

FINAL

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

VOLUME I

Prepared for:

City of Sierra Madre

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Acronyms and Abbreviations

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

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

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

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

Preface

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

- The Draft EIR or a revision of the draft.
- Comments and recommendations received on the Draft EIR either verbatim or in summary.
- A list of persons, organizations, and public agencies commenting on the Draft EIR.
- The responses of the lead agency to significant environmental points raised in the review and consultation process; and
- Any other information added by the lead agency.

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

1 Format of the Final EIR

This Final EIR consists of the following four chapters:

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

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

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

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

2 Revisions to the Draft EIR

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

in the project or environmental setting as well as additional data or other information. New information added to an EIR is not considered significant unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement. As defined in CEQA Guidelines Section 15088.5(a), significant new information requiring recirculation includes the following:

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

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

Responses to Comment Letters Received on the Draft EIR

The Draft EIR was circulated for public review from August 2, 2021, through October 4, 2021, in accordance with Section 15105(a) of the California Environmental Quality Act (CEQA) Guidelines. A total of 119 written comment letters were received on the Draft EIR from agencies, organizations, and individuals as shown in Table 1. Each of the written comment letters have been assigned an alphanumeric label, and the individual comments within each written comment letter are bracketed and numbered. For example, Comment Letter A1 contains one comment that is numbered A1-1.

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

Table 1. Comment letters and Commenters

Comment Letter	Commenter	Date Received
Agency		
A1	California Department of Fish and Wildlife	October 1, 2021
Tribal Government		
T1	Gabrieleño Band of Mission Indians- Kizh Nation	September 22, 2021
Organizations		
O1	Clean Power Alliance, Coalition for Clean Air, Southern California Edison	October 1, 2021
O2	Preserve Sierra Madre	October 4, 2021
Individuals		
I1	Alice Whichello	August 5, 2021
I2	Barbara Vellturo	August 5, 2021
I3	Andrea Van Wickle	August 3, 2021
I4	Nancy Beckham	August 11, 2021
I5	Vickie Shackett	August 16, 2021
I6	Greg and Denise Nelson	August 11, 2021
I7	Kathy and Eoin Harty	August 23, 2021
I8	Allen Ma, P.E.	August 2, 2021
I9	Jody Gunn	September 2, 2021
I10	Daniel and Arline Golden, PhD	September 2, 2021
I11	Ron Martinelth	September 7, 2021
I12	Ellen Carroll	July 7, 2021
I13	Peter Smock	September 9, 2021
I14	Gary Bosso	September 14, 2021
I15	Nancy Lingeman	September 15, 2021

Table 1. Comment letters and Commenters

Comment Letter	Commenter	Date Received
I16	Deirdre Murphy	September 16, 2021
I17	Daniel and Arline Golden, PhD	September 16, 2021
I18	Anke and Jean Bardenheier	September 16, 2021
I19	Frances Qiu	September 27, 2021
I20	Chris Leclerc	September 27, 2021
I21	Christie M. Dimon	September 27, 2021
I22	Sherry Wheelock	September 27, 2021
I23	Stanton Hunter	September 27, 2021
I24	Tom Halpenny	September 26, 2021
I25	Katrelya Angus	September 27, 2021
I26	Henry Leung	September 27, 2021
I27	Valerie G. Salembier	September 27, 2021
I28	Clyde F. Stauff	September 27, 2021
I29	Nancy Lingeman	September 28, 2021
I30	Randall Family	September 28, 2021
I31	John and Mary Hopkins	September 28, 2021
I32	Nancy Beckham	September 28, 2021
I33	Barbara Vellturo	September 28, 2021
I34	Nancy Beckham	September 28, 2021
I35	Darlene Papa	September 29, 2021
I36	Barbara McCallon	September 29, 2021
I37	Daniel Golden	September 28, 2021
I38	Daniel Golden	September 28, 2021
I39	Michael Charters	September 29, 2021
I40	Gracie Charters	September 30, 2021
I41	Ashley Wilson	September 29, 2021
I42	Caroline Brown	September 29, 2021
I43	Katrelya Angus	September 30, 2021
I44	Anke and Jean Bardenheier	September 30, 2021
I45	Alice Whichello	September 30, 2021
I46	Nancy Beckham	October 4, 2021
I47	Nancy Beckham	September 30, 2021
I48	Evan Steinberg	September 30, 2021
I49	Deirdre Murphy	October 3, 2021
I50	Judy Webb	October 3, 2021
I51	Mary Steinberg	September 30, 2021
I52	Marcielle Brandler	October 3, 2021
I53	Barbara Ontiveros	October 3, 2021
I54	Deb Sheridan	September 30, 2021
I55	Stephanie Allison	October 1, 2021
I56	Sarkis Baltayian	October 3, 2021
I57	Miriam Trogdon	October 3, 2021
I58	Lauren Yee	October 3, 2021
I59	Rosalie Curry	October 3, 2021
I60	Brian Bielanski	October 2, 2021

Table 1. Comment letters and Commenters

Comment Letter	Commenter	Date Received
I61	Claire McLean	October 2, 2021
I62	Linda Hernandez	October 1, 2021
I63	Randy Boyd	October 3, 2021
I64	Caroline Brown	September 30, 2021
I65	Susan Neuhausen	October 3, 2021
I66	Lorna Brosio	October 4, 2021
I67	Teri Vessella	October 4,2021
I68	Nancy Beckham	October 4,2021
I69	Nancy Beckham	October 4,2021
I70	Nancy Beckham	October 4,2021
I71	Nancy Beckham	October 4,2021
I72	Barbara Vellturo	October 4,2021
I73	Barbara Vellturo	October 4,2021
I74	Barbara Vellturo	October 4,2021
I75	Barbara Vellturo	October 4, 2021
I76	Barbara Vellturo	October 4, 2021
I77	Arlene Arrieta	October 4, 2021
I78	David Hughes	October 4, 2021
I79	Bertha D. Patsavas	October 4, 2021
I80	Shelby Moser	October 4, 2021
I81	Maria Karafilis	October 4, 2021
I82	Vicki Jennelle	October 4, 2021
I83	Bruce H. Jones	October 4, 2021
I84	John Wiedeman	October 4, 2021
I85	Tricia Searcy	October 4, 2021
I86	Wendy Thermos	October 4, 2021
I87	Laura Kalayjian	October 4, 2021
I88	Colleen Allen	October 4, 2021
I89	Alexander Arrieta	October 4, 2021
I90	John Clarke	October 4, 2021
I91	Pat Alcorn	October 4, 2021
I92	Christopher Spensley	October 4, 2021
I93	Scott Hood	October 4, 2021
I94	Carol Parker	October 4, 2021
I95	Glenn Hickman	October 4, 2021
I96	Lynne Collmann	October 4, 2021
I97	MaryAnn MacGillivray	October 4, 2021
I98	Connor Murphy- Boyd	October 4, 2021
I99	Ally Arrieta	October 4, 2021
I100	Susan Neuhausen	October 4, 2021
I101	Ellen Munoz	October 3, 2021
I102	Deb Sheridan	October 4, 2021
I103	Phillip, Alicia, Daniel, and Marites Yoa	October 4, 2021
I104	Karen Rowinsky	October 4, 2021
I105	Karin Delman	October 4, 2021

Table 1. Comment letters and Commenters

Comment Letter	Commenter	Date Received
I106	Helena Karafilis- Spensley	October 4, 2021
I107	Matthew Bryant	October 4, 2021
I108	Heather Allen	October 4, 2021
I109	Brian Stieler	October 4, 2021
I110	Teng Hik & Kiok Gwat	October 4, 2021
I111	Robert Gjerde	October 5, 2021
I112	Beth Kerns	October 5, 2021
I113	Elsa A. Saldana	October 3, 2021
I114	Amy Wasson	September 2, 2021
I115	Bobbie Hooker	September 15, 2021

Global Responses

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

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

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

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

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

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

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

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

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

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

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

GR-3

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Comment Letter A1

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State of California – Natural Resources Agency
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CHARLTON H. BONHAM, Director



October 1, 2021

Vincent Gonzalez
Director of Planning and Community Preservation Department
City of Sierra Madre
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Subject: Comments on the Draft Environmental Impact Report for The Meadows at Bailey Canyon Specific Plan, SCH #2020060534, Los Angeles County

Dear Mr. Gonzalez:

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

A1-1

CDFW's Role

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

A1-2

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

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Project Description and Summary

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

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

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

A1-3

Comments and Recommendations

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

A1-4

Specific Comments

Comment #1: Impacts from New Path Installation

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

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

A1-5

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

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

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

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

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

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

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

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

Recommended Potentially Feasible Mitigation Measure(s):

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

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

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

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

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

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

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

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

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

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

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A1-6

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

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

Recommended Potentially Feasible Mitigation Measure(s):

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

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

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

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

A1-6
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Comment #3: Impacts to Bat Species

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

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

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

A1-7

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

Recommended Potentially Feasible Mitigation Measure(s):

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

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

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

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

Comment #4: Impacts to Oak Trees and Tree Replacement

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

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

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

A1-7
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A1-8

A1-9

A1-10

A1-11

A1-12

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

A1-13

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

A1-14

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

A1-15

Recommended Potentially Feasible Mitigation Measure(s):

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

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

A1-16

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

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

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

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

Additional Comments and Recommendations

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

A1-17

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

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

A1-18

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

A1-19

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

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

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

A1-20

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

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

A1-21

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

A1-22

Filing Fees

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

A1-23

Conclusion

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

A1-24

Sincerely,

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

ec: CDFW

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- Cindy Hailey, San Diego – Cindy.Hailey@wildlife.ca.gov
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State Clearinghouse, Office of Planning and Research – State.Clearinghouse@opr.ca.gov

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State of California – Natural Resources Agency
 DEPARTMENT OF FISH AND WILDLIFE
 South Coast Region
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GAVIN NEWSOM, Governor
 CHARLTON H. BONHAM, Director



Attachment A: Draft Mitigation and Monitoring Reporting Plan

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

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

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

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

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

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MM-BIO-11- Impacts to Trees	An infectious tree disease management plan shall be developed and implemented prior to initiating Project activities. All trees scheduled for removal shall be identified and counted to provide total numbers and species type. In addition, trees scheduled for removal resulting from the Project shall be inspected for contagious tree diseases including but not limited to: thousand canker fungus (<i>Geosmithia morbida</i>), Polyphagous Shot Hole Borer (<i>Euwallacea</i> spp.), and goldspotted oak borer (<i>Agrilus auroguttatus</i>) (TCD 2020; UCANR 2020; UCIPM 2013). To avoid the spread of infectious tree diseases, diseased trees shall not be transported from the Project site without first being treated using best available management practices relevant for each tree disease observed.	Prior to Project construction and activities	City/Project Applicant
MM-BIO-12- Impacts to Oak Trees and Tree Replacement	Replacement oaks shall be of the same species and come from nursery stock grown from locally sourced acorns, or from acorns gathered locally, preferably from the same watershed in which they were planted.	Prior to Project construction and activities	City/Project Applicant
MM-BIO-13- Oak Tree Replacement	Given that the DEIR does not provide justification for how a mitigation ratio of 1:1 would adequately reduce impacts to below a level of significance while considering temporal loss, special status trees, size of trees, potential mitigation failure, etc. (see Recommendation #1 below), CDFW recommends replacing native trees, including oak trees, with at least a 3:1 ratio. CDFW also recommends replacing non-native trees with at least a 1:1 ratio with native trees.	Prior to Project construction and activities	City/Project Applicant
REC-3-Ratio Justification	CDFW recommends the DEIR provide adequate and complete explanation why the chosen mitigation ratio is sufficient to mitigate for permanent loss of 101 trees on site. The DEIR should address the following: 1. How the chosen ratio accounts for impacts to trees on a species-specific level; 2. How oaks have been mitigated at the chosen mitigation ratio given their special status;	Prior to Project construction and activities	City/Project Applicant

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	3. Whether other native or non-native tree species will be mitigated in the same way; 4. How the chosen mitigation ratio mitigates for the temporal loss of trees; 5. How the ratio addresses impacts to wildlife for the loss of habitat; 6. How the mitigation addresses trees of various sizes (diameter at breast height (DBH)) as well as any potential understory vegetation; and, 7. How the mitigation ratio addresses potential mitigation failures if replacement trees do not survive.		
REC-4- Recirculation	CDFW recommends that the City recirculate the DEIR for more meaningful public review and assessment of the City's mitigation ratio. Additionally, the City should recirculate the DEIR if the proposed mitigation measure (i.e., 1:1 replacement ratio of oak trees) would not reduce potential effects to less than significant and new measures must be required [CEQA Guidelines, § 15073.5(b)(2)].	Prior to Project construction and activities	City/Project Applicant
REC-5-Human Wildlife Interface	CDFW recommends the City require the use of bear-proof trash cans for this and all new developments in the foothills. There have been sightings of black bear in the Project vicinity. Bears or mountain lions spotted in residential, suburban or urban areas should be reported to the South Coast Regional Office (858) 467-4201 or AskR5@wildlife.ca.gov during normal business hours. After-hours or weekend sightings should be reported first to local police or sheriff officers, who often can respond and secure a scene quickly and then contact CDFW as needed. CDFW considers improper storage of human food and garbage to be the primary cause of bear conflicts with humans. This requirement is necessary for the local waste management agency to provide each house these special cans. These trash cans require the use of special trucks and must be specifically	Prior to Project construction and activities	City/Project Applicant

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

A1-25
Cont.

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

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

Response to Comment Letter A1

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Comment Letter T1

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

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

Dear Vincent,

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

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

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T1-1
T1-2

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T1-2
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[REDACTED]

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

T1-3

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

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

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

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

Admin Specialist
Gabrieleno Band of Mission Indians - Kizh Nation
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Covina, CA 91723
Office: 844-390-0787
website: www.gabrielenoindians.org



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

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T1-3
Cont.



GABRIELEÑO BAND OF MISSION INDIANS - KIZH NATION



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

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

[Redacted text block]

T1-4

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

T1-5

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

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

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

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

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

T1-5
Cont.

T1-6

GABRIEL BAND OF MISSOURI AND KANSAS NATIVE AMERICANS

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

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

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

T1-7

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

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

T1-7
Cont.

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

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

T1-8

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

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

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

T1-8
Cont.

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

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

T1-9

GABRIEL BAND OF MISSONDIANS - KZNTATION | CRM | GA | ONSV.7

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

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

T1-9
Cont.

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

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

T1-10

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

Consultation Date: _____

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

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



T1-11

South Central Coastal Information Center

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

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

[REDACTED]

T1-12



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

August 22, 2018

Re: proper CRM monitoring of properties

Dear Chairman Salas,

[Redacted content]

T1-13

Sincerely yours,

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

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

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



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

Assembly Bill No. 52

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

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

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

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

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

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

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

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

T1-14

Andrew Salas, Chairman
Albert Perez, treasurer I

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

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

PO Box 393 Covina, CA 91723

www.gabrielenoindians.org

admin@gabrielenoindians.org

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



T1-15

Response to Comment Letter T1

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

- T1-1** The comment acknowledges previous consultation between the City and the Gabrieleño Band of Mission Indians - Kizh Nation (Tribe) performed for the proposed project in accordance with Assembly Bill (AB) 52. The comment requests that information provided as part of this comment letter be kept confidential, and not included in the publicly disclosed portions of this Final EIR in accordance with California Government Code sections 6254(r) and 6254.10 and Public Resources Code section 21082.3(c)(1). The City will keep sensitive information presented within the comment letter and its attachments as part of an additional confidential appendix to this Final EIR (Confidential Appendix I2, Gabrieleño Band of Mission Indians - Kizh Nation Additional Confidential Information).
- T1-2** The comment cites Public Resource Code section 21080.3.1(a) and notes that the Tribe's affiliation with the project site means it has expertise concerning tribal cultural resources and the potential for project activities to impact those resources. The comment states that subsurface ground disturbance activities could impact tribal cultural resources. As such, the comment introduces confidential tribal archive information which has been included as Final EIR Confidential Appendix I2. The comment concludes that there is a high potential for project construction to impact tribal cultural resources.
- T1-3** This comment summarizes the tribal consultation process required under AB 52. As described in Draft EIR Section 4.18, Tribal Cultural Resources, the City and the Gabrieleño Band of Mission Indians - Kizh Nation engaged in the formal AB 52 consultation process prior to the release of the Draft EIR for public review. The City contacted all NAHC-listed traditionally geographically affiliated tribal representatives, including representatives of the Gabrieleño Band of Mission Indians - Kizh Nation, on March 30, 2021, to notify them of the proposed project, and invite them to consult under AB 52. The Gabrieleño Band of Mission Indians - Kizh Nation responded to the City's notification letter on April 5, 2021 with a request to engage in formal consultation. The City held a virtual meeting with the Gabrieleño Band of Mission Indians-Kizh Nation on May 20, 2021 to consult, and consultation between the City and the Tribe continued following that meeting. However, on July 15, 2021, after both the City and the Tribe agreed on the potential for the project to impact tribal cultural resources, and agreed on mitigation measures to reduce those impacts to a level of less than significant, the City concluded its consultation with the Gabrieleño Band of Mission Indians - Kizh Nation. The mitigation measures agreed upon by the City and the Tribe during formal consultation were included in the Draft EIR. The Draft EIR concluded that with incorporation of the measures agreed upon by the Tribe during the formal consultation process, impacts to tribal cultural resources would be reduced to less than significant.
- The comment also states that the Tribe has requested any and all information that the City possesses or has access to regarding the history of the subsurface soils that will be impacted as part of the project's ground disturbance activities. On May 21, 2021, the City provided a copy of the Geotechnical Report prepared for the project to the Tribe, per the Tribe's request (see Confidential Appendix I1). As described in Draft EIR Chapter 3, Project Description, project-related grading would include 3,528 cubic yards of import. Similarly, Draft EIR Sections 4.7, Geology and Soils and 4.9, Hazards and Hazardous Materials, analyze the project site's existing soil conditions. For example, the project site was used for historical agricultural uses between 1938 and 2005; however, no further investigation or excavation is

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

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

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

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

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

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

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

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

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

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

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

Comment Letter O1

From: Gina Goodhill <GGoodhill@cleanpoweralliance.org>
Sent: Thursday, September 30, 2021 5:34 PM
To: Vincent Gonzalez
Subject: Public Comments - Draft EIR for Meadows at Bailey Canyon Development
Attachments: Sierra Madre Sign on Letter.pdf

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

To whom it may concern,

Please see the attached sign-on letter in regards to the draft EIR for the Meadows at Bailey Canyon development. Feel free to contact me with any questions. Thank you!

↓ O1-1



Gina Goodhill
Policy Director
ggoodhill@cleanpoweralliance.org
(213) 361-6650
cleanpoweralliance.org



October 1, 2021

Dear Sierra Madre City Council,

As you review the environmental impact report (EIR) submitted on behalf of the Meadows at Bailey Canyon, the above organizations urge you consider stronger building electrification requirements that go beyond the current state building code. Specifically, we urge you to require that the Meadows at Bailey Canyon be required to have sufficient electrical capacity, wiring and conduit for all-electric operations.

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O1-1
Cont.

California is on a rapid pathway towards stronger building decarbonization requirements for new construction that favor partial or full electrification. In August 2021, the California Energy Commission (CEC) adopted the 2022 Building Energy Efficiency Standards (Title 24, Part 6) and the Building Decarbonization Assessment. The Building Decarbonization Assessment made clear that California must urgently implement a plan to cut pollution from homes and buildings through aggressive electrification of new and existing buildings to achieve the state’s new 2035 carbon neutral goal as directed by Governor Newsom. The transition to all-electric buildings – which utilize electric powered buildings systems and/or appliances and transition away from the use of natural gas-powered building systems and/or appliances - will be a critical part of achieving this goal. Today, an all-electric home produces almost half the greenhouse gas emissions compared to a similar mixed fuel home¹. In Sierra Madre, the emissions reductions from all-electric buildings would be closer to 100% greenhouse gas free because the city receives 100% renewable energy through Clean Power Alliance. That is why, even though the current EIR for the Meadows at Bailey Canyon may comply with current applicable laws, the Council has a unique and urgent opportunity to be forward-looking and hold the development to the building code standards that the state will move towards in the coming years.

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O1-2

All-electric buildings have a multitude of benefits, including increased air quality for Sierra Madre residents. On average, Californians spend 68 percent of their time indoors, making indoor air quality a key determinant of human health.¹ The combustion of gas inside our homes produces harmful indoor air pollution, specifically nitrogen dioxide, carbon monoxide, nitric oxide, formaldehyde, acetaldehyde, and ultrafine particles.² These odorless and undetectable

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O1-3
↓

¹ Klepeis, N. E.; Nelson, W. C.; Ott, W. R.; Robinson, J. P.; Tsang, A. M.; Switzer, P.; Behar, J. V; Hern, S. C.; Engelmann, W. H. The National Human Activity Pattern Survey (NHAPS): a resource for assessing exposure to environmental pollutants. *J. Expo. Anal. Environ. Epidemiol.* 2001, 11 (3), 231–252.

² See, Jennifer Logue *et al.*, “Pollutant Exposures from Natural Gas Cooking Burners: A Simulation-Based Assessment for Southern California” *Environmental Health Perspectives* Vol. 122 No. 1 pp. 43-50, (2013); Victoria Klug and Brett Singer. “Cooking Appliance Use in California Homes—Data Collected from a Web-based Survey.” Lawrence Berkeley National Laboratory (August 2011); John Manuel, “A Healthy Home Environment?” *Environmental Health Perspectives*, Vol. 107, No. 7 1999, pp. 352–357; Nasim Mullen *et al.*, “Impact of Natural Gas Appliances on Pollutant Levels in California Homes” Lawrence Berkeley National Laboratory, 2012.

gas combustion pollutants can cause respiratory diseases, as well as more serious conditions, including death. ³ Lawrence Berkeley National Laboratory recently found that air pollution levels in the 60 percent of homes with gas stoves exceed EPA’s definition of clean air – in other words, air pollution levels indoors in these homes would be illegal if found outdoors. ⁴

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O1-3
Cont.

All-electric new construction will also be key to mitigating outdoor air pollution. While most think of trucks, power plants and industry as the major culprits of air pollution, buildings have for too long gotten a free pass. Gas combustion appliances lack modern-day pollution controls and are a major source of air pollution, particularly in the winter from gas heating. Gas appliances in residential and commercial buildings produce nearly nine times more nitrogen oxide (NOx) emissions than gas power plants. ⁵ Nitrogen oxide is a precursor to ozone and PM 2.5, two pollutants that cause asthma, lung cancer, respiratory diseases, and premature death. ⁶ All-electric new construction is an essential step to improving air quality in Sierra Madre and the greater Southern California area.

↑
O1-4

All-electric buildings also improve safety, especially in the face of earthquakes. Gas pipelines are vulnerable to methane leakage, over-pressurization, and earthquakes. Aliso Canyon (2015/16), Bakersfield (2015), Carmel (2014), San Bruno (2010), and Rancho Cordova (2008), and the recent fires in North Carolina, Massachusetts, and San Francisco are but a few of the important and unfortunate reminders of the gas system’s inherent risks. As the EIR notes, the 1987 Whittier Earthquake and the 1991 5.8 Sierra Madre Earthquake drastically damaged the Monastery building, and the Sierra Madre fault is located just 700 feet north of the project site. Communities with gas pipelines in earthquake-prone areas face increased risks of fires since vibration and changes in pipeline tension during seismic events can result in leaking gas that fuels fires. Aging, inflexible pipelines and associated equipment are particularly vulnerable to shifts in the earth which can cause cracks and methane leaks. The California Seismic Safety Commission estimates up to half of total post-earthquake fires are related to gas leaks. ⁷ All-electric buildings would minimize that threat.

↑
O1-5

The buildings we construct today will last for decades to come, and building them with only fossil fuel infrastructure locks in decades of additional fossil fuel emissions. Local cities and counties therefore have an important role in ensuring that they are built to a standard that helps the state meet its goals around clean air, climate change, health and more. That is why we urge the Sierra Madre City Council to require that the project have the capacity for all-electric operations. Thank you.

↑
O1-6

³California Air Resources Board, “Combustion Pollutants” (reviewed Jan. 19, 2017). Available at <https://www.arb.ca.gov/research/indoor/combustion.htm>

⁴Pollution in the Home: Kitchens Can Produce Hazardous Levels of Indoor Pollutants” Available at <https://newscenter.lbl.gov/2013/07/23/kitchens-can-produce-hazardous-levels-of-indoor-pollutants/>

⁵ “Emission Inventory Data” Available at <https://www.arb.ca.gov/ei/emissiondata.htm>

⁶ “Health Effects of Ozone and Particle Pollution” Available at <https://www.lung.org/our-initiatives/healthy-air/sota/health-risks/>

⁷ California Seismic Safety Commission, Improving Natural Gas Safety in Earthquakes, (Adopted July 11, 2002), p. 1. Available at https://ssc.ca.gov/wp-content/uploads/sites/9/2020/08/cssc_2002-03_natural_gas_safety.pdf

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Response to Comment Letter O1

Organization

Clean Power Alliance, Coalition for Clean Air, Southern California Edison

October 1, 2021

- 01-1** The comment is an introduction to comments that follow. The comment encourages the consideration of stronger building electrification requirements. No further response is required or necessary.
- 01-2** The comment provides factual background information and does not raise an environmental issue on the Draft EIR. No further response is required.
- 01-3** The comment provides factual background information regarding all-electric building and does not raise an environmental issue on the Draft EIR. No further response is required.
- 01-4** The City acknowledges the comment which expresses the opinions of the commenter regarding all-electric new construction. The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. No further response is required.
- 01-5** The City notes the comment provides factual background information and does not raise an environmental issue on the Draft EIR. No further response is required.
- 01-6** The comment expresses the opinions of the commenter and does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. No further response is required.

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Comment Letter O2

From: Preserve Sierra Madre [mailto:preservesierramadrenow@gmail.com]
Sent: Monday, October 4, 2021 4:43 PM
To: Vincent Gonzalez <vgonzalez@cityofsierramadre.com>
Subject: Draft EIR Comments

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

Dear Vince,

Please accept our comments for inclusion into the Final EIR.

Thank you,

Preserve Sierra Madre

┌
O2-1
└

EIR REBUTTAL

Preserve Sierra Madre, a group of citizen volunteers, appreciates the opportunity to present the results of our review of the Meadows at Bailey Canyon DraftEIR done in the 60 days the residents of Sierra Madre were given, which was prepared by a professional team paid for by Mater Dolorosa. 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.

O2-1
Cont.

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.

O2-2

O2-3

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.

O2-4

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.

O2-5

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.

O2-6

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!

O2-7

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.

O2-8

- 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.

O2-9
- 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.

O2-10
- 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.

O2-11
- 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”

O2-12
- 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.

O2-13
- 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.

O2-14

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.

O2-15

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.

O2-16

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.

O2-16
Cont.

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.

O2-17

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 3.2 persons), 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.

O2-18

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.

O2-18
Cont.

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.

O2-19

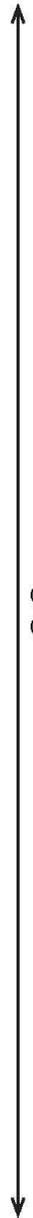
- Coast live oaks are affected by sudden oak death, a pathogen that has been killing them off in certain areas across the state. These trees are becoming more and more rare. It should not be considered a replacement to kill mature coast oaks and put in young oaks without fire resistance and mature root 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.



O2-19
Cont.

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.

↑ O2-19
Cont.

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.

↑ O2-20

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.

O2-21

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?

↓ O2-22

The Project does note that there are potentially significant impacts to nesting birds if vegetation clearing in 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.

O2-22
Cont.

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’.

O2-23

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.

O2-24



O2-25

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

O2-26

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

O2-27

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.

O2-28

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)].

O2-29

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’.

O2-30

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.

O2-30
Cont.

O2-31

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.

O2-31
Cont.

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:

O2-32

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.

O2-33

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.

O2-34

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.

O2-35

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.

O2-36

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.

O2-37

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

O2-38

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

↑ O2-38
Cont.

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.



O2-39

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.



O2-40

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.



O2-41

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.

O2-42

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.

O2-43

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’.

O2-44

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.

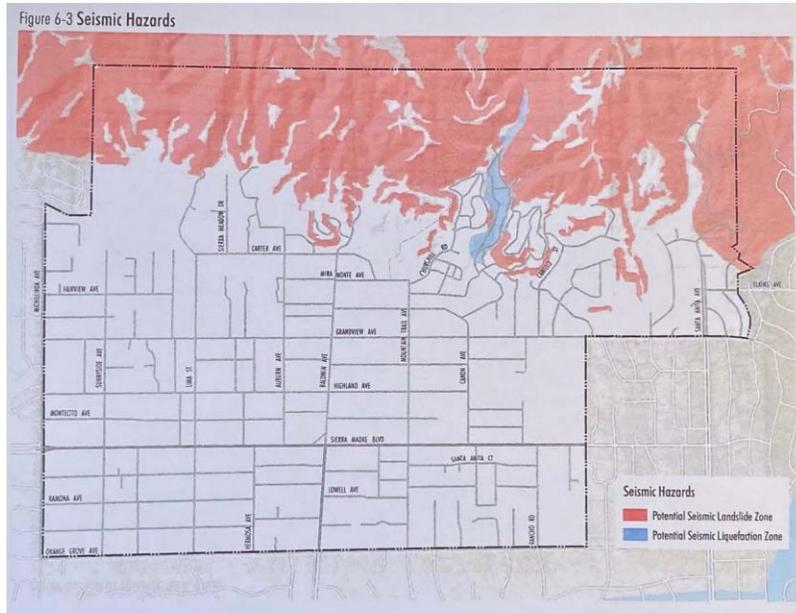
GEOLOGY AND SOILS

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.

O2-45

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.



O2-46

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.”

O2-47

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.

O2-48

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.

O2-49

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.

O2-50

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.

O2-51

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.



O2-52

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.

O2-53

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.

O2-54

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

↑ O2-54
Cont.

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.

O2-55

O2-56

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.



O2-57

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.

O2-58

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:

O2-59

- 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

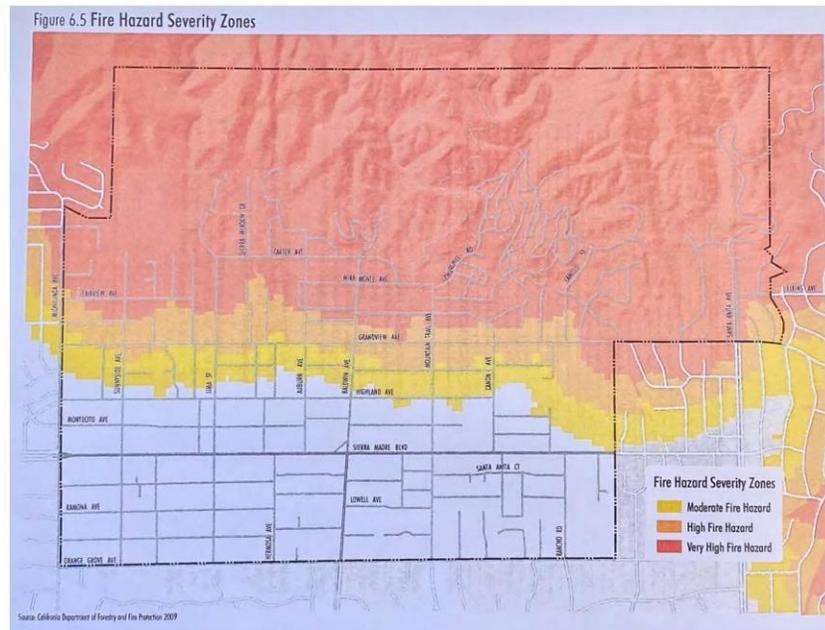
Road access would be problematic, and dangerous because Sunnyside, the road that leads up to the monastery, would quickly become congested, limiting the access for emergency vehicles.

O2-59
Cont.

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.

O2-60



O2-61

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.

O2-62



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.

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O2-62
Cont.

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.

↑
O2-63

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.”

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O2-64

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.

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O2-65

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.

↑ O2-65
| Cont.

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.

| O2-66

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.

| O2-67

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.

| O2-68

On behalf of Preserve Sierra Madre and its followers.

Response to Comment Letter O2

Organization
Preserve Sierra Madre
October 4, 2021

- 02-1** The comment provides an introduction to comments that follow. The comment does not raise any specific issues related to the adequacy of the Draft EIR.
- 02-2** The comment restates information describing the proposed project contained in the Draft EIR and does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. No further response is required or provided.
- 02-3** The comment raises economic issues that do not relate to any physical effect on the environment. No further response is required because the comment does not raise an issue related to the adequacy of any specific section or analysis of physical environmental impacts in the Draft EIR.
- 02-4** The comment provides background information associated with the General Plan but does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. No further response is required.
- 02-5** The comment raises concerns regarding the proposed project's consistency with General Plan policies. Please refer to Global Response GR-7.
- 02-6** The comment states that the Draft EIR is written from the perspective of the project and its residents and not the City and neighbors. The comment expresses the opinions of the commenters and does not raise any specific issues related to the environmental analysis of the Draft EIR.
- 02-7** The comment raises concerns regarding the zone change associated with the proposed project and adoption of a Specific Plan. As described in Draft EIR Chapter 3, Project Description, the proposed project would require a General Plan land use amendment and zone change from Institutional to Specific Plan. Please refer to Global Response GR-7.
- 02-8** The comment raises traffic related issues and states that the proposed project is inconsistent with the General Plan. The comment does not identify specific policies the proposed project is inconsistent with. Please refer to Global Response GR-6 and Global Response GR-7.
- 02-9** The comment expresses concern regarding water supply and the project's net-zero water use. Please refer to Global Response GR-1.
- 02-10** The comment expresses concern regarding tree removal and replacement and states that the tree removal would be inconsistent with the General Plan, and generally references, but does not identify other negative impacts. Please refer to Global Response GR-2.
- 02-11** The comment expresses concern regarding the effects of the 1991 Sierra Madre earthquake within the project area and that information regarding the 1991 earthquake was not included in the Draft EIR. Please refer to Response to Comment I42-19. In addition, the comment raises concern regarding mitigation for earthquake effects. Please refer to Response to Comment I79-5.

- 02- 12** The comment expresses concern regarding the proposed project’s consistency with the General Plan. Please refer to Response to Comment I102-6 regarding the project’s consistency with Guiding Principle #5 and Global Response GR-7 regarding general consistency with the General Plan.
- 02- 13** The comment expresses concern regarding the project’s impacts on the Sierra Madre Police Department. As addressed in Draft EIR Section 4.15, Public Services, the development of the project site is expected to increase demands of police protection services relative to existing conditions. However, payment of development fees by the project applicant, as required by Chapter 15.52 of the SMMC, would offset the costs of increased personnel or equipment that could be required in order to maintain acceptable service ratios, response times, and other performance objectives.
- 02-14** The comment expresses concern regarding the proposed project’s impacts to fire protection and the project’s location within a Very High Fire Hazard Severity Zone. Please refer to Global Response GR-3. In addition, Draft EIR Section 4.15.5, Impact Analysis, in Section 4.15, Public Services, analyzes impacts associated with fire potential, and this analysis determined that implementation of the proposed project would a less than significant impact on fire protection services.
- 02- 15** The comment expresses concern regarding the proposed project’s consistency with the General Plan. Please refer to Global Response GR-7.
- 02-16** The comment raises concerns regarding the increase in air pollution as a result of implementation of the proposed project, especially associated with an increase in vehicle trips. The Draft EIR analyzed the project’s potential contribution to vehicle miles traveled (VMT), including impacts related to trips other than home-based trips. Air pollution has been analyzed in Draft EIR Section 4.3, Air Quality, and the assumptions include increases in trips associated with the project. As discussed in Draft EIR Section 4.3, Air Quality, impacts to air quality would be less than significant with mitigation. The comment also incorrectly references the conclusions of the Draft EIR as “Developer response.” The conclusions of impact significance in the Draft EIR are those of the City.
- 02-17** The comment raises concerns regarding air quality impacts associated with the proposed project. Air pollution has been analyzed in Draft EIR Section 4.3, Air Quality. Air quality emissions were compared to SCAQMD Thresholds. As discussed in Draft EIR Section 4.3, Air Quality, impacts to air quality would be less than significant with mitigation. The proposed project does not include plans for charging stations to promote the use of electric vehicles. The 2019 Title 24 building code does not require the installation of EV chargers in single-family residential developments. However, the City’s Municipal Code Section 15.30.010 incorporates the California Green Building Standards Code 2019 Edition. Section 4.106.4.1 of the California Green Building Standards Code 2019 Edition requires new one- and two-family dwellings and townhouses with private attached garages to install a listed raceway to accommodate a dedicated 208/240-volt branch circuit. The service panel must also be sized to accommodate the installation of a future EV charger. Therefore, although the project did not account for installation of EV chargers, in accordance with the City’s building code it will be required to install infrastructure that will support future installation of EV chargers. The comment also incorrectly references the conclusions of the Draft EIR as “Developer response.” The conclusions of impact significance in the Draft EIR are those of the City.

As discussed in Draft EIR Section 4.3.5, Impact Analysis, of Section 4.3, Air Quality, construction of the project would comply with SCAQMD Rule 403 (Fugitive Dust), which requires fugitive dust sources to implement best available control measures for all sources and prohibits all forms of visible particulate matter from crossing any property line. Water used for fugitive dust suppression would be sourced from the City. It should be noted that this water use would be temporary and only be required during grading of the project. As the site is already largely disturbed, this water use would be minimal. The proposed net-zero water is based on anticipated water utilization during operations of the project, including water used for the proposed residences and open space. Water used for fugitive dust suppression would not be reclaimed. Therefore, used for fugitive dust suppression would not be accounted for in the project's net-zero water usage.

