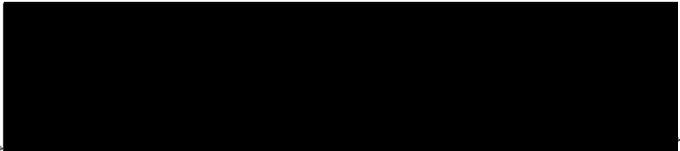
Jenny

Kao

First Name

Last Name

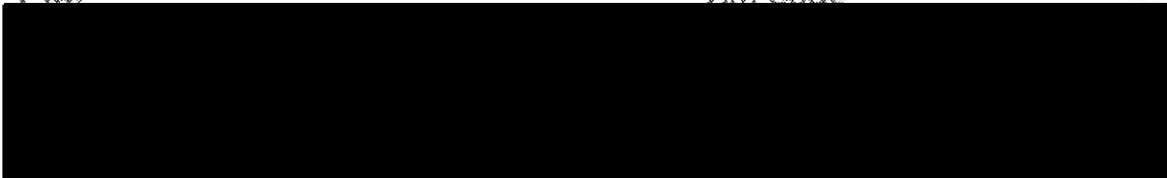
Address



City

Zip Code

Phone



I support the Monastery

I want to show my support by...



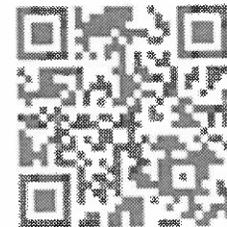
Writing a support letter to the City



Attending a public meeting



Speaking at a public meeting



SupportTheMonastery.com

Carol Canterbury

Last Name

[Redacted]

Address

SM 91024

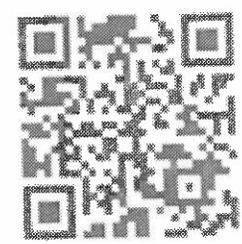
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Email

I support the Monastery

I want to show my support by...

- Writing a support letter to the City
- Attending a public meeting
- Speaking at a public meeting



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Gail

Gottfried

Last Name

Address

SM

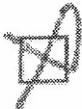
City

91024

Zip Code

Phone

Email



I support the Monastery

I want to show my support by...



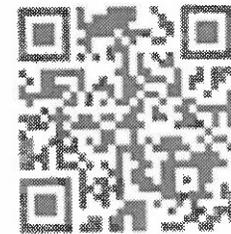
Writing a support letter to the City



Attending a public meeting



Speaking at a public meeting



SupportTheMonastery.com

Jana  
First Name

Illig  
Last Name

[Redacted]  
Address

Sierra Madre  
City

91024  
Zip Code

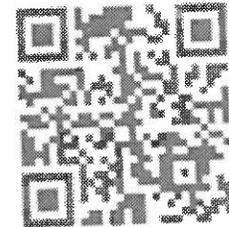
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Phone

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E

I support the Monastery

I want to show my support by...

- Writing a support letter to the City
- Attending a public meeting
- Speaking at a public meeting



SupportTheMonastery.com

Ponah

NATKINDS

First Name

Last Name

[Redacted Address]

Address

JEREB MAKE 91024

City

Zip Code

Phone

[Redacted Phone Number]

Email

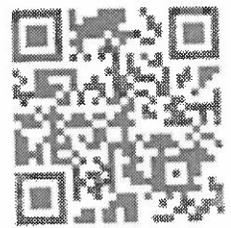
I support the Monastery

I want to show my support by...

Writing a support letter to the City

Attending a public meeting

Speaking at a public meeting



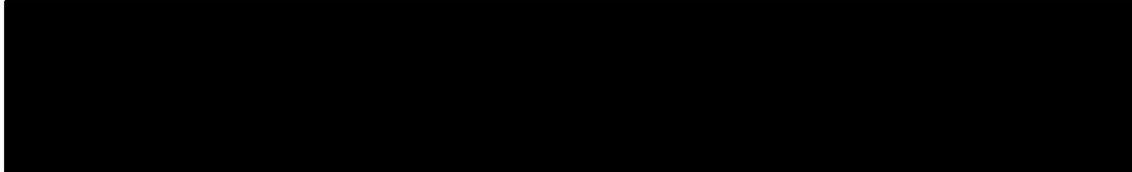
SupportTheMonastery.com

Esther

First Name

DAVIS

Last Name



Sierra Madre

City

91024

Zip Code

Phone

Email

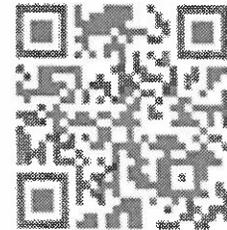
I support the Monastery

I want to show my support by...

Writing a support letter to the City

Attending a public meeting

Speaking at a public meeting



SupportTheMonastery.com

Ray Long

First Name

Last Name

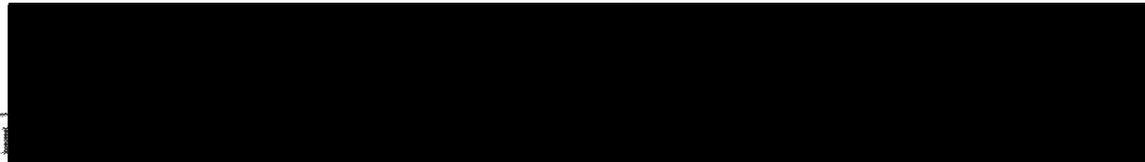


City

90124

Zip Code

Phone



Email

I support the Monastery

**I want to show my support by...**

Writing a support letter to the City

Attending a public meeting

Speaking at a public meeting



[SupportTheMonastery.com](https://SupportTheMonastery.com)

Chris

Fetner

First Name

Last Name

[Redacted Address]

Address

SM

91024

[Redacted Phone]

City

Zip Code

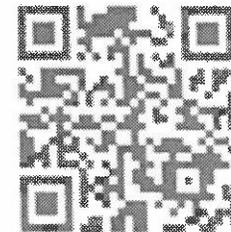
Phone

[Redacted Email]

I support the Monastery

I want to show my support by...

- Writing a support letter to the City
- Attending a public meeting
- Speaking at a public meeting



SupportTheMonastery.com

Deanna

First Name

Lucia

Last Name

[Redacted Address]

Address

Serra Madre

City

91029

Zip Code

[Redacted Phone]

Phone

[Redacted Address]



I support the Monastery

I want to show my support by...



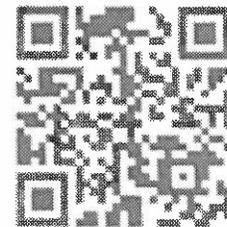
Writing a support letter to the City



Attending a public meeting



Speaking at a public meeting



SupportTheMonastery.com

Ralph

RODRIGUEZ

First Name

MOUNTAIN

Last Name

[Redacted Address]

Address

SIERRA MADRE 91024

City

Zip Code

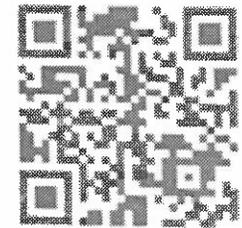
Phone

[Redacted Phone Number]

I support the Monastery

I want to show my support by...

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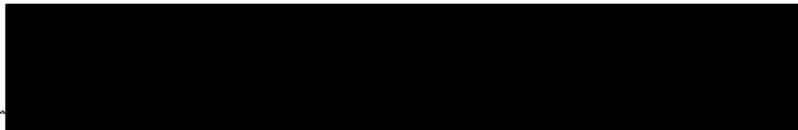


SupportTheMonastery.com

First Name *Margareth*

Last Name *Weakley*

Address



City

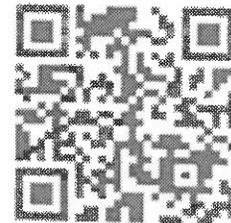
Zip Code



I support the Monastery

I want to show my support by...

- Writing a support letter to the City
- Attending a public meeting
- Speaking at a public meeting



[SupportTheMonastery.com](https://SupportTheMonastery.com)

.1  
Neil  
First Name

Katsuyama  
Last Name

Address

Sierra Madre

91024

Phone

City

Zip Code

Email

I support the Monastery

I want to show my support by...

Writing a support letter to the City

Attending a public meeting

Speaking at a public meeting



SupportTheMonastery.com

Norman

Chien

First Name

Last Name

[Redacted Address]

Address

Sierra Madre

CA

City

Zip Code

[Redacted Phone]

Phone

[Redacted Address]

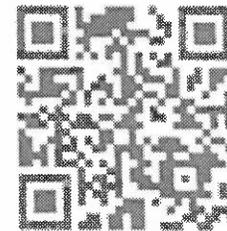
I support the Monastery

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Speaking at a public meeting



SupportTheMonastery.com

Carol

Thompson

First Name

Last Name

[Redacted Address]

Address

Sierra Madre 91024

City

Zip Code

Ph

[Redacted Phone Number]

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DIRE

RJK

Last Name

[Redacted]

Address

WA

90041

[Redacted]

Zip Code

Phone

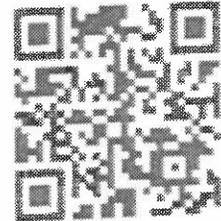
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Email

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Ann

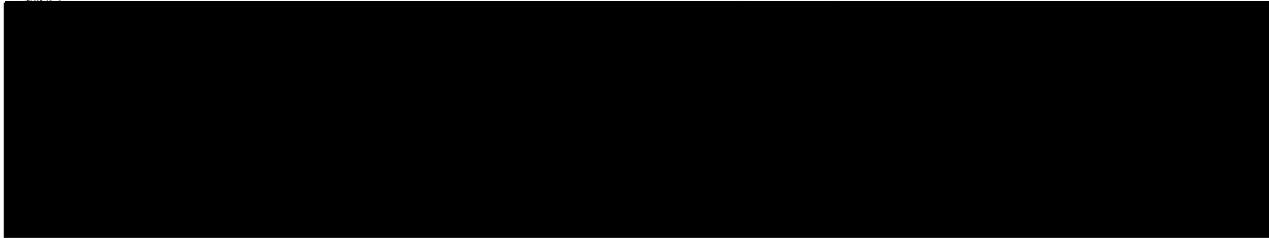
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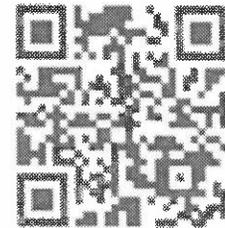
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Joanne Hawes

First Name



Pasadena

City



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MARIANNE

First Name

BOYD

Last Name

[Redacted Address]

Address

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City

91004

Zip Code

[Redacted Phone]

Phone

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Email

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Fuzzy

Brained

First Name

[Redacted Address]

Pasadena

91101

[Redacted City]

City

[Redacted Phone Number]

@Dr Fuzzy Brained

IG / TikTok / FB

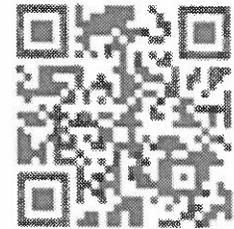
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Jamie

First Name

Boyer

Last Name

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91007

Zip Code

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Phone

[Redacted City]

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Joaguen

Calderon

First Name

Last Name

[Redacted Address]

Address

Monterey Park

91755

[Redacted Phone]

City

Zip Code

Phone

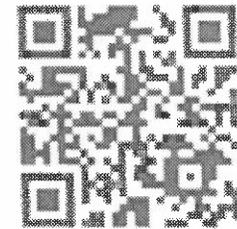
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Patty

First Name

TAVAR

Last Name

[Redacted Address]

Address

MONROSE

City

CA

Zip Code

[Redacted Phone]

Phone

[Redacted]

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Gill

Johnson



Address

Duarte

City

91010

Zip Code



Phone



Email

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Elizabeth

First Name

Hernández

Last Name

[Redacted Address]

Address

Agua

City

CA

Zip Code

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Phone

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Email

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Sheik S+Joh

First Name

Last Name

Address

City

Zip Code

Phone

Email



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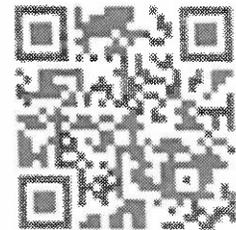
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Speaking at a public meeting



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JAMES

COUGHLIN

First Name

Last Name

[Redacted Address]

Address

Merifoo

92586

[Redacted Phone]

City

Zip Code

Phone

[Redacted Email]

Email

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TONI

ARCAZA

First Name



SOUTH PASADENA 91031

City



Email

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Ariel

First Name

Loop

Last Name

[Redacted Address]

Address

Pasadena

City

91107

Zip Code

[Redacted Phone]

Phone

[Redacted Email]

Email

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TOM  
First Name

WOLFE  
Last Name

[Redacted]  
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ALTADENA  
City

91001  
Zip Code

[Redacted]  
Phone

[Redacted]  
Email

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Alton Mann

Last Name

[Redacted Address Line]

Address

Upland

91784

Zip Code

[Redacted Phone Number]

Phone

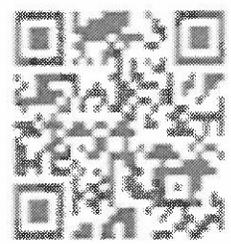
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Cindy Tamburello

First Name

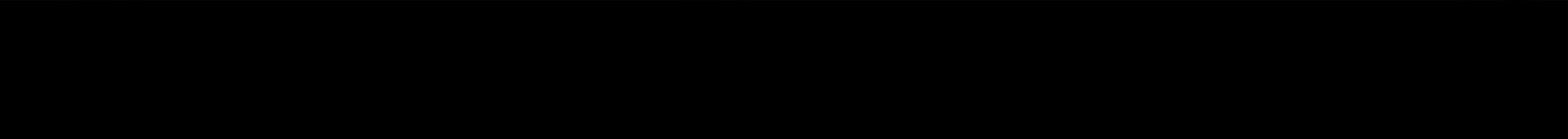


Address

Glendora



City



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Mary Bovarini

First Name

Last Name

Arcadia 91007

City

Zip Code

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Michelle

First Name

Souza

Last Name

[Redacted Address]

Address

West Covina

City

91791

Zip Code

[Redacted Phone]

Phone

[Redacted Email]

Email

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Aswley

First Name

Harrison

Last Name

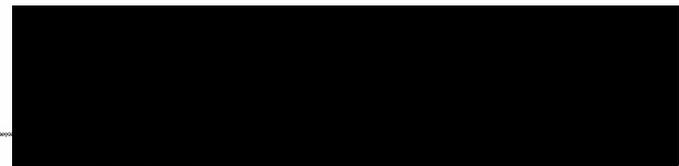


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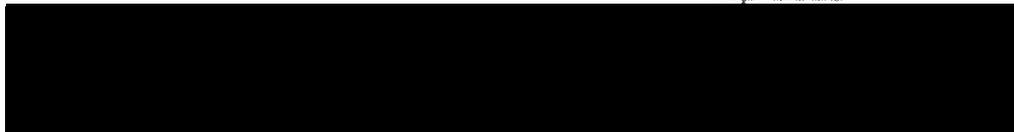
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91752

Zip Code



Phone



Email

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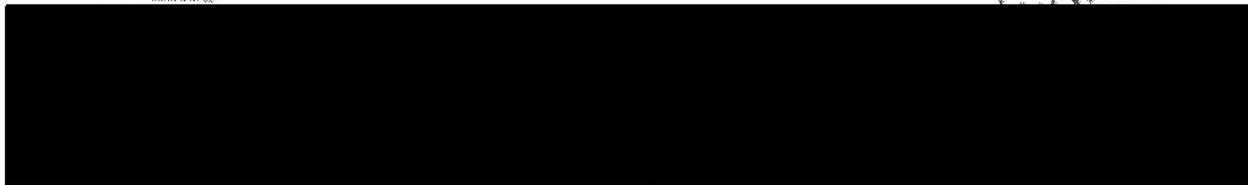


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Belinda

First Name

Rainwater

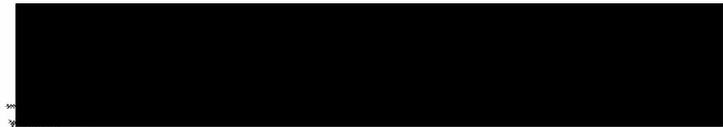


Monterey Park

City

91754

Zip Code



Address



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Debbie Montesanti

First Name



San Dimas 91773

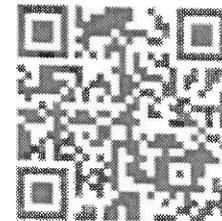
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Don

First Name

Thorsen

Last Name

Address

Upland, CA

City

91784

Zip Code

Phone

Email

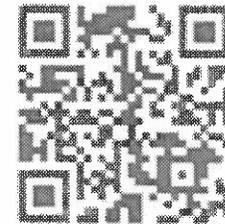
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11

Cindy Camins

First Name

Last Name

[Redacted Address Line]

Address

Mamma

91016

[Redacted Phone Number]

City

Zip Code

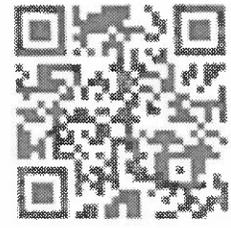
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Email

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IRICA

First Name

DURAN

Last Name



Monterey

City

91016

Zip Code



Phone



Email



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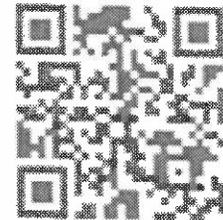
Writing a support letter to the City



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Speaking at a public meeting



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Sophia

First Name

Bedell

Last Name

[Redacted Address]

Address

Pasadena

City

91103

Zip Code

[Redacted]

[Redacted]

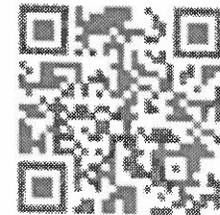
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First Name *Jessica* Last Name *Bird*

[Redacted]

Address

*Pasadena*

*91107*

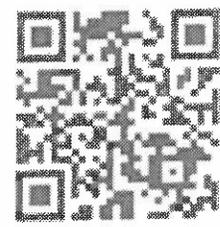
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- Speaking at a public meeting



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First Name

Brad

Last Name

Clarke

Address

[Redacted]

City

Claremont, CA

Zip Code

[Redacted]

[Redacted]

Email

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Madison White  
First Name



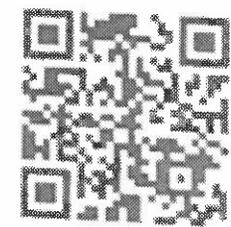
City Zip Code  
91107



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Alia

First Name

Buck

Last Name



Tucson, AZ

City



Zip Code



Phone



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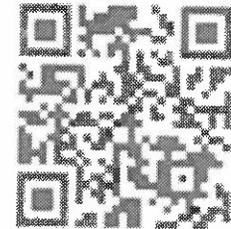
Writing a support letter to the City



Attending a public meeting



Speaking at a public meeting



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Karun

Bill

First Name

Last Name

[Redacted Address Line]

Address

Lakewood

[Redacted Zip Code]

[Redacted Phone]

City

Zip Code

Phone

[Redacted Email]

Email

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Marilyn Spelton  
First Name Last Name

[REDACTED]  
Address

Monrovia 91016 [REDACTED]  
City Zip Code Phone

[REDACTED]  
Email

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DANIEL

First Name

HERLACHE

Last Name

~~1234~~

Address



MONROVIA

City

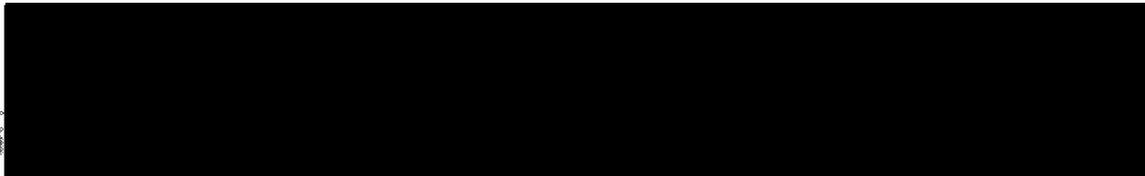
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Zip Code



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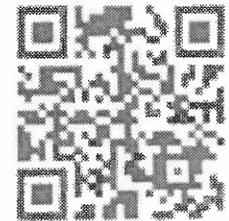
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Speaking at a public meeting



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Alma

Scharf

First Name

Last Name

[Redacted Address]

Address

La Verne

91750

City

Zip Code

Phone

~~055~~

[Redacted Phone Number]

Email



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**From:** [Philip Yao](#)  
**To:** [Public Comment](#)  
**Cc:** [Alexander Arrieta](#); [Nancy Beckham](#); [Barbara Vellturo](#)  
**Subject:** Public Comment - City of Sierra Madre Draft Environmental Impact Report, The Meadows at Baily Canyon  
**Date:** Thursday, April 7, 2022 1:02:54 PM  
**Attachments:** [image.png](#)

---

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

Attention Sierra Madre City Hall, Planning Commission, and City Council,

Sierra Madre residents have brought up a number of concerns and issues with the proposed 42 large homes development on the Mater Dolorosa Passionist Retreat Center grounds. This development is commonly referred to as The Meadows at Baily Canyon; and, there has been much disinformation advanced by City of Sierra Madre staff, Passionist Order, and the developer. They've framed our concerns and actions as attempts to restrict the property rights of the Passionist, which is nothing short of a lie.

Mater Dolorosa is an integral part of the Sierra Madre community. They have been recognized as such in our General Plan and they have enjoyed significant community support. Their importance to our local microcosm and the American society also exempts some, if not all, of their federal and state income taxes and property taxes. To have this community misrepresent the position of the opposition is an egregious repudiation of what they stand for.

Concerned residents have identified deleterious impacts such as increased air pollution, water shortage, loss of a significant wildfire fire break, increased traffic on an already dangerous street with limited egress, loss of habitat for indigenous wildlife, denuding of local vegetation and mature trees, the adding of large home in an earthquake zone, and homes that do not reflect the surrounding community. These have been summarily dismissed and/or dismissed via questionable sleight-of-hand analyses, including a "net zero water usage" assessment. These actions from the city that I love and raised my children in show me that greed knows no bounds. The rush to revenue and the push for city job security at the expense of the quality of life of its residents is inexcusable!