Regarding the Tier 4 language included under MM-AQ-1, exemptions can be granted if a Tier 4 Interim piece of equipment is not reasonably available at the time of construction and a lower tier equipment is used instead (e.g., Tier 3), another piece of equipment could be upgraded to a Tier 4 Final or replaced with an alternative-fueled (not diesel-fueled) equipment to offset the emissions associated with using a piece of equipment that does not meet Tier 4 Interim standards.

The comment expresses concern regarding the net zero water impact. Please refer to Global Response Gr-1.

02-18

The comment expresses concern regarding the cumulative effect on air quality resources, health risks associated with air quality (particularly respiratory issues), and air quality impacts associated with increase in vehicle trips. As discussed in Draft EIR Section 4.3, Air Quality, the proposed project would not result in a cumulatively considerable increase in emissions of nonattainment pollutants. Health risks associated with air quality were analyzed in Draft EIR Section 4.3.10, Impact Analysis, of Section 4.3, Air Quality. As discussed in this section, Construction and operation of the project would not contribute to exceedances of the NAAQS and CAAQS for NO₂. Health effects that result from NO₂ and NO_x include respiratory irritation, which could be experienced by nearby receptors during the periods of heaviest use of off-road construction equipment. However, project construction would be relatively short term, and off-road construction equipment would be operating at various portions of the site and would not be concentrated in one portion of the site at any one time. In addition, existing NO₂ concentrations in the area are well below the NAAQS and CAAQS standards. Operation of the project would not require use of any stationary sources (e.g., diesel generators and boilers) that would create substantial, localized NO_x impacts. Regarding air quality impacts associated with increase in vehicle trips, please refer to Response to Comment 02-16.

In addition, the comment states that the proposed project would be inconsistent with General Plan Policies L51.2 and L51.4. Please refer to Response to Comment I96-47. Regarding Policy L51.4, Sierra Madre Boulevard does provide existing bicycle lanes; however, Sierra Madre Boulevard is located approximately 0.6 miles south of the project site. Therefore, any bicycle improvements proposed within the project site or vicinity of the project site would not have nearby existing bicycle facilities or infrastructure to provide a connection. Additionally, according to Final EIR Section 4.17.5, Impact Analysis, in Section 4.17, Transportation, although no bicycle facilities and improvements are proposed under the project, the project would not impact existing bicycle facilities in the vicinity of the project, including the existing bicycle lanes within Sierra Madre Boulevard. Global Response GR-7. Lastly, the comment also incorrectly references the conclusions of the Draft EIR as "Developer response." The conclusions of impact significance in the Draft EIR are those of the City.

02-19 The comment expresses concern regarding the tree removal and states that the proposed project would be inconsistent with Goal 1, Goal 2, Objective R10, and Policy R10.2 of the General Plan. Please refer to Global Response GR-2 and Final EIR Section 4.11.5, Impact Analysis, of Section 4.11, Land Use and Planning, regarding the proposed project’s consistency with the goals, objectives, and policies listed by the commenter. As discussed in this section, the project would be consistent with Goal 2, Objective R10, and Policy R10.2. Although the project would be inconsistent with Goal 1 of the Tree Preservation Element, this inconsistency would not result in a physical environmental impact.

The comment references the benefits of mature oak trees and implies that the subject oak trees on-site are also mature and that a significant amount of environmental benefits and habitat value will be lost through the removal of oak trees from the site. As noted in the Final EIR Appendix C2, Arborist Report, only one oak tree (#61) has a single stem (36 inches) and canopy size (40’ height and 50’ width) that can be considered a mature tree. The remaining oak trees in the inventory have single stems that measure from 2”-12”, crown heights from 8’-25’, and canopy spreads from 6’-30’, and would be classified as young or immature trees. It is not accurate to assert that this project is removing a mature collection of oak trees.

The comment accurately describes the site conditions of the oak trees as, ‘these trees are scattered among non-native trees to the eastern edge of the project site,’ which negates there assertion that the trees are ‘an important extension of the intact oak woodland to the immediate east into Sierra Madre’s Bailey Canyon Wilderness Park.’ The six (6) oak trees located on the eastern edge of the property are small stature trees that grow underneath the canopies of the non-native tree species. Only two (2) oak trees (#3 and #4) have connecting canopies, while the remaining oak trees are dispersed and stand alone as individual trees. Based on these factors the oak trees should be considered as individual trees within a non-native landscape and not an extension of oak woodland. In addition, as stated in Draft EIR Section 3.3.4, the Conceptual Landscape Plan would use fire resistant and drought tolerant tree species. Please also refer to Global Response GR-2.

02-20 The City acknowledges the comment and notes that it expresses the opinions of the commenter regarding the tree removal and does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. Therefore, no further response is required.

02-21 The comment raises concern regarding the proposed project’s consistency with Goal 2 and Objective R10.2 of the General Plan. Please refer to Response to Comment 02-19. In addition, the comment reiterates information from the CDFW regarding mitigation measures and is noted by the City.

The five-year monitoring period by an independent third-party arborist ‘may’ result in recommendations for remedial actions because it is not known if remedial actions will be needed. If the trees maintain good health and vigor, then no remedial actions are needed or would be recommended. For a response to comments to the letter submitted by CDFW, please refer to Response to Comment Letter A1.

02-22 The comment reiterates the impact analysis and MM-BIO-1 from the Draft EIR. The comment does not raise an issue regarding the adequacy of the Draft EIR or information regarding a physical environmental effect of the proposed project. No response is required.

02-23 The comment expresses concern that the biological resources analysis was not robust enough and that some species, including bats, may have not been detected during the survey. It also states that

Townsend's big-eared bat is listed by the State of California, but the California Fish and Game Commission determined that the species did not warrant a CESA listing in 2016. As stated in Section 4.4 of the Draft EIR, the project site does not support any native vegetation communities and the area appears to be regularly maintained, which limits the potential for many native plant and wildlife species. As such, extensive surveys/studies of the project site are not warranted.

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

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

02-24 This comment states that the barren conditions of the project site during the survey was due to herbicide being used to eradicate "tumbleweeds". Based upon historical aerial imagery and topographic maps from Google Earth³ and Historic Aerials⁴ online viewer, the project site is regularly maintained, with no evidence of shrub growth, since at least 1952, with topographic maps showing substantial changes to the topography on the project site in 1928.

02-25 This commenter provided before and after photos of the project site showing the results of the alleged herbicide application in 2019. The before photo shows cheeseweed (*Malva parviflora*) in the foreground, and deer grazing on what is likely wild oats (*Avena* sp.), which are non-native species and wild oats is on the California Invasive Plant Council Inventory⁵. As Stated in Section 4.4 of the Draft EIR, the project site appears to be mowed and composed of almost entirely nonnative grasses and nonnative herbaceous annuals. The project site could be a source of non-native plants into the native vegetation communities to the north of the project site if not controlled.

³ Google. 2022. Google Earth, desktop application; centered on the project site. Accessed February 2022. <https://www.google.com/earth/>.

⁴ Nationwide Environmental Title Research. 2022. Historic Aerials. NETROnline. Accessed February 2022 <https://www.historicaerials.com/>.

⁵ California Invasive Plant Council Inventory. 2022. Cal-IPC Inventory, online database. Accessed February 2022. <https://www.cal-ipc.org/plants/inventory/>.

- 02-26** This comment states that it should have expected that no wildlife or plant material were observed following the alleged application of the herbicide. Based upon historical aerial imagery and topographic maps from Google Earth and Historic Aerials online viewer, the project site is regularly maintained, with no evidence of shrub growth, since at least 1952, with topographic maps showing substantial changes to the topography on the project site in 1928. This maintained area would not be expected to support an abundance or wide variety of wildlife due the lack of complexity of the vegetation composition and structure.
- 02-27** This comment states that the survey did not address seed bank or lasting roots of native plants. Based upon historical aerial imagery and topographic maps from Google Earth and Historic Aerials online viewer, the project site is regularly maintained, with no evidence of shrub growth, since at least 1952, with topographic maps showing substantial changes to the topography on the project site in 1928. As such, it is expected the natural vegetation that occurred prior to 1952 would no longer be extant in the seed bank or root zone of the onsite soil. The seed bank is expected to be composed of nonnative grasses and nonnative herbaceous annuals that dominate the project site, which could be a source of non-native plants into the native vegetation communities to the north of the project site if not controlled.
- 02-28** The comment expresses concern that wildlife corridors were not addressed and that wildlife interactions with humans may lead to animal being killed. Wildlife movement was addressed in Section 4.4 of the Draft EIR. The project site is surrounded by residential development to the west and south, the fenced retention basin to the west, and the Mater Dolorosa Retreat Center to the north, and does not have a linkage to other large undeveloped areas. Wildlife that may have localized movement within and through the project site, such as mule deer, were observed grazing within the northern portion of the site and within the adjacent Mater Dolorosa Retreat Center, and, it is expected that the mule deer would also use the foothills to the north of the Mater Dolorosa Retreat Center. However, there is no wildlife corridor connection or habitat linkage to other large undeveloped areas to the south of the project site. As such, no additional analysis is warranted.
- 02-29** This comment identifies information in general about bats that the commenter believes should have been included in the analysis of project impacts to bat species. As noted, the information is general in nature and not specific to the project site. As described in Draft EIR Section 4.4, Biological Resources, and the Biological Resources Report provided as Appendix C1 of the EIR, per the California Natural Diversity Database (CNDDDB), eleven bat species were identified but were determined to have “low occurrence” due to the lack of habitat and noted that the pallid bat would have a low potential to occur on the site because wintering and maternity roosts are not expected, and individuals would be expected to leave if the tree is disturbed (information that was summarized in the comment). Therefore, direct impacts as a result of tree removal, and indirect impacts associated with loss of foraging habitat, noise, dust, construction activities and human presence are unlikely and would not require mitigation. All other species of bats are not expected to occur on site due to lack of suitable habitat.

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

tree when it is disturbed and there are numerous other trees within the surrounding residential area, as well as native trees within Bailey Canyon Wilderness area, that an individual could use.

- 02-30** This comment expresses concern that impacts to nesting birds could occur. MM-BIO-1 in the Draft EIR provides adequate avoidance and minimization measures to reduce impact to nesting birds to less than significant by requiring nesting bird surveys and protection buffers for active nests.
- 02-31** This comment expresses concern that MM-BIO-1 does not conform to CEQA. The methodology in MM- BIO-1 are standard for the industry and have been implemented successfully on countless projects and would reduce impacts to less than significant.
- 02-32** This comment expresses concern that the Draft EIR does not to provide a thorough discussion of direct, indirect, and cumulative impacts affecting project biological resources. Direct impacts to the project site, primarily composed of a maintained lawn, are discussed in depth in Section 4.4 of the Draft EIR. Indirect impacts to wetlands are addressed in Section 4.10, which states that a Storm Water Pollution Prevention Plan is required for the project and impacts to wildlife corridor/movement areas were addressed in Response 02-28. Additionally, MM-BIO-2 requires that the invasive plants currently on site cannot be replaced by other invasive plants in the landscaping plan. The comment also expresses concern that the trees removed on the project site will affect the birds found in Bailey Canyon. The onsite, primarily non-native trees will be replaced (see GR-2) with more trees so there will be a net benefit for foraging birds. All protected trees would also be replaced at a 1:1 ratio.
- 02-33** The comment expresses concern regarding transportation. Specifically, the comment expresses concern regarding bicycle and pedestrian connectivity associated with the proposed project. Due to the scope of the proposed project, bicycle facilities would not be included as a component of the proposed project (see also Response to Comment 02-18). The proposed project would incorporate sidewalks along the proposed streets to promote pedestrian safety and mobility.
- 02-34** The comment expresses concern regarding traffic safety and the consistency with Circulation Goal 2 of the General Plan. Please refer to Global Response GR-6 and Global Response GR-7. As discussed in Final EIR Section 4.11.5, the proposed project would be consistent with this policy as it would extend public access along North Sunnyside Avenue and include new Streets A, B, and C to provide circulation throughout the project site. Carter Avenue would also be improved and would be publicly accessible from within the project site and would become an ingress and egress secondary access road at the southeastern portion of the site. The project would implement street sections that slow traffic and create a safe and pleasant small neighborhood environment.
- 02-35** The comment expresses concern regarding traffic and asks for clarification between the Sunnyside Avenue entrance and the ingress/egress associated with Carter Avenue. Please refer to Global Response GR-5 and Global Response GR-6.
- 02-36** The comment states that the project would not be consistent with Circulation Goal 3 as it would result in an increase traffic. Please refer to Global Response GR-7. As discussed in Final EIR Section 4.11.1, Impact Analysis, of Section 4.11, Land Use and Planning, with proposed improvements, the project would be consistent with Circulation Goal 3.

- 02-37** The comment expresses concern regarding the consistency with Objective L51 and states that the proposed project would not provide access to transit systems. Please refer to Response to Comment I96-46 and Global Response GR-7. The proposed project would be consistent with Objective L51 of the City’s Land Use Element, which states “developing a balanced and multi-modal transportation system to serve the needs of all roadway users, including motorists, public transit patrons, pedestrians and cyclists,” because the proposed project would include a landscaped parkway and sidewalk on the west side of North Sunnyside Avenue, and a sidewalk between proposed A, B, and C Streets, enhancing pedestrian safety and mobility (Draft EIR Section 4.17.4, Project Design Features, in Section 4.17, Transportation).
- 02-38** The comment states that the project is inconsistent with Policy L51.2 as it creates new roadways and would result in increases in traffic. As concluded in Draft EIR Section 4.11, the project would be consistent with this policy because the project would not build any new roadways beyond the internal roads within the project site and would only include the reconfiguration of North Sunnyside Avenue and improvements to Carter Avenue. Please refer to Global Response GR-6 and Global Response GR-7.
- 02-39** The comment expresses concern associated with the consistency with Policy L51.5, L51.6, and L51.7. Please refer to Global Response GR-6 and Global Response GR-7. Furthermore, in regard to consistency with the mentioned policies, please refer to Response to Comment I96-48.
- 02-40** The comment states that the proposed project is inconsistent with Objective L52 as it fails to maintain levels of safety to vehicles, cyclists, and pedestrians. Please Response to Comment I96-49 and Global Response GR-7.
- 02-41** The comment restates Policy L52.8. The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. Therefore, no further response is required or provided.
- 02-42** The comment states that the proposed project would be inconsistent with Policy L52.8 as bicycle facilities would not be required and are not included as a component of the proposed project. As concluded in Draft EIR Section 4.11, Table 4.11-1, due to the size and scope of the proposed project, bike facilities would not be required. 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. However, Per Draft EIR Section 4.11, this inconsistency would not result in an environmental impact. Please also refer to Global Response GR-7.
- 02-43** The comment states that the proposed project would be inconsistent with Policy L52.9 because it does not provide sidewalk continuity with existing neighborhoods. Please refer to Response to Comment I96- 51, I46-8, and Global Response GR-7.
- 02-44** The comment states that the proposed project would be inconsistent with Objective L53. Please refer to Response to Comment I85-45, Global Response GR-6 and Global Response GR-7.
- 02-45** The comment provides information regarding the 1991 Sierra Madre earthquake but does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. Please refer to Response to Comment I42-19.

- 02-46** The comment includes a map of seismic hazards within Sierra Madre and does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. Seismic hazards were addressed in the Draft EIR. See Response to Comment 02-45.
- 02-47** The comment states that the proposed project would violate Vision and Guiding Principle #5 because the proposed residences would be significantly larger than those located on surrounding streets. The Specific Plan sets out the standards that must be adhered to for future development. The exact size of each residence is not known at this time and, as is standard, will be determined at the time the tentative tract map is prepared and submitted to the City for review. Architectural plan sets would be provided prior to issuance of building permits, which would specify the exact design of the home.
- The commenter also notes the Municipal Code requirements for a Conditional Use Permit for homes over 3500 square feet. This statement does not present a comment about a physical environmental impact or address the adequacy of the environmental analysis.
- 02-48** The comment states that the proposed project is consistent with Housing Policy 2.5 but expresses concern regarding the additional load associated with the proposed project. Please refer to Global Response GR-6.
- 02-49** The comment states that the proposed project would be inconsistent with Housing Policy 5.3 because it does not promote the use of alternative energy sources. As concluded in Draft EIR Section 4.11, Table 4.11-1, the proposed project would be consistent with this policy because the proposed project would allow for the use of solar panels on proposed structures.
- 02-50** The City notes that the comment expresses concern for issues that do not appear to relate to any physical effect on the environment. No further response is required because the comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR.
- 02-51** The comment summarizes General Plan Policy L6.1, which requires notification of surrounding neighbors if new construction would exceed one story in height and expresses concern that the Specific Plan would violate Policy L6.1. The Notice of Availability (NOA) of the Draft EIR was sent to all residents of the City. Therefore, City residents have been notified of the Draft EIR.
- The comment also summarizes General Plan Policy L7.3, which limits height of new buildings to reflect current height patterns in Sierra Madre. The comment expresses concern about how many two-story homes will be built. Please see Response to Comment I4-8.
- 02-52** The comment summarizes General Plan Policy L5.1, which prohibits the use of cul-de-sacs, and states that the project would be cutoff, from the surrounding neighborhood. As discussed in the Land Use and Planning Section of Final EIR at Section 4.11.5, the project would not include cul-de-sacs and would be consistent with this policy.
- 02-53** The comment summarizes General Plan Policy L5.1, which prohibits the use of cul-de-sacs, and states that the project would be cutoff, from the surrounding neighborhood. As discussed in Final EIR Section 4.11.5, Impact Analysis, of Section 4.11, Land Use and Planning, the project would not include cul-de-sacs and would be consistent with this policy.

- 02-54** The comment summarizes General Plan Policy L4.1, which ensures that expansion of existing uses' consistency of the overall pattern of development. The comment expresses concern about the size and height of the homes being inconsistent with the pattern of development. It should be noted that this policy does not directly relate to the proposed project as the project would not be an expansion of existing use. Nonetheless, please see Response to Comment I4-7, I4-8, and GR-7. Additionally, the comment states that the City must build a certain percentage of lower- and middle-income housing. Please see Response to Comment I65-3.
- 02-55** The comment correctly states that the project is located in a VHFHSZ. The comment also summarizes Policy Hz5.a and Hz7 from the Draft Safety Element. Additionally, the comment states that the surrounding streets would not be able to support emergency equipment. Please refer to Global Response GR-3 regarding consistency with Draft Safety Element Policy Hz7 and Global Response GR- 4 regarding emergency evacuation concerns. In addition, the project would be consistent with Draft Safety Element Policy Hz5.a as it would limit risk of wildfire planning through implementation of PDF- WF-1, which requires implementation of the FPP.
- 02-56** The comment provides information about past fires in the region, including one in the City. The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. Please refer to Global Response GR-3 for additional discussion related to the project's impacts on wildfire.
- 02-57** The comment shows a photo of wildfire and does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. Please refer to Global Response GR-3 for additional discussion related to the project's impacts on wildfire.
- 02-58** The comment provides background information related to previous fires in the area and does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. Please refer to Global Response GR-3 for additional discussion related to the project's impacts on wildfire.
- 02-59** The comment expresses concern related to wildfire and the project's location within wildland/urban interface areas. Please refer to Global Response GR-3.
- 02-60** The comment expresses concern related to water supply associated with increased drought conditions and exacerbation of fire risks. Please see Global Response GR-1 and Global Response GR-3.
- 02-61** The comment shows a map that depicts Moderate, High Fire, and Very High Fire Hazard Severity Zones. The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. Please see Global Response GR-3.
- 02-62** The comment expresses concern related to the project's net zero water use. More specifically, the comment expresses concern that the net zero water use is inconsistent with General Plan Objective R12 and Policy L4.3 as well as availability of supplemental water purchase. Please see Global Response GR-1. Although financial impacts are not considered an environmental issue associated with the Draft EIR, it should be noted that homeowners will not have to pay for the project's supplemental water use. In addition, as discussed in Draft EIR Section 4.19.5, the project site would be developed in compliance with the California Green Building Code (which implements water efficiency standards for appliances and fixtures), which would further reduce project water usage. Lastly, please

refer to Response to Comment I21-7 regarding consistency with Objective R12 and Response to Comment I102-4 regarding consistency with Policy L4.3. Regarding the commenter's suggestions of additional water saving measures and concern related to imported water supplies, please also refer to Global Response GR-1. As discussed in this response and in Final EIR Section 3.3.7, Proposed Utilities, to achieve a net-zero impact on existing local water supplies, the project Applicant would contribute to one of three programs: (1) increase the City's water supply through the purchase of additional supplemental water from the San Gabriel Valley Municipal Water District (SGVMWD); (2) the creation of a lawn retrofit program, which would provide homeowners with a grant provided to replace their lawn with turf; and (3) funding of improvements to existing water infrastructure, such as pipe leakage fixes (see project design feature [PDF]-UTL-1 under Final EIR Section 3.3.13, Project Design Features).

02-63 The comment expresses concern associated with groundwater capture, water supply as it relates to landscaping, and impacts to drainage associated with the increase of impervious surfaces on-site. Please see Global Response GR-1 for a discussion related to water supply as it relates to landscaping. The proposed project would be required to comply with landscaping criteria set forth in Section 15.60.030 of the SMMC, or the City's Water Efficient Landscape Ordinance (WELO), which states that landscaping shall use low water use plants and native California plants where possible. Per the WELO, moderate or high use water should only be used when needed. In addition, as discussed in Draft EIR Section 4.10.5, although the project would introduce impervious surfaces on-site, the proposed open space on site, which includes the 3.04-acre dedicated neighborhood public park at the southernmost portion of the project site, would remain pervious and therefore contribute to groundwater recharge. Additional drainage features, such as the proposed catch basins and storage gallery retention system, would further contribute to groundwater recharge. Those additional drainage features and the proposed park would also ensure drainage impacts associated with introduction of impervious surfaces on-site would be less than significant.

02-64 The comment expresses concern related to the alluvial fan and references a prior comment submitted by Jane Tsong (Watershed Conservation Authority). Please see Response to Comment I32-2 and I32-3.

In addition, the comment expresses concern related to biodiversity and the project's impacts to adjacent wetlands as well as its location within the watershed of the LA River and the San Gabriel River. As discussed in Draft EIR Section 4.4.5, the project site is adjacent to wetlands and riparian features across the roadways which separate the project site from Bailey Canyon Wilderness Park. However, with compliance with existing regulations, as well as MM-BIO-2, which prohibits the use of invasive species in the project's landscaping plan, impacts to nearby wetlands/jurisdictional waters would be less than significant. The commenter expresses concern whether the project's impacts will have an effect on restoration projects such as restoration of the LA River and the San Gabriel River. The comment, however, ignores the open space protection that is provided by the project which is a benefit to watershed protection.

02-65 The comment cites General Plan Policy Hz2.4 and expresses concern related to flooding associated with the proposed retention storage gallery, as well as concerns related to water supply. Please refer to Response to Comment I95-13 and Global Response GR-1.

02-66 The comment expresses concern related to the project's water supply and the proposed purchase of supplemental water. Please refer to Global Response GR-1.

02-67 The comment cites Policy Hz2.2.5, related to traffic congestion, fire hazards, emergency response times, fire protection, as well as impacts fire hazards related to fire hazards and water supply.

Is it assumed that the commenter is referring to Policy Hz2.5 of the City's General Plan. Please refer to Response to Comment I89-26. Please also refer to Global Response GR-1 and Global Response GR-3.

02-68 The comment expresses opposition for the proposed project and states that that the Draft EIR fails to justify the change in zoning and land use designation of the site. The purpose of an EIR is to analyze the physical environmental impacts of a proposed project. Please refer to Global Response GR-7.

Comment Letter I1

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

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

Dear Mr. Gonzalez:

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

I 11-1

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

I 11-2

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

I 11-3

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

I 11-4

Thank you so much for your time and attention.

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

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Response to Comment Letter I1

Individual
Alice Whichello
August 5, 2021

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

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Comment Letter 12

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

12-1

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

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

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

12-2

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

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

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

12-3

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

12-4

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

12-5

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

↑ I2-5
Cont.

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

I2-6

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

I2-7

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

I2-8

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

Thank you

Barbara Velturo
Protect Sierra Madre – Stop the Housing Project

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

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

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

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

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

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

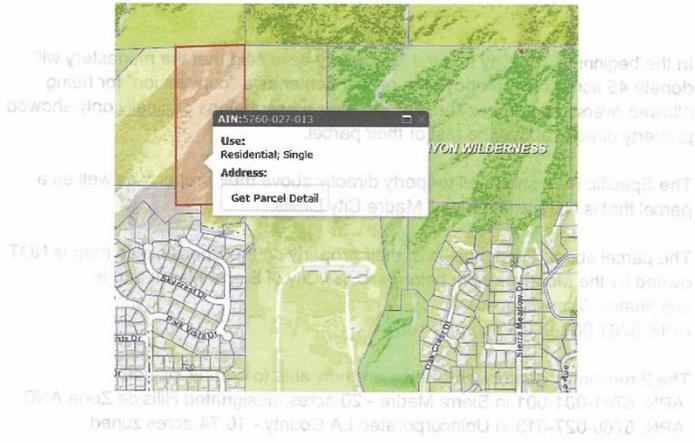
We can see a lot of negative consequences in our owning 16.74 Hillside acres in Unincorporated LA County - but NO positive ones!!

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

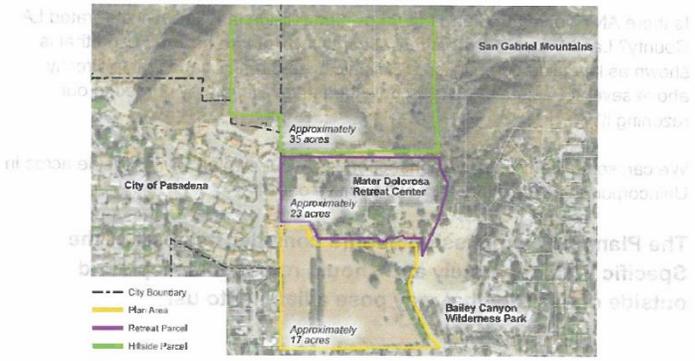
12-9

12-10

Parcels owned by the Monastery



Map from the Specific plan



I2-11

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

12-12

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

12-13

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

12-14

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

This is the information included in their Specific Plan

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

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

12-15

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

I2-16

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

THEY MUST HAVE SURVEYED!

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

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

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

I2-17

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

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

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

ORIGINAL MAP



SPECIFIC PLAN MAP



I2-17
Cont.

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Response to Comment Letter I2

Individual
Barbara Vellturo
August 5, 2021

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

⁶ City of Sierra Madre 2021. Sierra Madre Municipal Code. Updated September 28, 2021.

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

- I2-4 The comment provides information on Sierra Madre’s Zoning Ordinance 17.64.030. Please refer to Response to Comment I2-3.

- I2-5 The comment states that the City Attorney confirmed City’s Zoning Ordinance Section 17.64.030 is applicable to the proposed project. The City is unaware of such comment and the comment is unclear as to the details of when this comment was made. Please refer to Response to Comment, I2-3.

- I2-6 The comment states that there are many concerns associated with the project and that the project does not have sufficient basis to override the City’s General Plan. However, the project does not propose to override the General Plan. As discussed in Draft EIR Section 3.3.8, the proposed project would require a General Plan land use amendment and zone change from Institutional (I) to Specific Plan (SP), which is an allowable process under the General Plan. Please refer to See Response to Comment I2-2 for further details regarding other actions and entitlements that would be required for approval of the proposed project

- I2-7 The comment recommends that rezoning and adoption of the EIR and Specific Plan should occur separately. However, an EIR is required to analyze the potential environmental impacts that would result from the zone change, as well as the other portions of the project, including adoption of the Specific Plan. CEQA requires that lead agencies undertake environmental review of proposed actions (such as a proposed zone change) prior to considering approval of such actions, and that environmental review analyze the whole of the project. Please refer to Responses to Comments I2-2 and I2-3.

- I2-8 The comment recommends that various issues of the Specific Plan should be decided separately and provides an introduction to additional issues in attachment provided, which are addressed in Responses to Comments I2-9 through I2-17, below. The City notes that the comment provides an introduction to comments that follow as well as the opinions of the commenter that do not raise issues related to the adequacy of the EIR. No further response is required.

- I2-9 The comment provides an overview of the proposed open space conservation easement area to be located to the north of the Mater Dolorosa Retreat Center. The City notes that the comment provides background information and does not raise an issue related to the adequacy of the EIR. As discussed in Draft EIR Section 3.3, Project Description, the proposed open space conservation easement area would be approximately 35 acres. The text in Final EIR Section 3.3.3, Open Space Conservation Easement, has been revised to clarify the means of transfer of this open space hillside area, which would involve conveyance of this open space hillside land to the City, which would be effectuated through execution of a development agreement between the City and project applicant/landowner and conservation easement would be recorded.

- I2-10 The City notes that the comment expresses the opinions of the commenter related to the proposed 35-acre open space conservation easement area but does not raise any issue concerning the adequacy of the EIR. As discussed in Final EIR Section 3.2, Project Objectives, one of the objectives of the

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

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

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

Comment Letter 13

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

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

Dear Mr. Gonzalez,

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

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

Thank you, I hope you find time to respond.

Andrea Van Wickle
avanwickle@yahoo.com
626-355-7012

13-1

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Response to Comment Letter I3

Individual
Andrea Van Wickle
August 3, 2021

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

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Comment Letter I4

8/11/21

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

I
14-1
I



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

Dear Neighbor,

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

14-2

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

14-3

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

Nancy Beckham
337 North Lima Street
626 355-1602
nbeckham48@gmail.com

Jim Sadd
286 North Lima Street
626 233-4074
jsadd@oxy.edu

Outline for Zoom/in-Person Meetings

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

14-4

14-5

14-6

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

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

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

14-19
Cont.

IV. Traffic concerns

A. Sunnyside; Ingress and Egress for project.

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

14-20

14-21

B. Carter

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

14-22

14-23

46	<p>46 feet in width on the Monastery land and then change to a single lane road 25' in width.</p> <p>5. The land on either side of Carter (@ 5 feet but split with the north and south side of the road.) The land is owned by the county.</p> <p>6. County is not interested in improving the street situation. Apparently, Gabe approached the county and they are not interested in improving that area not are the interested in adding sidewalks or widening it.</p> <p>7. Do not yet know who owns the street but it appears that the county owns the land on either side of Carter in the small area near Bailey Canyon. The attached plate map looks like Carter is owned at Oak Crest by the city, but not prior and then continues east of until Carter reaches Baldwin. (See attached plate map)</p> <p>8 There is no parking allowed currently on that part of Carter</p> <p>9. There are no sidewalks in this area on Carter.</p> <p>10. This area is already of great concern of the fire chief, especially after last year's Bobcat Fire.</p> <p>11. WAS THE COUNTY APPROACHED ABOUT WHAT THIS PROJECT WILL DO TO THIS STRETCH OF LAND? See B Carter #6 above</p> <p>12. Was the municipal water district approached about the impact of this project on this area that leads to the run off basins in Bailey Canyon? A gate exists here but nothing was mentioned in the specific plan. i</p> <p>C. North Grove</p> <p>1. North Grove is really a lane at this location (adjacent to Bailey Canyon) and would have a very difficult time absorbing additional traffic.</p> <p style="padding-left: 20px;">a. no sidewalks on North Grove.</p> <p style="padding-left: 20px;">b. North Grove is an interrupted street as it begins as a lane, is off set twice before reaching Sierra Madre Blvd, and just prior to Sierra Madre becomes an alley in width.</p> <p>D. Plan proposes ingress and egress of Carter to Baldwin with a right turn on Baldwin to get to town., and vice versa.</p> <p>E. . Carter (Carter to Baldwin)</p> <p style="padding-left: 20px;">1. Carter now will function as an ingress and an egress, will have to accept additional traffic throughout the day.</p>	<p>↑ 14-23 Cont.</p> <p>14-24</p> <p>14-25</p> <p>14-26</p> <p>14-27</p> <p>14-28</p> <p>14-29</p>
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- a. information written in the March 8 handout by the developer shows 398 trips per 42 homes. They have admitted they did not include Amazon deliveries, gardeners, activities for the retreat center 14-30
 - b. trips are more like 780 a day.
 - 2. Will parking be removed off Carter so residents cannot park in front of their home? 14-31
 - 3. Most cars will not travel to Baldwin but will turn down another neighborhood street to get to town faster. 14-32

- F. North Lima is first normal width residential street leaving the Bailey Canyon area.
 - 1. North Lima Street has no sidewalks above Grandview.
 - 2. People walk in the street, walk their dogs in the street, and children walk from home to home in the street.
 - 3. North Lima has an abundance of Edison poles that are serviced several times a year. 14-33
 - a. Edison trucks are very wide
 - b. residents cannot back their cars out of the driveways when the Edison trucks are on the street
 - c. When Edison comes to service the poles the residents have to park below Grandview and then walk up to their home
 - 4. North Lima street is an emergency access route by default that was used effectively during the Bobcat fire by all the firetrucks. 14-34
 - 5. North Lima will be impacted with additional traffic as a percentage of the 800 plus daily car trips created by 42 new homes will use North Lima to get to the downtown area.
 - 6. North Lima has very pronounced angle and cars pick up speed traveling down North Lima to the city proper. 14-35

- V. All streets in North West corridor. 14-36
 - A. No streets above Grandview have sidewalks including the north side of Grandview.
 - B All streets will be expected to absorb additional traffic. 14-37

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

14-38

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

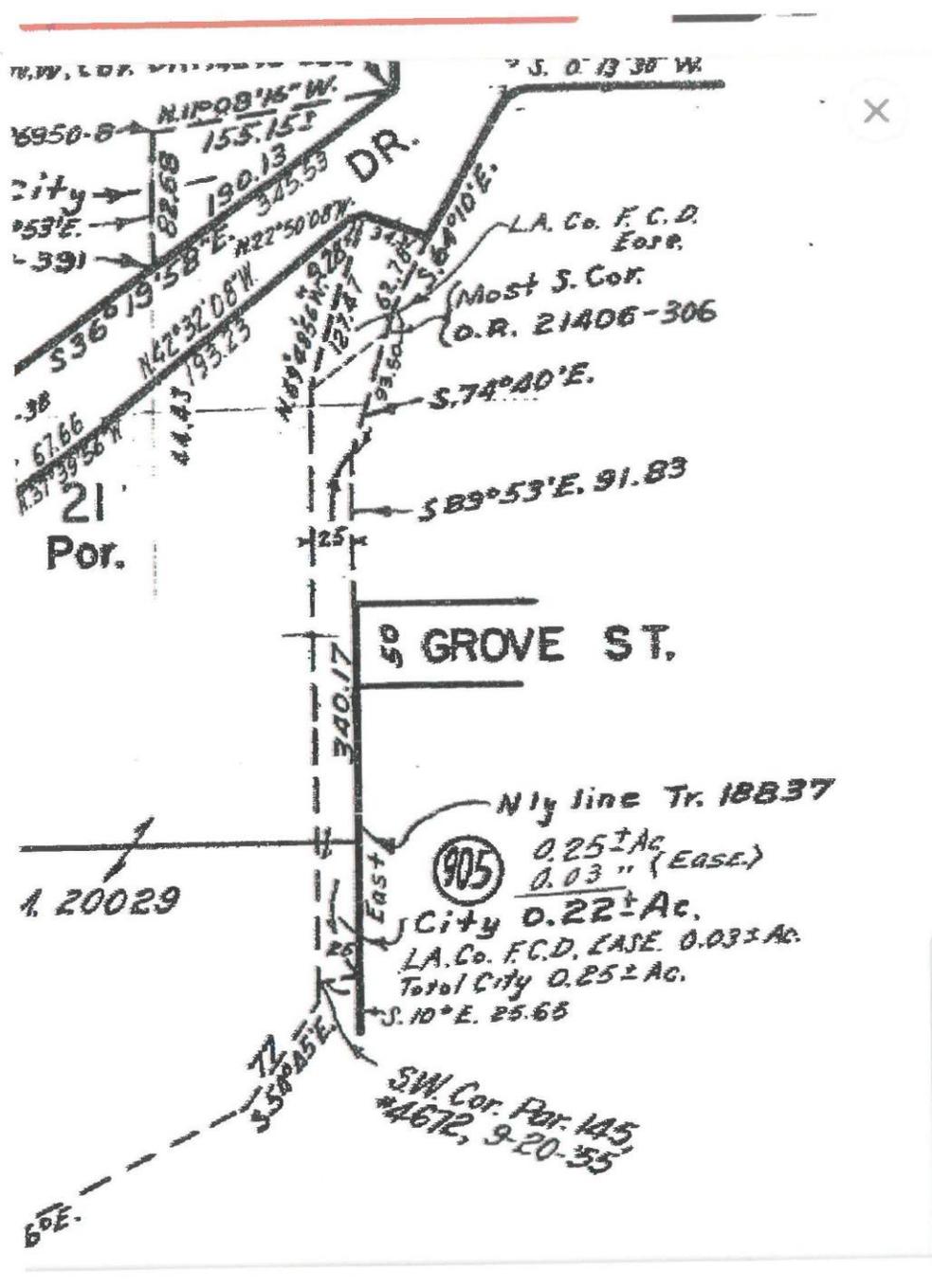
1. THERE ARE 2 FIRE ACCESS ROADS THAT END ON THE SMALL STREETS ADJACENT TO MICHILINDA

14-39

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



14-40



14-40
Cont.