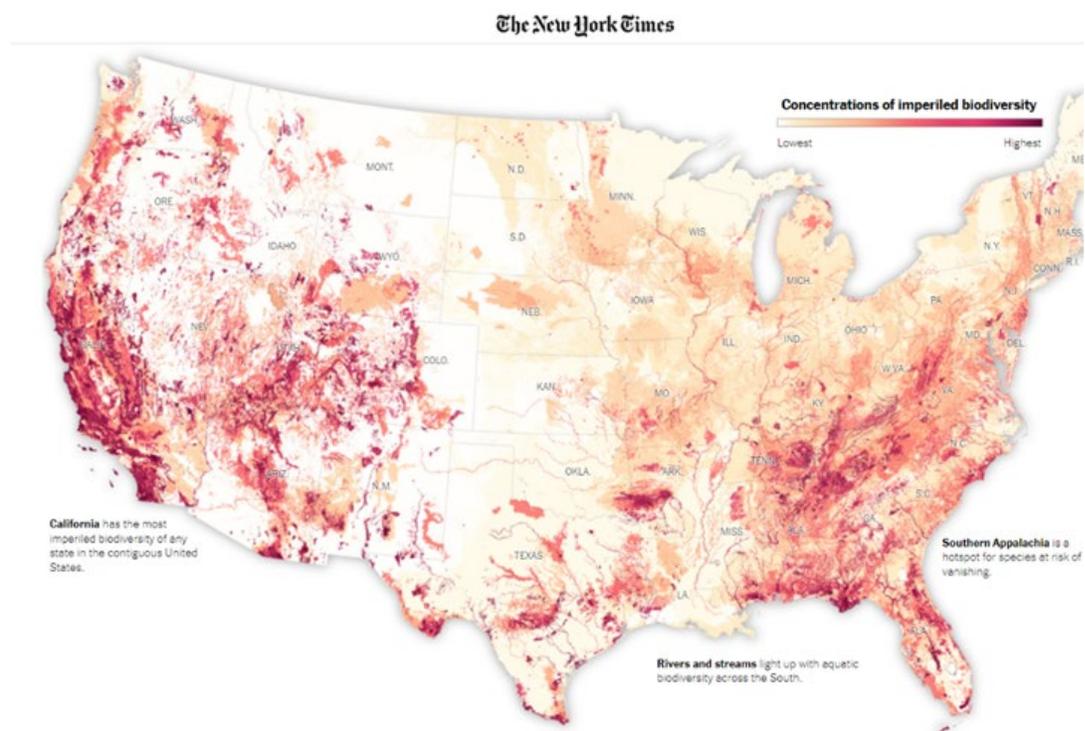
If the above is not enough to put a brake on the development, Sierra Madre as we know it is doomed! The impacts identified by concerned Sierra Madre residents are the constituents of a bigger picture problem of the state of biodiversity in the United States. Not only is the desire to maximize profit and extend job security at the expense of Sierra Madre residents, it significantly imperils biodiversity of Sierra Madre, the state of California, and, ultimately, the United States of America. The image below is from the New York Times dated 3 March 2022. It shows California to be the most imperiled biodiversity of any states in the contiguous United States. Please note where Sierra Madre is located.

You are our voices. Please represent us and make the right decision!

Regards,

Philip Yao

■ Sierra Keys Drive, Sierra Madre, CA 91024



**From:** [Susan Neuhausen](#)  
**To:** [Public Comment](#); [PlanningCommission](#)  
**Subject:** Re: Planning Commission Rezoning and Variances  
**Date:** Thursday, April 7, 2022 3:54:30 PM

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

Date: April 7, 2022

To: Planning Commission

From: Susan Neuhausen, [REDACTED] Grove St

Re: This is for the public record. Consideration of the "Meadows at Bailey Canyon" project

As established in a letter sent to Mr. Han of New Urban West (NUW) on January 13, 2022 notifying him of the completion of his application, this Planning Commission (PC) meeting was tentatively scheduled for April 7, 2022. However, city officials overlooked a requirement in the application process that New Urban West (NUW) did not fulfill. As part of that notification Mr. Han was instructed: *"Please post notice on site pursuant to application requirement, and return the notarized Posting of Notice Affidavit to City 14 days prior to the hearing date."* New Urban West did not post a notice and did not return a notarized Posting of Notice Affidavit as required by the City, and so this meeting should be postponed. When this was pointed out to the City Attorney on April 5th in an email from Mr. Bacio, Mr. Giragosian stated that what had been requested of NUW was not required and so the meeting would proceed. The email must have been forwarded to NUW, as they posted a notice today at the Mater Dolorosa gates. Given the City's stated goal of full transparency for the project, it would seem that more notification rather than less is in order.

This proposed project is the largest tract housing subdivision in Sierra Madre history, and it is being built in an extremely high-severity fire zone on an environmentally sensitive hillside in a time of severe drought. Because of its tremendous impact on the environment, adjacent neighborhood, and inconsistency with the policies and values of our General Plan and municipal code for low-density residential housing, it seems premature to discuss the project when the Planning Commission does not have all the needed and complete documents for review.

Regarding the environmental impact report (EIR): The final EIR (FEIR) was prepared by Dudak, a consultant hired by the developer. MIG, the independent consultant hired by Sierra Madre, reviewed the draft EIR. However, MIG has not reviewed the FEIR and there needs to be an independent review prior to a vote. It is such a large document that it is unlikely that the Planning Commission, the City Council, or even the city staff have read the entire document carefully. Some Sierra Madre residents have read it carefully and made comments which were not adequately addressed and, in fact, the 12-page document from Preserve Sierra Madre was omitted from the FEIR until it was pointed out that it was missing. A revision was then posted without notifying the public. Clearly, there may be other missing documents. The lack of adequate review by an independent firm is evident as pointed out in the letter from Ms. Grossman Palmer outlining deficiencies and the need for recirculation. Other aspects that are woefully inadequate include the alternative plans. There are legitimate alternatives that aren't mentioned, including a land conservancy as suggested by State Senator Portantino, a 90-unit assisted living facility as proposed by Clyde Stauff, a smaller number of houses on larger lots consistent with Hillside zoning, etc. The alternatives presented are largely "worst-case" scenarios to alarm the City and residents.

Regarding the Specific Plan: State law 65454 requires that "No specific plan may be adopted or amended unless the proposed plan is or amendment is consistent with the general plan." In the case of the proposed project, the Specific Plan does NOT abide by Sierra Madre's General Plan and

municipal codes and appears to be designed for the express purpose of circumventing the General Plan and municipal codes, as well as sensible land use. Because the Specific Plan supersedes the General Plan and the accompanying municipal code, it needs to be sufficiently *specific* so that the Planning Commission and City Council know the true impact of the project. What has been submitted does not fulfill that obligation. Mr. Giragosian stated at the joint Planning Commission and City Council meeting that the discretionary review, including design elements, needs to be evaluated by the Planning Commission. The Planning Commission does not have the required information. Below are just a few of the items missing or inconsistent in the Specific Plan. Note that a major item missing is that no house plans have yet been submitted for your review, which impacts almost all of the items below.

A. When the project was first described, NUW stated that all houses would be built at once. Now they say it will be phased development. How many houses per phase? Within a phase, are they all on the same street? How does that change the timeline of construction? How do they ensure that the same models and facades won't be built adjacent to one another, or that the vast majority won't all be the same model? This is directly related to preserving the character of Sierra Madre, which is already a tall order for this tract subdivision. As Henry Leung has shown, houses on streets adjacent to the proposed subdivision are 90% one-story dwellings, whereas NUW has only said the majority will be two-story. In effect, that could mean that 41 out of 42 will be two-story houses. There is currently no requirement in place that stops this from happening.

B. What is the size of each lot and the maximum-size house that can be on each lot? This is directly related to the building code provisions in the municipal building code Section 17.20 R-1 residential zone that all low-density housing construction in Sierra Madre needs to abide by in terms of maximum allowable gross square footage (which includes measuring from the outside walls and includes the garage), setback from street, etc. In the NUW specific plan, in Table 3.2, they violate those rules with a minimum setback of only 15' compared to the 25' required and a maximum lot coverage of >50% compared to the <40% for all other residential R1 housing. Most egregious though is the excessive size of the houses given the size of the lot. I have sent you information on that previously and can send it again. Moreover, there are numerous inconsistencies in NUW's documents and communications with regard to what the minimum and maximum house sizes are (measured as interior square footage and not including garages, staircases, exterior walls, etc.) and the minimum lot sizes. Clearly, they know the size of the lots as it is drawn on their diagrams, but the actual sizes are not denoted. Shouldn't that information be provided before the Planning Commission can make its final determinations?

C. Specific information about house models, designs, and plans is lacking, as well as data about which houses can be built on which lots. In particular, house plans need to be provided so that residents and the Planning Commission have time to review them. This is critical for determining that they fit with the municipal code, including maximum allowable square footage and massing on the lot, as well as fitting into the character of the neighborhood. This is also important for fire protection. With its proximity to Bailey Canyon, this housing project is less than "sustainable" when it comes to burning and threatening the adjacent neighborhood. The latest fire codes only address slowing down how long it takes a house to catch fire. Not requiring fire-resistant landscaping other than in the front yard and letting houses have only 5-foot side yards needs to be further discussed.

D. The Gross density calculations presented are misleading. The amount of space in the development for houses is 9.2 Acres and not 17.2 Acres. Therefore, density is e 4.6 houses per acre, which is higher than elsewhere in Sierra Madre. Moreover, some of the comparisons NUW has presented seem blatantly inaccurate and misleading, such as the comparison to Jameson Place, which has nowhere near the number of houses that NUW claimed.

E. Energy. NUW has consistently advertised in the newspaper, in flyers, and even in their Powerpoint presentation that the project's houses will be 100% electric. But when called on that claim, they backtrack and admit that they're just encouraging all-electric housing. Encouraging? That means that it's entirely up to the buyer, and that the vast majority of houses are likely to have gas ranges, furnaces, and fireplaces—which makes them fire-prone, carbon-emitting liabilities. Will the City step in and require that a percentage be electric?

F. Water usage. There is no description anywhere of how much water will be required during

construction and where the water will come from. Moreover, the reference to “net zero” water usage that was in every NUW communication until recently is now gone and replaced with several options for water collection with a dollar amount per house built. Ironically, one of the options includes paying to replace lawns, yet NUW said that homeowners would not be required to do xeriscape and would likely have lawns in the backyard.

G. The park and number of houses. At the joint meeting, the City Attorney said that after the 23<sup>rd</sup> house was built, there would be sufficient funds for NUW to build the park. However, NUW’s presentation stated that if they reduced size of the project to 34 houses, they would not build a park as the cost would not be covered. This is a discrepancy which needs to be addressed. Moreover, a water capture basin is supposed to be built under the park. If they do not build the park, is the water capture basin still being put in place?

These are just some examples of items that have not been determined such that it is not clear how you, the Planning Commission, can even discuss the project in a way that is at all thoughtful and comprehensive.

On Thu, Apr 7, 2022 at 3:23 PM Barbara Velturo [REDACTED] wrote:  
To the Planning Commission and City Council Members

The documents you are being asked to evaluate are voluminous - the DEIR, the FEIR, Volume 1 (an amendment to the FEIR to respond to several dozen pages of comments from 4 individuals and 2 organizations that the City somehow “overlooked” - and there was never any announcement to the citizens that any amendment to the “FINAL” Deir was on the City Website) And Volume 11 (apparently a comprehensive “FINAL” EIR with helpful underlines and strikeouts to show the MANY changes - no notice given to the Citizens of that document either) Thousands of pages of documents, some with conflicting facts.

However, the basic decisions you are being asked to make are simple and familiar to the commission members. And have long ago been established as the standards we will adhere to.

The first and essential issue that may be before the Planning Commission will be whether to rezone the property from Institutional to a Specific Plan Zone (or a residential zone, Specific Plan overlay). That is a prerequisite for the project to take place.

The Sierra Madre Ordinance on rezoning, based on an application from a property owner says:

17.64.050 - Decision.

A. After conducting a hearing on any proposed amendment, the commission, based upon its decision as to whether the public interest, convenience and necessity so require, shall take one of the following courses of action:

However, in order to determine whether the “public interest, convenience

and necessity” require the rezoning of the Meadows property from Institutional, the Planning Commission needs to be aware of the many impacts the rezoning would have on the community. Even those impacts that have been mitigated (or that the developer claims have been mitigated) are impacts nevertheless.

It may also require a comparison between those impacts and ones that would occur in an Institutional Development - IF A DEVELOPER WAS REQUIRED TO ADHERE TO THE ZONING, CONDITIONAL USE AND MASTER PLAN REQUIREMENTS of that zone. Such a comparison would show that the Huge Buildings shown in the Developer’s presentations and included as “Alternatives” in the EIR would never be allowed by our City. IF OUR ORDINANCES WERE ADHERED TO - we have no doubt at all that the owner and developer would also seek to override those restrictions if required to develop under the Institutional Zoning.

Obviously UNLESS the Planning Commission finds that “the public interest, convenience and necessity” REQUIRE the suggested development, they should deny the rezoning.