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Response to Comment Letter I4

Individual
Nancy Beckham
August 11, 2021

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

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

- I4-7** The comment provides an accurate summary of the project. Final EIR Section 3.3.1, Residential Development, includes minor revisions for clarification, to state that the residential units range from 2,700 square feet to 4,000 square feet with a minimum lot size of 7,800 square feet. The Specific Plan sets out the standards that must be adhered to for future development. The exact size of each residences is not known at this time and as is standard, will be determined at the time the tentative tract map is prepared and submitted to the City for review. Architectural plan sets would be provided prior to issuance of building permits, which would specify the exact home. However, the final assignment of specific home sizes to specific lots would not change the limits of disturbance for the environmental analysis. The comment does not raise an issue related to the adequacy of the Draft EIR; therefore, no further response is required or provided.
- I4-8** The comment expresses concern that only two-story residences were depicted in the Specific Plan, but the Specific Plan text references that both one and two story detached single family homes would be developed. The Specific Plan sets out the standards that must be adhered to for future development. As discussed in Draft EIR Section 3.3.1, the proposed residences would be one or two stories and would comply with SMMC maximum building envelope of 25 feet. The project would include a mix of one- to two-story homes. However, which home would be one versus two stories is not known at this time and as is standard, will be determined at the time the tentative tract map is prepared and submitted to the City for review. Architectural plan sets would be provided prior to issuance of building permits, which would specify the exact number of stories. However, per the Specific Plan, no building shall exceed 25 feet in height. The comment does not raise an issue related to the adequacy of the Draft EIR; therefore, no further response is required or provided.
- I4-9** The comment expresses concern that only two-story residences would be developed. See Response to Comment I4-8. The comment does not raise an issue related to the adequacy of the Draft EIR; therefore, no further response is required or provided.
- I4-10** The comment expresses concern regarding the maximum size of the residences. See Response to Comment I4-7. Regarding the various designs mentioned by the commenter, the final design of the project has been chosen and is outlined in Draft EIR Chapter 3, Project Description, and the Specific Plan. Lastly, see Response to Comment I4-8 regarding height of proposed residences. The comment does not raise an issue related to the adequacy of the Draft EIR; therefore, no further response is required or provided.
- I4-11** The City appreciates the commenter’s recommendation. It should be noted that custom lots are not proposed as a part of the proposed project and individual, unimproved lots are not proposed to be sold. The comment does not raise an issue related to the adequacy of the Draft EIR; therefore, no further response is required or provided.
- I4-12** The City notes that the comment provides information on the public review of the Draft EIR. The comment states that the final date as to when comments can be submitted is October 2, 2021. Please note that the correct date to submit final comments on the Draft EIR was October 4, 2021. This date was selected by the City in order to provide the public additional time to provide comments as part of the public review process.

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

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

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

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

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

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

Comment Letter 15

8/16/21
Vickie

TO WHOM IT MAY CONCERN -

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

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

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

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



Vickie

THEY CAN STAY & CONTINUE THEIR WORK.

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

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

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

RESPECTFULLY SUBMITTED,

VICKIE SHACKETT

↑
15-3
Cont.

Response to Comment Letter I5

Individual
Vickie Shackett
August 16, 2021

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

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

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

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

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Comment Letter 16

9/11/21

Dear Vincent,

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

16-1

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

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

16-2

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

16-3

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

16-4

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

16-4
Cont.

The park is small. From the scale on the maps, the ~~width~~^{depth} of the park looks to be < 200 ft. Our current lot on Orange Grove Ave is 210 ft deep, our lot is nearly one acre. The width of the park looks to be ~1000-1200 ft. Looks like the park will be ~3 acres. That's not a lot of space for all the "enchanting" features proposed. If this project is approved, do so with a much larger park size - 5 acres or more. That's nice 75 acres above the retreat house to be donated, but it is already hillside and is not / should not be developed.

16-5

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

16-6

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

16-7

Response to Comment Letter I6

Individual
Greg and Denise Nelson
August 11, 2021

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

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

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

Comment Letter 17

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

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

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

Dear Mr. Gonzales,

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

17-1

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

17-2

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

17-3

1

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

17-4

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

17-5

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

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Response to Comment Letter I7

Individual
Kathy and Eoin Harty
August 23, 2021

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

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Comment Letter 18

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

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

Hello Mr. Gonzalez,

Please accept my below written comments for the subject DEIR.

18-1

DEIR Figure 3-10 Grading Plan

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

18-2

DEIR Figure 3-7 Proposed Drainage Plan

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

18-3

DEIR Section 4 Environmental Analysis

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

18-4

DEIR Section 4.17 Transportation

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

18-5

DEIR Section 4.19 Utilities and Service Systems

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

18-6
18-7

DEIR Section 5.12 Pedestrian Facilities

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

18-8

DEIR Appendix H

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

| 18-9

Proposed MOU

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

| 18-10

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

Allen Ma, P.E.

Response to Comment Letter I8

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

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

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

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

Comment Letter 19

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

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

Mr. Reynoso,

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

19-1

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

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

19-2

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

19-3

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

19-4

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

19-5

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

19-6

Sincerely,

Jody Gunn

685 W Grand View Ave.

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Response to Comment Letter I9

Individual
Jody Gunn.
September 2, 2021

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

⁷ Sapphos Environmental, Inc. 2021. Alverno Heights Academy Master Plan Update. July 26, 2021. Accessed December 22, 2021. <https://www.cityofsierramadre.com/common/pages/DisplayFile.aspx?itemId=17973516>

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Comment Letter I10

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

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

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

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

I10-1

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

I10-2

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

I110-3

Here are our key points for your consideration:

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

I110-4

The Central Fact:

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

I110-5

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

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

I110-6

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

I 110-7

Specifically:

SEVERELY INCREASED RISK OF FIRE AND DEATH

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

I 110-8

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

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

I 110-9

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

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

I 110-10

INCREASED NEED FOR WATER IN TIME OF CONTINUING DROUGHT

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

I 110-11

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

I 110-12

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

I 110-13

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

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

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

Where will these people park? [110-17

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

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

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

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

Daniel and Arline Golden

--

Dan Golden, PhD

Director, GOLDENWORDS College and Life Planning Consultants

278 East Alegria Avenue Sierra Madre, CA 91024

626.355.1919

Make Every Word...A GOLDENWORD

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Response to Comment Letter I10

Individual

Daniel and Arline Golden, PhD

September 2, 2021

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

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

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

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Comment Letter I11

Sept 7, 2021

AMERICAN LEGENDS

562 Woodland Drive
Sierra Madre, CA 91024

LETTER TO THE EDITOR

COULD YOU KILL THIS TREE?

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

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

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

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

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



I11-1

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

I11-2

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Response to Comment Letter I11

Individual
Ron Martineth
September 7, 2021

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

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Comment Letter I12

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

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

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

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

I12-1
I12-2

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

Sincerely,

Ellen Carroll

↑
I12-2
Cont.

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

Hi,

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

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

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

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

Sincerely,

Ellen Carroll

I12-3
I12-4
I12-5
I12-6
I12-7

I12-8

I12-9

Response to Comment Letter I12

Individual
Ellen Carroll
September 7, 2021

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

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Comment Letter I13

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

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

I own my house at 393 Auburn Lane.

I have reviewed the EIR.

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

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

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

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

Peter Smock

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Response to Comment Letter I13

Individual
Peter Smock
September 9, 2021

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

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Comment Letter I14

Gary Bosso
Fairview Ave.

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

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

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

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I14-1
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Response to Comment Letter I14

Individual
Gary Bosso
September 14, 2021

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

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

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Comment Letter 115

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

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

To whom it may concern:

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

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

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

Sincerely,
Nancy Lingeman

Photos taken during Bobcat fire.

I15-1
I15-2



115-3



Sent from my iPhone

I15-3
Cont.

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Response to Comment Letter I15

Individual
Nancy Lingeman
September 15, 2021

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

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Comment Letter I16

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

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

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

I 116-1

Thank you
Deirdre Murphy
601 Woodland Drive
Sierra Madre

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Response to Comment Letter I16

Individual
Deirdre Murphy
September 16, 2021

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

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Comment Letter I17

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

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

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

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

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

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

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

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

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



I17-1

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

117-2

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

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

117-3

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

Arline and Dan Golden

--

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

Response to Comment Letter I17

Individual

Arline and Daniel Golden, PhD

September 16, 2021

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

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Comment Letter I18

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

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

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Thanks,
Jose

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

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

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

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

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

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

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Sincerely,

Anke and Jean Bardenheier

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Response to Comment Letter I18

Individual
Anke and Jean Bardenheier
September 16, 2021

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

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Comment Letter I19

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

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

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

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

I I19-1

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

I I19-4

I I19-5

I I19-6

Frances Qiu

Sent from my iPhone

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Response to Comment Letter I19

Individual
Frances Qiu
September 27, 2021

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

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Comment Letter I20

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

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

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

Dear City Council Members and Planning staff;

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

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

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

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

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

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So, so, so very sad.

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

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

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

Sincerely,
--
Chris Leclerc

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

I20-1

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Response to Comment Letter I20

Individual
Chris Leclerc
September 27, 2021

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

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Comment Letter I21

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

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

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

I21-1

1. TREES

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

I21-2

Goal 1. Continued preservation and protection of existing trees.

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

I21-3

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

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

2. TRAFFIC

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

I21-4

I21-5

3. WATER

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

I21-6

I21-7

4. FIRE

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

I21-8

I21-9

5. EARTHQUAKES

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

I21-10

Christie Michael Dimon

C. K. Dimon; Adjunct, Clatsop College

Construction Project Management PMI Historic Preservation

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

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

Response to Comment Letter I21

Individual
Christie M. Dimon
September 27, 2021

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

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Comment Letter I22

From: Sherry Wheelock
436 Grove St
Wheelock.sherry@gmail.com

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

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

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

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I22-1
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In today's environment we are having to look at housing development differently than we did when I moved to Sierra Madre 30 years ago. A project like the Meadows might have been attractive 30 years ago but that was before "Paradise", mega fires, severe droughts and questions of water supply. These are our new norms that should influence our decisions as we build for the future.

I strongly object to proposed housing development for multiple reasons:

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I22-2
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I support all the issues put forward regarding the reasons the housing development in that space is a bad idea: trees, animal habitat, landslide and earthquake zones.

My focus is on fire hazards and traffic concerns.

Fire hazard:

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

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I22-3
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I22-4
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I22-5
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Traffic on Carter:

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

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I22-6
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I22-7
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I22-8
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In an emergency egress situation, cars will fill the Carter exit and NO one will be able to enter, not even emergency providers. This could become a huge bottleneck and people living on Grove may find it difficult to leave their homes as the cars from the Meadows jam up.

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I22-9

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

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I22-10

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

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

Response to Comment Letter I22

Individual
Sherry Wheelock
September 27, 2021

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

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

Comment Letter I23

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

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

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

Dear Mr. Gonzales -

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

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I23-1

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

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

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Response to Comment Letter I23

Individual
Stanton Hunter
September 27, 2021

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

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Comment Letter I24

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

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

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

To: Vincent Gonzalez <vgonzalez@cityofsierramadre.com>

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

I 124-1

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

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

I 124-2

Sent from my iPhone

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Response to Comment Letter I24

Individual
Tom Halpenny
September 26, 2021

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

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Comment Letter I25

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

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

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

Please deny the proposed development.

Sincerely,

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

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

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Response to Comment Letter I25

Individual
Katrelya Angus
September 27, 2021

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

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Comment Letter I26

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

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

To Mr. Vincent Gonzalez,

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

I 126-1

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

I 126-2

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

I 126-3

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

I 126-4

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

I 126-5

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

I 126-6

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

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I26-7
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Again, a single institution would have a significantly lower impact with energy and water consumption. It requires much less energy to heat and cool a single building with climate zones. It could also be required that any landscaping be drought tolerant reducing the need for watering plants. A single institution with profits and expenses to manage has much more incentive to reduce energy and water costs. The alternatives in question were presented as if they had similar impacts to the housing project when they clearly have more. These statements are not an endorsement for any building project, but I do not believe that this was a fair assessment of the alternatives.

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I26-9
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I26-10
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-Henry Leung
411 N. Sunnyside Avenue
Sierra Madre, CA

Response to Comment Letter I26

Individual
Henry Leung
September 27, 2021

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

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

- I26-8** The comment suggests that landscaping be required to be drought tolerant. As stated in Draft EIR Section 3.3.4, Conceptual Landscape Plan, the project landscaping plan would include drought tolerant tree and plant species.
- I26-9** The comment expresses the opinion that an institution would have more incentive to reduce energy and water usage. However, the level to which future users will be incentivized to reduce energy and water usage is too speculative to be factored into the alternatives analysis at this time. However, as discussed in Chapter 8, Alternatives, of the EIR, both Alternatives 2 and 3, would result in higher water usage than the proposed project.
- I26-10** The commenter's opinion is that Draft EIR Chapter 8 does not represent a fair assessment of project alternatives. However, the comment does not suggest any additional alternatives for consideration. The alternatives to the proposed project as analyzed in Draft EIR Chapter 8 were developed in accordance with CEQA Guidelines Section 15126.6. In developing the alternatives to be addressed in the Draft EIR, the potential alternatives were evaluated in terms of their ability to meet the basic objectives of the project, while reducing or avoiding the environmental impacts of the project identified in Chapter 4, Environmental Analysis, of the Draft EIR. In determining what alternatives should be considered in the Draft EIR, it is important to acknowledge the objectives of the project, the project's significant effects, and unique project considerations. These factors are crucial to the development of alternatives that meet the criteria specified in California Code of Regulations (CCR) Section 15126.6(a). Although, EIRs must contain a discussion of "potentially feasible" alternatives, the ultimate determination as to whether an alternative is feasible or infeasible is made by the lead agency's decision-making body, the Sierra Madre City Council (see PRC Section 21081[a][3]).

Comment Letter I27

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

Good Morning Mr. Gonzalez:

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

I27-1

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

Sincerely,

Valerie “Simmie” G. Salembier
241 East Sierra Madre Blvd
Sierra Madre, CA. 91024
1923 George Jones Sierra Madre Dairy
Simsalembier@gmail.com

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Response to Comment Letter I27

Individual
Valerie Salmbier
September 27, 2021

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

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Comment Letter I28

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

Dear Vincent,

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

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

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

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Thank you for your consideration to the above.

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



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Response to Comment Letter I28

Individual
Clyde Stauff
September 27, 2021

- I28-1** The comment is an introduction to comments that follow.
- I28-2** The comment expresses concern about the traffic on Sunnyside Avenue. Please refer to Global Response GR-6.
- I28-3** This comment expressed concern about traffic impacts on pedestrian traffic and parking on Grove Street and Carter Avenue. Please refer to Response to Comment I4-31 and Global Responses GR- 5 and GR-6.
- I28-4** The comment expresses concern that the project site is located within an earthquake and Very High Fire Hazard Severity Zone (VHFHSZ) and that an institution would be subject to more stringent building standards to address these hazards. The project will be built to California Building Code Standards as well as the California Fire Code which provides adequate safety standards for earthquake and fire hazards. As concluded in Draft EIR Section 4.7.5, Impacts Analysis, in Section 4.7, Geology and Soils, with implementation of mitigation measures and project design features, hazards related to seismic activity would be mitigated to less than significant levels. As stated in Draft EIR Section 4.20, Wildfire, the project would be required to adhere to the design measures provided in the Fire Protection Plan (FPP) (Appendix F2) which includes measures such as using ignition resistant construction materials and fuel modification around homes. Please refer to Global Response GR-3.
- I28-5** The comment expresses concern that the zone changes of the site would result in growth inducement impacts because the zone change would allow additional accessory dwelling units (ADUs) and that the EIR does not adequately consider the development potential of the proposed project with the inclusion of ADUs.⁸ As detailed in the SMMC Chapter 17.22, ADUs or “second units” are permitted in residential zones (including existing residential zones in the City), to meet the requirements under State law for ADUs and Junior ADUs. Thus, ADUs and Junior ADUs would be permitted should individual homeowners choose to undergo the process of permitting and constructing an ADU on their property; however, ADUs or further subdivision of lots are not proposed as part of the proposed project or Specific Plan and it is too speculative to assume when or how many (if any) individual homeowners would choose to construct an ADU in the future for purposes of environmental review.

Thus, Draft EIR Chapter 3, Project Description, defines the project as including 42 detached single-family dwellings, which would be implemented by a future action for a tentative tract map process. Moreover, Draft EIR Section 4.14, Population and Housing, applies a conservative regional household size of 3.2 persons per household in its analysis of the project’s potential for population growth, despite the fact that City household size and population growth trends lower than the regional average. Thus, the Draft EIR estimates a (conservatively higher) potential population growth of 134 residents that could be generated from project implementation.

⁸ Atkins. 2021. Senate Bill (SB) No. 9. Housing development: approvals. Authored by State Senator Toni Atkins, President pro Tempore. Approved by Governor September 16, 2021. https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202120220SB9

- I28-6** The comment expresses the opinion on that a hospital alternative is unrealistic and that there is another senior housing alternative that was not considered in the Draft EIR. Draft EIR Chapter 8, Alternatives, does not include an alternative for a hospital. As stated in Draft EIR Chapter 8, a communal residential alternative (Alternative 2) assumes development of senior care facilities. Alternative 2 would not meet five of eight of the objectives, and impacts would be greater under Alternative 2 compared to the proposed project. Please refer to Response to Comment I26-10 regarding the development of alternatives to the proposed project.
- I28-7** The comment provides concluding remarks and does not raise new or additional environmental issues concerning the adequacy of the Draft EIR.

Comment Letter I29

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

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

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

Sent from my iPhone

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I29-1

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Response to Comment Letter I29

Individual
Nancy Lingeman
September 28, 2021

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

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Comment Letter I30

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

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

Hello Vincent,

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

I 130-1

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

I 130-2

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

I 130-3

Thank you for your attention,

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Randall Family
605 Edgeview Dr.
backyard to the Meadows Project

Protect Sierra Madre - Stop The Housing Project

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Response to Comment Letter I30

Individual
Randall Family
September 28, 2021

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

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Comment Letter I31

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

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

John and Mary Hopkins
jrhopkins@verizon.net
marychopkins@verizon.net
272 Ramona Ave
Sierra Madre

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

I 131-1
I 131-2

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

I 131-3

We are highly concerned about the destruction of open spaces.

I 131-4

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Response to Comment Letter I31

Individual
John and Mary Hopkins
September 28, 2021

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

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Comment Letter I32

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

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

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

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

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

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↓
I32-1
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Watershed Conservation Authority’s mission is to expand the open space and recreational opportunities in the San Gabriel and Lower Los Angeles Rivers Watershed area consistent with the goals of flood protection, water supply, and groundwater recharge. It is in this spirit that I want to share a considerations for the Mater Dolorosa land, which is proposed as a site of a residential development.

I32-1
Cont.

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

I32-2

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

I32-3

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

Jane Tsong

Project Manager

Watershed Conservation Authority

I32-4



Jane Tsong
Project Manager
c/ 323-842-2991

Connecting Communities Through Nature



Response to Comment Letter I32

Individual

Barbara Velturo and Jane Tsong

September 28, 2021

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

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Comment Letter|33

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

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

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

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

.....

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

1

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

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

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

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

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

Jane Tsong
Project Manager
Watershed Conservation Authority

133-1

133-2

133-3

133-4

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Response to Comment Letter I33

Individual
Nancy Beckham
September 28, 2021

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

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Comment Letter I34

From: Nancy Beckham [<mailto:nlbeckham48@gmail.com>]
Sent: Tuesday, September 28, 2021 4:39 PM
To: Vincent Gonzalez <vgonzalez@cityofsierramadre.com>; Jose Reynoso <jreynoso@cityofsierramadre.com>
Subject: Re: Public Comment- Regarding Alluvial Fan open space in Sierra Madre

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

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

I I34-1
I I34-2

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

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

I I34-3

Vincent Gonzalez

Director of Planning and Community Preservation Department

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

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

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

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

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

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

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

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

134-4

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

Jane Tsong

Project Manager

Watershed Conservation Authority

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134-4
Cont.
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Jane Tsong
Project Manager
c/ 323-842-2991

Connecting Communities Through Nature



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Response to Comment Letter I34

Individual
Nancy Beckham
September 28, 2021

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

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Comment Letter I35

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

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

Dear City Council,

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

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

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

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

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

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

Please reevaluate this project. We can do better.

Thank you,
Darlene Papa
91 W. Montecito Ave.

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

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Response to Comment Letter I35

Individual
Darlene Papa
September 29, 2021

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

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Comment Letter I36

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

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

Hello

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

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

I36-1

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

I36-2

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

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

I36-3

I36-4

I36-5

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

I36-6

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

I36-7

It's just not a good idea.

I36-8

Barbara McCallon

490 N Sunnyside Ave
Sierra Madre
astrocats@gmail.com

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Response to Comment Letter I36

Individual
Barbara McCallon
September 29, 2021

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

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

Comment Letter I37

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

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

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

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

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

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

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

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

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

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

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

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

I37-1
I37-2
I37-3
I37-4
I37-5
I37-6

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

↑ I37-6
| Cont.

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

↑ I37-7

Daniel Golden

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Dan Golden, PhD

Director, GOLDENWORDS College and Life Planning Consultants

278 East Alegria Avenue Sierra Madre, CA 91024

626.355.1919

Make Every Word...A GOLDENWORD

Response to Comment Letter I37

Individual
Daniel Golden
September 28, 2021

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

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

Comment Letter 138

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

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

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

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

138-1

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

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

138-2

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

138-3

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

138-4

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

138-5

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

138-6

Daniel Golden

--

Dan Golden, PhD

Director, GOLDENWORDS College and Life Planning Consultants

278 East Alegria Avenue Sierra Madre, CA 91024

626.355.1919

Make Every Word...A GOLDENWORD

Response to Comment Letter I38

Individual
Daniel Golden
September 28, 2021

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

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Comment Letter I39

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

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

TO Victor Gonzalez, Director of Planning and Community Preservation

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

I39-1

I39-2

I39-3

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

I39-4

I39-5

I39-6

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

I39-7

Michael Charters
286 E. Alegria Ave.
Sierra Madre, CA 91024
mmlcharters@gmail.com

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Response to Comment Letter I39

Individual
Michael Charters
September 29, 2021

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

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Comment Letter I40

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

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

Dear Mr. Gonzalez,

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

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

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

All the best,

Gracie Charters
119 North Lima Street
Sierra Madre, CA 91024

graciecharters@me.com
(626) 372-5172

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

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Response to Comment Letter I40

Individual
Gracie Charters
September 30, 2021

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

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Comment Letter I41

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

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

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

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I41-1
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I41-3

Sincerely,

Ashley Waterhouse Wilson
500 Grove Street

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Response to Comment Letter I41

Individual
Ashley Wilson
September 29, 2021

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

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Comment Letter I42

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

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

To: Vincent Gonzales

Fr: Caroline Brown

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

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

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

I42-1

September 10, 2021

To: Vincent Gonzales, Sierra Madre Development Services Department

Fr: Caroline Brown, Sierra Madre, CA

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

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

142-2

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

142-3

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

142-4

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

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

142-5

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

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

142-6

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

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

I42-7

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

I42-8

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

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

I42-9

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

I42-10

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

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I42-11
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All in all, I find that the property should be required to keep the oak trees in situ and work the proposed housing lots around them. They should not be removed.

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I42-12
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September 10, 2021

To: Vincent Gonzales, Sierra Madre Development Services Department

Fr: Caroline Brown, Sierra Madre, CA

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

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

I42-13

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

I42-14

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

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

I42-15

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

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

I42-16

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

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142-17
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September 10, 2021

To: Vincent Gonzales, Sierra Madre Development Services Department

Fr: Caroline Brown, Sierra Madre, CA

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

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

142-18

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

142-19

142-20

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

142-21

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

142-22

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

142-23

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

142-24

142-25

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

142-26

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

142-27

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

142-28

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

142-29

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

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

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Response to Comment Letter I42

Individual
Caroline Brown
September 29, 2021

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

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

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

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

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

Comment Letter I43

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

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

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

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

Best Regards,

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

626-355-7837

qlangus@verizon.net

I43-1

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Response to Comment Letter I43

Individual
Katrelya Angus
September 30, 2021

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

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

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

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

I 144-2

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

I 144-3

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

I 144-4

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

I 144-5
I 144-6

Sincerely,

Anke and Jean Bardenheier



Virus-free. www.avast.com

Response to Comment Letter I44

Individual
Anke and Jean Bardenheier
September 30, 2021

I44-1 This comment requests the following comments (Comments I44-2 through I44-5) be included in the responses to comments of the Final EIR. As shown, the commenter's request has been recorded as part of this Final EIR.

Additionally, the comment expresses opposition to the proposed project and states the project is inconsistent with the City's General Plan. Please refer to Global Response GR-7.

I44-2 The comment states the proposed zone change would be inconsistent with the General Plan. Please refer to Global Response GR-7.

I44-3 The comment states the proposed project would conflict with the City's Safety Element of the General Plan. The policies mentioned are of the Draft Safety Element Update (now the adopted Hazard Prevention Element). Please refer to Global Response GR-3.

The comment also notes the existing fire hazards for the project site and surrounding area. Draft EIR Section 4.20, Wildfire, addresses the commenter's concern regarding fire hazard designations, safety standards, the potential to exacerbate fire hazardous conditions, and emergency evacuations. Impacts were determined to be less than significant and included as part of the project's design is Appendix F2, the Fire Protection Plan (FPP), which outlines requirements to reduce fire risk during construction and operation. Furthermore, the analysis found in Draft EIR Section 4.19, Utilities and Service Systems, which has been revised in the Final EIR to include some clarifications, determined the project site would be adequately served by water, including during drought conditions. Please refer to Global Response GR-4.

I44-4 As stated in Response to Comment I44-3, the Safety Element objective noted in this comment is not from the existing Safety Element of the 2015 General Plan. Please refer to Global Response GR-3. Please refer to Global Response GR-4, regarding emergency evacuation routes. No change or addition is required of the environmental analysis.

I44-5 This comment expresses concern for traffic congestion as a result of the project. Considering the commenter's statement that an increase of online shopping deliveries would result as part of the project and adversely impact traffic is too speculative to be analyzed in the Draft EIR, and therefore, such analysis is not required under CEQA. Please refer to Global Response GR-6.

I44-6 The comment states the Draft EIR does not adequately consider the development potential of the proposed project with the inclusion of accessory dwelling units (ADUs) and Senate Bill (SB) 9. Please refer to Response to Comment I28-5.

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Comment Letter I45

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

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

Alice Whichello
471 W. Sierra Madre Blvd.
Apt. A
Sierra Madre 91024
alice_whichello@att.net

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

I 145-1

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

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

I 145-2
I 145-3
I 145-4
I 145-5
I 145-6
I 145-7
I 145-8
I 145-9

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

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Response to Comment Letter I45

Individual
Alice Whicello
September 30, 2021

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

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

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

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

Comment Letter I46

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

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

Hi Jose and Vincent

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

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

Enjoy.

Nancy Beckham

I 146-1

Could you kill this tree?

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

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

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

This Mission statement is as follows:

I46-2

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

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

I46-3

Nancy Beckham

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

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



I46-4

They called it Paradise

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

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

146-5

146-6

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

146-6
Cont.

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

146-7

Where are the Sidewalks?

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

"One Goal of the Sidewalk Master Plan" is listed below:

"The Sierra Madre Sidewalk Master Plan is intended to be a broad planning document that can be referenced when sidewalk considerations confront the Public Works Department. Resources and funding will most likely prevent the city from accomplishing all recommendations of this plan immediately. The primary goal of this plan is continuous improvements towards a safe, accessible, useful, aesthetically pleasing and sustainable system of walkways throughout the city.

Also recognized in the continuation of the Master Sidewalk Plan was:

Sidewalks are the pedestrian arteries of the city and the safety of those pedestrians using the sidewalks is a significant concern to the community. As is the case with any other segment of city-owned infrastructure, the city is generally considered to be responsible for the safety of persons using the sidewalks.

Further exploration of this 42-page Master Sidewalk Plan revealed:

A sidewalk inspection program paired with a plan for maintenance and installation provides economic benefits to the city by preventing claims and minimizing the expense of litigation. Aside from the prevention of accidents, inspection programs and maintenance/installation plans may allow cities to take advantage of certain governmental immunities that are not otherwise available to those entities without such programs. "

Clearly the city recognizes the need and recognizes the safety issues sidewalks address, but the question is the why has there been no aggressive sidewalk program to have them installed throughout this area? My home and my next-door neighbor's home were built in 1922. Both will be 100 years old next year, and neither have sidewalks. Why has the city neglected this area for so long? Why did the developer who had a Draft EIR created fail to even consider what increased traffic would do to these neighborhood streets? A point in fact, with the exception of one home whose owner installed their own sidewalk as part of a total landscape remodel for installing drought tolerant plants a few years ago, both sides of North Lima up to Carter have very few sidewalks. If the city's plan was to have residents put in their own sidewalks when the property was

146-8

involved with a major renovation, or when the homes were bought and sold this has not occurred in Sierra Madre. In fact, had someone from the city told me when I moved into Sierra Madre I needed to put in a sidewalk in front of my home it would have been installed years ago. Instead I walk my dog in the street, I walk to my neighbor's home in the street, I walk with my grandchildren in the street, and I go on morning walks in the street because no sidewalks have ever been installed above Grandview. The sad comment is that if there has been a program in place no one has ever heard about it. Why is that? Why did the draft EIR neglect the current situation let alone what will occur with 400 additional trips leaving the housing development throughout the day.

↑
I46-8
Cont.

The thought of additional traffic or approximately 800 cars a day generated from 42 homes that MIGHT BE BUILT IF THIS HOUSING PROJECT ON THE MONASTERY LAND GOES FORWARD further concerns me. The current infrastructure of the streets that will be impacted by this development are woefully not ready to accept extra traffic. Can you imagine the law suit generated from one child walking in the street to school being hit by a car speeding down Lima, because that was where the child had to walk because the street has no sidewalks? Think about it. This is a real "wake-up call" for the city. This also must be addressed by the developer. Where are the bike lanes for bikers, as well as proposed sidewalks to help the current residents who are expected to absorb 400 more daily trips of the 800 generated on a daily basis. Sunnyside, the other ingress and egress will be impacted in the exact same way. Whether the Housing Development is accepted or not, for safety reasons sidewalks should be installed throughout the city. Better be safe and start installing sidewalks in an aggressive fashion so something like this does not have a chance to occur. However this should have been part of the draft EIR. It was not. Why? Please answer this question

I46-9

Nancy Beckham

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Response to Comment Letter I46

Individual
Nancy Beckham
October 3, 2021

- I46-1** The comment notes the submittal of additional comment letters related to the adequacy of the Draft EIR. The commenter indicated more comments would be submitted prior to the end of public review. No response is required.
- I46-2** The comment describes a specific oak tree currently located on the project site and is concerned with the tree's removal, as well as the removal of other trees on the project site. The comment suggests instead of removal, the project could save existing trees with the possible boxing of existing trees to be replanted on site. The commenter's suggestion will be noted for the decision makers to consider in their review of the Final EIR. Please refer to Global Response GR-2.
- I46-3** The comment objects to the use of a Specific Plan to entitle the proposed project. Please refer to Global Response GR-7.
- I46-4** The comment represents an excerpt of the goals related to the City's Community Forest Master Plan. The comment does not contain particular concerns related to the adequacy of the Draft EIR. See Global Response GR-2. In addition, the project's consistency with the City's Community Forest Master Plan is discussed in Draft EIR Section 4.11, Land Use and Planning. A few minor revisions were made in Final EIR Section 4.11 to account for off-site widening of Carter Avenue. These revisions and proposed off-site improvements do not raise new or additional environmental issues concerning the adequacy of the Draft EIR.
- I46-5** The comment describes the Camp Fire that occurred in 2018 that burned down the town of Paradise, California. The comment also raises concern with the project site's ingress and egress points and states only Sunnyside Avenue is an adequate evacuation route. The comment referenced proposed policy Hz2.12 of the Draft Safety Element of the General Plan (now the adopted Hazard Prevention Element). Please refer to Global Response GR-3 for information regarding the Hazard Prevention Element and Global Response GR-4, for information about ingress/egress and evacuations.
- I46-6** This comment describes the Bobcat Fire that occurred in 2020. The City acknowledges the wildfire history of the project site's vicinity. Discussion related to impacts associated with wildfire is included in Draft EIR Section 4.20, Wildfire. This comment does not contain questions or concerns related to the adequacy of the Draft EIR's environmental analysis.
- I46-7** The comment states the project is within a Very High Fire Hazard Severity Zone (VHFHSZ) and expresses general concern related to wildfire, evacuation, and consistency with the City's General Plan Safety Element. Please refer to Global Response GR-3 and Global Response GR-4.
- I46-8** The comment includes remarks concerning existing sidewalk conditions and lack of sidewalks on Grand View Avenue, North Lima Street, as well as along the commenter's street. The comment also references the City's Sidewalk Master Plan.

Draft EIR Section 4.17, Transportation, analyzed potential impacts related to pedestrian safety and consistency with General Plan goals and policies addressing the circulation system. The proposed project would include a landscaped parkway and sidewalk on the west side of North Sunnyside Avenue and Carter Avenue, and a sidewalks within the south sides of proposed A, B, and C Streets, enhancing pedestrian safety and mobility, consistent with Objective L51 and Policy C30.3. In addition, in order to address commenters' concerns related to safety issues along Carter Avenue and outside of the boundaries of the proposed project site, the project applicant is proposing off-site improvements to Carter Avenue (see Global Response GR-5 for details). Further, as discussed in Draft EIR Section 4.11, Land Use and Planning, the project would provide an internal circulation system that would facilitate safe and efficient access to the site from North Sunnyside Avenue while minimizing traffic impacts to adjacent residential streets. Moreover, the Draft EIR analyzed the project's potential to substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) and determined impacts would be less than significant. Minor edits were made in Final EIR Section 4.11 and Section 4.17.5, Impact Analysis, of Section 4.17, Transportation, to explain the proposed off-site widening of Carter Avenue. Nonetheless, the Draft EIR adequately considered project-related impacts to pedestrian safety and the circulation network (i.e., sidewalks).

I46-9 The comment is concerned with the number of daily vehicle trips generated by the proposed project and associated impacts to pedestrian and bicycle safety. The comment incorrectly states that the project will generate 800 daily vehicular trips. Please refer to Global Response GR-6. Furthermore, the comment's concerns related to pedestrian and bicycle safety are addressed in Draft EIR Section 4.17.5, Impacts Analysis, as well as in Response to Comment I46-8, above.

Comment Letter I47

Sept 30, 2021

Dear Jose and Vincent, and Urban West

I really studied Carter when it was proposed to be used as an ingress and an egress before I wrote my letter to the Mt View News on September 11, 2021. However, I received an additional map created by Urban West the end of last week. After very careful inspection I realized the Carter ingress/egress situation is far worse. As we all know the proposed homes are terraced as the land is quite steep because that land is the beginning of the foothills. It is even steeper than the grade on North Lima Street. What I did not realize is the proposed two-lane road that will come down the hill towards the Monastery Gate at Carter will become less in width as it comes down the hill. It will start at 46' in width at the top, but as the attached map indicates the road shrinks in width as it approaches the gate. At the gate itself it will be 44' in width. The other additional problem is that as a car travels down that hill gathering speed, the driver then has to turn left to actually reach the gate. At the gate the road then becomes 20' in width that is paved road (2 1/2' of dirt on either side of the paved roadway for a total of 25'). My article was called An Accident Waiting to Happen, but this is much more serious than I ever imagined.

I am now directly addressing the DEIR

I47-1

Dear Urban West. You knew Carter being used as an egress and ingress was problematic at best because the street is only a maximum of 25' in width and there is not more land available to purchase to add to the street's width. You knew the city standard was that had a street was to be 30' in width with some type of pedestrian walkway. City street ordinances state that "16.32.035 - Street standards—Modification of same. (Ord. 1229 § 2, 2005)

Except as otherwise required by Chapter 15.24 of this code, the city's public street standards shall require at least thirty feet of road and a pedestrian walkway

Notwithstanding Sections 16.32.020 and of this code, the city council may determine, upon approval of a parcel or tentative tract map creating streets, that adjustment of the city's public street standards as to those streets is justified by other benefits to the policies stated in Section 17.52.010 of this code and that such adjustments do not unduly impact circulation and parking.

I47-2

Once again, the normal standard is a two-lane city street must have 30 feet of road easement to accommodate the two lanes. That 30 feet does not exist on W. Carter in this area near Bailey Canyon.

Knowing full well this was the situation, you still proposed to use Carter in this fashion. What are you going to do about it? You need to find 10 more feet of land in order to use Carter for that purpose. What are you going to do to find more land? Please articulate what your plan is if you still plan to use Carter as an ingress and an egress. However, to have a two-lane road on a very steep hill that measured 46 in width at the top and allow it to taper to 44' in width coming down the hill until the road meet the Monastery gate in unbelievable, but to then include the left turn is not only treacherous but deadly it its own right. What do you plan to do about this.? There is a 12% grade a driver has to negotiate while the car picks up speed just driving down the hill due to the weight of the car. . You have a huge piece of property to work with, but then you do this. Why? How do you plan to mitigate this situation?
 Furthermore, at the now open gate the Carter road then becomes 20 feet in **width that is paved**. The city ordinance reveals the minimum required is 30 feet. That **LAND DOES NOT EXIST up there so why did you propose it? Please address this question.**

147-3

However, how can a road be created that goes from 44'-46' in width and end up at the Carter Gate having driven down a 12% steep hill and having to make a left turn and arrive at a 20' roadway with cars now driving in both directions? What do you plan to do about this situation.? What kind of mitigation do you plan to use to rectify this situation? Who has the right of way, the cars going into the Monastery or the cars coming out of the Monastery? We are not talking about a few cars a day, but about 400 cars daily as that is half of the estimated 800 car daily trips projected for this housing development plus the traffic going to Bailey Canyon for people going hiking or biking in this wilderness area. . See attached Urban West Map revealing the narrowing of the monastery road at the monastery gate on Carter

Furthermore, one of the areas the draft EIR failed to even consider were those people who ride bikes into the "Little Carter" area let alone the is the pedestrian walkways and missing sidewalks, especially on streets such as Sunnyside, Lima, Carter, and Grandview. There are more streets that will be impacted, but these are the streets will be severely impacted. By increased traffic. Grandview only has a sidewalk on the south side of the street, but there is space to build one on the north side. Lima has never had sidewalks, but given the additional traffic it will receive from cars driving downhill into the city of Sierra Madre, sidewalks will become necessary for the safety of the residents. What do you plan to do about this additional traffic and the lack of sidewalks? Please explain. Finally, Sunnyside also does not have sidewalks right outside the monastery gate on Sunnyside. How are you going to address that situation? Please explain? Finally, the stretch of Carter from Lima to Baldwin also has no sidewalks. IF traffic does use "Little Carter" (from the monastery gate to Lima) as one of the ingresses and egresses what will you do about the lack of sidewalks on Carter from Lima to Baldwin.? Please explain

147-4

Was there a reason bicycles and the people who ride bikes into the Bailey Canyon area were not even considered? How do you explain this omission? Where are the pedestrian paths done in a reasonable and safe fashion for people trying to get into Bailey Canyon? If you tell me you took care of this because you will have additional parking near the new park on the monastery land, that also adds to the mess of the 44 foot road meeting the 20 foot road, but now, children

147-5

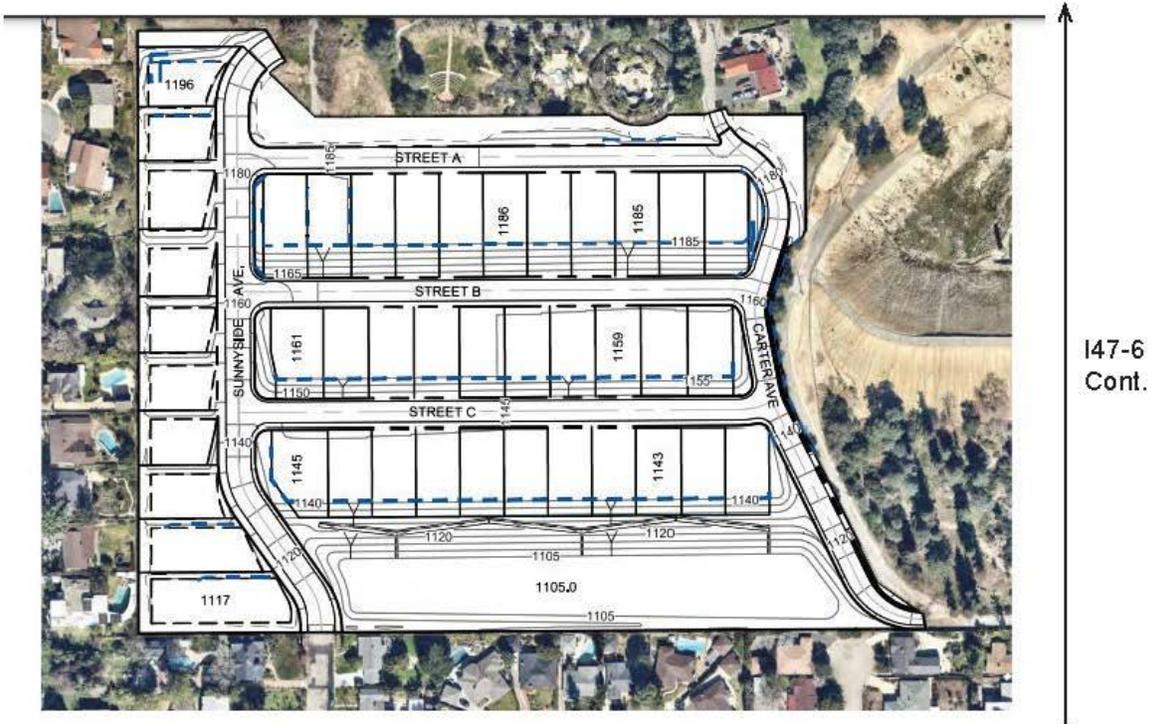
dogs and people will now have to cross the street somewhere to get to Bailey Canyon for a morning walk....A good EIR would have addressed this omission. Was there a reason pedestrians and pedestrian safety was omitted from the draft EIR? Please explain this omission and explain to me how you plan to resolve this omission? Another EIR? Why in the housing development area are there no bike lanes for potential residents? Did you forget to realize large homes will have children in the homes as well as adults who might like to ride a bike around their new community. Please address this concern in your response to this draft EIR. Thank you.

Nancy Beckham
337 North Lima Street
Sierra Madre CA 91024

See attachments of updated plate map of Carter and Urban West's Map of streets and pads.

↑
147-5
Cont.

↓
147-6



Response to Comment Letter I47

Individual
Nancy Beckham
September 30, 2021

I47-1 The comment expresses general concerns relating to the project's ingress/egress, particularly related to Carter Avenue. Please refer to Global Response GR-5.

I47-2 The comment raises concerns regarding the design of the Carter Avenue ingress/egress and potential safety hazards to motorists and pedestrians under existing conditions, and that those hazardous conditions would be exacerbated with implementation of the proposed project. The comment states that Carter Avenue is only 25 feet in width and cannot be made wider, which comes into conflict with City ordinance 16.32.035 – Street standards—Modification of same.” Please refer to Global Response GR-5. In addition, in order to address commenters' concerns related to safety issues along Carter Avenue and outside of the boundaries of the proposed project site, the project applicant is proposing off-site improvements to Carter Avenue. As discussed in Final EIR Section 3.3.12, Off-Site Improvements, and Global Response GR-5, the Applicant would widen Carter Avenue to a total of 24 feet (10 feet for each travel lane plus one 4-foot curb along the southern boundary of Carter Avenue) and a 6-foot sidewalk on the north side of Carter Avenue, for a total width of 30 feet.

I47-3 This comment expresses safety and circulation concerns about Carter Avenue, located just outside of the project site. More specifically, the comment expresses concern about the width of Carter Avenue being creating a safety hazard as the proposed extension of Carter Avenue narrows in width at the entrance point of the project site. The comment further expresses concern that the portion of Carter Avenue just outside the project site does not comply with City Standards. Please refer to Global Response GR-5 and Response to Comment I47-2.

The comment questions which cars would have right of way; the cars going into the Monastery or the cars coming out of the Monastery. As described in Specific Plan Section 3.4.3, Proposed Streets, North Sunnyside Avenue will be a public street with one vehicular lane in each direction providing primary vehicular access to and from the project site and public park, internal circulation for the residential area, and access through the project site to the Mater Dolorosa Retreat Center. A sliding gate will be located at the Mater Dolorosa Retreat Center's entrance on the northern end of the North Sunnyside Avenue extension, just north of the project site boundary. Due to the low thru traffic anticipated entering the Mater Dolorosa Retreat Center, a queue of cars is not expected to form south of the gate within the project site. North Sunnyside Avenue will have a maximum 56.5-foot right-of-way with curbs and gutters, parking and planting areas on both sides, and a sidewalk on the west side. North Sunnyside Avenue is depicted in cross sections A and B in Figure 3-4, Street Cross Sections, of the Specific Plan and Draft EIR Figure 3-6, Proposed Street Sections.

Finally, the comment raises concern about increasing traffic as a result of the proposed project and provides an attachment of the proposed project plan. Please refer to Global Response GR-6.

The comment references an attachment to the proposed project plan (see Response to Comment I47-6). The comment does not raise new or additional environmental issues concerning the adequacy of the Draft EIR.

I47-4 The comment expresses concern about Carter Avenue and specifically mentions impacts on bicyclists, pedestrian safety, and traffic. In order to address commenters' concerns related to safety issues along Carter Avenue and outside of the boundaries of the proposed project site, the project applicant is proposing off-site improvements to Carter Avenue. As discussed in Final EIR Section 3.3.12, Off-Site Improvements, and Global Response GR-5, the Applicant would widen Carter Avenue to a total of 24 feet (10 feet for each travel lane plus one 4-foot curb along the southern boundary of Carter Avenue) and a 6-foot sidewalk on the north side of Carter Avenue, for a total width of 30 feet. Please refer to Global Response GR-5 and Global Response GR-6.

I47-5 The comment states that bicyclists and their safety were not considered and asks why there are no bike lanes proposed with the project. The City does not have a bicycle master plan and no planned bicycle facilities are identified within or near the project site. Sierra Madre Boulevard does provide existing bicycle lanes. However, Sierra Madre Boulevard is located approximately 0.6 miles south of the project site. Therefore, any bicycle improvements proposed within the project site or vicinity of the project site would not have nearby existing bicycle facilities or infrastructure to provide a connection. Additionally, according to Final EIR Section 4.17.5, Impact Analysis, in Section 4.17, Transportation, although no bicycle facilities and improvements are proposed under the project, the project would not impact existing bicycle facilities in the vicinity of the project, including the existing bicycle lanes within Sierra Madre Boulevard. Please refer to Global Response GR-5.

Additionally, the comment asks how pedestrians could get to Bailey Canyon in a reasonable and safe fashion. According to Draft EIR Section 3.3.2, Neighborhood Park and Open Space, a pedestrian path extending from the east side of Carter Avenue would provide pedestrian access to Bailey Canyon Wilderness Park. According to Draft EIR Section 4.17.4, the proposed project would involve development of a 3.03-acre dedicated neighborhood park, to be located within the southern portion of the site (see Figure 3-3, Proposed Park Conceptual Plan, in Chapter 3, Project Description, of this Draft EIR). The proposed park would involve pedestrian paths as well as enhanced connectivity to the Bailey Canyon Wilderness Park to the east. In addition, the proposed project would include a landscaped parkway and sidewalk on the west side of North Sunnyside Avenue, and a sidewalk between proposed A, B, and C Streets, enhancing pedestrian safety and mobility, consistent with Objective L51 and Policy C30.3. In addition, as stated in Final EIR Section 3.3.12, the proposed project would include off-site improvements to Carter Avenue, between the southeastern portion of the project site boundary and Lima Street, which would include a 6-foot sidewalk on the north side of Carter Avenue.

I47-6 The comment references an attachment which accurately depicts the proposed grading plan included as Figure 3-10 of the Draft EIR and does not raise new or additional environmental issues concerning the adequacy of the Draft EIR. No further response is required.

Comment Letter I48

From: Evan and Mary <marynevans@earthlink.net>
Sent: Thursday, September 30, 2021 10:15 PM
To: Vincent Gonzalez
Subject: Please Oppose The Meadows Proposal As It Stands.....
Attachments: MeadowsLtr ES.pdf

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

Greetings:

My wife and I strongly oppose The Meadows development proposal involving the Passionist Fathers' Monastery.

We each have strong feelings, so we are each sending you an individual letter. Here is my letter.

We do not feel that the community will benefit from the proposal as it is now and ask that you please support our concerns and oppose it.

I48-1

Thank you, Evan Steinberg

328 Auburn Ave
Sierra Madre, CA 91024
September 30, 2021

To: Victor Gonzalez,
Director of Planning and Community Preservation,
City Hall,
232 W. Sierra Madre Blvd.
Sierra Madre, CA 91024

Re: Concerns About The Meadows at Bailey Canyon (Monastery) Development

My wife and I moved to Sierra Madre in September 1977, and have greatly enjoyed living here for the 44 years since then. We used to regularly attend the annual fundraiser at the Passionist Fathers Monastery, and enjoyed walking through their grounds. Unfortunately, we do not feel their plan to sell property to developers to build 42 homes would be good for the community. We therefore do not support them in this plan as it has been proposed, and recommend that that you oppose it.

148-2

Our concerns are several, based on the elements of the Environmental Impact Report.

Traffic is already a problem in Sierra Madre with its many schools, made worse recently by pandemic measures. Drop-off and pick-up times create significant problems. Multiple streets, especially Lima, Sunnyside, Grove St., and Carter, would experience a significant increase in traffic. Unfortunately, the EIR has no comments about possible effects on our village, and addresses only travel within the proposed project.

148-3

Water is a precious commodity, especially now during severe drought conditions. The developer alleges what they call "net zero water usage". We question that they can deliver on that claim, and wonder what current and future costs would be involved in any attempt to do so.

148-4

In addition to drought, recent prolonged high temperatures have increased the risk of wildfires. Both the Sierra Madre Fire Department and the California Dept of Forestry and Fire Protection consider the proposed location a very high fire hazard severity zone. New homes in this area would put people and structures at significant risk, contrary to the recommendation of our General Plan which recommends not to build in a high fire zone. We also wonder how well local streets would support emergency equipment.

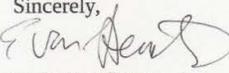
148-5

Part of what makes Sierra Madre so appealing is our foothill location, with multiple plants and trees that are great for walking and hiking. The proposed project would result in the removal of 100 mature trees; 10 of these are protected Coastal Oaks. It is hard to see a significant environmental benefit from losing so many trees. Again, our General Plan recommends exactly the opposite, to develop tree preservation and protection measures.

148-6

Again, we strongly recommend that that you oppose the proposed Monastery Development, The Meadows at Bailey Canyon. We appreciate your consideration.

148-7

Sincerely,

Evan Steinberg

Response to Comment Letter I48

Individual
Evan Steinberg
September 30, 2021

- I48-1** This comment expresses general opposition to the proposed project and notes the attached letter accompanying the comment (see Responses to Comments I48-2 thru I48-11).
- I48-2** The City expresses general opposition to the project but does not raise new or additional environmental issues concerning the adequacy of the Draft EIR.
- I48-3** This comment states traffic congestion is an existing issue within the City. Additionally, the comment states existing condition issues of vehicle drop off around schools. As stated in Draft EIR Section 4.15, Public Services, the nearest school (Sierra Madre Elementary School) is located 0.48 miles southeast of the project site. The Draft EIR analyzed the project's potential contribution to vehicle miles traveled (VMT), including impacts related to trips other than home-based trips. Please refer to Global Response GR-6. Lastly, the comment suggests the Draft EIR does not consider the impacts to the "village ... and addresses only travel within the proposed project." However, the Draft EIR analyzed off-site traffic impacts (in terms of VMT) in Section 4.17, Transportation, and cumulative transportation effects in Draft EIR Chapter 5. The cumulative impacts analysis was based on the project's potential to result in cumulatively considerable adverse impacts when considered in conjunction with the related (cumulative) projects presented in Table 5-1, Cumulative Projects List. As such, the Draft EIR analyzed the full scope of transportation impacts as required by CEQA. For additional discussion related to traffic, see Global Response GR-6.
- I48-4** The comment questions the project's water use and proposed net-zero water impact. Please refer to Global Response GR-1.
- I48-5** The comment states that the project is located within a Very High Fire Hazard Severity Zone (VHFHSZ), and expresses concern related to wildfire hazards and emergency equipment. Please refer to Global Response GR-3 and Global Response GR-4.
- I48-6** This comment expresses concern regarding the project's proposed removal of existing trees on site. The comment states the City's General Plan intends for tree preservation and protection measures. Please refer to Global Response GR-2. It should be noted that revisions have been made in the Final EIR (see Section 4.4, Biological Resources) and Appendix C2, Arborist Report, as a result of the proposed off-site widening of Carter Avenue. However, MM-BIO-3, included in Section 4.4.6, Mitigation Measures, of the Final EIR, would still be implemented to reduce impacts to trees to less than significant. These revisions and proposed off-site improvements do not raise new or additional environmental issues concerning the adequacy of the Draft EIR.
- I48-7** The comment provides concluding remarks and states general opposition to the project.

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Comment Letter I49

From: Deirdre Murphy <dedeannmurphy@gmail.com>
Sent: Sunday, October 3, 2021 12:37 PM
To: Vincent Gonzalez
Subject: DEIR input for the Meadows at Bailey Canyon

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

Thank you for taking my comments concerning this matter. Please retain a copy for the administrative records. Please respond to these comments in the Final EIR and please put me on the list of people to notify when the Final EIR is complete.

I49-1

I wholeheartedly object to the entire proposed housing development. It is MORE than inconsistent with our General Plan. Citizens, the same citizens who elected all of you spent an enormous amount of time on the General Plan so please honor and respect the amount of hard work that went into preserving Sierra Madre.

I49-2

A change in zoning, especially in light of the newly signed SB 9 and SB 10 would prove disastrous if zoning was even being considered being changed. Now more than ever we are determined to keep the zoning Institutional.

I49-3

The proposed cookie cutter homes are inconsistent with the eclectic architecture of Sierra Madre - once again in opposition to General Plan guidelines.

I49-4

The impact on Traffic flow has not been adequately examined but provides only a cursory outline inconsistent with the mock ups provided by NUW. Further, given that 30 feet width streets are indicated in the General Plan, it is once again in violation of what is safest for Sierra Madre.

I49-5

Water. Please please do not insult us with the promise of "not interfering with SM water sources" when EVERY current news report and environmental statistic indicates that no one is in a position to say there will be water. We are in a massive drought which SM itself is currently unprepared for. This is a huge issue and we need to conserve water not increase taxing our limited water sources.

I49-6

This area is in a fault zone and HIGH FIRE Zone. This is CRUCIAL. We are in the midst of increasing fire emergencies the likes of which are unprecedented in California. Our frontline fire fighters do not deserve to have this added calamity when as we know, fires in Sierra Madre are threatening and dangerous as it is.

I49-7

The oak trees and forest on this property are unprecedentedly unique and fecund. The Oaks are sacred. They are a refuge for the many animals that call the Monastery grounds their home. We have an obligation to protect these Oaks and the wildlife that lives among them. Sierra Madre has made a previous commitment to the Forest and the trees in this city which we need to abide by.

I49-8

On a personal note, I feel we were never provided ample opportunity to explore other options for this parcel of land. We need room for low income housing and our older population is increasing in Sierra Madre. Why not a Senior Care Home in the aesthetic of the Monastery so we are caring for our most vulnerable? NOT multi million dollar McMansions.

I have also had cause, as a 23 year resident of Sierra Madre to feel insulted with the unctuous appeals for the "Meadows Project". It is insulting to see flyers of how the Monastery is "feeding the poor" while avariciously feeding its own pocket. By all means build it is their property but please, build something more in line with "church policy"- our old folk need out support. Further, a survey I completed was so biased toward the project that I was disgusted with the guise of legitimate opinion seeking. The entire onslaught smacks of slick self serving avarice and our current city council appears to be on the side of the greed.

Can we not as a community, 50 years down the line, BE the city that chose small town interest over greedy developers set on destroying the very quaintness we all fell in love with in this village?

I have never seen Sierra Madre this disgusted and disappointed with our elected officials. Shame on you.

Thank you
Sincerely
Deirdre Murphy
601 Woodland Drive
Sierra Madre

|49-9

Response to Comment Letter I49

Individual
Deirdre Murphy
October 3, 2021

- I49-1** The comment is an introduction to comments that follow. As shown below, Responses to Comments I49-1 through I49-9 are included as part of the Final EIR for City decision makers' review and consideration.
- I49-2** This comment expresses general opposition to the proposed project and the concern that the project is inconsistent with the City's General Plan. Please refer to Global Response GR-7.
- I49-3** The comment expresses concern with the potential of SB 9 and SB 10 to result in impacts if the project site is zoned for residential uses. See Response to Comment I28-5.
- I49-4** The comment states general opposition to the architectural style of the proposed project. The City notes that this comment expresses the opinions of the commenter. The design guidelines of the Specific Plan outline site planning and design, architectural design, and landscape design standards that would be implemented as a design of the project in order to ensure that development is consistent with surrounding development and that the proposed project would not significantly degrade views of the project site from nearby public locations. In addition, as discussed in Section 4.1.5, Impact Analysis, of Section 4.1, Aesthetics, the project's impacts to aesthetics would be less than significant.
- I49-5** The comment states the Draft EIR has not adequately analyzed the project's impact to traffic flow. Please refer to Global Response GR-6.

Furthermore, the comment raises concern for transportation safety with regards to roadway width. Although the commenter did not cite the specific SMMC section, Chapter 3 (Project Description) of the Draft EIR outlines the internal circulation components of the project site in subsection 3.3.6.2, featuring the following:

North Sunnyside Avenue would transition from a width of 40 feet at its existing terminus to a varying 54- to 56.5-foot right-of-way within the project site, with curbs and gutters, parking and planting areas on both sides, a landscaped parkway and sidewalk on the west side, and tree plantings on the east side of the street. Carter Avenue would transition from its existing 25-foot right-of-way to a varying 44.5- to 46-foot right-of-way within the project site and would have curbs and gutters, and planting areas on both sides, parking on the west side of the street, and a sidewalk on the west side of the street. A pedestrian path extending from the east side of Carter Avenue would provide pedestrian access to Bailey Canyon Wilderness Park. Lastly, three additional streets that run east to west would be provided within the project site. This includes Streets A, B, and C (see Figure 3-2, Conceptual Site Plan). Street A would have a maximum 38.5-foot right-of-way and a sidewalk and parking on the south side of the street. Streets B and C would have a maximum 42.5-foot right-of-way and a sidewalk and parking on the south side of the streets. The proposed street sections are shown in Figure 3-6, Proposed Street Sections (Draft EIR page 3-4).

In addition, in order to address commenters' concerns related to safety issues along Carter Avenue and outside of the boundaries of the proposed project site, the project applicant is proposing off-site widening to Carter Avenue, between the southeastern portion of the project site boundary and Lima Street, which would ensure that Carter Avenue would comply with existing code within and outside of the project site (see Final EIR Section 3.3.12 and Global Response GR-5 for details).

I49-6 The comment is concerned about water supplies in drought conditions. Please see Global Response GR-1.

I49-7 The comment states the project site is located within an earthquake fault zone. Draft EIR Section 4.7, Geology and Soils, states the project site is not located on a known active, potentially active, or inactive fault as delineated on the Alquist-Priolo Earthquake Fault Zoning Map. The closest earthquake fault to the project site is the Sierra Madre Fault, located approximately 700 feet to the north. As detailed in Draft EIR Section 4.7 and Appendix E, the potential for ground rupture on the project site is considered low. The proposed project would be required to comply with all existing seismic safety regulations, including the California Building Code and the SMMC in order to ensure seismic safety. In addition, the project would comply with project design features PDF-GEO-1 through PDF-GEO-15, which includes project specific recommendations from the geotechnical investigation (included as Appendix E).

This comment also states that the project site is designated as a Very High Fire Hazard Severity Zone (VHFHSZ) by the California Department of Forestry and Fire Protection (CAL FIRE) and states development of the project should not occur. The comment further raises concern for the wildfire risk to surrounding communities as a result of project development. Please refer to Global Response GR-3.

I49-8 The comment discusses the importance of the oak trees on site and states a desire to protect them for wildlife habitat. Please refer to Global Response GR-2.

I49-9 This comment states a desire to discuss more alternatives for the proposed project, including a senior care home. Draft EIR Chapter 8, Alternatives, assesses potential alternatives to the proposed project in compliance with State CEQA Guidelines section 15126.6(a) and (b). The Draft EIR includes alternatives considered but rejected, alternatives under consideration for the City's decision makers to review and consider, as well as an assessment on the environmentally superior alternative. The commenter's suggestion closely aligns with Alternative 2, Existing Zoning and Land Use Designation: Communal Residential Facility Alternative. This alternative assumes development of group homes, developmentally disabled, or senior care facilities, consistent with the existing Institutional zoning and General Plan land use designation of the project site. See Response to Comment I26-10 for further discussion related to alternatives.

The comment further provides commentary about the project site's owners, the project applicant, and the Sierra Madre City Council, as well as general opposition to the project, which are not related to the adequacy of the environmental analysis. No response is required.

Comment Letter I50

From: judywm <judywm@webb-martin.com>
Sent: Sunday, October 3, 2021 4:06 PM
To: Vincent Gonzalez
Subject: New Urban West

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

I am writing this letter to object to the project proposed by the New Urban West to develop the Monastery.

In their project update October 2021, they refer to the Monastery asking the city of Sierra Madre to "restore the plan "to build a new community. There wasn't an "original plan" and as to it being less Impactful "NOT", Compatible "NOT", and certainly "NOT" consistent with the original planning rules for Sierra Madre.

1. They did not do extensive research on the history of Sierra Madre as they said they did or they would not proceeded with the project!
2. There is no diverse design and single levels instead of 2 stories would have been more desired as the 47 homes surrounding the project with approximately 1500 sq. ft. instead of the 1500 to 3800 sq. ft purposed.
3. Respectful of neighbors, light traffic noise? They said 31 trips in the am and 42 in the pm. What about trips to the market, school, work, visiting friends, etc. and that is assuming only one adult is working ?
4. Water! This is a mute point! We don't have the water and prepaying won't work as we don't know what the cost will be in 5 years, 10 years, or 20 years or if we will have any water at all! We are in an unprecedented drought and it will only be getting worst. In our General Plan our objective R 12 is to optimize the use of water.
5. The area is in a high fire risk severity zone. R 3-2 and R 3-3 We need to mitigate flood and fire in natural open space.
6. Earthquake! We have 3 major fault lines running very near the Project. In 1991, the Sierra Madre earthquake destroyed the church on the property and condemned 22 homes with damage to 403 structures.
7. Trees! The General Plan calls for goals and policies for preservation and protection of existing trees. They want to remove over 100 trees of which 10 are coastal oaks. The canopy of mature trees are important to our health and aesthetics for net oxygen.
8. Zone changes can have serious implications to our town. Because of SB
- 9 and 10 more houses can be built on the lots so the overall impact would be much greater than their report says.
9. The ingress and egress is not available for two streets because the Carter street is only 25 ft wide and it must be 30 ft. and there is no room to add the extra 5 feet to make it legal.
10. The lower level of the property is a natural alluvial fan and is needed to protect us from floods and to put water in our aquifer.
11. Sierra Madre set back from the street is 25 feet, but the project is asking for 20 feet with 5 feet on the side (looking like a condo subdivision from the street) The lots are too small and will overwhelm the area. All the garages are in front and will look like Orange County with cookie cutter fronts.
12. They are offering 100% electric but at what price will the buyers be willing to pay for high electric costs.
13. They didn't address the potential pedestrian problems for walkers and lack of sidewalks in the NW Sierra Madre

There are too many problems with this project and we should deny it!!
 Thank you,

Judy Webb-Martin, judywm@webb-martin.com, 626-688-2273

150-1

150-2

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Response to Comment Letter I50

Individual
Judy Webb-Martin
October 3, 2021

- I50-1** This comment expresses general opposition to the proposed project. The comment states the project is inconsistent with the planning rules of Sierra Madre. It is assumed that the comment is concerned with consistency between the proposed project and the City's General Plan and Zoning Code. The proposed project would require amendments to both the General Plan and Zoning Code. Please refer to Global Response GR-7.
- I50-2** The comment states that the project applicant has not researched the history of Sierra Madre. However, this comment does not raise any general or specific issue with the environmental review and the adequacy of the Draft EIR. An overview of existing setting of the project site and its surroundings was provided throughout Chapter 4 of the Draft EIR.
- I50-3** The comment provides opinions and objections to the project's proposed design. The proposed project would be implemented with the adoption of a Specific Plan, which includes design guidelines subject to the approval of City decision makers. For additional response regarding character compatibility, see Response to Comment I49-4.
- I50-4** This comment questions how the Draft EIR calculated anticipated daily and peak hour trips generated by the proposed project. As described in Draft EIR Section 4.17, Transportation, the proposed project would generate 396 daily trips, 31 AM peak trips and 42 PM peak-hour trips. Draft EIR Section 4.17 determined the proposed project of 42 single-family detached homes would generate a daily trip rate of 9.44 vehicular trips per dwelling unit. Trip rates are calculated from the Institute of Transportation Engineers Trip Generation 10th edition manual. This represents a conservative estimate of vehicular trips associated with the proposed project and, thus, accounting for work trips, school trips, and others. Considering the commenter's statement that an increase of online shopping deliveries would result as part of the project is speculative, and therefore, not required by CEQA. Please refer to Global Response GR-6.
- To the extent the comment is concerned with traffic noise, off-site traffic noise is analyzed under Draft EIR Section 4.13.5, Impact Analysis, of Section 4.13, Noise. Please refer to Response to Comment I5-2.
- I50-5** This comment raises concern for water supplies and drought conditions. Please see Global Response GR-1. Additionally, the comment cited General Plan Objective R12. As shown in Draft EIR Table 4.11-1, Project's Consistency with City of Sierra Madre's General Plan Goal and Policies, the project was found to be consistent with this objective.
- I50-6** The comment states that the project is located within a Very High Fire Hazard Severity Zone. Additionally, the comment notes General Plan policies R3.2 and R3.3 and states the project needs to mitigate flood and fire hazards. Below are the two policies as defined in Chapter Two, Resource Management, of the City's General Plan:

General Plan Policy R3.2 Ensure that wildland open space, including the areas of the City designated as High Fire Hazard Severity Zone, is left in its natural state

with the exception of brush abatement for public safety in order to aid the City in fighting fires

General Plan Policy R3.3 Ensure that natural open space within the Very High Fire Hazard Severity Zones remains undeveloped so as to mitigate the flood cycles that follow wild land fires in the natural open space

As shown above, the two policies referenced are specifically related to “wildland open space” and “natural open space” neither of which are applicable to the project site, which is not designated as Natural Open Space (NOS) or Constructed Open Space (COS). Wildfire risk and flooding are analyzed in the Draft EIR within Sections 4.10, Hydrology and Water Quality, and 4.20, Wildfire. Impacts related to risk of flooding were found to be less than significant. For additional information about Very High Fire Hazard Severity Zones and how it relates to this project, please refer to Global Response GR-3.

I50-7 The comment states the project site is located near earthquake faults and notes past earthquake history within the vicinity of the project site. The Draft EIR analyzes the project’s potential impacts related to earthquake zones. Draft EIR Section 4.7, Geology and Soils, states the project site is not located on a known active, potentially active, or inactive fault as delineated on the Alquist-Priolo Earthquake Fault Zoning Map. However, the closest earthquake fault to the project site is the Sierra Madre Fault, located approximately 700 feet to the north. As further detailed in Draft EIR Section 4.7, impacts to seismic hazards were found to be less than significant with incorporation of PDF-GEO-1 through PDF-GEO-15 and MM-GEO-1. No change or addition to the environmental analysis is required.

I50-8 The comment notes the City’s General Plan includes goals and policies for preservation and protection of existing trees and expresses general concerns associated with loss of trees, such as loss of oxygen. Please refer to Global Response GR-2. Regarding the commenter’s concern related to oxygen generation, refer to Response to Comment I24-1.

I50-9 The comment is concerned with the potential of SB 9 and SB 10 to result in impacts associated with the proposed zone change. See Response to Comment I28-5.

I50-10 This comment states the project site’s roadway design as proposed is not sufficient or compatible with the adjoining streets. In particular, the commenter notes Carter Avenue needs to be 30 feet wide to connect with adjoining streets. In order to address commenters’ concerns related to safety issues along Carter Avenue and outside of the boundaries of the proposed project site, the project applicant is proposing off-site widening to Carter Avenue, between the southeastern portion of the project site boundary and Lima Street, which would ensure that Carter Avenue would comply with existing code within and outside of the project site (see Final EIR Section 3.3.12 and Global Response GR-5 for details).

I50-11 The comment states the project site under existing conditions is needed to protect the surrounding community from floods and is used to replenish the groundwater aquifer. As discussed in Response to Comment I50-6, above, impacts related to flooding were found to be less than significant. Moreover, as detailed in Draft EIR Section 4.10, the project is not anticipated to substantially decrease groundwater supplies with the proposed redevelopment of the site. Impacts were found to be less than significant.

- I50-12** This comment expresses opposition to the project’s proposed design standards. The comment does not reflect concern with the adequacy of the environmental analysis; thus, no response is required. Please refer to Global Comment 7 (GR-7) General Plan Consistency regarding the project’s proposed design standards.
- I50-13** The comment states the proposed project would offer 100% electric power for operations and questions the cost. Although the comment was not specific, Draft EIR Section 4.6, Energy, cites “electrical service in the City ... is provided by the Clean Power Alliance. As of October 2020, Sierra Madre residents and businesses are receiving 100% Green Power (100% renewable energy) as their default rate product. Customers also have the option to purchase the Lean Power rate which is 36% renewable energy and Clean Power rate which is 50% renewable energy” (Draft EIR page 4.6-1). Regarding the commenter’s question about cost, State CEQA Guidelines section 15064(e) states “economic and social changes resulting from a project shall not be treated as significant effects on the environment.” The project’s electricity cost is not within the scope of required environmental analysis. Therefore, this comment does not contain any specific concerns related to the adequacy of the environmental analysis in the Draft EIR. No changes or additions to the project description or environmental document are required in response to this comment.
- I50-14** This comment states the Draft EIR does not address pedestrian safety and that the project’s proposed design lacks sidewalks. The project would include sidewalks along the proposed streets to promote pedestrian safety and mobility within the project site and local vicinity. Moreover, Draft EIR Section 4.17, Transportation, includes analysis on the project’s consistency with pedestrian safety policies. As a result, the analysis determined the project would not result in a hazardous roadway design or unsafe roadway configuration and impacts were found to be less than significant. In addition, in order to address commenters’ concerns related to safety issues along Carter Avenue and outside of the boundaries of the proposed project site, the project applicant is proposing off-site widening to Carter Avenue, between the southeastern portion of the project site boundary and Lima Street, which would ensure that Carter Avenue would comply with existing code within and outside of the project site (see Final EIR Section 3.3.12 and Global Response GR-5 for details).
- I50-15** The comment expresses general opposition to the proposed project and does not contain any specific concerns related to the adequacy of the environmental analysis in the Draft EIR.

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Comment Letter I51

From: Evan and Mary <marynevans@earthlink.net>
Sent: Thursday, September 30, 2021 10:15 PM
To: Vincent Gonzalez
Subject: Objections to the Meadows proposal
Attachments: MeadowsLtr MS.pdf

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

Greetings:

My husband and I strongly oppose The Meadows development proposal involving the Passionist Fathers' Monastery.

We each have strong feelings, so we are each sending you an individual letter. Here is my letter.

We do not feel that the community will benefit from the proposal as it is now and ask that you please support our concerns and oppose it.

Thank you, Mary Steinberg



328 Auburn Ave
Sierra Madre, CA 91024
September 30, 2021

To: Victor Gonzalez,
Director of Planning and Community Preservation,
City Hall,
232 W. Sierra Madre Blvd.
Sierra Madre, CA 91024

Re: Concerns About The Meadows at Bailey Canyon (Monastery) Development

My husband and I moved to Sierra Madre in September 1977, and have greatly enjoyed living here for the 44 years since then. We used to regularly attend the annual fundraiser at the Passionist Fathers Monastery, and enjoyed walking through their grounds. Unfortunately, we do not feel their plan to sell property to developers to build 42 homes would be good for the community. We therefore do not support them in this plan as it has been proposed, and recommend that that you oppose it.

Our concerns are several, based on the elements of the environmental impact report (EIR).

Traffic is already a problem in Sierra Madre with its many schools, made worse recently by pandemic measures. Drop-off and pick-up times create significant problems. Multiple streets, especially Lima, Sunnyside, Grove St., and Carter, would experience a significant increase in traffic. Unfortunately, the EIR has no comments about possible effects on our village, and addresses only travel within the proposed project.

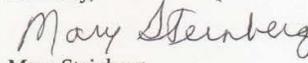
Water is a precious commodity, especially now during severe drought conditions. The developer alleges what they call "net zero water usage". We question that they can deliver on that claim, and wonder what current and future costs would be involved in any attempt to do so.

In addition to drought, recent prolonged high temperatures have increased the risk of wildfires. Both the Sierra Madre Fire Department and the California Dept of Forestry and Fire Protection consider the proposed location a very high fire hazard severity zone. New homes in this area would put people and structures at significant risk, contrary to the recommendation of our General Plan which recommends not to build in a high fire zone. We also wonder how well local streets would support emergency equipment.

Part of what makes Sierra Madre so appealing is our foothill location, with multiple plants and trees that are great for walking and hiking. The proposed project would result in the removal of 100 mature trees; 10 of these are protected Coastal Oaks. It is hard to see a significant environmental benefit from losing so many trees. Again, our General Plan recommends exactly the opposite, to develop tree preservation and protection measures.

Again, we strongly recommend that that you oppose the proposed Monastery Development, The Meadows at Bailey Canyon. We appreciate your consideration.

Sincerely,


Mary Steinberg

I51-1

Response to Comment Letter I51

Individual
Mary Steinberg
September 30, 2021

- I51-1** This comment letter represents a form letter prepared by the commenter's husband, Evan Steinberg. Please see Response to Comment Letter I48 for discussion.

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Comment Letter I52

From: marcielle brandler <marcielleb@hotmail.com>
Sent: Sunday, October 3, 2021 10:08 AM
To: Vincent Gonzalez; Karen Rowinsky
Subject: I too am against ruining our little town.

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

Please reconsider all the building and the tearing out of long-standing trees in Sierra Madre. This housing project will damage the charm and safety of our already-crowding town. Marcielle Brandler, resident since 2006.

I52-1

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Response to Comment Letter I52

Individual
Marcielle Brandler
October 3, 2021

- I52-1 This comment expresses general opposition to the proposed project. and does not raise concerns with the adequacy of the Draft EIR and environmental analysis.

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Comment Letter I53

From: Barbara Ontiveros <barbont215@gmail.com>
Sent: Saturday, October 2, 2021 7:23 AM
To: Vincent Gonzalez
Subject: Monastery property

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

I am vehemently opposed to the monastery project for so many reasons.
It is a dangerous and greedy undertaking. In the middle of a drought (and California is always in a drought) to build all those huge houses for the wealthy to purchase is a travesty. Think of the water they would need for those sizes of houses!
And there is the fire danger. They would be in a very precarious fire hazard zone.
The traffic those houses would add to our quiet town would be unmanageable.
Please deny the progress of this project.
Barbara Ontiveros
111 e Sierra Madre blvd.
Sierra Madre

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I53-4

Sent from my iPad

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Response to Comment Letter I53

Individual
Barbara Ontiveros
October 2, 2021

- I53-1** This comment expresses opposition to the proposed project and expresses concerns associated with water supplies in drought conditions. Please see Global Response GR- 1.
- I53-2** This comment notes that the project site is designated as a Very High Fire Hazard Severity Zone by the California Department of Forestry and Fire Protection (CAL FIRE). Please refer to Global Response GR-3.
- I53-3** The comment states the project would generally result in traffic congestion. Please refer to Global Response GR-6.
- I53-4** This comment restates opposition to the project and does not raise concerns with the adequacy of the Draft EIR and environmental analysis.