The second issue before the Planning Commission is the adoption of the presented Specific Plan. That plan would set its own zoning regulations. Essentially what they ask for in seeking approval of the Specific Plan is VARIANCES from the ordinances which regulate all other Single Family Housing in Sierra Madre. They are seeking variances from house sizes and lot coverage, as well as set backs. The Plan also allows many changes after the plan is adopted (up to 20% in some cases) with only the approval of the Director of Planning.

If the City’s standards for approving Variances is applied to these Single Family Homes, the basis for approving or denying the plan that enacts these variations rather than our carefully crafted ordinances is clear.

## **Chapter 17.60 - VARIANCES AND DISCRETIONARY PERMITS**

- **17.60.010 - Variances.**

- When practical difficulties, unnecessary hardships or results inconsistent with the general intent and purpose of this chapter occur by reason of the strict and literal interpretation of any of its provisions, a zone variance may be granted in the manner hereinafter set forth in this chapter.

- 



- Any variance granted shall be subject to such conditions as will assure that the adjustment thereby authorized shall not constitute a grant of special privileges inconsistent with the limitations upon other properties in the vicinity and zone in which such property is situated.
- 
- A variance shall not be granted for a parcel of property which authorizes a use or activity which is not otherwise expressly authorized by the zone regulation governing the parcel of property.
- 
- **17.60.020 - Variances—Burden of proof.**
- Before any zone variance is granted, the applicant shall show, to the reasonable satisfaction of the body hearing such matter, that there are special circumstances applicable to the property involved, such as size, shape, topography, location or surroundings, which do not generally apply to other adjacent properties included in the same zone as the subject property, which make the granting of the zone variance necessary in order to facilitate a reasonable use of the property involved.

The deliberate use of the word "shall" means that the rezoning can not be granted unless the applicant can show that there is no reasonable use of the property unless it is rezoned.

"In the context of statutes, cases such as this one from California, explain that "settled principles of statutory construction direct that courts ordinarily construe the word 'may' as permissive and the word 'shall' as mandatory, particularly when a single statute uses both terms." <https://www.law.cornell.edu/wex/shall#>

Although there are MANY factors to be considered in coming to a decision in this matter, our existing Ordinances do simplify the appropriate standards to apply when granting a single applicant property rights that are unavailable to any others in Sierra Madre whose property is within the Single Family Residential property Zone.

**From:** [Tricia Searcy](#)  
**To:** [Public Comment](#)  
**Subject:** Fw: Comments on DEIR for the Meadows at Bailey Canyon Specific Plan Project  
**Date:** Wednesday, April 6, 2022 2:55:26 PM  
**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.

Please enter the below comment into the public record for the April 7th Planning Commission meeting.

Thanks very much,  
Tricia Searcy

----- Forwarded Message -----

**From:** Tricia Searcy <[REDACTED]>  
**To:** Vincent Gonzalez <[vgonzalez@cityofsierramadre.com](mailto:vgonzalez@cityofsierramadre.com)>  
**Cc:** [REDACTED]  
[REDACTED], 4, 2021, 01:21:45 PM PDT

**Subject:** Comments on DEIR for the Meadows at Bailey Canyon Specific Plan Project

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  
[REDACTED] Fairview Avenue  
Sierra Made, CA 91024  
[REDACTED]

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.

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.

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.”

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.”

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.

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 a service to the project similar to utilities, street improvements etc: **remove it from the sentence.**” P.3 MIG Review (emphasis mine).

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 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

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.

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.

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.

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. 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 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.

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.

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 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.

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.

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.

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 removes(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.

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. "

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.

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.

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.

## 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

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).

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.

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 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.

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.

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 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.

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 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 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.

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.*

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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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**

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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.



Comment Location	MIG Comment	Dudek Response	Dudek Response (2 <sup>nd</sup> Round)
<b>DEIR Executive Summary</b>			
P. ES 2, 4th, Para. 2nd Sentence	Modify to read as follows: Public access for <u>within</u> both of these roads . . .	Revised here and in PD <a href="#">Ok</a> . Also chapter will need to be modified track with other comments/changes in other parts of the EIR.	Complete
<b>DEIR CHAPTER 1.0: INTRODUCTION</b>			
P. 1-1, 1 <sup>st</sup> 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. <a href="#">An exhibit still needs to be provided per our earlier comment.</a>	See Figure 3-4, which has been incorporated and included in the 2 <sup>nd</sup> 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>This 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 Bumble 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 sends the standard acknowledgement letter since converting to the online portal. There should only be 5 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><a href="#">OK</a></p> <p>Table has been added</p> <p><a href="#">OK</a></p> <p>No scoping meeting was held for the project. See response under bio regarding the CDFW comment letter, which has been incorporated. <a href="#">This item needs to be discussed further.</a></p>	It is unclear what needs to be discussed here. MIG seemed 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 <a href="#">OK</a>	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 <a href="#">OK</a>	Addressed
<b>DEIR CHAPTER 3.0: PROJECT DESCRIPTION</b>			
P. 3-1, 2 <sup>nd</sup> Para., 3rd Sentence	Typo: add the word "acres" after the number 3.75	Added <a href="#">OK</a>	Addressed

Comment Location	MIG Comment	Dudek Response	Dudek Response (2 <sup>nd</sup> Round)
P. 3-1, 2 <sup>nd</sup> Para., Last Sentence	With respect to the park, specify whether the project includes the dedication <u>and</u> 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 <b>Ok – Based on the revised language the park will be improved as part of the project – correct?</b>	Park/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 <b>OK</b>	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. If this is not part of the project than 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. <b>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.</b>	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: <ol style="list-style-type: none"><li>1. 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.</li></ol>
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. <b>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.</b>  - <b>COMMENT ON NEW REVISIONS TO OBJECTIVES – See comment above on 45-acre open space dedication.</b>	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, 4 <sup>th</sup> 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 sizes: 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 <b>OK</b>	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. <b>The tense is still wrong in this sentence</b>  “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

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		“ 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. PDF’s AES-1 &2	Both of these PDF’s are somewhat circular in nature in that they refer back to content in the Specific Plan. Instead of identifying them as PDF’s 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 PDF’s 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 exec summary) to be more precise and to include the associated section numbers in the Specific Plan
P. 3-8, PDF UTL-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 timing (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 info 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

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<p>p. 3-8, Wildfire PDF's (and Fire protection plan).</p>	<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? If 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 regs/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/fireflow: below is the excerpt from the FFP 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: at 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 FFP is important to include in the EIR and the FFP 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 FFP 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>P. 3-7, Sec. 3.3.9</p>	<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 <b>OK</b>	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. MWD? 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 <b>Ok</b> .	Addressed
<b>DEIR CHAPTER 4.0: Environmental Analysis</b>			
	Add Mineral Resources to the list of environmental issues addressed.	Done <b>OK</b>	Addressed
<b>DEIR CHAPTER 4.1: 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. <b>These numbers are still inconsistent. Please revise.</b>	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 <b>OK</b>	Addressed
<b>DEIR CHAPTER 4.2: AGRICULTURE AND FORESTRY RESOURCES</b>			
	NO COMMENTS ON THIS SECTION		
<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 8 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. <b>OK. Please provide this information when completed.</b>  <b>NEW COMMENT ON GP Policies - Page4.3-17 – Several from the last draft have been removed: why were they removed?</b>	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 bullets following this text reflect the assumptions accounted for in the CalEEMod runs.	Text was revised as commenter suggested. <b>OK</b>	Addressed
Page 4.3-28, "Health Effects of Other Criteria Air	<ul style="list-style-type: none"> <li>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</li> </ul>	The text was revised to reflect the exceedance of the LST thresholds. <b>OK</b>	Addressed

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Pollutants”, Fourth Paragraph	potentially significant. MIG recommends revising this text to reflect localized particulate matter emissions could be potentially significant.		
Page 4.3-29, Section 4.35, MM-AQ-1	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 afore mentioned 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 concentrations at the MEIR. 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>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>1) 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>2) 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>3) 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>4) 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>1) 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>2) 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 offroad equipment engines would cause confusion for the reader.</li> <li>3) 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>4) The health risk assessment was prepared evaluating emissions of DPM sitewide 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 analysis would be revised consistent with the 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 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 MIG'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 3.04 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	<p>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 basis would have an approximate depth of 13.7 feet. MIG recommends:</p> <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> <p>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>	<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 SRA 9 is 535 pounds per day; however, based on the LST look-up tables provided by the SCAQMD, the CO LST is 623 pounds per day (535 pounds per day is for SRA	<p>The LST was revised to 535 in Appendix B and the EIR.</p> <p>OK</p>	Addressed

Comment Location	MIG Comment	Dudek Response	Dudek Response (2 <sup>nd</sup> Round)
	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.		
Appendix B, Page 30, Section 2.5, "Consistency Criterion No. 2"	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 SCAG 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 for allowed by the project would be consistency with the growth projections accounted for in the 2016 RTP/SCS.	Additional clarification was added to the EIR and Appendix B to address the history of development in the City.  OK	Addressed
Appendix B, Page 33, Table 8	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.	The footnote was removed as no changes to CalEEMod were made for architectural coatings.  OK	Addressed
Appendix B, Page 37, "Construction Health Risk"	Appendix B discloses 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.	Appendix B and the EIR were updated to include the location of the MEIR.  OK	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 480 surface-based line 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 ½ 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>			
<b>General Comment</b>	<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). There comments will need to be addressed.</p>	<p>CDFW concerns have been incorporated. Here is an overview of where issues are addressed:  <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 Bumble Bee             <ol style="list-style-type: none"> <li>a. This species did not come up in the CNDDDB 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 Dudek 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 CNDDDB 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 CNDDDB 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>

Comment Location	MIG Comment	Dudek Response	Dudek Response (2 <sup>nd</sup> Round)
		<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 natal dens (momma’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-DWQ, NPDES No. CAS000002) or the latest approved general permit.</li> </ul> </li> </ul>	

Comment Location	MIG Comment	Dudek Response	Dudek Response (2 <sup>nd</sup> Round)
		<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>1. Jurisdictional Waters               <ol style="list-style-type: none"> <li>a. 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>2. Project Description and Alternatives               <ol style="list-style-type: none"> <li>a. See Chapter 8 of the DEIR</li> </ol> </li> <li>3. Compensatory Mitigation for Impacted Sensitive Habitats               <ol style="list-style-type: none"> <li>a. 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>4. Long-term Management of Mitigation Lands               <ol style="list-style-type: none"> <li>a. None needed since no sensitive or riparian habitats are being impacted.</li> </ol> </li> <li>5. Translocation/Salvage of Plants and Animal Species               <ol style="list-style-type: none"> <li>a. As stated in Section 4.4.1 of the DEIR, no special-status species are expected.</li> </ol> </li> <li>6. Moving out of Harm's Way – Wildlife               <ol style="list-style-type: none"> <li>a. 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 roadways which separates the project site from Bailey Canyon Wilderness Park (USFWS 2020). <b>OK</b>	<b>Addressed</b>
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 maladies and health and structural conditions. As presented in Appendix A, 29% of the individually mapped trees (29 trees) exhibit good health; 48% (48 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 maladies. Trees in fair condition are typical, with few maladies but declining vigor. Trees in poor condition exhibit declining vigor, unhealthy	<p><b>Added policy R10.2 back in the bio and land use section.</b></p> <p><b>Added text regarding tree replacement ratio, required under MM-BIO-3.</b></p>

Comment Location	MIG Comment	Dudek Response	Dudek Response (2 <sup>nd</sup> Round)
		<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." <b>Ok</b></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 address 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 raptor's, including California ground squirrel (<i>Otospermophilus beecheyi</i>) and desert cottontail (<i>Sylvilagus audubonii</i>) were not observed or not abundant enough to provide a unique resource for raptors.” <b>OK</b></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. <b>Yes, we know but 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.</b></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. <b>OK</b>	Addressed
P. 4.4-12, Last Para. Last sentence	Indicate that withMM-BIO-3 that impacts would be less than significant.	Added "...and it would reduce potential impacts to less than significant" to last sentence. <b>OK</b>	Addressed
<b>DEIR CHAPTER 4.5: CULTURAL RESOURCES</b>			
P. 4.5-22, MM-CUL-1	<p>Change the last sentence to read as follows so the MM is not permissive/optional:</p> <p>The WEAP training <del>should</del> <u>shall</u> include a discussion of the types of archaeological resources that may potentially be uncovered during project excavations, laws protecting these resources, and appropriate actions to be taken when these resources are discovered.</p>	<p>Revised <b>OK</b></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 Mater Dolorosa Retreat Center". Please correct this sentence.</p>	Revised