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Comment Letter I54

From: Laura Aguilar <laguilar@cityofsierramadre.com>
Sent: Thursday, September 30, 2021 7:59 PM
To: deb sheridan
Subject: Re: Draft EIR Comments

Hi, Deb.

Email is acceptable. Please send to Vincent Gonzalez at VGonzalez@cityofsierramadre.com by 5:00pm.

Regards,

Laura M. Aguilar
City Clerk
Administrative Services Manager
(626) 836-6756

On Sep 30, 2021, at 7:39 PM, deb sheridan <debsheridan2000@yahoo.com> wrote:

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

Another Question Madam Guru of all facts - I just read that our responses must be given to Vince Gonzalez "in writing" by 5 pm on Monday. It occurred to me that "in writing" might mean a real letter, although his email address is listed. Just wanted to make sure email is okay.

I 154-1

Thanks,
Deb Sheridan

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Response to Comment Letter I54

Individual
Deb Sheridan
September 30, 2021

- I54-1** This comment asks whether comments on the Draft EIR may be submitted via email. The comment does not include any comments or questions regarding environmental review. The City has responded to the comment and confirmed that email submission is acceptable. In addition, the Notice of Availability distributed for the proposed project outlined steps for email submissions of public comments.

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Comment Letter I55

From: Stephanie Allison <svallison34@gmail.com>
Sent: Friday, October 1, 2021 12:54 PM
To: Vincent Gonzalez
Subject: My comment on the DEIR for the "Meadows Project "

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

Dear Mr. Gonzalez:

I've been a resident of Sierra Madre since 1965. I live one block over from Sunnyside on Gatewood Lane and am **totally against this project for 42 homes.** My main concern is for fire safety. Plus we already have a water shortage in our town. We have always been able to keep this area free for helicopter rescue efforts. Not to mention the fact that this will destroy all the wildlife, trees, and just completely destroy so much of our natural green space in our little town. Also, there will be more traffic and congestion (air pollution from all the cars going up and down Sunnyside) now in this small area and on Sunnyside street. Nor is this project consistent with our Sierra Madre General Plan and Zoning ordinances.

I55-1
I55-2
I55-3
I55-4

Sincerely,

Stephanie Allison
490 Gatewood Lane
Sierra Madre, CA
svallison34@gmail.com

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Response to Comment Letter I55

Individual
Stephanie Allison
October 1, 2021

- I55-1** This comment expresses general opposition to the proposed project but does not include any specific comments relating to the environmental review or adequacy of the Draft EIR.
- I55-2** The comment notes concern with fire safety, water supplies, and previous use of the site as a helicopter landing area. Please see Global Response GR-1 for information regarding water supply and Global Response GR-3. for information regarding hazards within a Very High Fire Hazard Severity Zone. Regarding the loss of the site as a fire response/helicopter landing area, see Response to Comment I10-1.
- I55-3** The comment states the project would result in traffic congestion. Please refer to Global Response GR- 6. As described in Draft EIR Section 4.3, Air Quality, potential health impacts related to carbon monoxide (CO) hotspots from mobile source emissions (i.e., vehicular traffic) were determined to not be cumulatively considerable and would result in less than significant impacts. In addition, with implementation of MM-AQ-1, air quality impacts would be less than significant. No change or addition is required.
- I55-4** This comment states the proposed project is not consistent with the City's General Plan and site's zoning. Please refer to Global Response GR-7.

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Comment Letter 156

From: Sarkis Baltayian <sbaltayian@gmail.com>
Sent: Sunday, October 3, 2021 6:31 PM
To: Vincent Gonzalez
Subject: Monastery Housing Development
Attachments: Baltayian-Sierra Madre letter-housing development.docx

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

From:
Sarkis Baltayian
522 Sierra Keys Drive
Sierra Madre, CA 91024
October 3, 2021

To:
Vincent Gonzalez
vgonzalez@cityofsierramadre.com

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

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

Subject to the proposed housing development. It is inconsistent with the Policies and Values of Sierra Madre's General Plan. I am especially concerned with the following issues:

1. That area is not zoned for single family homes. Sierra Madre residents do not agree with a change of zoning.
2. They are planning on building large houses on small lots, increasing the density of the population to uncomfortable and dangerous levels, contrary to the proposed Sierra Madre Safety policy to avoid developing in High Fire Hazard Safety Zone.
3. The area in question is a buffer to the wildfire zone of the mountains. That buffer zone will be gone, plus the new homes will be in a high fire danger zone themselves.
4. The traffic will be unbearable to the population currently living on N. Sunnyside Ave. and on W. Carter Ave. This will cause an increase in motor vehicle accidents, as well as a serious pedestrian safety issue. A small sample of that is seen once a year on Good Friday, when multitudes visit the Stations of the Cross or Via Crucis at the Monastery.
5. Water will be even more scarce than it is now. Proponents say that there will be a zero balance impact on water supply, but everyone knows that it is impossible. The environmental impact for the water supply in Sierra Madre will be great.

I 156-1
I 156-2
I 156-3
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I 156-6

6. A large number of mature trees will be removed and replaced with smaller trees requiring a great deal of water to become established. Sierra Madre has a Forest Management Plan with a mission to preserve "canopies" for their environmental and aesthetic benefit. A total of 101 large canopied trees will be destroyed.

156-7

I have been living in Sierra Madre with my wife and children since 1987. I know that I am not the only one with these concerns and that many others can echo these words as well.

156-8

Respectfully,

Sarkis Baltayan

Response to Comment Letter I56

Individual
Sarkis Baltayian
October 3, 2021

- I56-1** This comment requests the following comments (Comments I56-2 through I56-8) be included in the responses to comments of the Final EIR. As shown, the commenter’s request has been recorded as part of this Final EIR.
- I56-2** This comment expresses opposition to the proposed project but does not include any specific comments relating to the environmental review or adequacy of the Draft EIR.
- I56-3** This comment expresses opposition to the proposed zone change and states the project is inconsistent with the City’s General Plan. Please refer to Global Response GR-7.
- Additionally, the comment states the project would conflict with “proposed Sierra Madre Safety policy to avoid developing in High Fire Hazard Safety Zone”. Please refer to Global Response GR-3.
- I56-4** This comment states the project site is currently used as a buffer to the wildfire zones. Please refer to Global Response GR-3.
- I56-5** This comment states the project would generate traffic that would result in safety hazards. Draft EIR Section 4.17, Transportation, details consistency with existing General Plan policies and objectives highlighting the need for safety. Moreover, the project would include sidewalks along the proposed streets to promote pedestrian safety and mobility within the project site and local vicinity and would not result in a hazardous roadway design or unsafe roadway configuration. Thus, impacts were found to be less than significant. Please refer to Global Response GR-6 for information about traffic impacts.
- I56-6** The comment raises concern for water supplies. Please see Global Response GR-1.
- I56-7** This comment notes the project’s proposed removal of trees on site and cites the City’s Forest Management Plan intent to preserve tree canopies. Please refer to Global Response GR-2.
- I56-8** This comment expresses opposition to the proposed project but does not include any specific comments relating to the environmental review or adequacy of the Draft EIR.

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Comment Letter I57

From: mtrogdon1@aol.com
Sent: Sunday, October 3, 2021 8:51 PM
To: Vincent Gonzalez
Subject: Monastery Housing Project

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

Mr. Gonzalez,

I am writing to express my anger at the proposed Monastery Housing Project. I do not think the city has considered how this project will affect the citizens of Sierra Madre.

I 157-1

In particular I am very concerned about this development's water usage. We are currently in an unprecedented years-long drought with steep water restrictions in effect and more probably to come. How anyone can plan to build forty-two new big houses during a drought is incomprehensible. The developers plan to buy water in advance so they won't affect Sierra Madre's current drought situation?! How is water purchased in advance? How can these developers guarantee that water "pre-purchased" will be available when the forty plus homeowners need it? I'm pretty sure that that water will come from our supplies and that will mean less (of very little) water for us current residents. And the developers will claim that they would purchase outside water if only there was some to purchase. And we'll all suffer.

I 157-2

I'm also concerned about the number of trees this new "Meadows" will take down. And the fire danger of bringing so many new houses into a town up against a mountain with big wildfire danger. But let's not preserve, let's build and make the developers (who don't live here) rich! Shame on this city!

I 157-4

Miriam Trogdon
286 E. Alegria Ave.
Sierra Madre, CA 91024
626-372-5170

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Response to Comment Letter I57

Individual
Mirian Trogdon
October 3, 2021

- I57-1** This comment expresses opposition to the proposed project but does not include any specific comments relating to the environmental review or adequacy of the Draft EIR.
- I57-2** The comment raises concern for water supplies. Please see Global Response GR-1.
- I57-3** This comment notes the project's proposed removal of trees on site. Please refer to Global Response 2 GR-2.
- I57-4** The comment expresses concern for wildfire risk. Please see Global Response GR-3. Finally, the comment shares opinions and commentary regarding the project applicant. The commenter's opposition to the proposed project will be included in this Final EIR for the City decision makers' review and consideration.

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Comment Letter I58

From: Lauren Yee <laureneyee@gmail.com>
Sent: Sunday, October 3, 2021 8:44 AM
To: Vincent Gonzalez
Subject: Opposed to Meadows at Bailey canyon

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

Hello Mr. Gonzalez,

I am a resident of Sierra Madre and I strongly oppose the development of the Meadows at Bailey Canyon for the numerous reason my neighbors have already expressed to you. This is in a high fire, earthquake zone during a drought, and goes against many of the goals and policies of our City's General Plan. It would be terrible to remove the at least 100 mature trees, and traffic will increase along Sunnyside and Carter by 300-400 cars per day. I also have major concerns about the fire hazard the actual construction site will pose to the existing neighborhoods. Please take these concerns and others in to consideration.

I58-1

My address is 86 East Mira Monte Ave.

Best regards,
Lauren Yee
247-736-5058

Sent from my iPhone

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Response to Comment Letter I58

Individual
Lauren Yee
October 3, 2021

- I58-1** This comment expresses general opposition to the project and highlights a number of concerns including wildfire, earthquakes, drought, inconsistency with the City's General Plan, tree removal, and traffic. Please refer to Global Response GR-3 for information regarding the project site being located within a VHFHSZ. The project site is not located on a known active, potentially active, or inactive fault as delineated on the Alquist-Priolo Earthquake Fault Zoning Map. As discussed in Draft EIR Section 4.7, Geology and Soils, impacts to seismic hazards were found to be less than significant with incorporation of PDF-GEO-1 through PDF-GEO-15 and MM-GEO-1. Regarding the commenter's concern for water supplies in drought conditions, please see Global Response GR-1. For discussion related to inconsistency with the City's General Plan, please see Global Response GR-7. Please refer to Global Response GR-2 for information about impacts of tree removal. With regard to traffic congestion, please refer to Global Response GR-6.

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Comment Letter I59

From: Roro11 <rasowma@roadrunner.com>
Sent: Sunday, October 3, 2021 11:24 AM
To: Vincent Gonzalez
Subject: The Meadows at Bailey Canyon

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

From: Rosalie Curry
292 W. Montecito Ave, #T. Sierra Madre, Ca 91024

I am not in favor of this project for our City.

This is an extremely bad choice for the City of Sierra Madre.
There is no way, you as administrators can guarantee the residents that it will not impact our city or our future. This project is totally, unjustified and unfair to the people who live here now.
This project will be one big set of problems, the water shortage here in our city, the future electricity shortages, the fire issues. We are not equipped to handle more traffic, nor do we want it!!!
We don't need more issues to deal with in our small community. This community does not need to be burdened with more problems and more costs.
Please take these real issues into consideration, because they matter to the residents!
Thank you.

I59-1
I59-2
I59-3
I59-4

Sent from my iPad

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Response to Comment Letter I59

Individual
Rosalie Curry
October 3, 2021

- I59-1** This comment expresses general opposition to the proposed project but does not include any specific comments relating to the environmental review or adequacy of the Draft EIR. The Draft EIR is an informational document intended for the use by the City of Sierra Madre, other public agencies, and members of the general public in evaluating the potential environmental effects of the proposed The Meadows at Bailey Canyon Specific Plan Project (project or proposed project). California Environmental Quality Act (CEQA) Section 21002 requires that an EIR identify the significant effects of a project on the environment and provide measures or alternatives that can mitigate or avoid these effects. This Draft EIR evaluates the environmental effects associated with development of the project and discusses the manner in which the project's significant effects can be reduced or avoided through the implementation of mitigation measures or feasible alternatives to the proposed project. In accordance with Section 15130 of the CEQA Guidelines, this Draft EIR also includes an examination of the effects of cumulative development. In addition, these responses to each comment on the Draft EIR represent a good-faith, reasoned effort to address the environmental issues identified by the commenter.
- I59-2** The comment implies the project will exacerbate water shortages, electricity shortages, and fire issues. Please see Global Response GR-1 and Final EIR Section 4.19, Utilities and Service Systems, for discussion on water supplies. Final EIR Section 4.19 also discusses electricity services. Additionally, please see Global Response GR-3 for impacts related to fire hazards.
- I59-3** The comment implies the project will worsen existing traffic congestion. Please refer to Global Response GR-6.
- I59-4** This comment expresses general opposition to the proposed project but does not include any specific comments relating to the environmental review or adequacy of the Draft EIR.

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Comment Letter I60

From: Brian Bielanski <bbielanskiwfg@gmail.com>
Sent: Saturday, October 2, 2021 11:56 AM
To: Vincent Gonzalez
Subject: Approve The Meadows at Baily Canyon

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

We live at 299 E. Sierra Madre Blvd.

Please approve this project.

--
Brian Bielanski

I
I60-1

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Response to Comment Letter I60

Individual
Brian Bielanski
October 2, 2021

- I60-1** This comment expresses support for the proposed project but does not include any specific comments relating to the environmental review or adequacy of the Draft EIR.

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Comment Letter I61

From: Claire McLean <ctmpeace2u@gmail.com>
Sent: Saturday, October 2, 2021 10:23 AM
To: Vincent Gonzalez
Subject: Stop Monastery Housing Project

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

Hi Vincent -

Here are some of my reasons why I do not support the Monastery Housing Project:

I61-1

1. **TREES**

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

I61-2

Goal 1. Continued preservation and protection of existing trees.

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

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

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

2. **TRAFFIC**

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

I61-3

3. **WATER**

The developer has assured the City of net zero water usage, which means the buyers of the new homes will purchase water for the next 50 years. California and surrounding states are in an unprecedented drought. The Colorado River is the lowest it has ever been, and its water usage is already being rationed for Nevada, Arizona, and Mexico. "Net zero" water usage seems impossible to predict, regardless of the algorithms used. It is unclear how storage of water for the next 50 years would be achieved. Our City Council will be discussing a Mandatory Water Conservation Plan at the September 28 meeting. This is inconsistent with the General Plan Objective R12 - Optimizing the use of water resources. Building 42 large homes will be counter to this.

I61-4

4. **FIRE**

The project site is located in a very high fire hazard severity zone, according to the Cal Dept of Forestry and Fire Protection. It is inconsistent with our General Plan that we do not build in a high fire zone. Local streets can't support emergency equipment. Parts of Sierra Madre have been evacuated three times in the last 35 years, and the incidence and intensity of wildfires has been increasing.

I61-5

5. **EARTHQUAKES**

The project is located near the Sierra Madre Fault as well as the Raymond and Clamshell Faults. In 1991 the Sierra Madre earthquake damaged one of the Monastery buildings beyond repair and 22 homes in the

I61-6

proximity of Sunnyside were condemned, with damage to 403 structures, resulting in \$12.5 million in damages.

Thank you. Please make the right decision.

Claire McLean
420 W. Sierra Madre Blvd.
Apt. N
Sierra Madre, CA 91024
--

"In every walk with nature one receives far more than he seeks." ~ John Muir

↑
I61-6
Cont.

Response to Comment Letter I61

Individual
Claire McLean
October 2, 2021

- I61-1** This comment expresses general opposition to the proposed project and notes the attached letter accompanying the comment (see Responses to Comments I61-2 thru I61-11). The comment does not express concerns related to the adequacy of the Draft EIR.
- I61-2** The comment opposes the removal of mature trees on the project site, including protected oak trees, as a result of the proposed project. Please refer to Global Response GR-2.
- I61-3** This comment raises concern with the project's consistency with the City's General Plan Circulation Element Goal 3, "Preservation of quiet neighborhoods with limited thru traffic". The comment further states the land use consistency analysis found within Draft EIR Section 4.11, Land Use and Planning, Table 4.11-1, does not address the "preservation of quiet neighborhoods." Please refer to Response to Comment I5-2.
- Furthermore, the comment states traffic congestion would occur as a result of the project along Sunnyside Avenue, Lima Street, Carter Avenue, and Grove Street. Please refer to Global Response GR- 6. See Response to Comment I41-2.
- I61-4** This comment raises concern about net zero water being feasible, given that California and many other states experience drought, and that the project is not consistent with the General Plan Objective R12. For more discussion on water usage, please see Global Response GR-1 and see Global Response GR-7 for information about consistency with the General Plan. Furthermore, the comment states the City Council discussed a Mandatory Water Conservation Plan at the September 28, 2021 meeting. According to the City's Municipal Code, a Mandatory Water Conservation Plan, codified as Chapter 13.24, is a policy declaration to comply with sections of the California Water Code and requires mandatory water conservation during a period of necessity. Final EIR Section 4.19, Utilities and Service Systems, addresses this section of the SMMC and states the City has also adopted Water Efficient Landscape and Low Impact Development Ordinances to require water conservation efforts associated with development and redevelopment. Given this, and as detailed in Global Response GR-1, above, the Draft EIR adequately analyzed the project's impact to water supplies.
- I61-5** The comment states that the City General Plan does not permit construction in Very High Fire Hazard Severity Zones. However, this is incorrect. Please refer to Global Response GR-3.
- I61-6** This comment notes concern with earthquake faults located within the project area. Draft EIR Section 4.7, Geology and Soils, states the project site is not located on a known active, potentially active, or inactive fault as delineated on the Alquist-Priolo Earthquake Fault Zoning Map. However, the closest earthquake fault to the project site is the Sierra Madre Fault, located approximately 700 feet to the north. As detailed in Draft EIR Section 4.7 and Appendix E, the potential for ground rupture on the project site is considered low. Furthermore, the proposed project would be required to comply with all existing regulations, including the California Building Code and the SMMC in order to ensure seismic safety. In addition, the project would comply with project design features PDF-GEO-1 through PDF-GEO-15, which includes project specific recommendations from the geotechnical investigation (included as Appendix E) and implement MM-GEO-1 to reduce seismic hazards.

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Comment Letter I62

From: sealgrl@yahoo.com
Sent: Friday, October 1, 2021 8:43 PM
To: Vincent Gonzalez
Subject: Comments on the DEIR for the Meadows Development

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

My name is Linda Hernandez, resident of 440 N Sunnyside Ave. email: sealgrl@yahoo.com. Please record my comments as public record.

I have spent over 30 years in Sierra Madre, mostly as a renter, but now as a homeowner. I have attended many City Council meetings over the years. We have spent a great deal of time developing a General Plan and Zoning ordinances that would protect the residents of this town. I have been involved in voting for our representation for many years. We do expect that you hear our concerns and do what is right for our City.

I
162-1

1. Why are "we" agreeing to the re-zoning of this property? it is quite clear there has been a scare tactic from day one, that an institutional setting would be far more detrimental to the city and neighbors. However, under current zoning, an institutional setting will be subject to much more stringent regulations. Please know that there are many, many residents adjacent to Sunnyside (the most severely impacted area) that are NOT against an institutional setting.

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162-2

-if you do change the zoning, why are you allowing the developers to dictate what the number and size of the homes in the development are to be? WHY do they get to buy changes that the rest of your citizens would never get approved for?

2. The traffic studies were "conducted" during a pandemic. Computer modeling seems inappropriate for such a small segment of street. None of the residents have observed surveyors conducting any kind of traffic study. In addition, while the traffic generated by homeowners dropped, the increased traffic of delivery trucks doubled during the pandemic.

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162-3

-Please note the the Monastery has gotten into the habit of busing it's Retreat members into the grounds, rather than have them drive up Sunnyside. The neighbors on Sunnyside have been complaining about the traffic during retreats for many years, which likely has generated FAR less than the projected 700 + car trips per days projected for Sunnyside.

-If this project is approved, the residents on Sunnyside will petition for speed bumps to be installed above Grandview to slow the increased traffic. We already have people and delivery carriers that speed up and down the street. The emergency/fire crews have to back down the street in response to calls. Large delivery trucks have to do the same. Sunnyside cannot support the additional traffic impact without some major changes.

-In addition, this project must have TWO routes in and out that can support the projected traffic, due to it being in a high fire zone.

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162-4

3. Net zero water rights. We are in a drought. How can we expect anyone can buy water rights for the next 50 year, when it is projected that we will run out of water MUCH sooner than that? I would like to go on record saying that is a ridiculous proposal.

I
162-5

I ask that you NOT change the current zoning for this property unless these concerns can be adequately addressed. Which they have not been.

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162-6

Sincerely,

Linda Hernandez

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Response to Comment Letter I62

Individual
Linda Hernandez
October 1, 2021

- I62-1** This comment requests the following comments (Comments I62-2 through I62-6) be included in the responses to comments of the Final EIR. The comment expresses general support for the city's current General Plan and Zoning Code. However, these comments are not related to the adequacy of the environmental analysis contained in the Draft EIR.
- I62-2** The comment opposes the proposed zone change of the project site. As described in Draft EIR Chapter 3, Project Description, the proposed project would require a General Plan land use amendment and zone change from Institutional to Specific Plan. Please refer to Global Response GR-7.
- I62-3** This comment is concerned that the Draft EIR's methodology for assessment of traffic impacts did not factor in traffic pattern changes due to the COVID-19 pandemic. In addition, the comment suggests speed control devices such as speed bumps be installed above Grand View Avenue. Finally, the comment highlights concern for impacts to fire protection services and response times. Please refer to Global Response GR-6.
- Lastly, in regard to the concern for impacts to fire protection services, Draft EIR Section 4.15, Public Services, analyzed the potential operational impacts to fire protection services and determined existing services and response times were sufficient. Additionally, Draft EIR Section 4.17, Transportation, determined less than significant impacts relative to geometric design hazards and inadequate emergency access. In addition, Grand View Avenue is located approximately 0.3 miles south of the project. Therefore, providing speed bumps along that roadway or above would not be necessary to reduce any existing traffic impacts associated with the project.
- I62-4** The comment suggests two routes for ingress and egress access to the project site. In addition, the comment notes the project site's location within a fire hazard zone. Please refer to Global Response GR- 3 and Global Response GR-4.
- I62-5** The comment questions the feasibility of the net-zero water program and expresses opposition to the project. Please see Global Response GR-1.
- I62-6** This comment expresses general opposition to the proposed land use and zoning changes and is not related to the adequacy of the environmental analysis contained in the Draft EIR.

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Comment Letter I63

From: Randy Boyd · Cobraside Distribution <randy@cobraside.com>
Sent: Sunday, October 3, 2021 1:15 PM
To: Public Comment
Cc: Vincent Gonzalez
Subject: DEIR input for the Meadows at Bailey Canyon

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

I wholeheartedly object to the entire proposed housing development. It is MORE than inconsistent with our General Plan. Citizens, the same citizens who elected all of you spent an enormous amount of time on the General Plan so please honor and respect the amount of hard work that went into preserving Sierra Madre.

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163-1

A change in zoning, especially in light of the newly signed SB 9 and SB 10 would prove disastrous if zoning was even being considered being changed. Now more than ever we are determined to keep the zoning Institutional.

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163-2

The proposed cookie cutter homes are inconsistent with the eclectic architecture of Sierra Madre - once again in opposition to General Plan guidelines.

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163-3

The impact on Traffic flow has not been adequately examined but provides only a cursory outline inconsistent with the mock ups provided by NUW. Further, given that 30 feet width streets are indicated in the General Plan, it is once again in violation of what is safest for Sierra Madre.

I
163-4

Water: Please please do not insult us with the promise of "not interfering with SM water sources" when EVERY current news report and environmental statistic indicates that no one is in a position to say there will be water. We are in a massive drought which SM itself is currently unprepared for. This is a huge issue and we need to conserve water not increase taxing our limited water sources.

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163-5

This area is in a fault zone and HIGH FIRE Zone. This is CRUCIAL. We are in the midst of increasing fire emergencies the likes of which are unprecedented in California. Our frontline fire fighters do not deserve to have this added calamity when as we know, fires in Sierra Madre are threatening and dangerous as it is.

I
163-6

The oak trees and forest on this property are unprecedentedly unique and fecund. The Oaks are sacred. They are a refuge for the many animals that call the Monastery grounds their home. We have an obligation to protect these Oaks and the wildlife that lives among them. Sierra Madre has made a previous commitment to the Forest and the trees in this city which we need to abide by.

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163-7

On a personal note, I feel we were never provided ample opportunity to explore other options for this parcel of land. We need room for low income housing and our older population is increasing in Sierra Madre. Why not a Senior Care Home in the aesthetic of the Monastery so we are caring for our most vulnerable? NOT multi million dollar McMansions.

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163-8

I have also had cause, as a 23 year resident of Sierra Madre to feel insulted with the unctuous appeals for the "Meadows Project". It is insulting to see flyers of how the Monastery is "feeding the poor" while avariciously feeding its own pocket. By all means build it is their property but please, build

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something more in line with "church policy"- our old folk need out support. Further, a survey I completed was so biased toward the project that I was disgusted with the guise of legitimate opinion seeking. The entire onslaught smacks of slick self serving avarice and our current city council appears to be on the side of the greed.

Can we not as a community, 50 years down the line, BE the city that chose small town interest over greedy developers set on destroying the very quaintness we all fell in love with in this village?

I have never seen Sierra Madre this disgusted and disappointed with our elected officials. Shame on you.

Randy Boyd
601 Woodland Drive
Sierra Madre, CA, 91024

Cobraside Distribution Inc.

Please make note that Cobraside is currently operating Mondays thru Thursdays.

3639 San Fernando Road
Glendale, CA, 91204
818-548-9001 (phone)
818-548-9002 (fax)
randy@cobraside.com



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I63-8
Cont.
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Response to Comment Letter I63

Individual
Randy Boyd
October 3, 2021

- I63-1** This comment is the same comment as Response to Comment I49-2. Please see Response to Comment Letter I49 for more discussion. No further response is provided.
- I63-2** This comment is the same comment as Response to Comment I49-3. Please see Response to Comment Letter I49 for more discussion. No further response is provided.
- I63-3** This comment is the same comment as Response to Comment I49-4. Please see Response to Comment Letter I49 for more discussion. No further response is provided.
- I63-4** This comment is the same comment as Response to Comment I49-5. Please see Response to Comment Letter I49 for more discussion. No further response is provided.
- I63-5** This comment is the same comment as Response to Comment I49-6. Please see Response to Comment Letter I49 for more discussion. No further response is provided.
- I63-6** This comment is the same comment as Response to Comment I49-7. Please see Response to Comment Letter I49 for more discussion. No further response is provided.
- I63-7** This comment is the same comment as Response to Comment I49-8. Please see Response to Comment Letter I49 for more discussion. No further response is provided.
- I63-8** This comment is the same comment as Response to Comment I49-9. Please see Response to Comment Letter I49 for more discussion. No further response is provided.

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Comment Letter I64

September 30, 2021

To: Vincent Gonzales, Sierra Madre Development Services Department

Fr: Caroline Brown, President, Sierra Madre Mountain Conservancy;
Albert Metzger, Vice-president; Kevin Moore, Secretary; Scott Hood, Treasurer; Board
Members Marcia Bent, Lynne Collmann, Marguerite Shuster; Sharon Pevsner;
David Williams

Re: Draft EIR for The Meadows at Bailey Canyon—Open Space Donation Earlier Misidentified

We need to point out that in the public meetings there was a map outlining an area of hillside for Open Space donation to the City of Sierra Madre that included portions of Open Space that was already part of the city Open Space. This appears to still be on the supporter website.

Figure 1-2, page 5 the hillside parcel called out for donation in the Meadows Specific Plan, included an area that is a portion of an Open Space parcel already owned by the city: APN 5761-001-900. The project map shows a 20-acre portion as a donation of city owned open space which is not the Monasteries to donate.

In the Draft EIR, Figure 3-4, Proposed Open Space Dedicated area, there is a different plot outlined which appears to have corrected this. The total donation proposed would have to be updated. It is unclear what acreage is being considered for donation.

As per our 1980 Articles of Incorporation, we are a non-profit 510 (c) (3). In cooperation with the City of Sierra Madre, land that we acquire through donation or Open Space funding purchase (Proposition A) is given to the City of Sierra Madre while we hold the conservation easements in strict accordance with the Conservation Easement document for each APN.

In 2002 the City granted the Conservancy a Conservation Easement to the Bailey Canyon Wilderness Park land acquired by the City in 1967. It is required of the Sierra Madre Mountain Conservancy, as per our Articles of Incorporation and our 501 (c) (3) that we complete a yearly survey to see that the land is being conserved per the language of the conservation easements.



One of two other parcels that the Meadows at Bailey Canyon is proposing to donate to the City is in unincorporated Los Angeles County not in Sierra Madre's Corporate Boundary. We believe that to maintain conservation easement control over Open Space in another jurisdiction would not be in the best interest of the city or the Conservancy. In the past Conservancies have lost their non-profit status if they were unable to maintain the status of the easements they were bound to control.

The Santa Monica Mountains Conservancy owns APN 5862-015-903, 40 acres acquired in 2002, adjacent to the Sierra Madre Historical Wilderness area. As a state agency, they would be in a better position to acquire the parcel discussed in the preceding paragraph outside the City of Sierra Madre Corporate Boundary for Open Space protection.

Additionally, there is a proposed lot line redrawn above the Monastery Retreat house which would place acreage now in APN 5761-002-008 into the open space donation. This would place an unknown acreage into their open space donation. To identify it for purposes of stewardship of the conservation easement would be very difficult. We believe this acreage should remain as part of the remaining parcel that includes the Retreat House, meditation gardens and other structures (caretakers housing, etc.).



I64-2
Cont.

Response to Comment Letter I64

Individual

Caroline Brown, President, Sierra Madre Mountain Conservancy

Albert Metzger, Vice-President

Kevin Moore, Secretary

Scott Hood, Treasurer

Board Members Marcia Bent,

Lynne Collmann,

Marguerite Shuster,

Sharon Pevsner, and

David Williams

September 30, 2021

I64-1 This comment states the proposed open space conservation easement spans a portion of already City-owned open space (APN 5761-001-900), approximately 20-acre in size. Please see Response to Comment I42-14.

The comment cites Figure 1-2 of the Specific Plan and states Figure 3-4, Proposed Open Space Conservation Easement Area, of the Draft EIR appears to be different from the Specific Plan. As described in Draft EIR Chapter 3, Project Description, the project proposes approximately 35 acres of open space hillside land to be preserved. Conveyance of the open space hillside land to the City would be effectuated through execution of a development agreement between the City and the project applicant/landowner. It should be noted that Figure 1-2, Vicinity Map, from the Specific Plan has been revised for clarification, in order to show the most recent boundaries of the proposed 35-acre open space hillside conservation easement area.

I64-2 This comment describes how the Sierra Madre Mountain Conservancy acquires and holds lands in the vicinity of the project site. This comment is not related to the adequacy of the Draft EIR's environmental analysis. However, the comment states the project includes proposed land dedications outside of the City of Sierra Madre boundaries. Please see Responses to Comment I42-13 through I42-17. No further response is provided.

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Comment Letter I65

From: Susan Neuhausen <neuhausen.susan@gmail.com>
Sent: Sunday, October 3, 2021 4:41 PM
To: Vincent Gonzalez
Cc: Barbara Vellturo; Alexander Arrieta
Subject: DEIR for the "Meadows at Bailey Canyon"
Attachments: DEIR neighborhood_SLN.docx; DEIR Water comment_SLN.docx; DEIR traffic comments_SLN.docx; DEIR_Fire danger_SLN.docx; DEIR environmental impact_SLN.docx

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

October 3, 2021

Dear Vincent:

Thank you for the opportunity to comment on the DEIR for the "Meadows at Bailey Canyon." Below are my comments and questions on environmental impact. Please retain a copy for the administrative record.

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

Please see the attached five separate documents on my concerns related to:

- Fire
- Traffic
- Environmental Impact
- Water
- Neighborhood consistency

Sincerely,
Susan Neuhausen
491 Grove St
neuhausen.susan@gmail.com

I
I65-1
I

Date: October 3, 2021

To: Vincent Gonzalez

From: Susan Neuhausen
491 Grove St
Neuhausen.susan@gmail.com

Re: DEIR for the "Meadows at Bailey Canyon"

Thank you for the opportunity to comment on the DEIR for the "Meadows at Bailey Canyon." Below are my comments and questions on how this project deviates from the General Plan. Please retain a copy for the administrative record.

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

I object to the proposed housing development. It is inconsistent with the Policies and Values of our General Plan.

First, this project does nothing to address the affordable housing needs of the community. If these 42 houses were on the market now, they would likely sell for between \$2M to \$4M. By the time they are completed in 2025, it will be much more. Given that Sierra Madre is mandated to build affordable housing, please comment on why this project is acceptable when it does not address the needs of the community.

Objectives of the General Plan, as stated in Chapter 17.20 (One-Family Residential Zone), include: "A) to encourage development that preserves the small town, mountainous flavor of this closely-knit foothill community; C) To encourage architectural diversity while maintaining architectural accord with the character of the existing neighborhood; and G) To encourage appropriate scale and size of new construction and reconstruction that is compatible with the existing neighborhood and surroundings.

The Meadows at Bailey Canyon does not meet the criteria of A, C, or G. In regard to A, this will be the first subdivision in the city where all the houses are built by a single developer with a limited set of plans and larger houses on smaller lots, the end result being cookie-cutter rather than eclectic like the rest of Sierra Madre. A subdivision of \$2M+ tract houses is not maintaining the architectural variety or small-town spirit of Sierra Madre.

In regard to C, the character of the existing neighborhood is such that more than 90% are single-story homes and, at most, two houses near each other are of similar design. The developers for the proposed project have avoided answering the question of how many houses will be single story and how many will be two stories, and in fact, have only presented a minimum number of floor plans and all were for two-story houses. This suggests that the vast majority, if not all, will be two-story houses.

In regard to G, all the homes in the area adjoining the proposed project are under the maximum allowable gross floor area under Section 17.20.125. For the Meadows at Bailey Canyon, we do not know the sizes of the lots other than that they range from 7800 square feet to 9500, which affects the size of the house that can be built. Under residential zoning, the maximum size of a house on a 7800-square foot lot including the garage cannot be more than 2574 square feet (33%), yet the developer is proposing that their minimum house is 2900 square feet (including the garage), which covers 37% of the lot; this is not allowable under the General Plan. The largest house plan of 4250 plus 200 square foot garage = 4450 square feet, which would require a lot size of 13,000 square feet -- significantly larger than they have proposed.

I65-2

I65-3

I65-4

Because this project is being proposed under the Specific Plan rather than needing to be zoned residential, the Specific Plan supersedes any provisions of the General Plan that all other residents need to abide by.

Please answer the following:

1. Given that the project is proposed under the Specific Plan, what guarantees are there that they will not change additional items/sizes/scope, etc. after approval?
2. What prevents them from developing additional acreage moving forward?
3. If the objective of the Sierra Madre General Plan is to preserve the look and feel of Sierra Madre, why is this project proposal being considered for approval under a Specific Plan, which allows for the developer to not abide by requirements that all other residents of our community follow.

I
165-5
I

Date: October 3, 2021

To: Vincent Gonzalez

From: Susan Neuhausen
 491 Grove St
 Neuhausen.susan@gmail.com

Re: DEIR for the “Meadows at Bailey Canyon”
 Traffic and safety

Thank you for the opportunity to comment on the DEIR for the “Meadows at Bailey Canyon.” Below are my comments and questions on traffic and safety. Please retain a copy for the administrative record.

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

I object to the proposed housing development. It is inconsistent with the Policies and Values of our General Plan. I am concerned about the traffic and safety impact.

The project DEIR states that there will be access at Sunnyside and Carter Streets, as there need to be two egress points. However, the egress at Carter does not meet the standards of the City Plan, which stipulates that the road needs to be 30’ wide. Carter is currently an asphalt road that is 20’ wide at the entrance to the proposed project and a maximum of 24’ wide from residential property lines to the Bailey Canyon fence.

1. The Fehr and Peers Traffic forecast used the SCAG model, which included fewer car trips because of Covid, not reflecting that things likely will be back to normal by 2025 when this project is completed. The expectation is that with the project, there will be an additional 400 car trips per day, which does not include workers, deliveries, etc. This also is based on 42 houses and does not account for ADUs, which could add an additional 400 trips per day. How is the width of Carter suitable for 2-way traffic of this magnitude and what are the plans to deal with this issue?
2. In addition to the vehicular traffic, pedestrians/bicyclists/hikers use Carter all the time from Grove to Carter. This is a major concern for safety of pedestrians and bikers, and particularly at dawn and dusk when visibility is reduced and the vehicular traffic is likely to be highest. What are the plans to ensure their safety with this additional traffic?
3. In the event of a fire, fire engines would be on Carter and, given the width of the engines, there would not be room for cars to exit onto Carter. How would residents be able to evacuate in a timely manner? The Paradise Fire resulted in deaths because people could not get out in time.
4. On weekends, there are already an enormous number of cars lining nearby streets as well as pedestrians going back and forth to Bailey Canyon. In fact, Grove Steet basically becomes a one-lane road with cars parked on both sides. The addition of a park in the proposed project will only create more pedestrians. and cars given how little parking is proposed. What is the plan to manage parking?
5. During construction, there will be heavy construction equipment, cement mixers, asphalt trucks, semi-trucks with supplies (i.e., lumber, pipes, windows, flooring) – all these trucks and equipment being heavier than usual vehicular traffic. What is the plan for damage and repair of roads caused by heavy loads and oversized vehicles?