Comment Location	MIG Comment	Dudek Response	Dudek Response (2 <sup>nd</sup> Round)
<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 GHG emissions. For example, "...reduced GHG emissions from California passenger vehicles by about 22% in 2012, <u>compared to XYZ.</u> "	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>  <b>NOTE: additional revisions to the Energy section that were made will be reviewed/verified. Ok - verified</b>	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. <b>This comment is not addressed: please reference the Paleo Study.</b>	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. <b>This revision was not made: please include this revision.</b>	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.cityofsierramadre.com/residents/emergency_management/lmhp">https://www.cityofsierramadre.com/residents/emergency_management/lmhp</a> .  <b>OK</b>	Addressed

Comment Location	MIG Comment	Dudek Response	Dudek Response (2 <sup>nd</sup> Round)
<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 will 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 uncertified and unsuitable for structural support; therefore, it should be removed and recompacted 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><u>Revised. Note that per the Geotech only the top 7 feet were needed to be mitigated</u></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 uncertified and unsuitable for structural support; therefore, it should be removed and recompacted 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 recompacting 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 mem on page 9:</p>	<p>Revised section and MM</p>

Comment Location	MIG Comment	Dudek Response	Dudek Response (2 <sup>nd</sup> Round)
		<ul style="list-style-type: none"> <li>Remedial removals and overexcavation of the site prior to compacted fill placement should include removing all artificial onsite (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 the project geotechnical consultant's observations of subsurface conditions during grading.</li> </ul> <p>Based on Leighton'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., 5 <sup>th</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 PDFs per comments from the applicant's legal counsel and then revised from PDFs to MMs per City comments. They were originally packaged/included in the Geosols consultants Geotech report. Therefore, we made them PDFs 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 PDFs 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 PDFs 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. PDFs 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 PDFs to make sure they are consistent.</p> <p>Geo PDFs came directly from the Geotech. PDFs have already been incorporated to ensure compliance with geo study, which has already been reviewed by MIG consultant. We will leave discussion as is.</p>

Comment Location	MIG Comment	Dudek Response	Dudek Response (2 <sup>nd</sup> Round)
<b>DEIR CHAPTER 4.8/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>2e</sub> 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>2e</sub> , 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>2e</sub> 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 2026, 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>2e</sub> 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>2e</sub> 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 "Vehicular/Mobile Sources" line on page 72, the analysis indicates the project is compliant with and subject to the RTP/SCS targets for 2016; however, the SCAG recently adopted <i>Connect SoCal</i> , 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 4.9: HAZARDS AND HAZARDOUS MATERIALS</b>			
N/A	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 - <a href="#">See Cross comments on FPP</a>	Addressed
<b>DEIR CHAPTER 4.10: 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., 5 <sup>th</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

	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 PDF is too vague to be used as a mitigation or a PDF. See discussion of PDF under Project Description.	Revised PDF to add timing (see PD) <a href="#">See other comments on water supply.</a>	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 <a href="#">See other comments on water supply.</a>	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 <a href="#">OK</a>	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 <a href="#">Ok</a>	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 <a href="#">OK</a>	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  <a href="#">OK</a>	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 SCAG 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  <a href="#">OK</a>	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  <a href="#">OK</a>	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  <a href="#">Ok</a>	Addressed

Table 4.11-1 (Consistency) <b>Policy L51.5:</b>	Please describe other travel modes (beyond pedestrian).	Added  OK	Addressed
Table 4.11-1 (Consistency) <b>Objective L52</b>	This response needs to indicate how the project will maintain levels of service.	Added. Cited LOS study  OK	Addressed
Table 4.11-1 (Consistency) <b>Policy L52.9</b>	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) <b>Objective L53</b>	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) <b>Policy R8.3</b>	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 nigh 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) <b>Policy R10.2</b>	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) <b>Policy R12.3</b>	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

<b>Policy Hz2.1</b>		OK	
Table 4.11-1 (Consistency) <b>Policy Hz2.3</b>	The review indicated presumably does not include the review of building plans. Please revised this response to better demonstrate consistency with this policy.	Revised  OK	Addressed
Table 4.11-1 (Consistency) <b>Policy C4.3</b>	This response does not address the issue raised in Policy C4.3 (i.e., maximize passive prevention measures). Please revise to directly address this policy.	Added some details but exact passive prevention measures are not known at this time  OK	Addressed
Table 4.11-1 (Consistency) <b>Policy C31.5</b>	This response needs to include a description of the water retention facility that will be built under the park.	Added  Ok	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.	Removed discussion of the parkland dedication ordinance as it is not a plan. Left the rest and clarified discussion  OK	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.  OK	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

<p>Department of Health Services Guidelines”</p>	<p>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.</p>		
<p>Page 4.13-4, Section 4.13.2, “California Department of Transportation”</p>	<p>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.</p>	<p>Caltrans’ vibration manual references have been updated.  OK</p>	<p>Addressed</p>
<p>Page 4.13-4, Section 4.13-2, “City of Pasadena General Plan” and “City of Pasadena Municipal Code”</p>	<p>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 Madres. 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.</p>	<p>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</p>	<p>Addressed</p>
<p>Page 4.13-6, Footnote 1</p>	<p>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 would result in compliance with Pasadena construction equipment noise levels).</p> <p>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 9.32.060 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.</p>	<p>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.</p> <p>Please see the City’s definition of “noise level”, here: <a href="https://library.municode.com/ca/sierra_madre/codes/code_of_ordinances?nodeId=TIT9PUPEMOWE_CH9.32NO_9.32.020DE">https://library.municode.com/ca/sierra_madre/codes/code_of_ordinances?nodeId=TIT9PUPEMOWE_CH9.32NO_9.32.020DE</a></p> <p>Please see the FHWA’s definitions, here: <a href="https://www.fhwa.dot.gov/Environment/noise/resources/fhwahep17053.pdf">https://www.fhwa.dot.gov/Environment/noise/resources/fhwahep17053.pdf</a></p> <p>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.</p> <p>Based on the Code definition of “noise level” it is probable that the Leq metric is Code standard. While Lmax is more conservative, Leq 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.</p>	<p>Jonathan—This is asking the that the City checks and confirms whether the Leq or the Lmax noise metric is their chosen basis for the standard. Please discuss with Vincent</p>

<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}</math> (1-hr) 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 MIG's comment on Page 4.13-6, Footnote 1, MIG does not interpret the City's code to apply an 80 dBA <math>L_{eq}</math> (1-hr) standard for construction noise. Rather MIG 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 MIG'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. <b>Ok. Applicable standard (<math>L_{eq}</math> or <math>L_{max}</math>) pending City confirmation.</b></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 retreat 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. MIG 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.</p> <p>Language has been clarified that construction noise levels are assessed at the property line.</p> <p><b>OK</b></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 MIG 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 MIG's interpretation of the City's construction noise standard.</p> <p><b>OK Applicable standard (<math>L_{eq}</math> or <math>L_{max}</math>) pending City confirmation.</b></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 MIG 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.</p> <p><b>OK</b></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.</p> <p><b>OK</b></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.</p> <p><b>OK</b></p>	<p>Addressed</p>

	MIG notes that listing a single distance in Table 4.13-3 would be appropriate if an L <sub>max</sub> value is used to evaluate construction noise levels (since the RCNM model uses the single loudest value for L <sub>max</sub> reporting purposes).		
Page 4.13-11, Section 4.13-4, Impact 1, Off-site Traffic Noise	<p>The EIR uses the City of Sierra Madre Code (+6 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>	Agreed. Revised accordingly.  OK	Addressed
Page 4.13-12, Section 4.13-4, Impact 1, Interior Noise Impact	<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>	Comment noted. Discussion of potential for interior noise level increases added.  OK	Addressed
Page 4.13-13, Section 4.13-4, Impact 1,	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	Discussion of park use and associated potential for noise impact revised.  OK	Addressed

<p>Neighborhood Park</p>	<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>MIG 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>MIG 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., pump) that could generate noise levels that have the potential to impact noise-sensitive receptors.</p>		
<p>Page 4.13-13, Section 4.13-4, Impact 2</p>	<p>MIG 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. MIG 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>	<p>Addressed</p>
<p>Pages 4.13-14 to 4.13-15, Section 4.13-5, MM-NOI-1</p>	<p>The EIR indicates the temporary noise barrier will provide 9 dB of noise reduction. MIG 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>	<p>Jonathan—same as above.</p>
<p>Appendix X-2</p>	<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 MIG'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>	<p>Addressed</p>
<p>Appendix X-3</p>	<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>	<p>Addressed</p>

		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.  OK	Addressed
P. 4.14-7, Para. 3, 6 <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. 3 <sup>rd</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

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, Quimby 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 Quimby 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 4 <sup>th</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 4.19: UTILITIES AND SERVICES</b>			
P. 4.19-2, 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. 4-19-8 – Urban Water Management Plans	Please indicate when the 2020 update of the UWMP 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 UWMP and should have it completed in a few months.  OK – thanks for the check (leave as is)	Addressed

P. 4.19-12, 1 <sup>st</sup> Para., 4 <sup>th</sup> sentence	Please specify whether the 8.64 MGY water demand estimate includes water use for the park.	Done OK	Addressed
P. 4.19-12, 1 <sup>st</sup> Para., 7 <sup>th</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 MGY 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 – Impact 2, 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>			
<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 <u>ozone (O<sub>3</sub>) and particles less than 2.5 microns and particles less than 10 microns in diameter (PM<sub>10</sub>)</u> and a California nonattainment area for <del>ozone</del> 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 IRREVERSABLE 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.	Per 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

			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, 3 <sup>rd</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 verif/clarify.	Correct. Removed from discussion in alts
P. 8-14, 2 <sup>nd</sup> para, 4th 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 anticipate to differentiate between DIF fees and monthly maintenance fees.	Added





**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

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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:

### 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.

**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	6,606	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>	29,773	24,271	16,272	22,384	27,225	28,815	30,243	29,631
<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

**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
<i>Total</i>	30,657	26,302	16,081	22,154	26,941	30,490	31,313	32,440
<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