165-6

165-7

165-8

165-9

165-10

165-11

165-12

Date: October 3, 2021

To: Vincent Gonzalez

From: Susan Neuhausen
 491 Grove St
 Neuhausen.susan@gmail.com

Re: DEIR for the “Meadows at Bailey Canyon”

Thank you for the opportunity to comment on the DEIR for the “Meadows at Bailey Canyon.” Below are my comments and questions on environmental impact. Please retain a copy for the administrative record.

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

I object to the proposed housing development. It is inconsistent with the Policies and Values of our General Plan. I am concerned about the environmental impact for the following reasons:

1. Noise and vibrations during construction. In the DEIR, Section *Impact H-1: Would the project generate substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?* **Answer: Significant unavoidable.**

In Section *Impact H-2: Would the project generate excessive groundborne vibration or groundborne noise levels?* **ANSWER: Significant unavoidable**

In their response to H-1, they only describe trying to mitigate the noise of vehicles. For all of us who live near the construction site, the sound of vehicles is only one noise. The noise of the laying down of the infrastructure, the building of the new roads, and the construction of 42 homes will be incessant. As to excessive groundborne vibration, this could very likely impact the integrity of our own homes and the soil surrounding our homes. Many of us work from home, have small children, and have animals who are frightened by loud noises. In addition, this will be totally disruptive to the bears, deer, coyotes, bobcats, birds, and other wildlife that live in the area—not to mention humans. They state that the noise level will be significant and unavoidable. The current residents live in Sierra Madre because in large part because it is so quiet and peaceful. This DEIR is basically telling the residents near the construction zone that the project will be under construction for many years – and tough luck. This noise level and vibration levels, which will go on over many years, are unacceptable to those of us who live near the proposed project.

How can you approve a project with UNACCEPTABLE environmental impacts?

2. Destruction of 101 trees including protected species of oak and trees over 100 years old. Trees are invaluable for helping to scrub carbon monoxide from the air and thus would help mitigate the 400 plus additional cars every day from the project. The larger the trees the better; and the existing trees have mature canopies. As part of the Forest Management Plan, the project can plant small trees, but that does nothing to mitigate the destruction of the canopy. The new trees will take many decades to achieve the same size, and not to mention a lot of water which is in short supply. The proposed plan is inconsistent with the City of Sierra Madre General Plan to preserve the essence of Sierra Madre.

How is it acceptable to increase the pollution in the area due to construction and to additional vehicular traffic and housing-related pollution yet allow the destruction of mature trees that aid in mitigation of air pollution?

165-13

165-14

165-15

165-16

3. Loss of habitat to native animal and bird species. Currently deer, coyote, rabbits, and countless other species live on the grounds of the proposed project, and bears and bobcats regularly traverse the area. This project represents a severe loss of their habitat. Already with the drought, rabbits, ground squirrels, voles, and rats have moved from Bailey Canyon and the monastery grounds into the adjacent neighborhoods, destroying vegetation including vegetable gardens. With the construction, it will only get worse. The obvious effect of this project will be a lessening of the quality of life for current residents of Sierra Madre who live near the proposed project.

How is the loss of habitat being addressed?

I
|
165-17
|
I

Date: October 3, 2021

To: Vincent Gonzalez

From: Susan Neuhausen
491 Grove St
Neuhausen.susan@gmail.com

Re: DEIR for the "Meadows at Bailey Canyon"
Net-zero water use

Thank you for the opportunity to comment on the DEIR for the "Meadows at Bailey Canyon." Below are my comments and questions on net-zero water use. Please retain a copy for the administrative record.

165-18

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

I object to the proposed housing development. The net-zero water usage is not accounting for future availability of water and is not accounting for the potential of at least 42 additional housing units through the addition of ADUs.

165-19

The plan states that the developer will pay the cost for water now for the next 50 years. Considering that climate change has changed the rainfall patterns and Southern California and all of California and the west are already in a severe drought, please explain:

1. How do the calculations for water use change with the addition of up to 42 ADUs and with addition of swimming pools and other water features?
2. Under section Impact B2, the DEIR requires contractors to: "Water all active construction areas at least three times daily, or as often as needed to control dust emissions. Watering should be sufficient to prevent airborne dust from leaving the site. Increased watering frequency may be necessary whenever wind speeds exceed 15 miles per hour." Who is paying for and supplying water during construction?
3. What assurances can you provide that sufficient water will be available to meet the needs in the future given that there is a sustained drought such that the aquifers may not be refilled and sources of water to buy may not be available (i.e., Colorado River water)?
4. The plan pays in advance for water for 50 years. Houses last much longer than 50 years so what happens after 50 years? Will the project be deserted?
5. The water and sewer infrastructure in Sierra Madre is already in bad shape with issues with water pressure, leaking water pipes under the streets, water quality, and antiquated sewer system. What is the City's plan to deal with the added infrastructure burden of a minimum of 42 houses with the ability to have 42 additional ADUs?

165-20

165-21

Date: October 3, 2021

To: Vincent Gonzalez

From: Susan Neuhausen
491 Grove St
Neuhausen.susan@gmail.com

Re: DEIR for the "Meadows at Bailey Canyon"

Thank you for the opportunity to comment on the DEIR for the "Meadows at Bailey Canyon." Below are my comments and questions on Fire Danger. Please retain a copy for the administrative record.

165-22

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

I object to the proposed housing development. It is inconsistent with the Policies and Values of our General Plan. I am concerned about fire danger.

The proposed project is in an area designated as the HIGHEST fire danger rating. In the Sierra Madre General Plan, Objective Hz7, it states: "Avoid expanding development into undeveloped areas in Very High Fire Severity Zones." The proposed project is to develop in a Very High Fire Severity Zone. This project is in direct conflict with the Sierra Madre General Plan.

165-23

1. How can Sierra Madre officials even consider this proposal when it is in direct conflict with the city's own General Plan?
2. Across the state, developments in areas such as these are being denied because of this danger. Shouldn't Sierra Madre follow the lead of other local and state governments? If not, why not?
3. This development adds 42 houses plus the potential for as many ADUs to the neighborhood. It increases the fire hazard to all of Sierra Madre and particularly to those of us living north of Grandview adjacent to Bailey Canyon. The proposed homes already will be above the lot coverage maximums in the City of Sierra Madre Building Codes for residential housing, and with the addition of ADUs, the density will be even higher. What is the justification for increasing risk of fire for the adjacent neighborhoods?
4. The exit for the proposed project is through Sunnyside and Carter. Carter is a narrow street and has size constraints due to Bailey Canyon to the north and residences to the south. In the event of a fire, with fire engines coming and going, exiting onto Carter will not be viable. That leaves only one exit which then endangers the lives of the residents in the subdivision. Is there a plan to mitigate this situation?

165-24

165-25

165-26

Response to Comment Letter I65

Individual
Susan Neuhausen
October 3, 2021

- I65-1** The comment expresses general concerns about impacts relating to fire, traffic, water, and neighborhood consistency. The specific concerns of these five topics are attached as five attachments and have been addressed below.
- I65-2** The comment is a part of Attachment 1 of the Comment Letter I65. The comment expresses general opposition to the project and expresses concern related to inconsistencies with the City's General Plan. The commenter will be notified when the Final EIR is complete and available to the public. Regarding inconsistencies with the City's General Plan, please refer to Global Response GR-7.
- I65-3** The comment is a part of Attachment 1 of the Comment Letter I65. The comment expresses concern about affordable housing. While the project does not propose affordable housing units, one of the objectives of the project is to provide above-moderate income housing, in accordance with the City's 6th Cycle Regional Housing Needs Assessment (RHNA) (see Draft EIR Section 3.2, Project Objectives). The project would contribute to state-mandated RHNA housing goals and would be consistent with regional efforts to boost housing growth and meet regional housing needs, per Draft EIR Section 4.14.5, Impact Analysis, in Section 4.14, Population and Housing.
- I65-4** The comment is a part of Attachment 1 of the Comment Letter I65. The comment states that the project does not comply with the City's General Plan Chapter 17.20 objectives A, C, and G. It is assumed that the comment is referencing the SMMC Chapter 17.20 – R-1 One-Family Residential Zone. Under the proposed project, the project site would not be zoned as R-1 One-Family Residential Zone. Therefore, the section of the SMMC referenced by the comment would not apply to the proposed project. According to Draft EIR Section 3.4, Discretionary Actions, the approval of the project would require amendments to the City of Sierra Madre General Plan to change the land use designation for the project site from Institutional to Specific Plan and amendments to the Zoning Code to change the zoning designation for the project site from Institutional to Specific Plan. Therefore, the project would comply with all land use and zoning regulations. Regarding the comment's concerns as to how many homes would be one or two stories and the size of each home, please refer to Responses I4-7 through I4-9.
- I65-5** This comment is part of Attachment 1 of the Comment Letter I65. The comment is concerned that rezoning to Specific Plan would allow the project to supersede provisions of the General Plan. Specific concerns include whether the project would change additional items/sizes/scope after approval, developing additional acreage, and why the project is being considered only under a specific plan rather than under the general plan. As discussed in the Specific Plan, a specific plan was prepared to guide future development of the proposed project in order to create an orderly and compatibly development at the proposed project site, designed and constructed consistent in vision and guiding principles, in order to achieve a project that is consistent with the City in quality and character and look and feel. When a specific plan is adopted in accordance with the Sierra Madre Municipal Code (SMMC), the specific plan may effectively supersede portions or all of the current zoning regulations for specified parcels or plan area, and becomes an independent set of zoning regulations that provide specific direction to the type and intensity of uses permitted, and may define other types of design and

permitting criteria. The proposed Specific Plan is adopted by ordinance and serves as the primary zoning document for the project site. The Specific Plan supersedes any conflict with the Sierra Madre zoning regulations. Therefore, upon approval of the proposed project, the Specific Plan would be consistent with the SMMC. Please refer to Global Response GR-7.

- I65-6** This comment is part of Attachment 2 of the Comment Letter I65. The comment expresses general opposition to the project and general concerns related to General Plan consistency and traffic and safety which are addressed in Draft EIR Sections 4.11, Land Use and Planning, and 4.17, Transportation, respectively. Please refer to Global Response GR-7 for further discussion related to General Plan consistency. The commenter will be notified when the Final EIR is complete and available to the public.
- I65-7** This comment is part of Attachment 2 of the Comment Letter I65. The comment states that the Carter Avenue egress/ingress is 20' wide and therefore does not meet the 30' wide road requirement as mandated by the City. Please refer to Global Response GR-5. the project applicant is proposing off-site widening to Carter Avenue, between the southeastern portion of the project site boundary and Lima Street, which would ensure that Carter Avenue would comply with existing code within and outside of the project site (see Final EIR Section 3.3.12 and Global Response GR-5 for details).
- I65-8** This comment is part of Attachment 2 of the Comment Letter I65. The comment expresses concern that the number of car trips associated with the project would be higher than accounted for in the report prepared by Fehr & Peers as the report does not account for COVID-related conditions going back to normal, workers, deliveries, and accessory dwelling units (ADUs). Please refer to Global Response GR- 6. In addition, per the report prepared by Fehr & Peers, the SCAG model used for the analysis predicts 2040 travel conditions in consideration of land development and transportation changes. It also includes a work-from-home assumption to reflect anticipated changes in how people travel. The results of these assumptions lead to a conclusion that traffic levels will slightly decrease in the study area by 2040. To be conservative, the Fehr & Peers report assumed that the 2025 conditions will not decrease in comparison to existing (pre-COVID) conditions.
- I65-9** This comment is part of Attachment 2 of the Comment Letter I65. The comment raises concerns regarding pedestrian and bicyclists' safety on Carter Avenue due to the increased traffic from the proposed project. Please refer to Global Response GR-5.
- I65-10** This comment is part of Attachment 2 of the Comment Letter I65. The comment raises concerns regarding an efficient evacuation in the event of a fire and the project's egress/ingress design. Please refer to Global Response GR-4.
- I65-11** This comment is part of Attachment 2 of the Comment Letter I65. The comment provides information concerning parking and does not raise an issue related to the adequacy of the analysis provided in the Draft EIR. As discussed in Draft EIR Section 3.3, Project Description, North Sunnyside Avenue would include parking on both sides while Carter Avenue would include parking on the west side of the street. Streets A, B, and C would also include parking on the south side of the streets. In addition, each residence would have a parking garage and driveway parking. Lastly, the proposed park would include a parking lot in the southeastern corner.

- I65-12** This comment is part of Attachment 2 of the Comment Letter I65. The comment raises concerns in regard to physical impacts on roads from construction equipment of the proposed project, specifically heavy loads and oversized vehicles. Caltrans has the authority to issue a special use permit that allows the use and transportation of vehicle(s) or loads that exceed the California Vehicle Code maximum limitations (Caltrans 2021). As such, the proposed project has been permitted by Caltrans to transport heavy construction materials and equipment to and from the project site (see Draft EIR Section 3.5, Responsible Agencies).
- I65-13** This comment is part of Attachment 3 of the Comment Letter I65. The comment provides general remarks and general opposition to the project as well as general concerns related to General Plan consistency. Please refer to Global Response GR-7.
- I65-14** This comment is part of Attachment 3 of the Comment Letter I65. The comment asks why the project would be approved when some noise impacts, including impacts to ambient noise levels and groundborne vibration, would be significant and unavoidable. There are no significant and unavoidable noise impacts as a result of the proposed project. According to Draft EIR Section 4.13, Noise, there would be potentially significant impacts regarding construction noise (Impact NOI-1) and residential HVAC operation noise (Impact NOI-2). Impacts NOI-1 and NOI-2 would be reduced to a level below significant with the implementation of mitigation measures MM-NOI-1 and MM-NOI-2, respectively.
- I65-15** This comment is part of Attachment 3 of the Comment Letter I65. The comment raises concerns about the removal of 101 trees to build the proposed project, and the project's inconsistency with the City's General Plan as a result of the tree removal. Please refer to Global Response GR-2.
- I65-16** This comment is part of Attachment 3 of the Comment Letter I65. The comment raises concerns about increases in pollution as a result of construction, increased vehicular trips, and housing-related emissions, in addition to the removal of mature trees that help to mitigate air pollution. Regarding tree removal, please refer to Global Response GR-2. According to Draft EIR Section 4.3, Air Quality, with implementation of MM-AQ-1, impacts associated with air quality would be less than significant.
- I65-17** This comment is part of Attachment 3 of the Comment Letter I65. The comment is concerned about the loss of habitat associated with the construction of the proposed project. According to Draft EIR Section 4.4, Biological Resources, the project site consists of ornamental, non-native grassland, and paved roadways. As discussed previously, the project site does not support any native vegetation communities and the area appears to be regularly maintained, which limits the potential for many native plant species. No sensitive communities or riparian habitat occur on the project site (Appendix C1 of the Draft EIR) and the project would not impact these habitats. The loss of non-native grassland on the project site would not be significant impact either locally or regionally. Mountain lion may move through the project site, but it is not expected to have natal dens there or in the vicinity due to the existing development and human activity. Furthermore, the project site is not within any designated critical habitat. The project site does have ornamental trees and shrubs that could provide nesting habitat for common birds protected under the MBTA (16 USC Sections 703–712) and California Fish and Game Code Sections 3503, 3503.5, and 3513. However, implementation of MM-BIO-1, Nesting Bird Avoidance, would reduce impacts to nesting birds.
- I65-18** This comment is part of Attachment 4 of the Comment Letter I65. The comment is an introduction to comments that follow, related to the project's net-zero water impact. The commenter will be notified when the Final EIR is complete and available to the public.

- I65-19** This comment is part of Attachment 4 of the Comment Letter I65. The comment opposes the housing development and indicates that the net-zero water usage does not account for the future availability of water, particularly with the addition of ADUs. Please refer Global Response GR-1. Regarding concerns about ADUs, refer to response I28-5.
- I65-20** This comment is part of Attachment 4 of the Comment Letter I65. The comment raises concerns regarding water usage calculations, water usage during construction, if there would be sufficient water available, and long-term water needs (beyond 50 years). Please refer to GR-1.
- I65-21** This comment is part of Attachment 4 of the Comment Letter I65. The comment raises concerns about the current sewer and water infrastructure and its ability to support the proposed project. Draft EIR Section 4.19 analyzed the project's potential impacts to utilities, with a few clarifying changes made in the Final EIR Section 4.19. The project would involve the replacement and improvement of underground utility lines within the proposed project site. More specifically, the project would result in replacement of an existing 8-inch diameter water main in the eastern portion of the project site with a 12-inch diameter main within Carter Avenue. An existing 8-inch diameter sewer line in the southwest corner of the project site would also be replaced by new sewer system as shown in Figure 3-9, Proposed Wastewater System, in Chapter 3 of the Draft EIR. Therefore, the Draft EIR concluded that impacts to existing utility infrastructure would be less than significant. Furthermore, the project's proposed Development Agreement, as described in Draft EIR Section 3.3.11, would ensure applicable development fees are paid to provide water and sewer service. These fees may include a water impact fee, consistent with General Plan Policy L8.3. As such, the Draft EIR adequately addressed potential impacts as required by CEQA.
- I65-22** This comment is part of Attachment 5 of the Comment Letter I65. The comment provides general remarks and general opposition to the project and concerns related to General Plan consistency and fire danger which have been addressed in Draft EIR Sections 4.11, Land Use and Planning, and 4.20, Wildfire, respectively. Please also refer to Global Response GR-3 and Global Response GR-7. The commenter will be notified when the Final EIR is complete and available to the public.
- I65-23** This comment is part of Attachment 5 of the Comment Letter I65. The comment states that the proposed project is not compliant with Objective Hz7 of the Draft Safety Element (now the adopted Hazard Prevention Element) of the General Plan because it proposes housing developments in a Very High Fire Hazard Severity Zone. Please refer to Global Response GR-3, in regard to the Hazard Prevention Element.
- I65-24** This comment is part of Attachment 5 of the Comment Letter I65. The comment expresses concern related to General Plan consistency and danger (it is unclear what type of danger the commenter is referring to). Regarding General Plan consistency, please refer to Global Response GR-7.
- I65-25** This comment is part of Attachment 5 of the Comment Letter I65. The comment states that the proposed project would put proposed project residents and adjacent neighborhoods at increased fire risk. As discussed in Draft EIR Section 4.20, through compliance with existing regulations and implementation of PDF-WF-1, which requires compliance with the FPP (see Draft EIR Section 4.20.4, Project Design Features), the proposed project would not result in significant impacts to wildfire. Please refer to Global Response GR-3 in regard to how conversion of wildland to structures would impact the adjacent neighborhoods.
- I65-26** This comment is part of Attachment 5 of the Comment Letter I65. The comment raises concerns about adequate emergency egress/ingress from Sunnyside Avenue and Carter Avenue, in the event of a fire. Please refer to Global Response GR-4 and Global Response GR-5.

Comment Letter I66

From: Lorna Brosio [mailto:lornacatb@gmail.com]
Sent: Monday, October 4, 2021 5:50 PM
To: Vincent Gonzalez <vgonzalez@cityofsierramadre.com>
Subject: DEIR

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

From: Lorna Brosio
50 Esperanza Ave unit F
Sierra Madre, CA 91024
email Lornacatb@gmail.com

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

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

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

I object to the proposed housing development. It is inconsistent with the Policies and Values of our General Plan. I am especially concerned with the following items that all parties should likewise be concerned:

- 1. Large houses on small lots, concrete walls between each. Not SM character and not consistent with the neighborhood. No Information on the number of lots or houses of each size, no plans or elevations shown.
2. Fire hazard and contrary to the City's new policy in the SM Safety Element (proposed but not yet adopted) to avoid developing in High Fire Hazard Safety Zone.
3. Traffic on Carter - No study in DEIR of serious pedestrian safety issue. SM Ordinance requires 30 ft width for Streets.
4. Water - will give the City \$\$ for all the water 42 houses will use in 50 years - (at today's price and with no guarantee that water will ever be available.)
5. Trees - 101 mature trees will be removed, including 10 protected Oaks. The Oaks will be replaced with smaller Oaks and other small trees (requiring a great deal of water to become established) SM has a Forest Management Plan with a mission to preserve "Canopies" for their environmental and aesthetic benefit. 101 large canopied trees will be destroyed.

I66-1
I66-2
I66-3
I66-4
I66-5
I66-6

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Response to Comment Letter I66

Individual
Lorna Brosio
October 4, 2021

- I66-1** This comment requests the following comments (Comments I66-2 through I66-6) be included in the responses to comments of the Final EIR. As shown, the commenter's request has been recorded as part of this Final EIR.
- I66-2** The comment is concerned with the project's consistency with the policies and values of the City's General Plan. Please refer to Global Response GR-7.
- I66-3** The comment notes the project site's location within a fire hazard zone and states the proposed development would conflict with proposed Draft Safety Element Update's (now the adopted Hazard Prevention Element) policies. Please refer to Global Response GR-3.
- I66-4** The comment is concerned with pedestrian safety and traffic safety on Carter Avenue. Please refer to Global Response GR-5.
- I66-5** The comment questions the feasibility of the proposed net-zero water agreement. Please refer to Global Response GR-1, for a response addressing concerns on water supplies and the project's net-zero water use.
- I66-6** The comment notes the proposed removal of existing trees on site and the proposed landscape plan, which raises concern for water supplies and consistency with the City's Forest Management Plan. For discussion on water supplies, please see Global Response GR-1.

With regard to the City's Forest Management Plan and goal of tree canopy preservation, please refer to Global Response GR-2.

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Comment Letter I67

From: Teri Vessella [mailto:teri.vessella@yahoo.com]
Sent: Monday, October 4, 2021 5:22 PM
To: Vincent Gonzalez <vgonzalez@cityofsierramadre.com>
Subject: EIR on the project at the top of Sunnyside

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

Mr. Gonzalez,

I am appalled at the DEIR for this housing project. The report does not do justice to the impact the project will do to animal habitats. Just this weekend a family of bears were sleeping peacefully in a tree across the street from me. There is no way the bear, deer, and other animals will feel safe in our community.

167-1

Additionally, the report glosses over the increase in traffic and how it will affect the city. Would you want 700-800 more trips by your house every day????? I know the answer to that and you would not. The traffic will affect the street paving and ruin the community.

167-2

This report was CLEARLY skewed in favor of the development despite it being a "unbiased" group. Sierra Madre residents do not believe they were an independent group, and I, personally, am offended that the city would think I was naive enough to accept this report.

City Council-DO BETTER!

You know the residents are not in favor of this. Do not change zoning laws.

167-3

Sincerely,

Teri Vessella
Sunnyside Resident

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Response to Comment Letter I67

Individual
Teri Vessella
October 4, 2021

- I67-1** The comment expresses general opposition to the proposed project and is concerned with potential impacts to wildlife. As discussed in Draft EIR Section 4.4, Biological Resources, no wildlife corridor connection or habitat linkage to other large undeveloped areas to the south of the project site currently exist. Wildlife, such as black bear (*Ursus americanus*) and mountain lion, entering the existing residential areas would be at a higher risk of negative interactions with humans. However, the project site lacks suitable habitat, contains no water resources for suitable habitats, and is currently disturbed with compact soils. Given that the project site does not support natal bear or mountain lion dens and it is not a part of an existing wildlife corridor, impacts relating to bear and mountain lion interactions would not occur.
- I67-2** The comment is concerned with the proposed project's potential to result in traffic congestion. Please refer to Global Response GR-6.
- I67-3** This comment is generally concerned with the objectivity of the Draft EIR, however it does not identify any specific concerns or issues with the environmental analyses contained in the Draft EIR. The Draft EIR was prepared in accordance with CEQA (Public Resources Code, Section 21000 et seq.), the CEQA Guidelines (14 CCR Section 15000 et seq.), and the City's environmental review procedures. The City of Sierra Madre is the lead agency for the EIR and processing of the project. The Draft EIR provides decision makers, public agencies, and the public with detailed information about the potential for significant adverse environmental impacts to occur as a result of the proposed project. Prior to approving the proposed project, the City Council must certify that the Draft EIR is objective, complete, and consistent with CEQA's mandates. Responsible agencies (agencies other than the City of Sierra Madre) may also rely on the analysis of the EIR permits required for the project. The commenter's opposition will be noted for the decision makers to consider in their review of the Final EIR.

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Comment Letter I68

From: Nancy Beckham <nbeckham48@gmail.com>
Sent: Monday, October 4, 2021 3:14 PM
To: Jose Reynoso; Vincent Gonzalez
Subject: Responses to the DEIR
Attachments: Tree article for DEIR.docx; An Accident Waiting to Happen 2.docx

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

Attached is the update on my tree removal article and an Accident Waiting to Happen. both were put in the Mt View News.

I I68-1

Could you kill this tree?

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

This tree, 'an additional nine more Coastal Oak trees, a "supposedly protected tree" in Sierra Madre, and another 91 additional trees are slated to be "bulldozed or removed. Of the total 101 trees awaiting the same death 10 are Morton Bay figs, 64 jacaranda trees, 34 Chinese Elm trees, and assorted other varieties . It might be possible to save an additional 64 mature trees, but not all the trees on the list for removal are worth the expense of boxing to replant. However, a complete removal of all these trees to simply please the developer is also not the answer. But how could Coastal Oaks, a protected tree be protected everywhere else in Sierra Madre except at the monastery. How can the town have a Forest Management Plan that especially calls out for the saving of mature trees while

This Mission statement is as follows:

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

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

Using this mission to create and perpetuate this community forest how in the world can the bulldozing of 101 trees co-exist with the overall mission statement. Although Urban West can mitigate the destruction of 101 trees by planting smaller trees, the destruction of mature trees and those canopies cannot be mitigated.

I68-2

However, this is one area that absolutely does not align with the general plan. We do not kill trees in Sierra Madre.

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

Nancy Beckham

↑ I68-2
| Cont.

| I68-3

An Accident Waiting to Happen!

The Safety Element of the General Plan, that includes the Housing Element, Safety Element and Circulation or HZ 2.12 which states all residential developments in hazard areas shall have at least two emergency evacuations routes (ie.points of ingress and egress) is specifically important when discussing Carter as an Ingress and an egress.

To enter the Bailey Canyon parking lot to go hiking or to have a picnic .one must travel to West Carter Street between Lima Street and the gate that leads to the Monastery property called Mater Delorosa .The street functions as the entrance to the Bailey Canyon parking lot, or accesses upper Grove, a lane like street that accepts additional parking when the Bailey Canyon parking lot is full. West Carter also allows the Los Angeles Metropolitan Water District to access their debris basin gate just beyond their chain link gate. The Sierra Madre Fire Department can also use the debris basin gate to get their equipment inside the property and up the hill in case of fire. However, Carter is a 25 foot road that is in terrible repair that exists without curbs, no sidewalks, and either side of the paved 20 foot road there is dirt only. The roughly 2 .5 feet per side of dirt totals up to the 25' road width on West Carter. The chain link fence on the north side surrounds Bailey Canyon so the park can be locked up at night. On the south side of the street are wooden fences that were built by the property owners that surround their homes. There is no extra land to widen the street, the county is not interested in cooperating to sell land for this project, and it was never necessary prior because the street existed to just help cars access Bailey Canyon, or the opening the gate to gain access to the debris basin road.

This road is now slated to be both an egress and ingress by Urban West, the developer for The Meadows at Bailey Canyon Housing Development. (The other street slated to function as an egress and an ingress is Sunnyside.)The developer's plan is to build a two lane road for traffic traveling in and out of the housing development, 44-46 feet in width, and simply open the existing gate to the monastery property and just dump anywhere from 300-500 cars daily on this very narrow stretch of road. (total cars trips are thought to be around 800 cars daily.)For a street that was designed for about 100 cars a week, this is an accident waiting to happen. How drivers will negotiate from a road 46 wide at the top of the hill tapering to 44 ' in width as they descend on a slope, add a left turn and arrive at a now open gate and continue immediately on a road that measures

I68-4

20 feet in width. -- is a magic trick I would like to see. How are you going to mitigate this situation? Please explain in detail! I can just envision the first head on collision when someone (a teenager, a tired dad, a distracted mom or any driver not paying extreme attention is killed. How can you ask a two lane road to magically shrink to 20 feet in width, but is still to be used for two way traffic? The road was never designed i to function carrying this incresedamount of traffic let alone go from a two lane road to realistically a one lanetwo feet wide road.This raod was never designed to be use in this manner. Why asr youm asking the road to do something It cannot possibly do that it was never designed to do? Carter was never intended to function the way the developer plans it to be used. It is an accident waiting to happen! Think of the law suits!!!
Nancy Beckham



I68-4
Cont.

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Response to Comment Letter I68

Individual
Nancy Beckham
October 4, 2021

- I68-1** The introductory comment notes attachments are included as comment letters. Please see Responses to Comments I68-2 through I68-4, below.
- I68-2** Please see Response to Comment I46-2.
- I68-3** Please see Response to Comment I46-2.
- I68-4** This comment is comprised of Attachment 2 of the Comment Letter I68 titled, “An Accident Waiting to Happen!”. Please refer to Global Response GR-3 regarding compliance with policies within the Draft Safety Element Update (now the adopted Hazard Prevention Element).

The comment further notes Carter Avenue is currently used for access to nearby Bailey Canyon Wilderness Trail and the Bailey Canyon Debris Basin. Additionally, the commenter states the proposed street expansion as part of the project is not feasible to support future traffic conditions of the proposed development. Please refer to Global Response GR-4 and Global Response GR-5 . the project applicant is proposing off-site widening to Carter Avenue, between the southeastern portion of the project site boundary and Lima Street, which would ensure that Carter Avenue would comply with existing code within and outside of the project site (see Final EIR Section 3.3.12 and Global Response GR-5 for details).

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Comment Letter 169

From: Nancy Beckham <nbeckham48@gmail.com>
Sent: Monday, October 4, 2021 2:19 PM
To: Jose Reynoso; Vincent Gonzalez
Subject: The upgraded letter regarding Carter and the DEIR, the Urban West map, the Final Plate Map
Attachments: Letter regarding DEIR and Carter.docx; Map streets and pads.jpg; Final Plate Map W. Carter rev 10.01.2021-4 copy.pdf

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

Hi Gentlemen,
I hope the letters are flowing in today. I need to redo my introduction on my 13 page outline addressed to the DEIR so it will apply. It will be submitted shortly.
But,.....Here you are. Jose, this is the one I promised you I would write with the upgraded plate map explaining Carter further.
Nancy Beckham

I
169-1



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Response to Comment Letter I69

Individual
Nancy Beckham
October 4, 2021

- I69-1** The comment states a future comment letter will be submitted to revise another comment letter previously submitted to the City. However, the comment is unclear which previously submitted letter is intended to be revised. This commenter provided the multiple comment letters included as the following: Comment Letters I4, I46, I47, I68, I70, and I71. Please see the responses to comments, I46, I47, I68, I70, and I71.
- I69-2** This comment provides a map of the project site. Although not specified, this map closely resembles Draft EIR Figure 3-10, Grading Plan. No discussion was included as part of this comment. However, a similar comment letter prepared by the commenter included the same attachment. Please see Response to Comment I47.
- I69-3** This comment provides an unspecified engineering-related map with annotations provided by the commenter. This attachment closely resembles two similar comment letters prepared by the commenter. Please see Response to Comment I4-40.

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Comment Letter 170

From: Nancy Beckham <nlbeckham48@gmail.com>
Sent: Monday, October 4, 2021 3:49 PM
To: Jose Reynoso; Vincent Gonzalez
Subject: Updated outline for draft EIR with maps and picture of the Coastal Oak tree the developer is planning to bulldoze.
Attachments: Updated Outline for Zoom 2 DEIR.docx; Coastal Oak Tree.jpg; Final Plate Map W. Carter rev 10.01.2021-4 copy.pdf

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

Here is my last article for the draft EIR. The picture of the Coastal Oak and the updated plate map goes with it to make a packet.
Thank you for all your help. See you at the Thursday night Planning Commission meeting. at 7pm.
Nancy Beckham

170-1

The Proposal is to create three parcels of land from the entire area purchased by the monastery. This has not yet taken place. WHY???.Could this be because the monastery does not own all of the land but the county and the city owns some of this land as well.? Please explain and clarify? However, .do we need a park adjacent to Bailey Canyon? Bailey Canyon is a wilderness park. Instead could this park be partially a dog park? People have been walking their dogs at the monastery for years. Sierra Madre could use a large dog park. As currently we only have a tiny dog park that is not used because it is not maintained by the city. It just has dirt and chain link fence surrounding the small area and the city does not maintain it. Could this need please be addressed? Thank you.

170-2

The Homes section Page 16 "The Meadows at Bailey Canyon development consists of 42 one and two- story detached single family dwellings on approximately nine acres of the Plan area. Typical floor areas range in size from approximately 2,700 to 4,000 square feet with a minimum lot size of 7,800 square feet"\ Although shown at various gatherings and workshops, homes are to be either one or two stories. The concern is that only two-story homes were shown in specific plan. Does this mean only two-story homes will be built? It does not say anywhere what the maximum size is. Please clarify this information. Also said "The Specific Plan would show how many of each size homes" (it does not) When the Planning Commission asked if they would have to do design reviews of all 42 houses, Vincent Gonzales stated, "there are 4 designs the planning commission would have to review . The developer has shown 4 designs - all 2 story Once again 2 story only???? . Lot sizes have yet to be mentioned as well. Why?? Could a third of the lots be just sold to people so they could build their own home hat would get rid of the development look that many object to as a development is That is definitely not Sierra Madre at all. The CC and R;s would stipulate the zero water, solar panel etc. specified for the homes in this development by New Urban West.

170-3

Actual proposal as it was presented in the draft EIR. Land for the **project is not 20 acres that was negotiated by the city manager in the MOU. Currently the proposed 42 homes will be placed on 13 , not 20 acres.**The lines of the acreage is more irregular than first proposed why is that? I do know the Monastery wanted one additional acre to create a buffer zone between the retreat center and the development maintain the serenity for their retreats .The 1 acre landscaped buffer zone will help with the noise and sounds of the housing development.

170-4

However, could monastery take that one acre from the land they are saving for their retreat center? They are keeping 23 acres for their retreat site. Donating 45 acres of hillside that cannot be used for homesites to the city for additional trails and open space, and 13 acres will now be donated to the project...not 20 acres that Gabe negotiated in good faith for this project. The 7 additional parking places near the newly proposed park are now included in the draft EIR specific plan

Density I broke it down in steps. Where am I incorrect

- a. 17 acres minus 1 additional (for the monastery) minus 3 acres for the proposed park equals **13 acres.**
- b. . Density of project changed from 42 homes on 20 acres or 2.47 homes per acre
- c. . Density based on 13 acres of land equals **3.23** homes per acre
- d. This has now translated to a denser housing project because this is a 30.769% increase or 31%
- e. **Are they going to build 31% less homes or 13 less homes to go along with the spirit of the MOU that was negotiated????**

170-4
Cont.

3. Water usage

- a. **Project is net zero in terms of water usage.**
- b. Cost of 50 years of water will be built in the cost of the homes.
- c. The city water will not be impacted by these 42 new homes being built
- D. But there is not 50 years worth of water available now and what would be the cost of that water.? I do not understand how the developer made a big point of this and then found out that amount of water currently can not be purchased. .

170-5

4. Tree removal

- a. To build these 42 homes over 101 trees will have to be removed including about 10 California Coastal Oak trees which are a protected species in Sierra Madre. There are 5 protected types of trees in Sierra Madre of which three are Oak trees.

170-6

c. **However by making this housing development a “Specific Plan” NONE OF THE SPECIFIC ORDINANCES GOVERNING THE PROTECTION OF THE TREES IN SIERRA MADRE CAN BE ENFORCED.**

d. Of the 101 trees to be removed 64 are mature jacaranda trees as well as the 10 Coastal Oaks. 34 of the trees are considered to be in good condition. See map of trees to be removed and the chart for the condition the trees are currently.

e. **Why can't the some of the trees be boxed and added back into the landscaping plan once the houses are built.** By allowing this you are violating the mission statement of the town regarding TREES put into effect in 2015 under mayor Nancy Walsh. Those jacarandas would be beautiful being spaced though out the development and are MATURE TREES !

f. **The attached picture with this packet is of the 100 year old Coastal Oak slated to be bulldozed. Instead of bulldozing the tree why not do one less home, take the land and create a green belt around the tree, add some benches, and make it an additional green space for the residents to enjoy. That is a magnificent Oak tree. Please do not let it get destroyed. It should be the signature for the entire housing development.** The same is true of the Morton Fig. Take out two homes and make

parks featuring these trees instead.

g. With the LA County Arboretum approximately 3-4 miles away and with their expert horticulturalists why could those trees not be boxed up and either moved, watered, and maintained while the project continues at the monastery site, or remove the trees to the arboretum to be maintained there during the project. **Or could some of those trees be sold to the city or the**



170-6
Cont.

residents rather than be bulldozed. Mature trees are mature trees.