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

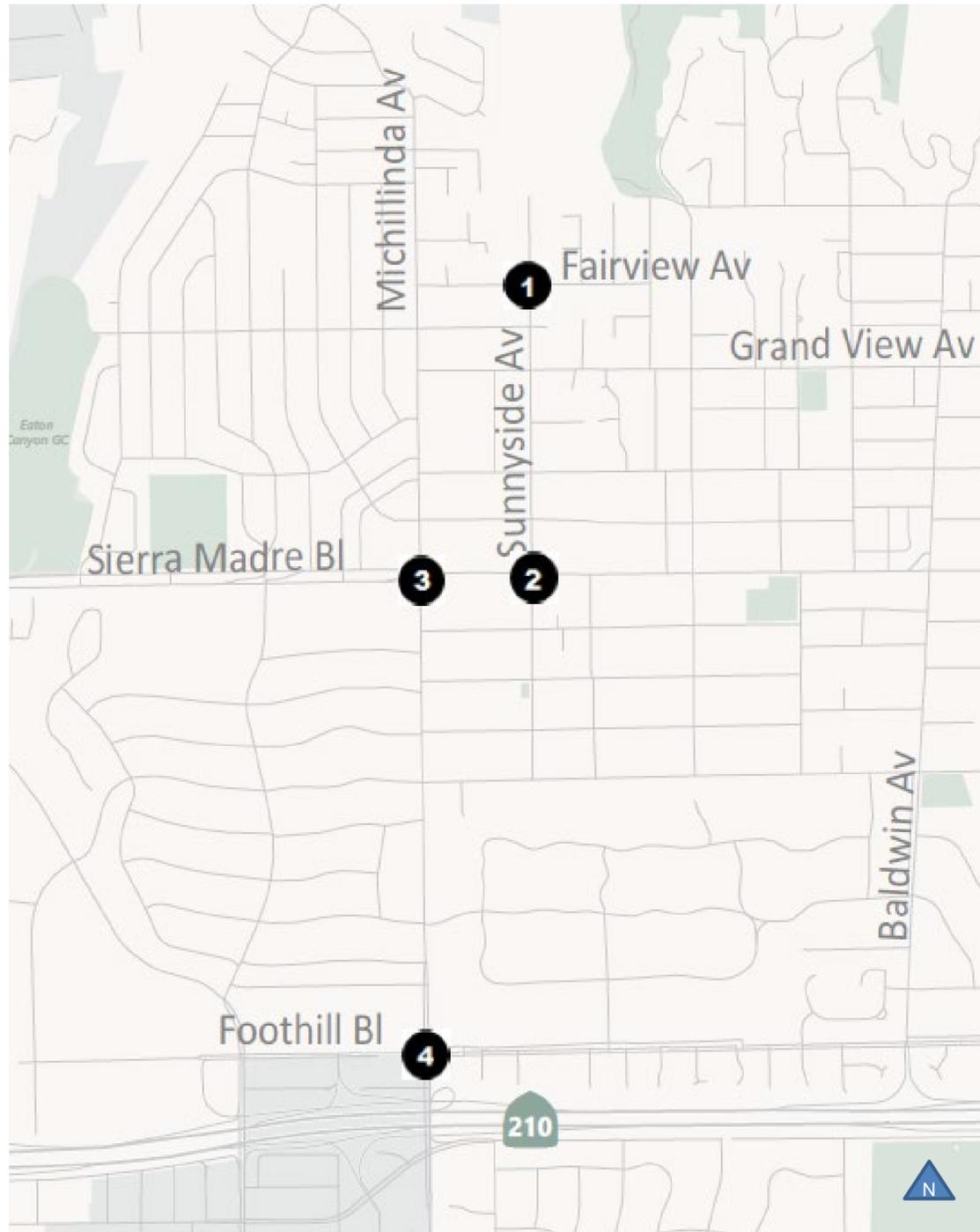
### EXISTING (2020) PRE-COVID CONDITION

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



**LEGEND**

- # Study Intersection
- AM (PM) Peak Hour Traffic Volume
- Stop Sign
- Signalized

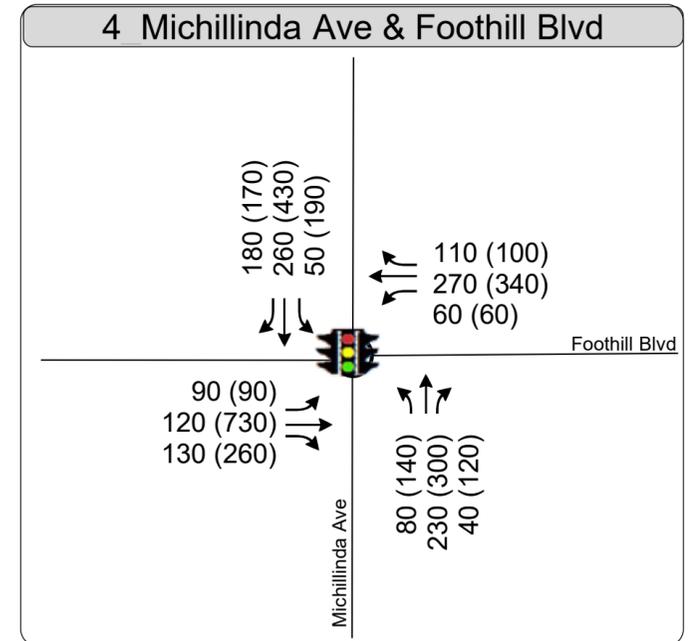
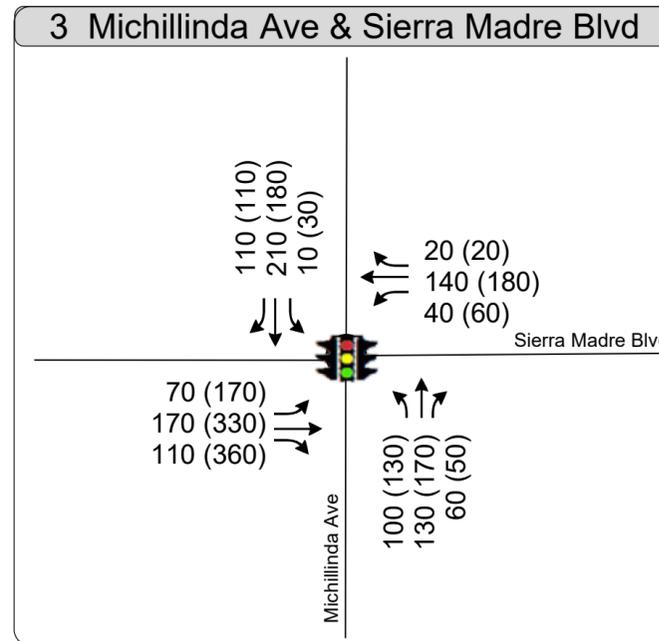
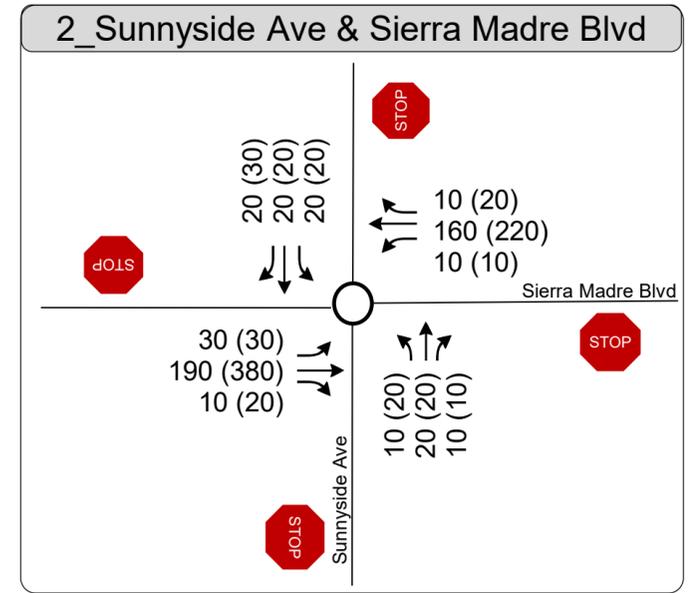
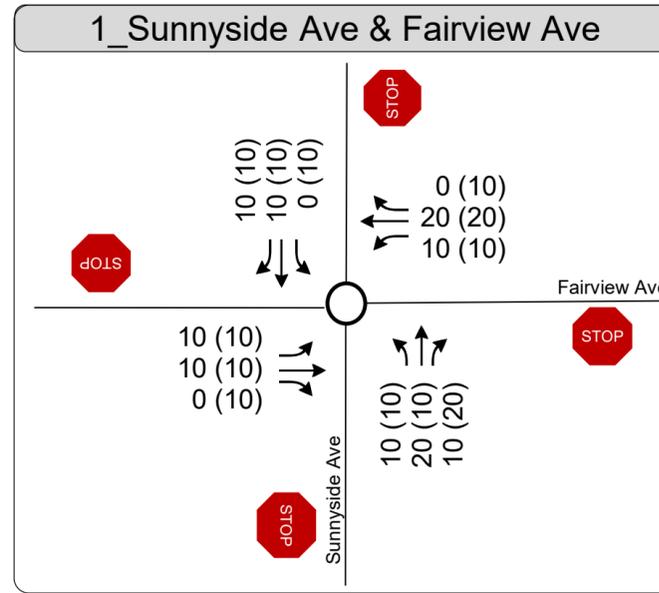


Figure 1  
Peak Hour Traffic Volumes and Lane Configurations  
Existing (2020) Pre-COVID Condition



## 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>

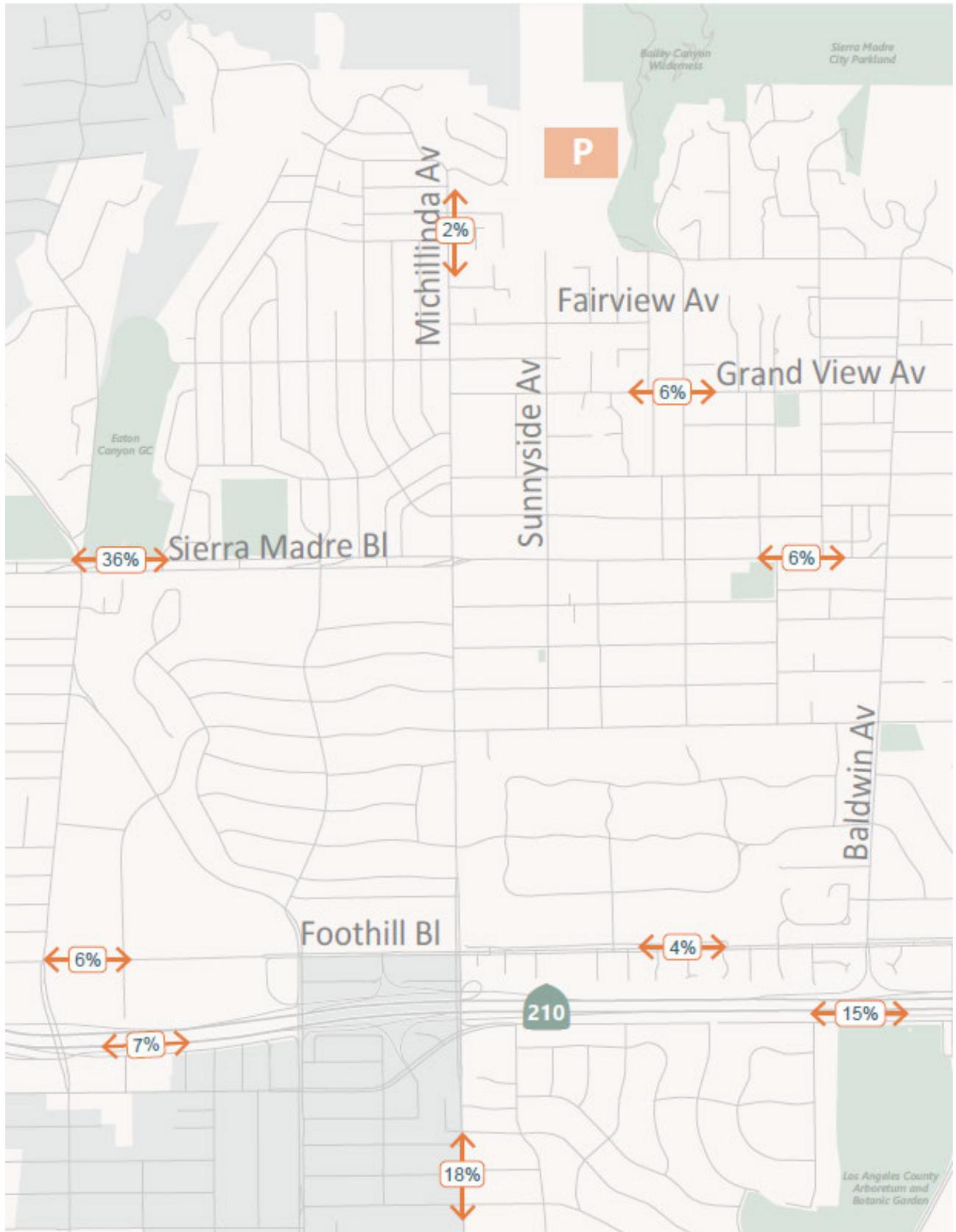
**Notes:**

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**.



Legend

↔ Trip Distribution

■ Project Site



Figure 2  
Trip Distribution

## 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%

**TABLE 6-2 – Weekend Build-out (2025) with Project Segment ADT**

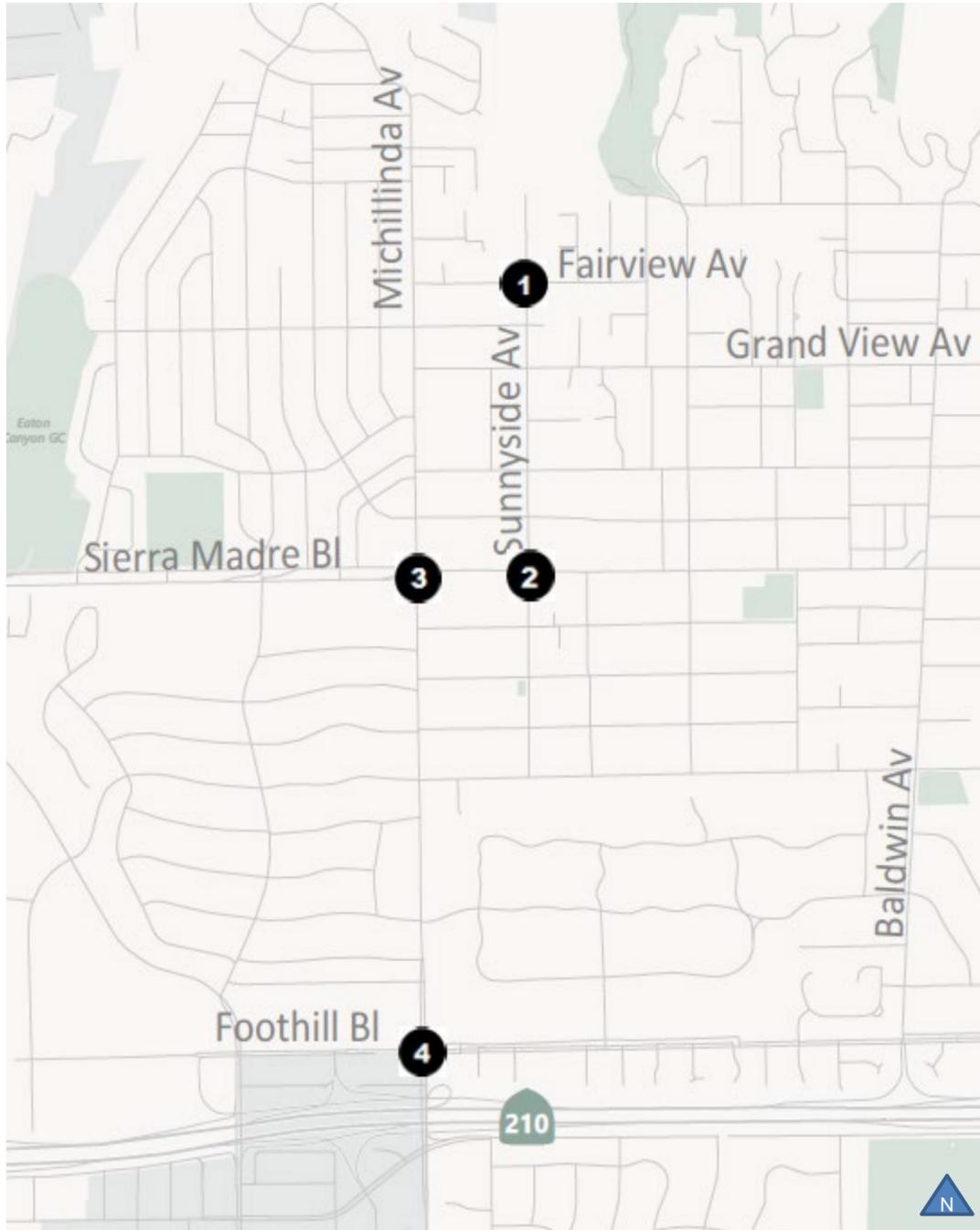
Segment	2025 without Project	2025 with Project	Increase%
Sunnyside Avenue between Project Site and Fairview Avenue	310	710	129%
Sunnyside Avenue between Fairview Avenue and Sierra Madre Boulevard	400	760	90%
Sierra Madre Boulevard between Michillinda Avenue and Sunnyside Avenue	6,290	6,640	6%
Michillinda 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

## 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 intersions.



**LEGEND**

- Study Intersection
- AM (PM) Peak Hour Traffic Volume
- Stop Sign
- Signalized

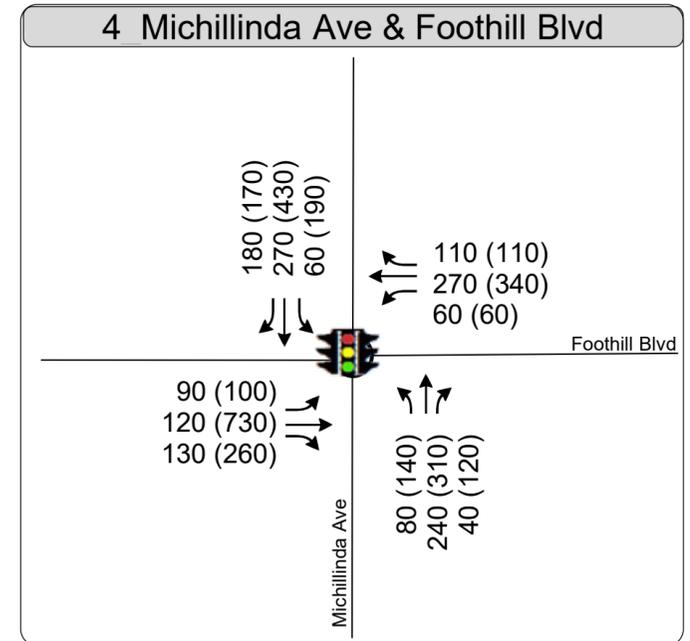
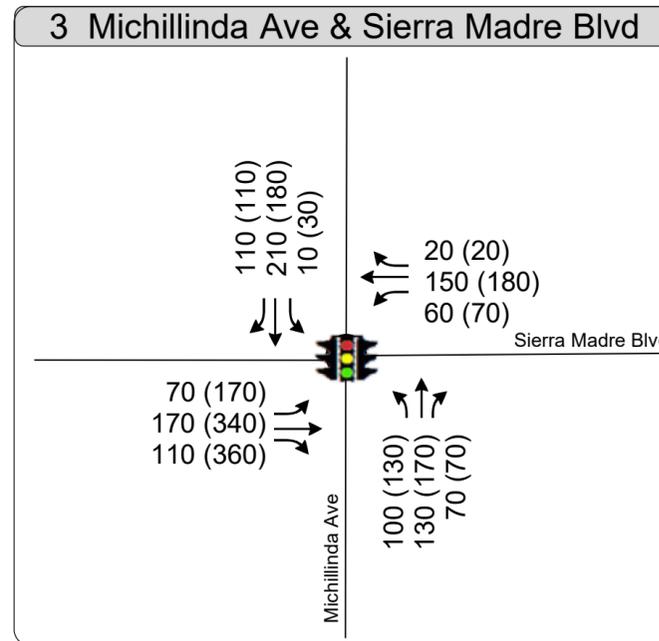
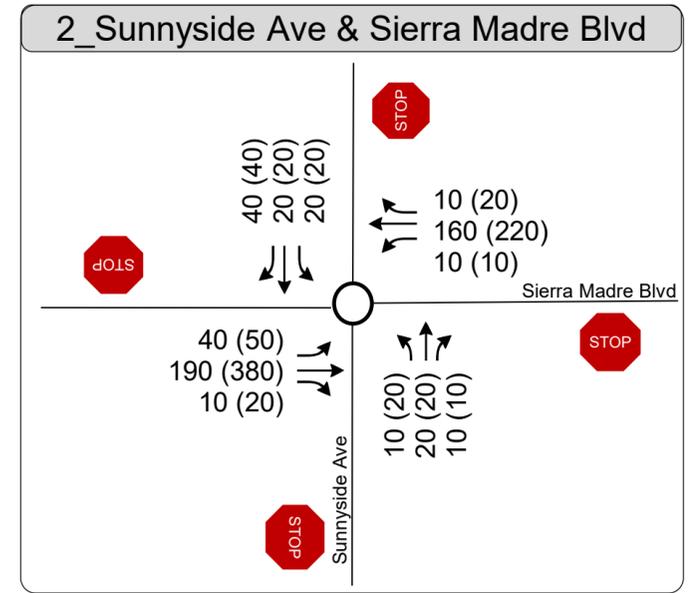
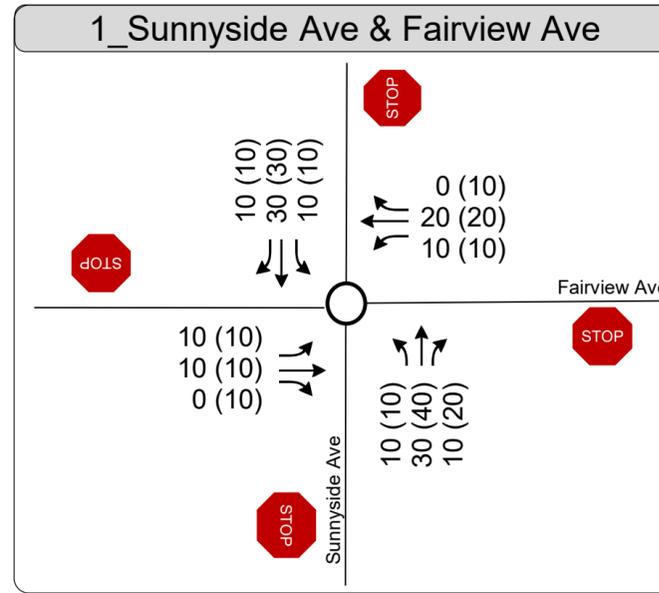


Figure 3  
Peak Hour Traffic Volumes and Lane Configurations  
Build-out (2025) With Project Condition



**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	0.38	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

## 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.

APPLICATION  
PENDING REVIEW

Clare Lin

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**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:** [REDACTED]  
**Sent:** Sunday, May 2, 2021 9:47 PM  
**To:** Chris Cimino <[CCimino@cityofsierramadre.com](mailto:CCimino@cityofsierramadre.com)>; Vincent Gonzalez <[vgonzalez@cityofsierramadre.com](mailto:vgonzalez@cityofsierramadre.com)>; Clare Lin <[clin@cityofsierramadre.com](mailto: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*

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.*

*Attachments:*

*Kev Tcharkhoutian P.E.*

**From:** [bgh](#)  
**To:** [Public Comment](#)  
**Subject:** Stop the Meadow project as proposed  
**Date:** Thursday, April 7, 2022 2:28:36 PM

---

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

We love our city and this project of 42 homes do not fit in. So many issues come to mind but the DROUGHT, FIRE HAZARD, TRAFFIC INCREASE, DESTRUCTION OF MATURE BEAUTIFUL TREES AND THE ANIMALS THAT RESIDE WITHIN, ARE JUST A FEW. Help us save our hillside. We count on you to protect the citizens of this special town.  
Bobbie Gerber

**From:** [John Cummings](#)  
**To:** [Public Comment](#)  
**Subject:** Supporting a good development project  
**Date:** Thursday, April 7, 2022 2:40:43 PM

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

Hello,

My name is John Cummings. My wife Thelma and I and our children live at the top of Oak Crest Drive in Sierra Madre. For years we have witnessed the good nature of the monastery across from us and their positive contributions to our community. We are in favor of the development proposed to add 42 homes to Sierra Madre.