- 1.. Jim Hendricks is a specialist with the California Oak trees and works at the Arboretum
- 2.. Frank Mc Donough, head horticulturist should be at least approached so these old and established trees are not slaughtered and replaced with tiny saplings which is what the pictures reveal, especially during this time of climate crisis. This would help with the loss of carbon emissions from the heavy equipment to be used to bulldoze and create the new levels of land, lots and streets for the development.
3. James Carlton, Management Analyst and in charge of trees for Sierra Madre. James very nicely explained to me how trees are valued and if someone removes a mature tree, especially a mature Oak because Coastal Oaks are a protected tree in Sierra Madre. The developer must plant a similar tree in place of what was removed.
 - a. Jim Hendricks found me the name of the company that moves large trees for Disney or the Huntington in San Marino James Carlton now has the name of the company in case the need arises.
 - b. I do not think that signature Coastal Oak could be moved successfully as it is too large a tree, so why not just make a park around it as I suggested in 5 f.? It would create a truly beautiful space.
- h. As you drive north on Baldwin and enter the City of Sierra Madre there is a sign posted that indicates Sierra Madre is a town that respects trees. The



170-6
Cont.

sign reads Tree City USA. I think we need to try and live up to the sign although I do not know if it was an award, or how the town earned that signage. However it is in the ground on a pole as you enter the city of Sierra Madre. We should remember that as well.

i. The developer certainly does not know this but Susan Henderson, editor of the MT View News suggested when I approached her about writing some news articles or letters to the editor regarding some of my concerns regarding this project that this town lost a tremendous amount of trees when we had that 100 year wind storm about 10 years ago. When we discussed the 64 Jacaranda trees that are to be bulldozed she suggested why not carefully box them and let people or the city buy them for their streets. The developer should place them in the development if they can because they are part of the land value of the monastery and by all rights the trees deserve to continue to live at the monastery and be part of the new development. Mature trees are still mature trees.

170-6
Cont.

IV. Traffic concerns

A. Sunnyside; Ingress and Egress for project.

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

170-7

B. Carter

1. Fire Safety concerns for Carter. It is in a fire hazard Area
2. **Fire Department Concerns about Carter becoming one of the ingresses/egresses**
 - a. the chief of the fire department would like as many residents as possible to find out about this project.

170-8

- b. Currently fire chief cannot make comments about the project.
- c. The fire chief will make sure all fire codes are correctly met.
- d. Safety is one of his main concerns
- 3. . Carter adjacent to the monastery gate is very narrow 25'and the road is in terrible condition. **The road itself measure 20'** in width as the additional 5 ' is dirt on either side of the existing road. The fire department already has a difficult time turning the fire trucks around in that location.
- 4. The monastery is going to create a two-lane road that will circle the Monastery property and end at the Monastery gate at Bailey Canyon on West Carter. **That means the road will go from approximately 44--46 feet in width on the Monastery land and then change to a single lane road 20'in width with the dirt on either side of the road way. On that road they now expect two way traffic to travel into and out of the housing development.**
- 5. City street ordinances state that "16.32.035 - Street standards— Modification of same. (Ord. 1229 § 2, 2005)

Except as otherwise required by Chapter 15.24 of this code, the city's public street standards shall require at least thirty feet of road and a pedestrian walkway
Notwithstanding Sections [16.32.020](#) and of this code, the city council may determine, upon approval of a parcel or tentative tract map creating streets, that adjustment of the city's public street standards as to those streets is justified by other benefits to the policies stated in [Section 17.52.010](#) of this code and that such adjustments do not unduly impact circulation and parking.
- 5. Once again this is a Specific Plan and all the normal standard do not apply... **a two lane city street must have 30 feet of road easement to accommodate the two lanes. That 30 feet does not exist on W Carter in this area near Bailey Canyon.**
- 6. The land on either side of Carter(@ 5 feet but split with the north and south side of the road.)The land is owned by the county.



I70-8
Cont.

7. County is not interested in improving the street situation.
Apparently, Gabe approached the county and they are not interested in improving that area and are not are the interested in adding sidewalks ,widening it, or selling land to the developer. .
8. It appears that the county owns the land north of Carter in the small area near Bailey Canyon. The attached plate map looks like Carter is owned by the city, (See attached plate map)
- 9 There is no parking allowed currently on that part of Carter.
10. There are no sidewalks or curbs in this area on Carter. Currently people park on upper Grove and cross the street into Bailey Canyon Park. to go hiking and enjoy the wilderness .
11. This area is already a concern of the fire chief, especially after last year's Bobcat Fire.
12. WAS THE COUNTY APPROACHED ABOUT WHAT THIS PROJECT WILL DO TO THIS STRETCH OF LAND?
13. Was the municipal water district approached about the impact of this project on this area that leads to the run off basins in Bailey Canyon? A gate exists here but nothing was mentioned in the specific plan. I
14. **How can you expect a street designed to be the entrance to Bailey Canyon and to the entrance of the Municipal Water District Debris Basis (which doubles as the Emergency Fire Access Road for the monastery to now accept 300-400 cars a day from a housing development. Carter is this area is an accident waiting to happen if it is to be used in this manner. The street was never designed to carry that kind of daily traffic**

SEE ADDITIONAL ARTICLES REGARDING CARTER entitled latter to the DEIR and Carter and carefully review the final copy of the plate map. Attached.

D. . **Carter** (Carter to Baldwin)

1. Carter now will function as an ingress and an egress, and will have to accept additional traffic throughout the day.
 - a. information written in the March 8 handout by the developer shows 398 trips per 42 homes. They have admitted they did not include Amazon deliveries, gardeners, activities for the retreat center

170-8
Cont.

170-9

b. trips are more like 780 a day. That means 300-400 cars per day on Carter because carter is the other ingress and egress.

2. Will parking be removed off Carter east of Lima so residents cannot park in front of their home? 2. Plan proposes ingress and egress of Carter to Baldwin with a right turn on Baldwin to get to town., and vice versa.
3. Most cars will not travel to Baldwin but will turn down another neighborhood street to get to town faster. Therefore, the neighborhood will have more cutting through enroute to the downtown area.

170-9
Cont.

E. North Grove

1. North Grove is really a lane at this location(adjacent to Bailey Canyon) and would have a very difficult time absorbing additional traffic.
 - a. There are no sidewalks on North Grove.
 - b. North Grove is an interrupted street as it begins as a lane, is off set twice before reaching Sierra Madre Blvd, and just prior to Sierra Madre becomes an alley in width.
2. if cars are parked on both sides of the street at the top of this street near Bailey canyon, a car traveling south can barely get through to Grandview. That street is also no designed to accept more traffic than just the traffic generated from the residents of the street.
3. The street should be cul-de-saced to protect it. It is just too narrow above Grandview. to be able to absorb additional traffic.

170-10

F. North Lima

1. North Lima is the first normal width residential street leaving the Bailey Canyon area and continues to Sierra Madre Blvd and then continues until Orange Grove.
2. North Lima Street has no sidewalks above Grandview.
3. People walk in the street, walk their dogs in the street, and children walk to school in the street and from home to home in the street.
4. Why has North Lima never had sidewalks put in? For that matter why have the streets north of Grandview and including Grandview never had sidewalks?

- a. My home will be 100 years old next year.**
 - b. How long does it take the city to put in sidewalks?**
 - 5. North Lima has an abundance of Edison poles that are serviced several times a year.
 - a. Edison trucks are very wide
 - b. Residents cannot back their cars out of the driveways when the Edison trucks are on the street
 - c. When Edison comes to service the poles the residents have to park below Grandview and then walk up to their home
 - 6 North Lima street is an emergency access route by default that was used effectively during the Bobcat fire by all the firetrucks.
 - 7. North Lima will be impacted with additional traffic as a percentage of the 800 plus daily car trips created by 42 new homes will use North Lima to get to the downtown area.
 - 8. North Lima has very pronounced steep descent and cars pick up speed traveling down North Lima to the city proper.
- See Where are the Sidewalks? article separately submitted

170-10
Cont.

G. Grandview

- 1. Grandview is the major east west artery for the residents in the NW quadrant.
- 2. The elementary school of Sierra Madre backs into Grandview and as a result when driving east on Grandview ng about 7:30 -8am or from 2:15 to 3:15 pm cars are stacked on Auburn from Highland to Grandview, and along Grandview past the field on Grandview. That is the drop off and pick up route and parents drop their children off accordingly. Others walk younger children to the school in the streets as once again no sidewalks above Grandview. They walk to pick them up. then walk with them to get them home again.
- 3. I was shocked because Last Tuesday I drove home from the Arboretum and went up Baldwin to Grandview. On Grandview I turned left and continued on W Grandview until N. Lima Street. I was very surprised to see all the cards headed down Auburn but also extending the carpool line past he playground on Grandview. Not having lived in town when my children grew up, I had no idea was the carpool lines were like and how extensive they were. That will be another problem for asking Grandview to absorb additional traffic. IF there is a parked car on each side of the street two cars cannot get

170-11

past the parked cars, rather one cars works it way carefully in between the parked cars and then continues to their next destination. The size of our streets is not conducive to this housing development.

4. At a minimum The north side of Grandview from Michilinda to Baldwin should have sidewalks installed to help the children get to and from the elementary school. It will also help the older children at the middle school walk from their homes safely.

V. All streets in North West Corridor

A. No streets above Grandview have sidewalks including the north side of Grandview. If there is a sidewalk the residents have put the sidewalk in themselves.

B All streets will be expected to absorb additional traffic.

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

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

1. When Anokia School sold the land and homes were developed on Baldwin just north of Foothill Blvd in Arcadia about 200 yards away from Sierra Madre, a main road with a manned gate was put into the development at Baldwin. The cars that came with this development of homes did not impact the homes that had been in that part of Arcadia for years. The cars from this development simply came and went on the road that was built on Baldwin. They continue to do so today.

2. THERE ARE 2 FIRE ACESS ROADS THAT END ON THE SMALL STREETS ADJACENT TO MICHILINDA

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

4. Residents on Michilinda reaction to this???? but this would help a number of streets in Sierra Madre that were not designed to carry more traffic without major work to paving, widening, and putting in sidewalks throughout this quadrant.

170-11
Cont.

170-12

170-13

E. The more streets that carry the additional traffic the better for all the residents. We cannot let two streets carry the entire burden of additional traffic.....Sunnyside and Carter. They were designed to be residential streets, or in Carter’s case to just access Bailey Canyon. Neither were designed to be ingresses and egresses for a housing development that will bring up to an additional 800 car trips daily, but @400 on Carter alone.

F. A DIFFERENT TRAFFIC PLAN must be considered that includes a DIRECT ROAD TO MICHILINDA why was this not done previously????why was this not addressed in the draft EIR?

VI. Signage on homes on Sunnyside tells you how the residents feel.

VII. Will this come to a local vote by the residents? If so I think this will be like the completion of the Long Beach freeway that was to be built through South Pasadena. 65 years later the State of California gave up and sold the homes they had purchased and rented for 65 years that were on the freeway route .due to the litigation to stop the freeway from cutting across South Pasadena. During those years Pasadena increased in size and the cars trying to get to the Pasadena freeway were forced to cut through the residential area below west of Oak Grove, South of California to Glenarm, and east of Marengo Traffic consultants were finally hired by the city to try and save the neighborhood. The neighborhood worked with the consultant to work out a plan. The neighborhood was saved which shows if the city and the neighbors can work together things can get done.

VIII. Although this is a small development which is why it has great appeal, what does the city gain? 42 new families to shop in our stores, get gas, enjoy our restaurants and ¼ of a policeman with their pensions paid for? That’s it? Explain this please.....

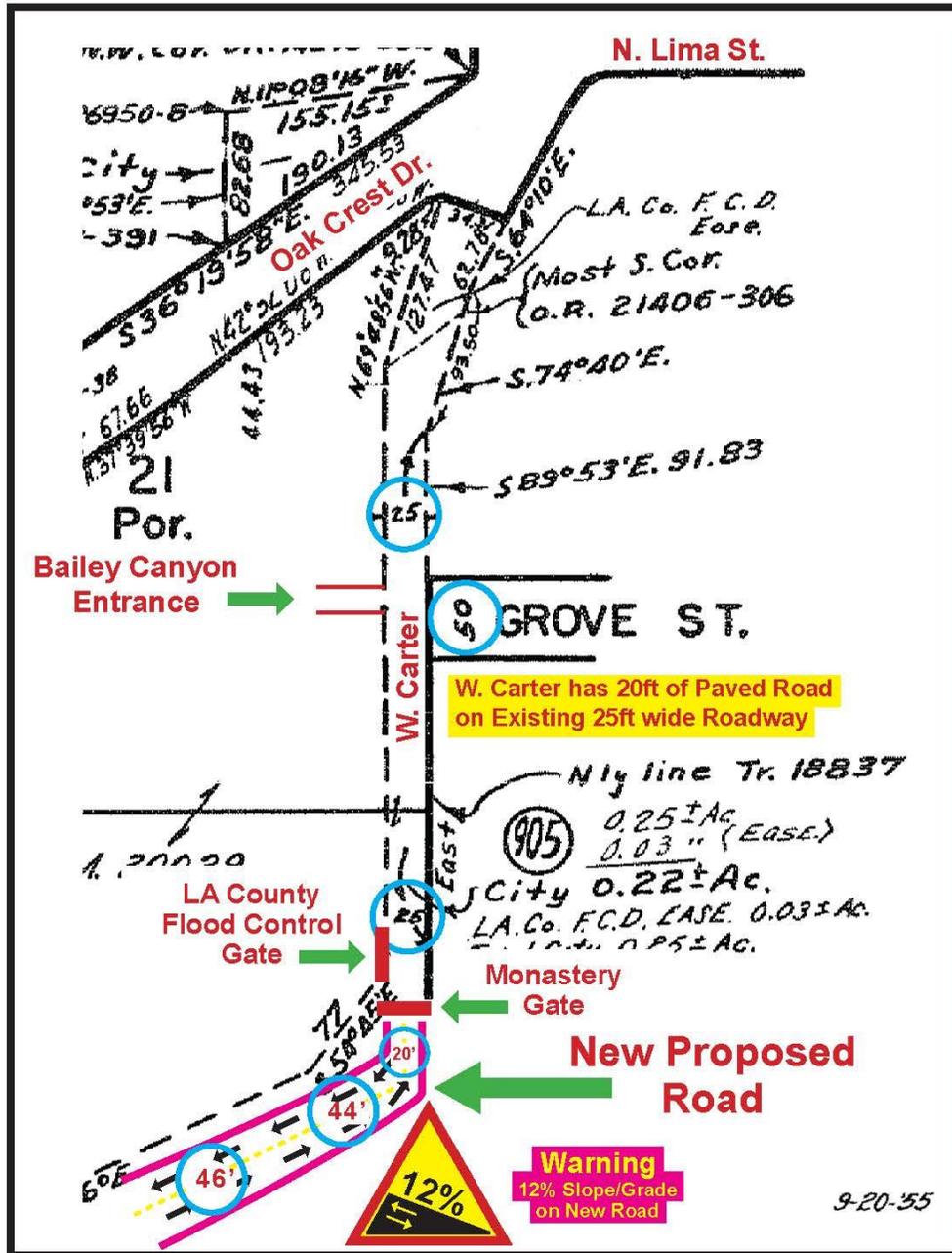
Nancy Beckham
337 North Lima street,
Sierra Madre, CA 91024

170-13
Cont.

170-14



I70-15



170-16

Response to Comment Letter I70

Individual
Nancy Beckham
October 4, 2021

- I70-1** The comment notes this letter is associated with letters previously submitted prepared by the commenter including: Comment Letters I4, I46, I47, I68, I70, and I71. Please see the responses to comments, I46, I47, I68, I70, and I71. No further response is provided.
- I70-2** This comment asks why the project proposes to create three separate parcels and asks whether the City of Sierra Madre and/or the County own part of the project site. The project site as described in Draft EIR Chapter 3, Project Description, consists of one approximately 17.3-acre parcel, identified as Assessor's Parcel Number 5761-002-008. As a result of the project, the site is planned to be subdivided through a future submittal of a tentative tract map which would create a total of 42 residential lots, plus streets, landscape areas, parking, a public park, landscape buffer, and open space. Neither the City nor the County currently own any part of the project site.
- The comment questions whether a new park is needed next to the existing Bailey Canyon Park and suggests that the new park be designated as a dog park. This suggestion will be provided to City decision makers for their review and consideration as part of this Final EIR.
- I70-3** This comment asks whether all the new homes will be two stories and for clarification regarding lot size. Please refer to responses I4-7 through I4-9, above. Finally, the comment asks whether some of the lots can be sold for the purpose of custom homes. Please see Response to Comment I4-11.
- I70-4** The comment asks for clarification regarding perceived changes in the project acreage. Please see Draft EIR Chapter 3, Project Description, for details, including Table 3-1, Land Use Summary. Under Table 3-1, the Specific Plan would designate 9.19 gross acres for Residential Land (RL), 3.39 gross acres for Open Space (OS), 3.68 gross acres for proposed roadways, and 1.04 gross acres for a grading and landscaping buffer. As such, the project site consists of a total of 17.3 acres. These acreages have been refined as the project design has progressed. However, the acreage to be preserved as open space would be 35 acres, and not 13, 23, or 20 acres, as mentioned in this comment. The Applicant has agreed to dedicate 35 acres of open space to the City and the project description remains consistent with this agreement.
- I70-5** The comment questions the cost and feasibility of the project's proposed net-zero water impact. Please refer to Global Response GR-1 for a response addressing concerns on water supplies and the project's net-zero water use.
- I70-6** The comment is concerned that approval of the Specific Plan means that City ordinances, including the City's Tree Preservation Ordinance, will not apply to the project. This is incorrect.
- Draft EIR Section 4.11, Land Use and Planning, states the adoption of The Meadows at Bailey Canyon Specific Plan would establish the zoning and development standards to guide future development on site. When a specific plan is adopted in accordance with the SMMC, the specific plan may effectively supersede portions or all of the current zoning regulations for specified parcels or plan area, and

becomes an independent set of zoning regulations that provide specific direction to the type and intensity of uses permitted, and may define other types of design and permitting criteria. However, the Specific Plan would not supersede the City's Tree Preservation and Protection Ordinance, which requires a permit to remove protected tree species.

Mitigation Measure BIO-3 would require a 1:1 replacement of the protected trees, reducing impacts to protected trees to less than significant. Thus, no further mitigation, including project redesign or the boxing of existing trees to be replanted on site or moved elsewhere, such as to the Los Angeles County Arboretum, is required. Please refer to Global Response GR-2 for information about tree removal, replacement, and requirements.

I70-7 The comment is concerned with potential traffic impacts to Sunnyside Avenue. However, no adverse impacts to Sunnyside Avenue would occur as a result of the project. The project site is directly accessible by two existing roadways, North Sunnyside Avenue, a north/south road that crosses through the western portion of the site, and Carter Avenue, an east-west road that extends through the eastern portion of the site. Under existing conditions, public access within both roads currently ends at the Mater Dolorosa Retreat Center's gates within the southern portion of the site. Under the proposed project, access to the project site provided via North Sunnyside Avenue would become public. Please refer to Global Response GR-5 and Global Response GR-6.

I70-8 The comment raises concern for wildfire risk and evacuation planning along Carter Avenue. Draft EIR Section 4.20, Wildfire, analyzes the project's potential impacts related to wildfire, which were determined to be less than significant. Please refer to Global Response GR-4.

The comment also notes concern for the roadway width of Carter Avenue under existing conditions and planned improvements. The comment includes reference to Attachment 3, as shown in Comment I70- 16. As addressed in Response to Comment I70-7, the project plans to improve Carter Avenue and the project site with sidewalk infrastructure. Please refer to Global Response GR-5.

Additionally, as addressed in Response to Comment I70-6, the project's proposed Specific Plan does not exempt project consistency and/or compliance with local regulations.

Lastly, the comment asks if the project applicant and the City have discussed the proposed project with the County of Los Angeles. As shown in Draft EIR Section 3.5, Responsible Agencies, the Los Angeles County Department of Public Works (County) has been identified as a responsible agency. The County was notified of the proposed project officially through the publication of the Notice of Preparation in which the City requested agency's views on the scope and content of the environmental information relevant to each agency's statutory responsibilities in connection with the proposed project, in accordance with California Code of Regulations, Title 14, Section 15082(a).

I70-9 The comment questions the adequacy of the Draft EIR's estimated daily trip generation. Please refer to Global Response GR- 6. See also Response to Comment I50-4.

Additionally, the comment questions parking along Carter Avenue east of Lima Street. Please refer to Global Response GR- 5.

- I70-10** This comment contains concerns related to existing conditions along North Grove Street and Lima Street. Neither street is located within the project site's boundaries or a part of proposed street improvements. Please see Responses to Comments I46-8, I46-9, and I70-9. Additionally, concerns related to traffic congestion Please refer to Global Response GR-6.
- I70-11** This comment is concerned about existing traffic conditions along Grand View Avenue, specifically noting existing traffic related to school drop-off and pick-up. However, Grand View Avenue is not located within the project site's boundaries, will not be impacted by the proposed project, and is not a part of proposed street improvements.
- I70-12** This comment is concerned about existing traffic and lack of sidewalks above Grandview and in the North West Corridor. However, these roadway segments are not located within the project site, will not be impacted by the proposed project, and are not a part of proposed street improvements.
- I70-13** The comment asks why there is no direct access to the project site from Michillinda Avenue and suggests that such a connection would reduce traffic impacts to streets in the north west quadrant of the City. As shown in Draft EIR Section 4.17, Transportation, no significant traffic impacts will occur as a result of the proposed project, therefore no further mitigation measures, including the addition of a new project access to Michillinda Avenue, is required. See also Response to Comment I70-9, and Global Response GR-6.
- I70-14** The comment asks if the project will be decided by a vote of the City's residents. As outlined in Chapter 3, Project Description, of the Draft EIR, the project's discretionary approvals are not subject to a vote by the City's voting residents; the project would be approved by the City Council. The comment also asks about the ways in which the project benefits to the City. Please see Final EIR Section 3.2, Project Objectives, which identifies the City's objectives for the proposed project.
- I70-15** This comment presents a photograph taken of a tree on site, recorded as Attachment 2 to this comment letter. Comment I70-6 referenced this photograph. Please see Response to Comment I70-6 for more discussion.
- I70-16** This comment presents an unspecified engineering-related map with annotations provided by the commenter. See Responses to Comments I4-40 and I69-3.

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Comment Letter I71

From: Nancy Beckham <nlbeckham48@gmail.com>
Sent: Monday, October 4, 2021 10:04 AM
To: Vincent Gonzalez
Subject: Re: Letters directed at the draft EIR

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

You are welcome. When I wrote the letter to the Mt View News I did not know the road was to narrow from 46'in width to 44 ' in width as it came down that 12% grade to the area right outside the gate where the ground flattens out ,and a car has to then make the 90 degree turn into the 20'wide "little Carter street. Little Carter has been doing fine being used as the entrance to Bailey Canyon and has about **100 cars a week**. Now it is going to be asked to accept **400 cars daily** (50% of the 800 daily trips) generated from the 42 homes.It can't do that and the county does not want to sell any land to the city to widen the street. Gabe called and was flatly turned down. Your street statutes say 30' width minimum for a street. You only have **25 ' up there max** which means **20' only** for the paved street. It can not be used as an ingress and an egress. They have to figure something else out. The city requires two ingresses and egresses. Let them build a road to Michilinda.
However now add the children, dogs ,and adults parking their cars at the new proposed parking lot and walking to Bailey Canyon. The problem then becomes a nightmare.
I talked this through with the developer and he gets it. If the city really wants this development let them kill the one home necessary using eminent domain and put that road through to Michilinda. But no zoning changes should be discussed until the basic components are in place. This is just housing development that was called a "Specific Plan" so the rules and regulations the city put into place could be circumvented. Since the Bobcat Fle 13 months ago the city said no new development in undeveloped areas that are considered Severe Fire Areas. It should have never gotten considered, but because it is called a "Specific Plan" and it has made it this far. But Thursday night they should drop the "Specific Plan" label and let it make it or get killed based on the city statutes. I dislike the City Council putting pressure on the Planning Commission to change the zoning when the developer hasn't even gotten two decent ingresses and egresses figured out. Talk about putting the cart before the horse. This proposal is not the end all be all. There are other possibilities that could be considered. Putting a land conservancy up there would be the best for everyone...grants are available and should be sought. Jane Tsong will be coming from the Watershed Conservancy Authority and will hopefully be allowed to speak at the next city council. Please don't pressure the Planning Commission to push this thing through and change the zoning laws. The plan has to be improved greatly before they do that. That change should be granted when they make a real attempt to abide by some of the city statutes which they have not done. When they do then the zoning changes should be considered but not before that time occurs. They are not even close as you will find out when all the letters and concerns are read and addressed to the developer.
Thanks for taking the time to read and digest all of this. See you sometime this week.
Nancy Beckham

I71-1

I71-2

On Mon, Oct 4, 2021 at 8:13 AM Vincent Gonzalez <vgonzalez@cityofsierramadre.com> wrote:

Nancy,

Thank you for your comment. I forwarded your comment and attachments to the environmental consultant for inclusion in response to comments in the Final EIR for The Meadows project.

I71-3

Vincent Gonzalez

Director of Planning and Community Preservation Department

From: Nancy Beckham [mailto:nbeckham48@gmail.com]
Sent: Monday, October 4, 2021 7:55 AM
To: Vincent Gonzalez <vgonzalez@cityofsierramadre.com>
Subject: Re: Letters directed at the draft EIR

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

Good morning Vincent,

There is the most important one coming in today regarding Carter. I discussed it with Jose on Thursday morning and he was flabbergasted. I am getting the redo on the plate map and will attach it to the letter with both the Urban West map. that shows the problem but there is nothing that spells it out on their map. The Urban West map shows the narrowing of the road going into the left turn but does not spell out the problem created by the road narrowing going down the 12% grade combined with the left turn and then the arrival at the 20'wide road. They expect people to just figure it out by looking at the map. I will come and talk it through with you as I did with Jose once I put the package together but it is a real deal breaker. Here is my write up and the Urban West map but they are just for you. The package will be submitted this afternoon before 5 but will include the updated plate map showing the 12% decline, width of the road at the top versus the bottom going into the turn, the left turn into "little Carter", and then the 20'wide road at Carter at the Carter Gate.

171-4

I will call once I have the upgraded plate map.

Nancy Beckham

On Mon, Oct 4, 2021 at 7:23 AM Vincent Gonzalez <vgonzalez@cityofsierramadre.com> wrote:

Nancy,

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

171-5

Vincent Gonzalez

Director of Planning and Community Preservation Department

From: Nancy Beckham [mailto:nlbeckham48@gmail.com]
Sent: Sunday, October 3, 2021 7:04 PM
To: Jose Reynoso <jreynoso@cityofsierramadre.com>; Vincent Gonzalez <vgonzalez@cityofsierramadre.com>
Subject: Letters directed at the draft EIR

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

Hi Jose and Vincent

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

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

Enjoy.

Nancy Beckham

171-6

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Response to Comment Letter I71

Individual
Nancy Beckham
October 3, 2021

- I71-1** The comment expresses concern for roadway width consistency as well as a change in grade from the project site along Carter Avenue. Please refer to Global Response GR-5.
- I71-2** This comment expresses general opposition to the proposed project. The comment also expresses concern for pedestrian safety on Carter Avenue and suggests the City utilize eminent domain to create another access point to Michillinda Avenue to the project site's west. See Response to Comment I70-13.
- Additionally, the comment expresses concern about the proposed Specific Plan overriding local regulations. Please refer to Global Response GR-7 and Response to Comment I2-6.
- Finally, the comment states the City Council does not support development within fire hazard zones and suggests alternative project sites be considered instead of the proposed change in zoning. Please refer to Draft EIR Chapter 8, Alternatives, for information regarding why the alternative location option was rejected. Please refer to Global Response GR-3.
- I71-3** This comment represents the City's Response to Comment I71-4, noting the comments will be recorded as part of the Final EIR to the proposed project.
- I71-4** This comment represents a reply email to the City and refers to a map which raises concern for roadway width consistency as well as a change in grade. Please refer to Global Response GR-5 and Response to Comment I70-16.
- I71-5** This comment represents the City's Response to Comment I71-6, noting the comments will be recorded as part of the Final EIR to the proposed project.
- I71-6** This comment represents an email to the City from the commenter noting several letters will be provided in response to the Draft EIR. This commenter provided the multiple comment letters included as the following: Comment Letters I4, I46, I47, I68, I70, and I71. Please see the responses to comments on the letters specified for more discussion.

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Comment Letter 172

From: Barbara Velturo <barbaravelturo@gmail.com>
Sent: Monday, October 4, 2021 12:38 PM
To: Vincent Gonzalez
Subject: Comment on DEIR
Attachments: DEIR UTILITIES AND PARK.docx

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

Vincent Gonzalez
Vgonzalez@cityofsierramadre.com

From: Barbara Velturo
380 West Carter Avenue
Sierra Madre, CA 91024

barbaravelturo@gmail.com
(802) 558-8864

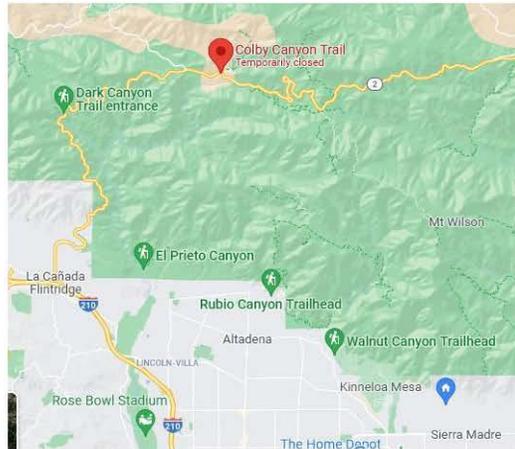
Thank you for the opportunity to comment on the DEIR for the "Meadows at Bailey Canyon"
Attached is a Word document with my comments. Please retain a copy for the administrative record.
Please respond to these comments in the Final EIR and please put me on the list of people to notify when the Final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

|
172-1
|

ERRORS IN THE DEIR

DEIR - PROJECT OBJECTIVES

5. Preserve the hillside open space area by dedicating approximately 30 acres north of the Mater Dolorosa Retreat Center to the City, in order to preserve a portion of Colby Canyon and the Colby Canyon Trail, which would be used by wildlife for movement up and down slope; preserve native vegetation communities and drainages; and preserve land adjacent to the Colby Canyon stream.



172-2

The language adding Colby Canyon and the benefit to wildlife and the stream to the "Project Objectives" came about as a result of a comment made by MIG, the "independent reviewer".

Comment from NUW in response to a previous MIG statement

"The proposed open space dedication is a community benefit but not subject to the SP. Additional details have been included in Section 3.3.3

Response from MIG, the Independent reviewer

“See earlier comment. Its attainment is one of the Project Objectives which makes it part of the project. One of the alternatives evaluated in the ADEIR also indicates that it would not be provided under such alternative which makes its provision clearly conditional on approval of this project. The open space site needs to be defined per our earlier comment. If it will be accessible to or otherwise used by the public it potentially could have, at the least, potential impacts on biological resources, and wildland fire potential. If the actions under this project will not result in access, improvements, or use by the public, than such should be stated and, further that such use or action would be subject to a separate environmental review at a later date if it is made available to the public.

NUW addressed the matter by posting this

Open space has been defined and included as Figure 3-4 of the EIR. In addition, the discussion about the open space dedication has been removed from the alternatives discussion.

Objective 5 has been revised throughout as follows, to indicate the benefits of this dedication:

5. Preserve the hillside open space area by dedicating approximately 30 acres north of the Mater Dolorosa Retreat Center to the City, in order to preserve a portion of Colby Canyon and the Colby Canyon Trail, which would be used by wildlife for movement up and down slope; preserve native vegetation communities and drainages; and preserve land adjacent to the Colby Canyon stream.

So that “BENEFIT” and the project objective BOTH were inaccurate - and somehow no one in the large, well-funded NUW company thought to check how close Colby Canyon was to their development?

172-2
Cont.

Other Mistakes in the DEIR

From the DEIR - Trails

The City of Sierra Madre is located at the base of the southern foothills of the San Gabriel Mountains, which provides access to over 550 miles of hiking and equestrian trails within the Angeles National Forest (USDA 2010).

The Mount Wilson Trail is the closest active recreation opportunity to the project site, located at the corner of Mountain Trail Avenue and East Mira Monte Avenue and approximately 0.77 miles east of the project site.

(Except for Bailey Canyon Trails which are closer)

Again, did no one in the large development company that plans to raze our Wildland Urban Interface, High Severity Fire Zone, and spend years planning and constructing a multi-million dollar development think to check (maybe the City Website?) for the closest Trail? Or consider the name of their project and think that there could be trails in the Canyon attached to that Park.? Well, they are not "from here".

2. The surrounding area to the north of the Mater Dolorosa Retreat Center and east of the project site is zoned as Hillside Management (H). 4.11-1

That is not accurate (It is Zoned Open Space)

On this map, the Area designated as Hillside Parcel is inaccurate - the parcel on the right above the retreat center is owned by the City of Sierra Madre and is zoned Open Space, as is the parcel they plan to donate.



172-3

172-4

Response to Comment Letter I72

Individual
Barbara Vellturo
October 4, 2021

- I72-1** This comment requests the following comments (Comments I72-2 through I72-4) be included in the responses to comments of the Final EIR but raises no specific issues relating to the environmental review.
- I72-2** The comment restates one of the proposed project objectives relating to the preservation of hillside open space north of the project site and expresses concern that the project will not actually realize this benefit. See Response to Comment I42-26.
- I72-3** The comment identifies an incorrect statement in Draft EIR Section 4.16, Recreation, that the closest trail to the project site is the Mt Wilson Trail. Please see Response to Comment I42-27. This error has been corrected in the Final EIR.
- I72-4** This comment states the area to the north of the Mater Dolorosa Retreat Center and east of the project site is not zoned “Hillside Management (H)” but instead zoned Open Space. The comment is incorrect. As shown in the latest Zoning Map prepared by the City of Sierra Madre, the area to the north and east of the project site is zoned Hillside Management (H).⁹ The City’s General Plan land use map designates the areas to the north and east of the project site as Natural Open Space (NOS).¹⁰

⁹ City of Sierra Madre. 2021a. Zoning Map. Effective September 14, 2021. <https://www.cityofsierramadre.com/common/pages/DisplayFile.aspx?itemId=18041501>.

¹⁰ City of Sierra Madre. 2021b. Land Use Map. Effective September 14, 2021. <https://www.cityofsierramadre.com/common/pages/DisplayFile.aspx?itemId=18041503>

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Comment Letter 173

From: Barbara Velturo <barbaravelturo@gmail.com>
Sent: Monday, October 4, 2021 4:59 PM
To: Vincent Gonzalez
Subject: Typos
Attachments: ALTERNATIVES.docx

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

Can you substitute this comment Alternatives for the one just sent, Corrected typos

I 173-1

Alternatives were neither chosen, described or analyzed in accordance with CEQA guidelines

All Alternatives studied in accordance with CEQA guidelines for the project MUST also be fully evaluated as to their level of impact to all environmental conditions

The Alternatives studied MUST, however, be ones chosen according to CEQA guidelines. They must be alternatives that could actually be built under the current Institutional development ordinances and not the ones referenced in the DEIR.

Alternatives must take into account the requirements of the Conditional Use Permit and the Master Plan which would allow the City to significantly lessen the impact of any Institutional development.

Previous City Councils took valid legal steps to protect the Monastery property from both overdevelopment or a housing development, in keeping with the Vision and goals of Sierra Madre's General plan.

Previous Sierra Madre City Councils and Planning Commissions have expressed concern over potential future construction on the property owned by the Passionists and have taken actions to protect both the land and the environment, as the law allows. The currently planned residential development, promoted by and supported by the City Staff, is contrary to all protections established by those previous City leaders to ensure the natural beauty of the monastery property is not destroyed, and to stop development contrary to our Water Conservation Policies.

Our General Plan states: "An emphasis on conservation of natural resources, including water conservation will play an important role in the City's land use development regulations in order to preserve the health, safety, welfare, and quality of life of the existing population. The City shall enact and enforce development standards which do not significantly increase the demand for water use and encourage reduction."

In its enactment of the previous Water Moratorium in July 2014, in the midst of a multi-year drought, the City recognized the fact that Water Conservation was critically important to the future of Sierra Madre. In its resolution, the city expressed its intent to make amendments to its zoning and General Plan to address water conservation policies. The wisdom of that intent is unfortunately obvious again today.

173-2

173-3

173-4

One of the many changes to the Land Use Section of the pending General Plan Update, made by the Planning Commission at the direction of the City Council and based on Staff reports, was the removal of a "reuse" provision that would have allowed the Monastery to reuse their land for housing.

If the City were now to remain true to the Goals and Policies expressed by the Citizens and enacted by their elected leaders in the Sierra Madre General Plan, the property would remain zoned Institutional and subject to the regulations for that zone.

Among the most likely Permitted Uses in an Institutional Zone, **with a Conditional Use Permit and a Master Plan** are a School or a Communal Residential Facility. Although the Monastery has publicly expressed its desire for a project that allows for the Serene Meditative nature of its Retreats and causes the least impact on residents, presentations have included photos of oversized monstrosities. The City and the developers have stated to the City Council and the Citizens of Sierra Madre that there would be no way to stop such a plan, if the Monastery chooses it. That is NOT true!

Any Application for an Institutional Use would be subject to all our City reviews and regulations, including the Conditional Use Permit and Master Plan.

Some requirements of the Conditional Use Permit include -

That the site has sufficient access to streets which are adequate, in width and pavement type, to carry the quantity and quality of traffic generated by the proposed use;

That the proposed use is neither detrimental to the public health, safety and general welfare, nor will unreasonably interfere with the use, possession and enjoyment of surrounding and adjacent properties; and

That the proposed use is consistent with the general plan, zoning and other applicable codes

The Master Plan Requires:

buildings keeping to the village theme, high architectural quality, water conservation etc. and a requirement that any institutional be considered with the values of the Hillside zone.

If the requested rezoning and Specific plan is rejected - any institutional building would also be subject to #7 of the Master Plan.



173-4
Cont.