Of all residents, we stand to be most effected by increased traffic but we believe this a natural result of expansion meeting the ever-growing need for more housing. We believe more importantly in the right of individuals and organizations to sell property for development. We understand the funds used here will go to the good cause of continuing the work these people do to help others in need.

We have reviewed the designs of these homes as well as the additional park and feel these will be tremendous additions to our city and neighborhood.

Thank you.  
John Cummings

**From:** [Nancy Beckham](#)  
**To:** [Public Comment](#)  
**Subject:** The Crotch Bumble Bee (endangered species since 2014)  
**Date:** Thursday, April 7, 2022 4:40:00 PM  
**Attachments:** [Crotch's Bumble Bee.docx](#)

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

Dear Planning Commissioners, the honorable Gene Goss, City Council Members, Jose Reynoso, James Carlson, and Vincent Gonzales

When I spoke at the joint meeting in March at the Middle School I spoke on behalf of the animals, including Townsend's Large-Eared Bats, the mule-eared deer, and the California Mountain Lion. I told you that evening I would continue to seek additional endangered species that live on the Meadows property and in Bailey Canyon. Wilderness Park. I found another candidate that the attorney Beverly Grossman Palmer mentioned in her letter regarding the Final EIR to the Planning Commission and the City Council dated April 6, 2022. The reference is in the first paragraph on page 7 and refers back to the draft EIR Appendix 1a (NOP and Comment Letters), pp 15-19.)

Attached is some information on this bee . I apologize for not attending the hearing tonight but the second Covid booster I received has made me quite ill. Instead, I am sending you my information as an email. I also sent my thoughts regarding the draft EIR yesterday. Thank you for considering all this information. Fish and Wildlife were happy to help me, and sent a second 6 page letter dated March 25,2022 that Barbara Velturo submitted about an hour ago regarding the final EIR.

Sincerely,  
Nancy Beckham

**From:** [Edward A Miller](#)  
**To:** [Public Comment](#)  
**Subject:** The Mater dolorosa development is an affront to the General Plan  
**Date:** Thursday, April 7, 2022 3:34:34 PM

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

Dear Planning Commission,

As a member of the General Plan Steering Committee who worked in that capacity for several years to develop our General Plan, I am very opposed to the proposed new development and their Specific Plan.

The EIR and the Specific Plan run counter to innumerable policies in the General Plan. In many cases, the EIR determines there is negligible impact or that the new proposal complies with GP provisions which is simply not correct.

It seems odd that the EIR would be accepted without question if it is paid for by the very developers that are requesting the approval. I think others have submitted more detailed accounting of these points.

I have no desire that we prevent the current owners from exercising their religious freedom. However building 42 new homes has nothing to do with that; it is a purely financial exercise with no benefit to our Community other than a short term influx of funds. What if they were building a chemical factory? It would have the same religious relevance. The community has the right to a say on what gets built in its midst. The impacts of this development are forever, and the city will bear costs associated with it long after the developers and current owners have cashed in and gone.

I urge you to disapprove the development in its current form, and ensure that if it continues it is compliant with the General Plan. If that means zoning it as Hillside, so be it. But creating a new area with special privileges and rules runs counter to everything this community is about.

Thanks,  
Ed Miller  
Lima st.

April 7, 2022

**VIA EMAIL**

Mr. Aleks Giragosian  
City Attorney  
City of Sierra Madre  
232 W. Sierra Madre Blvd.  
Sierra Madre, CA 91024

Re: April 7, 2022 Planning Commission Public Hearing, Action Item #1, 700 North Sunnyside Avenue (The Meadows at Bailey Canyon)

Dear Mr. Giragosian:

The law firm of Manatt, Phelps & Phillips, LLP, represents New Urban West, Inc., one of the applicants for the project proposed at 700 North Sunnyside Avenue (The Meadows at Bailey Canyon) and the subject of Action Item #1 on the April 7, 2022, Planning Commission agenda. We have received and reviewed the comment letter submitted by the law firm of Strumwasser & Woocher LLP on behalf of Protect Sierra Madre, dated April 6, 2022 (“Strumwasser Letter”), and wish to respond.

The Strumwasser Letter alleges that information included in the proposed project’s Final Environmental Impact Report (“Final EIR”) required the City to revise and recirculate the project’s Draft Environmental Impact Report (“Draft EIR”) for public review and comment. This is not so.

Recirculation of a draft EIR is triggered only in specific circumstances, none of which are present here. State CEQA Guidelines (Cal. Code Regs., tit. 14, § 15000 et seq.), section 15088.5, reads: “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 for public review under Section 15087 but before certification.”

“Significant new information” is defined as a disclosure showing at least one of 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 was precluded."*

(State CEQA Guidelines, § 15088.5(a)(1)-(4).) Neither the Final EIR, nor the Strumwasser Letter, disclose evidence showing that any of the above four circumstances has occurred.

As the Strumwasser Letter points out, the proposed project now includes the widening of an off-site portion of Carter Avenue, between the southeastern portion of the project site boundary and Lima Street. The purpose of this minor addition to the proposed project was to respond directly to comments from the public, received during the public comment period on the Draft EIR, expressing concern about the capacity of Carter Avenue and pedestrian and vehicular safety. (See Final EIR, Vol. 1, p. RTC-10 [GR-5, Carter Avenue].) This is exactly what CEQA intends—that the Draft EIR provide for the opportunity to accept and respond to comments from the public, and, if appropriate or possible, refinements in the project description to respond to those comments.

The Final EIR explains that, as described in the Draft EIR, the project always proposed to improve Carter Avenue, and with those proposed improvements, would have the capacity to handle both existing and projected trips. (*Id.*, see also Final EIR, Appendix K.) Further, the Draft EIR determined there was no evidence showing that the proposed project, and its originally proposed Carter Avenue improvements would result in significant impacts to pedestrian safety or traffic circulation. Regardless, in an abundance of caution and to further address and alleviate the concerns of the public, the project applicant, subsequently proposed *additional* improvements to Carter Avenue, offsite between the southeastern portion of the project site boundary and Lima Street. These additional details were added in Final EIR Section 3.3, Project Description. As described in the Final EIR, the additional improvements would occur within an already existing roadway right-of-way, and would require the removal of a small number of existing trees. (Final EIR, Vol. 1, p. RTC-11.) No new significant environmental impacts would occur as a result of this project description modification. (*Id.*)

Not every change to a proposed project requires recirculation of a draft EIR. As cited above, there are only four specific circumstances under which recirculation is required, and none

apply here. The additional offsite Carter Avenue improvements do not result in a new *significant* environmental impact, beyond those already disclosed in the circulated Draft EIR. The improvements also do not result in a “*substantial increase*” in the severity of an already disclosed significant environmental impact. No new feasible alternatives or mitigation measures have been identified that would clearly lessen the previously disclosed impacts of the project, and the addition of new improvements intended to directly respond to comments raised during public review in no way indicates that the Draft EIR was fundamentally and basically inadequate. If anything, it demonstrates that CEQA is working exactly as intended.

Given the above, under the express language of State CEQA Guidelines, section 15088.5(a), recirculation was not required. Should you have any questions regarding this response, please do not hesitate to reach out.

Sincerely,

*/s/ Jennifer J. Lynch*

Jennifer J. Lynch

**From:** [Barbara Vellturo](#)  
**To:** [PlanningCommission](#); [Public Comment](#); [Barbara Vellturo](#)  
**Subject:** For the Planning Commission meeting  
**Date:** Thursday, April 7, 2022 12:30:30 PM  
**Attachments:** [To the Planning Commission - Consistency Analysis.pdf](#)

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

Please place the attached public comment on the record for the Planning Commission meeting of April 7 and forward to the Commissioners

Thank you

Barbara Vellturo  
Protect Sierra Madre -  
Stop the Housing Project

To the Planning Commission

One of the many items you are being asked to approve is the SPECIFIC PLAN FOR THE MEADOWS DEVELOPMENT.

There is ONE most important criteria that the commission must consider when deciding whether to adopt the Specific Plan before you.

State law requires:

**65454.**

No specific plan may be adopted or amended unless the proposed plan or amendment is consistent with the general plan.

*(Added by Stats. 1984, Ch. 1009, Sec. 18.)*

*You are all very familiar with the values and goals of Sierra Madre's General Plan and have been instrumental in developing those "shared values" of the community. We are relying on you to protect and preserve those for future generations.*

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, inthat 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.

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.

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.
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."

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.

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.

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.

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.

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.



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 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 4 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.

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.

**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.

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, with houses only on one side of the street. 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.

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.

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.

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.

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

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;
- 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.

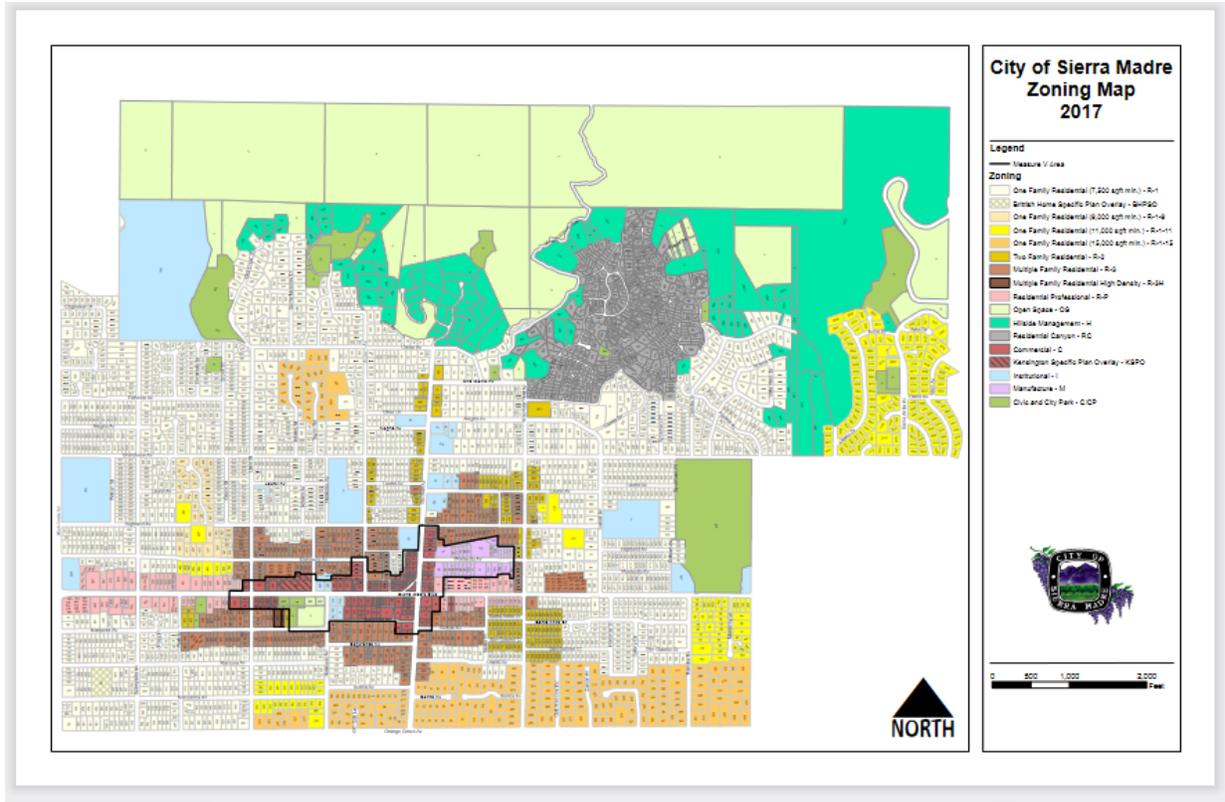
And in the Pending update to our General Plan, the City has added a new policy to its Safety Element to make their intentions clear:

**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 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 and the Hillside Management Zone in a darker blue/green, and the solid green as City Parks.



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.

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.

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.”

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”

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.

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.

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.

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