7. Any development of a site located north of the "Hillside view line" defined in [Section 17.52.080](#) of this title or adjacent to R-H-zoned property shall protect the natural environment from change, preserve and protect views and preserve and maintain the identity, image and environmental quality of the R-H zone;

At the time of the Amendment the adjacent Bailey Canyon Park, was zoned R-H. In acting that regulation, the City made clear its intent that any development must conform to the goals and policies that regulate the sensitive Hillside Parcels. That concern still applies and is reinforced by the present zoning of Bailey Canyon of Open Space.

Our expressed City values in our General Plan and the requirements of the R-H zone would dictate the development permitted.

"Parkland and open space should be preserved and expanded when possible. Hillside areas should be preserved either in their natural state or with very low density residential development designed to be sensitive to the environmental nature of the foothills. This should include water conservation measures to reduce and minimize the impact to the City's water supply and the ability to serve its water customers." and

"The City should continually recognize the connection from the urban area to the mountain wildland by way of hillside land. This connection aligns Sierra Madre with a unique cluster of foothill cities, and preserving this area is vital to protect the fragile watershed, and the urban wildland interface."

If the Planning Commission and City Council uphold the General Plan protections of our land and water by rejecting the Developer's Specific Plan, only a reasonably sized institutional project, that incorporates open spaces and protects views and slopes, as dictated by our Hillside management ordinance, could be built.

Such a development would be much less impactful to Sierra Madre residents, would provide the serenity the monastery wants for it's retreats and would protect our fragile and threatened environment.

In the present case, comprehensive descriptions of Alternatives "studied" were NOT given, nor were any comparative studies of environmental impacts of those alternatives included in the DEIR. We were presented NO evidence to support the conclusions made as to the Alternatives.

I73-4
Cont.

Alternatives MUST, however, be ones that actually could be built under the current Institutional development ordinances. The DEIR made conclusive and unsubstantiated findings as to the size, lot coverage and Environmental Impacts of Alternatives based on inaccurate information as to what COULD be built under Sierra Madre ordinances.

Those ordinances for Institutional development include REQUIRED Conditional Use Permits and Master Plans, which would significantly limit the size, lot coverage and appearance of a project.

Consideration of an Alternative such as a 150 unit Senior project, with Assisted living and Memory Care facilities would considerably lessen the impact of many environmental concerns. The owners and developers of the "Meadows" were aware of the fact that a developer had been trying to present a proposal for several years but they refused to consider it.

That project would have kept the Western side of the land as open space or a "vineyard" and the Southeastern side as a park. They would have built in a style to complement the Retreat Center. There would be less destruction of trees and sensitive slopes.

That developers EIR traffic studies of other of their similar projects all showed LESS traffic, as even residents who are able to drive tend to use the shuttle services. The City might be able to require even further mitigation by shuttling of incoming and outgoing staff from parking lots.

The "alternatives" in the DEIR were not clearly and adequately described and did NOT meet CEQA requirements of what alternatives must be considered. They MUST be adequately considered in the Final DEIR

The Huge projects referenced (but also not described in detail nor analyzed for their environmental impact) are not the ones required by CEQA to be chosen because of a reduced environmental impact.

The EIR stated that a smaller project had been considered by rejected based on "Economic Infeasibility"

Under CEQA case law, however, a claim of "economic infeasibility" can NOT be claimed unless the costs and income involved are presented for both the proposed project and the Alternatives studied.

And then, economic infeasibility can only be claimed if the difference is so great that "no reasonable person" would choose the alternative. In order to make that claim in the DEIR, the costs of development and income received of both the Meadows project and the Alternatives must be disclosed

173-5

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Response to Comment Letter I73

Individual
Barbara Vellturo
October 3, 2021

I73-1 This comment requests that non-specified typographical revisions be made to the Final EIR. Although the comment was not specific, the commenter has prepared and the City has received multiple letters, including Comment Letters I2, I32, I72, I74, I75, and I76. No response is required.

I73-2 This comment represents the start of comments associated with Attachment 1.

This comment generally questions the adequacy of the Draft EIR's alternatives analysis, and requests that alternatives be more thoroughly analyzed. According to State CEQA Guidelines Section 15126.6(d), "[t]he EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed. (*County of Inyo v. City of Los Angeles* (1981) 124 Cal.App.3d 1)". As such, Draft EIR Chapter 8 provides an impact analysis summary comparing each topic area's impact conclusions to the proposed project's impact analysis prepared in Chapter 4 of the Draft EIR.

Additionally, the comment requests the consideration of alternatives that are consistent with the existing land use designation for the project site and that alternatives that are inconsistent with the existing designation be rejected. Pursuant to the CEQA Guidelines, EIRs are required to "describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives" (14 CCR Section 15126.6[a]). The inclusion of an alternative in an EIR does not constitute definitive evidence that the alternative is in fact 'feasible.' The final decision regarding the feasibility of alternatives lies with the decision maker for a given project who must make the necessary findings addressing the potential feasibility of reducing the severity of significant environmental effects (California Public Resources Code, Section 21081; see also 14 CCR Section 15091)." As such, Draft EIR Chapter 8 included the project objectives for the proposed project under Draft EIR Section 8.2. Furthermore, as stated above, the alternatives analysis included a summary of impacts compared to the proposed project. In addition, each alternative summary includes discussion on the alternative's relation to each of the project objectives. This is consistent with the requirements outlined in the State CEQA Guidelines.

I73-3 The comment provides remarks based on past City leaders' decisions and opinions about the project site and development within the City. The comment states approval of proposed project would be contrary to past efforts. The City notes the commenter's opposition and notes that it does not raise an issue related to the adequacy of the analysis provided in the Draft EIR.

173-4 The comment quotes excerpts of the City's General Plan and emphasizes concern for water supplies and past policy considerations for water conservation. The comment states the proposed project is inconsistent with the City's General Plan and zoning for the site. See Global Response GR-7.

The comment supports permitted uses under the current zoning for the project site. Draft EIR Chapter 8 analyzed potential alternatives for City decision makers' review and consideration. These alternatives include Alternative 1, No Project/No Build Alternative; Alternative 2, Existing Zoning and Land Use Designation: Communal Residential Facility Alternative; Alternative 3: Existing Zoning and Land Use Designation: Private School Alternative; and Alternative 4: Reduced Development Alternative. Alternatives 2 and 3 align with the commenter's request to develop a project within the existing land use designations and support policies that preserve hillside open space.

The commenter further notes requirements for a Conditional Use Permit and Master Plan development. This discussion is not applicable to the adequacy of the environmental analysis. Additionally, the comment cites zoning requirements under the R-H zone. The project site is not zoned R-H, but instead Institutional (I).

173-5 The comment incorrectly states that CEQA mandates that only alternatives that are consistent with a project site's existing zoning be considered, and that CEQA does not require consideration of alternatives that include a general plan amendment or zoning code amendment. This is not correct as there is no such requirement in CEQA, the State CEQA Guidelines, or case law. CEQA instead directs lead agencies to consider a reasonable range of alternatives such that the agency can determine whether an environmentally superior alternative is available that is both feasible and would meet most of the project's identified objectives. Alternatives that both do and do not require general plan and zoning code amendments can satisfy CEQA's directives.

The comment also expresses general support for a project alternative that proposes 150 senior housing units, and/or assisted living or memory care facilities and states that such an alternative could reduce the significant impacts associated with the proposed project. The comment implies that the institutional use alternative considered in the alternatives analysis is too large. As stated in Draft EIR Section 8.4.2, a reduced intensity institutional alternative was considered but ultimately rejected. Per CEQA Section 15126.6(f)(1), among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability and economic viability. Due to the decreased intensity associated with this alternative, it is not reasonably foreseeable that a future applicant will develop the project site at this scale, or that development at a reduced intensity would be economically viable for future development of the site. More importantly, however, one of the purposes of an alternatives analysis is to identify alternatives that could avoid or substantially lessen one or more of the significant effects of the project. As discussed in Draft EIR Section 8.4.2, neither Alternative 2 nor Alternative 3 would avoid or substantially lessen the significant impacts of the project, and both would create new and greater impacts in some areas, such as aesthetics, recreation, greenhouse gas emissions, and transportation, as compared to the proposed project. While a reduced intensity alternative would reduce these impacts, there is nothing to indicate that it would avoid or substantially lessen the significant impacts of the proposed project or would be substantially different in terms of impacts as compared to the alternatives already addressed in this section. Therefore, the reduced intensity institutional alternative would not have substantially lessened one or more of the significant effects of the projects as compared to the alternatives that were included and analyzed in detail in Draft EIR Section 8.6, Alternatives Impact Summary. It should be noted that the proposed project would not result in any significant and unavoidable impacts. For additional overview of alternatives analysis under CEQA, please refer to Response to Comment 173-2.

Finally, the comment states that alternatives cannot be rejected on economic infeasibility grounds alone. However, none of the alternatives analyzed in Chapter 8 are rejected solely on economic infeasibility grounds. Alternatives can be rejected on grounds of legal infeasibility (i.e., the project applicant does not have ownership or rights to an alternative project site, or a proposed alternative is inconsistent with state or federal law), failure to meet most of the identified project objectives, or failure to reduce or eliminate one or more significant impacts associated with the proposed project. Notably, the project does not result in any significant impacts after the incorporation of mitigation. Therefore, none of the alternatives reduce a significant impact associated with the proposed project.

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Comment Letter I74

From: Barbara Velturo <barbaravelturo@gmail.com>
Sent: Monday, October 4, 2021 12:38 PM
To: Vincent Gonzalez
Subject: Comment on DEIR
Attachments: DEIR UTILITIES AND PARK.docx

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

Vincent Gonzalez
[Vgonzalez@cityofsierramadre.com](mailto:vgonzalez@cityofsierramadre.com)

From: Barbara Velturo
380 West Carter Avenue
Sierra Madre, CA 91024

barbaravelturo@gmail.com
(802) 558-8864

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

Attached is a Word document with my comments. Please retain a copy for the administrative record.

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

I
|
I74-1
|
I

The Specific Plan did not provide adequate information about many of its components, and the City did not provide the promised informational public meeting to discuss the DEIR. The City Attorney's single presentation, solely on the timeline of the DEIR was NOT the necessary public discussion on the contents of either the Specific Plan and Deir. As a result, many questions and concerns remain.

174-2

Utilities - Questions and Concerns

The City Website, Water plan and Sewer plan all make it clear that, despite City plans and actions to repair and upgrade underground utility lines, many remain in deteriorated conditions. Leaks are a regular occurrence, resulting in an significant expense to the City and a great loss of precious water.

Though the pipes within the new development and the connections will be in good condition, there is no information in the DEIR as to the condition of all pipes (water, sewer and wastewater) from their connection at the development to their terminus. The 42 home development will result in an influx of water and sewage to those lines.

For each utility the final EIR must provide the size and age of the pipes from their connection at the development to their terminus, when they were last repaired or replaced and whether any have had known leaks.

174-3

The severity and expected length of the current drought (or its permanence) and the critical need to protect dwindling reservoirs and precious groundwater, makes it essential that the planned development not place increased stress on inadequate or deteriorating water or sewer lines.

Sierra Madre must NOT allow a development unless all City water and sewer lines involved have been adequately repaired or replaced. That potential environmental impact MUST be addressed in the Final EIR.

The Park - Questions and Concerns

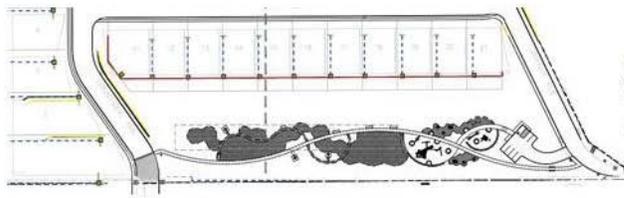
Very few details have been provided in the Specific Plan concerning the Park. Neither the Plan nor the DEIR address the potential nighttime Safety concern in having an open dark area, with many places for concealment, at the base of a development of multi-million dollar homes. They do not address whether the park itself will create the need for additional police officers.

174-4

Some questions that MUST be addressed in the Final EIR are:

What exactly is the benefit of the park to the Community?

How much of the acreage in the park is flat or relatively flat ground? What acreage of the park is included ONLY in the constructed space as shown in this design? What amount of land is used for creation of the "first tier" leading to the first row of houses? Is that land included in the 3 acre park? All space that is unusable to the public should not be included as part of the Park, if the park is considered to be a "Community Benefit". ONLY the acreage of the Park that is NOT required under the Quimby act can be considered a "Concession" (Given in exchange to the City's allowing larger homes and greater setbacks than are required in our Master Plan and Zoning ordinances)



The EIR should explain why this park (also being used for water retention as well as the first tier of their house pads), is a benefit that the City could not have had as a condition of ANY development, and its size and funding, based on its use by the entire community and nearby towns would have been included.

LAND DEDICATED FOR PARKS ETC

- 16.32.080 - Public facilities.
- The city may require that areas of real property within the subdivision be reserved for parks, recreational facilities, fire stations, libraries or other public uses subject to the provisions of Section 66479 of the Subdivision Map Act. (Ord. 1150 § 2 (part), 1999)
- 16.32.090 - Supplemental size of improvements.
The city may require that improvements installed by the subdivider for the benefit of the subdivision shall contain supplemental size, capacity, or number for the benefit of property not within the subdivision, and that such improvement be dedicated to the public pursuant to Sections 66485 and 66486 of the Subdivision Map Act. (Ord. 1150 § 2 (part), 1999)

174-4
Cont.

More information must be provided about the construction, location and nature of the planned water retention tank.

174-5

Will there be any above ground equipment involved with the water storage tank? Where will that be located? Is there any noise connected with its operation?

No restrooms are shown on the plans in the Specific Plan, but it is assumed that they will be included. Where would they be located, what would be the size and number and would they be ADA compliant.

174-6

Have the park paths and facilities been designed to be ADA compliant?

How was it determined that 7 parking spaces (1 handicapped accessible) was adequate for a development of 42 homes and public use by both Sierra Madre and Pasadena residents? Bailey Canyon Park has in excess of 25 parking spaces and overflow parking at many times of dozens more.

174-7

The Specific Plan states that the Park will be closed at night - will it be gated and fenced as Bailey Canyon Park is? Will the rest rooms be locked?

If it is not gated, has any study been done as to the safety issue of a dimly lit park at the base of a development of the most expensive homes in Sierra Madre? The Specific Plan indicates that only the paths will be lighted. Dark unsecured areas with trees and vegetation, as well as unlocked restrooms have proved to be an attraction resulting in safety issues in many and will likely require extra police patrols. The Final EIR MUST provide information and an analysis of this issue.

174-8

When the City manager originally spoke to the City Council and the Citizens of the "concessions" to be made, he said that the developer would create the park and "fund it in perpetuity". Now it appears that the town will be responsible for setting up and managing the maintenance, water etc for the park "in perpetuity." Is there a guarantee that only the residents of the development will pay all the costs of the new district, including the Management costs? The Final EIR must provide information and an analysis of this issue.

174-9

Rather than the ONLY "benefit" (or concession) that is not solely meant to meet the needs of the development, the proposed Park as shown may become a problem for the community. And it is clearly insufficient as a "Concession" in exchange for ignoring our General Plan, Ordinances and City Plans.

Response to Comment Letter I74

Individual
Barbara Velturo
October 4, 2021

I74-1 This comment requests the following comments (Comments I74-2 through I74-9) be included in the responses to comments of the Final EIR. Additionally, the comment notes an attachment for further comments (included as Responses to Comments I74-2 thru I74-9).

I74-2 The comment is concerned that the Specific Plan does not include enough information about the proposed project; however, the comment does not identify any specific inadequacies to which a response can be made.

The comment is also concerned that an additional public meeting was not held to discuss the Draft EIR; however, the City provided several opportunities for public comment and discussion. First, the City released a Notice of Preparation (NOP), soliciting input from the public during the NOP comment period of July 1, 2020 through August 1, 2020. In addition, as discussed in Chapter 1, Introduction, of the Draft EIR, in August of 2020, the City held three workshops related to the proposed project. At all three of the workshops held in August 2020, the Draft EIR was discussed in detail and participants provided comments to the City, which were memorialized and included in the record. Due to COVID-19 and its related restrictions now easing, and in order to hear from as many residents as possible, the City held an additional in-person informational meeting to discuss the Draft EIR to present the EIR process and to receive written public comments and suggestions regarding the scope and content of the EIR. The meeting has been held on Wednesday July 14, 2021, from 6:00 p.m.–7:30 p.m. at Memorial Park, located at 222 West Sierra Madre Boulevard. During and in regard to this meeting, 47 comment letters were received. The public input provided during the meetings listed above was then used to inform preparation of the Draft EIR. Once the Draft EIR was completed, a Notice of Availability (NOA) of a Draft EIR, was released on July 23, 2021 and revised on August 2, 2021, soliciting input and questions from the public during the Draft EIR public review period of August 2, 2021 to October 4, 2021. This chapter of the Final EIR, Responses to Comments, represents a good-faith, reasoned effort of addressing environmental issues identified by the comments received during the NOA comment period, in accordance with the State CEQA Guidelines sections 15088 and 15024. As such, City decision makers will review and consider the comments received and responses prepared as part of their discretionary review of the proposed project.

The Final EIR provides a good-faith, reasoned effort to address all comments received during the public review period on environmental issues, in accordance with the State CEQA Guidelines sections 15088 and 15024. The public comments, and the responses thereto, are reviewed and considered by City decision makers prior to making any decision on the project entitlements. City decision makers will take public comment at the public hearings at which the project will be considered. These meetings will be noticed on the City's website.

I74-3 The comment questions the condition of the existing underground water and sewer lines that would serve the proposed project. Refer to response I65-21, above.

The comment is also concerned about the availability of water supplies in drought conditions. See Global Response GR-1.

174-4 The comment asks whether the proposed park would include nighttime lighting for safety and security purposes or require additional police officer. As discussed in Specific Plan Section 3.8.6, pedestrian-scaled street lighting shall be provided within the proposed park areas within pedestrian routes of travel to enable visibility and safety. Potential impacts to light/glare associated with lighting are addressed in Draft EIR Section 4.1.5, Impacts Analysis, in Section 4.1, Aesthetics.

As addressed in Draft EIR Section 4.15, Public Services, the development of the project site is expected to increase demands of police protection services relative to existing conditions. However, payment of development fees by the project applicant, as required by Chapter 15.52 of the SMMC, would offset the costs of increased personnel or equipment that could be required in order to maintain acceptable service ratios, response times, and other performance objectives.

The comment also questions the community benefit of the proposed park. Draft EIR Section 4.15 states the City has a three acre per 1,000 residents parkland ratio and based on the City's population, the existing park to population ratio is only 2.09 acres per 1,000 residents. Thus, the City currently has a parkland deficiency of approximately 10 acres. The proposed project would result in approximately 134 new residents, and the 3.04 acre proposed park would exceed the parkland ratio required by the project's own residents and help reduce the overall Citywide parkland deficit of 10 acres. Additionally, the proposed park would enhance the project site relative to existing conditions with landscaped mounds, one pond, pedestrian paths, shared open turf/play areas, adventure/natural play equipment, native garden beds, picnic areas, benches, overlook areas, a restroom building, a water fountain, landscaping, water quality facilities, and a small parking lot. Finally, the park's location along the southern boundary of the site would enhance connectivity to the Bailey Canyon Wilderness Park to the east.

The comment also asks about the topography of the proposed park and whether the entire acreage will be usable. Draft EIR Section 3.3.10, Grading Plan describes how the project site would be altered to form four tiers (three tiers for the proposed residential development, and one tier for the proposed park), with a slope between each tier. The proposed project would create a maximum slope of 12% and elevations would range from 1,105 feet to 1,195 feet above mean sea level (AMSL). The proposed 3.03-acre park, which would be located along the southern boundary of the project site, would have an elevation of 1,105 feet AMSL. Per Draft EIR Figure 3-10, Grading Plan, the majority of the park site is flat, while the northern portion of the park site would elevate approximately 15 feet to 1,120 AMSL. Additionally, as further detailed in Section 4.15, the SMCC requires the project to provide 0.5 acres of parkland on site. Thus, the project applicant would provide substantially more than the required amount of parkland in compliance with the SMMC.

174-5 The comment requests more information related to the proposed water retention tank. Specifically, the comment requests details about construction, location, planned above-ground equipment, and potential impacts related to noise as result of this project component.

As detailed in Draft EIR Chapter 3, Project Description, the proposed storm drain network would flow runoff into an underground retention gallery within the proposed park and would convey surface runoff from two proposed catch basins located on the south end of Carter Avenue. The 63,500-cubic foot

retention storage gallery, proposed within the public park, would consist of approximately 2,400 linear feet of 60-inch diameter perforated pipe surrounded by gravel bed. This retention storage gallery would be located approximately 24 inches below ground and would promote water quality treatment through infiltration. Stormwater not retained in the storage gallery or infiltrated into the ground would be routed to the southeast corner of the proposed park and exit to Crestvale Drive via a 24-inch surface culvert. Please see Draft EIR Figure 3-7, Proposed Drainage Plan, for details on the storm drain network and retention gallery locations. No above ground water tank is proposed.

As described in Draft EIR Section 4.13, Noise, the proposed project would not include any stationary mechanical equipment (such as pumps, motors, fans) associated with the proposed stormwater retention facilities that could generate noise levels with the potential to impact noise-sensitive receptors.

174-6 The comment requests more information regarding the restrooms proposed at the project's park. Draft EIR Section 4.15 notes that at least one restroom building is planned within the neighborhood park. However, specific details of the restroom (such as location, size, number of stalls) would be developed and presented to the City for review as part of the future tentative tract map. However, restrooms and trails would be required by law to comply with the Americans with Disabilities Act of 1990 (ADA). The processing for the tentative tract map would undergo the City's plan check compliance and ensure regulatory compliance with local, State, and federal laws, including the ADA.

174-7 The comment asks why only seven public parking spaces are proposed. The seven parking spaces referred to in the comment are proposed for the neighborhood park parking lot, and would serve park visitors, not the 42 residential homes, which, pursuant to the Specific Plan, will each have private parking in the form of parking garages and driveway parking. Draft EIR Chapter 3, subsection 3.3.6.2, Internal Circulation, also describes the on-street parking availability on each of the proposed streets.

174-8 This comment asks if the proposed park will be closed and gated at night. Similarly, the comment asks if the proposed restroom building will be locked at night. The proposed park would not be gated or closed. As discussed in Draft EIR Section 3.3.2, Neighborhood Park and Open Space, the proposed public park would be maintained by a landscape maintenance district or similar public maintenance entity. The details regarding whether or not the proposed park restrooms would be closed are not available at this time and would be decided under this landscape maintenance district or similar public maintenance entity. The closing of public restrooms proposed would be consistent with other parks within the City.

The comment also expresses concern over whether security lighting will be provided at the park. See Response to Comment 174-4, above.

174-9 This comment asks whether the developer or the City will be responsible for funding ongoing maintenance of the park in perpetuity and expresses concerns regarding water supply. As stated in Draft EIR Section 3.3, Project Description, the project would establish a dedicated funding source for long-term park maintenance. The details of this funding source would be established via the project's Development Agreement. Regarding water supplies, see Global Response GR-1. In conclusion, the Draft EIR adequately analyzes the potential impacts associated with the proposed park and water supply.

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Comment Letter 175

From: Barbara Velturo <barbaravelturo@gmail.com>
Sent: Monday, October 4, 2021 11:32 AM
To: Vincent Gonzalez; Jose Reynoso
Subject: COMMENTS FOR DEIR
Attachments: TRAFFIC CARTER.docx; LAND ABOVE THE RETREAT CENTER.docx

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

Vincent Gonzalez
Vgonzalez@cityofsierramadre.com

From: Barbara Velturo
380 West Carter Avenue
Sierra Madre, CA 91024

barbaravelturo@gmail.com
(802) 558-8864

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

Attached are word documents with two of my comments, pertaining to TRAFFIC ON CARTER and THE DONATION OF LAND ABOVE THE MONASTERY

Please retain a copy for the record.

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

175-1

<p>The Specific Plan does not provide two safe and acceptable methods of ingress and egress to the Proposed Development.</p>	<p>175-2</p>
<p>The Specific Plan specifications for Carter Avenue do not comply with Sierra Madre Road Standards</p>	<p>175-3</p>
<p>The DEIR failed to consider or study a serious pedestrian Safety issue that would result from development of this project according to the Specific Plan.</p>	<p>175-4</p>
<p>Among the MANY concerns citizens have with this planned development is the intent to use an inadequate section of Carter Avenue as a second source of ingress and egress for the Parcel. The Specific Plan states that the existing Gate at Carter Avenue will be removed and opened to two way traffic.</p>	<p>175-5</p>
<p>The portion of the road outside the gate is approximately 20 feet wide. The road bed is in poor condition and unaccustomed to any regular traffic (it is used now for an occasional service to the Monastery, for LA County Flood Control access to the debris basin, and for occasional use by rescue vehicles if there is an emergency on the Bailey Canyon trails).</p>	<p>175-5</p>
<p>We have an early traffic study, sent to the developers, that shows that traffic counts, when the housing project is completed and occupied, will be 740 vehicles a day, not counting monastery traffic, traffic from deliveries, gardeners, trash pickup, people using the park, people using the development as a "short cut" to Bailey Canyon Park.....</p>	<p>175-6</p>
<p>(Section of Traffic report attached)</p>	<p>175-6</p>
<p>The developer has stated that it will "improve" that section of road but has not explained what that improvement would be. They have specifically said though that it will not be widened other than what is required for emergency vehicle access.</p>	<p>175-7</p>
<p>That Carter road section is in no condition to handle even a small portion of that much traffic, even if the road bed is improved.</p>	<p>175-7</p>
<p>Parcel map of the section of road attached.</p>	<p>175-7</p>
<p>Photo attached showing the gate to be removed to permit daily two way traffic of hundreds of cars and trucks - and the proximity of LA County Flood Control District access road to the Debris basin to that egress. That County access road is also used by first responders when there is an injured hiker.</p>	<p>175-8</p>

Our fire department has suggested that they could to use the County Access road to fight a wildland fire above the housing development, if it were built. Of course large equipment entering the Access road would make evacuations difficult or impossible

175-9

The DEIR also makes NO mention of the fact that many dozen pedestrians regularly cross the Grove/Bailey Canyon Park/Carter intersection on a daily basis, less than a block from the turn out of the development. It can also be expected that many people planning to use Bailey Canyon Park will park on the west side of Carter inside the development and cross that road to add to the pedestrian traffic exiting the development and adding more pedestrians to the north side of that 24 foot section of the street. Neither Grove nor Carter have sidewalks.

175-10

Cars exiting the development will be coming at a higher rate of speed down the wider, sloped portion of Carter within the development, and intercepting within a (half?) block with pedestrians, unaccustomed to traffic from that direction. Without (at the very least) sidewalks, there WILL be pedestrian accidents.

175-11

The City has known for a long time that the parking on Grove, which barely leaves one lane open on weekends, requires those going to Bailey Canyon Park to walk in the Street. The single lane left with cars parked on both sides would make it difficult for rescue equipment to access those blocked homes if necessary. Yet that already hazardous situation, which would be greatly exacerbated by two way traffic from the potential project, was not at all studied or its impact considered in the DEIR.

175-12

The Developer hopes to evade the protections of our zoning ordinances, on the property they plan to develop, by use of a Specific Plan that makes its own rules within the parcel. However, land OUTSIDE OF THE PARCEL will still be subject to Sierra Madre's General Plan and Ordinances, meant for protection of its Citizens and our City values.

175-13

The pending SEIR for the General Plan update/housing element, at the City's request, included Environmental impacts to both Stonegate and the "Meadows" project (as potential future residential development) to be studied.

175-14

In its traffic analysis of the impacts of development of ALL SITES, that DEIR stated that two evacuation routes must be provided for the adequate safety of all proposed and potential development and further required:

Access to/from each site would be required to meet the City's design standards with respect to location, width, and sight distance. With the above mitigation measures, the General Plan Update residential land uses can be added to the City housing supply without any remaining significant CEQA transportation impacts."

175-15

This is the Sierra Madre Ordinance setting forth the City Subdivision Standards for Streets, that would need to be met to avoid significant CEQA transportation impact.

§ 16.32.035. Street standards—Modification of same.

Except as otherwise required by [Chapter 15.24](#) of this code, the city's public street standards shall require at least thirty feet of road easement to accommodate two travel lanes, one parking lane, and a pedestrian walkway. Notwithstanding [Sections 16.32.020](#) and [16.32.030](#) of this code, the city council may determine, upon approval of a parcel or tentative tract map creating streets, that adjustment of the city's public street standards as to those streets is justified by other benefits to the policies stated in [Section 17.52.010](#) of this code and that such adjustments do not unduly impact circulation and parking. (Ord. 1229 § 2, 2005)

175-16

The public benefit referenced were those included in the Hillside Management Zone. Despite that ordinance, the Developer's Specific Plan for the "Meadows" states:

Site access, including road widths and connectivity, would also comply with all City requirements and would include the following:

- Primary access to the project site would be provided from North Sunnyside Avenue. Carter Avenue would provide secondary egress and ingress access.
- All roads comply with access road standards of not less than 24 feet, unobstructed width

175-17

Sierra Madre's City Street standards REQUIRE "AT LEAST" 30 feet of road easement, including sidewalks for pedestrian safety.

Although the Meadows Specific Plan DEIR includes this statement "Project site access, including road widths and connectivity, would be consistent with the City's roadway standards", they also state: "the existing Carter Avenue access improved to meet fire apparatus access road requirements".

175-18

Fire Apparatus requires 24 feet of road width. City standards for two way traffic require at least 30 feet.

The Specific Plan states that road access will be consistent with the City's standards, and the traffic impacts section of the DEIR for the Updated General Plan says that access to and from each developed site must meet the City's design standards. Those standards require at least 30 feet of width.

175-19

Unless the developer is able to meet Sierra Madre's requirements of 30 feet wide streets to provide safe ingress and egress to traffic, projected to total 740+ vehicles by the time the project is completed, it should not be approved.

The close proximity of that egress from the development should also be examined as to its adequacy as a second evacuation route, in light of firefighter's need to access the development either by Carter Avenue within the development or by the County Access Road, close to the development exit.

175-20

Barbara Velturo
380 W Carter Avenue
Sierra Madre, CA 91024

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TRAFFIC FORECASTS

The proposed Project was assumed to be built and occupied by 2025. The following traffic scenarios were developed and analyzed as part of this study:

- Existing (2020) Pre-COVID Condition
- Build-out (2025) without Project Condition
- Build-out (2025) with Project Condition

The best tool to determine background growth in the area is the SCAG model. The SCAG model predicts 2040 travel conditions in consideration of land development and transportation changes. It also includes a work-from-home assumption to reflect anticipated changes in how people travel. The results of these assumptions lead to a conclusion that traffic levels will slightly decrease in the study area by 2040. To be conservative, we assumed that the 2025 conditions will not decrease in comparison to existing (pre-COVID) conditions.

We added the Project trips to the study segments and intersections following the trip distribution identified above. The following Table 6-1 and Table 6-2 present the level of change expected on the study roadways as a consequence of the Project. The peak hour intersection traffic of Build-out (2025) with Project condition is shown in Figure 3.

TABLE 6-1 – Weekday Build-out (2025) with Project Segment ADT

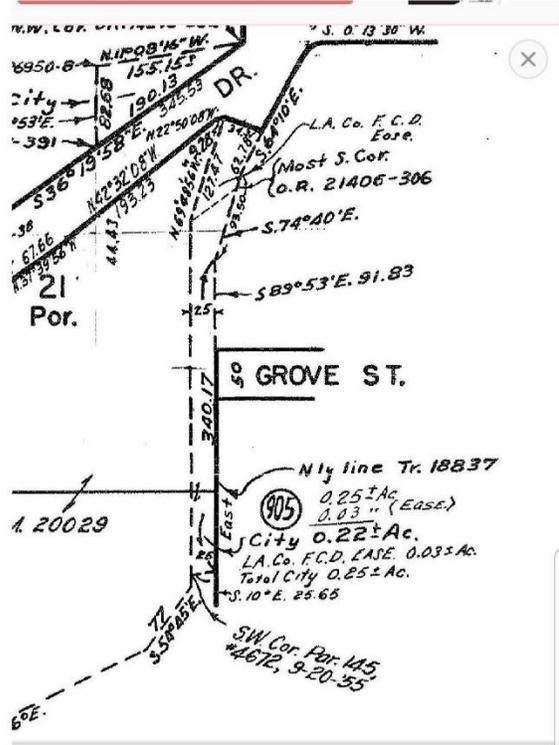
Segment	2025 without Project	2025 with Project	Increase%
Sunnyside Avenue between Project Site and Fairview Avenue	340	740	118%
Sunnyside Avenue between Fairview Avenue and Sierra Madre Boulevard	490	850	73%
Sierra Madre Boulevard between Michillinda Avenue and Sunnyside Avenue	6,970	7,310	5%
Michillinda Avenue between Fairview Avenue and Sierra Madre Boulevard	7,390	7,390	0%
Michillinda Avenue between Sierra Madre Boulevard and Foothill Boulevard	9,550	9,680	1%

175-21



Carter Avenue approaching Monastery Gate
LA County Access Road to the Right
Road width approx. 20 ft with vegetation at sides

175-22



Parcel map for Section of Road between Lima and Monastery Gate

AIN: 5761-003-905 8

<p>Situs Address:</p>	<p>Use Type: Other Property Type Parcel Type: Government Owned, Exempt Tax Rate Area: 07516</p>	<p>Parcel Status: ACTIVE Create Date: Delete Date: Tax Status: EXEMPT Year Defaulted: Exemption: None</p>
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175-23

THE DONATED LAND IN THE SPECIFIC PLAN IS OF NO PUBLIC BENEFIT AND DOES NOT “PRESERVE OR PROTECT” ALREADY PROTECTED LAND

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

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

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

The 2 remaining parcels which they are now able to donate include
 APN: 5761-001-001 in Sierra Madre - 20 acres, designated Open Space Zone AND
 APN: 5760-027-013 in Unincorporated LA County - 16.74 acres zoned residential
 Maps are attached showing those parcels as they presently exist – the monastery proposes to donate less land than is currently in APN: 5761-001-001

There is NO benefit to Sierra Madre owning Hillside land in Unincorporated LA County. Land that is in the highest severity level of Fire hazard? Land that is shown as landslide potential on a Seismic hazard map? Land that is directly above several Pasadena housing developments? Has LA County been noticed on the proposal to change or restrict the Zoning on their land? Have they agreed to our changing it?? We can see a lot of negative consequences in our owning 16.74 Hillside acres in Unincorporated LA County - but NO positive ones!!

The Parcel that IS within Sierra Madre is already zoned Open Space which allows NO residential building. It is already Protected and Preserved by that zoning designation. The Retreat Center and its grounds will be gated and protected by an 8 foot concrete wall; the community will have no access to that Parcel and its donation to the city would have NO public benefit.

In addition, the DEIR, in its Executive Summary, states that the Monastery intends to do a lot line adjustment moving its boundaries to the north and changing the size (and the AIN number of that parcel) At this time it is unknown what and how much of the protected land they are proposing to “donate”

The City should refuse to accept donation of land that is not within our City limits and which may be a liability to us.

The Sierra Madre Parcel is already protected by its zoning of Open Space, is not accessible to the public and its eventual size is unknown. It is not a valid concession to permit a developer to disregard our General Plan and Zoning Regulations.

175-24

175-25

175-26

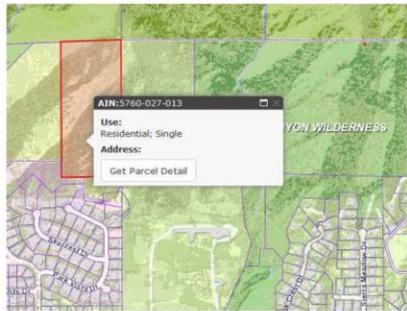
175-27

175-28

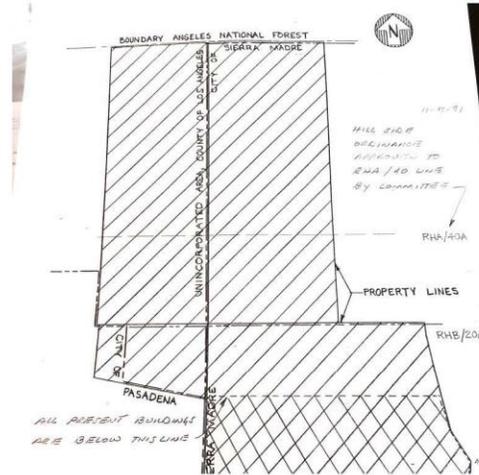
Map from the Specific plan



Parcel in Unincorporated LA County



LAND OWNED BY THE MONASTERY



175-29

Barbara Velturo
380 W Carter Avenue
Sierra Madre, CA 91024

barbaravelturo@gmail.com

Response to Comment Letter I75

Individual
Barbara Vellturo
October 4, 2021

- I75-1** The comment introduces the comment letter and attachments. The commenter would like to be put on the list of people to notify when the Final EIR is complete. The comment is an introduction to comments that follow. The commenter will be notified when the Final EIR is complete and available to the public.
- I75-2** This comment is part of Attachment 1 of the Comment Letter I75. The comment is concerned about safe egress/ingress at the project site. Please refer to Global Response GR- and Global Response GR-5.
- I75-3** This comment is part of Attachment 1 of the Comment Letter I75. The comment states that Carter Avenue does not comply with City road standards. Please refer to Global Response GR-5 (GR-5), Carter Avenue.
- I75-4** This comment is part of Attachment 1 of the Comment Letter I75. The comment expresses concern relating to pedestrian safety. See Response to Comment I46-8.
- I75-5** This comment is part of Attachment 1 of the Comment Letter I75. The comment states that many citizens are concerned about the use of Carter Avenue as an egress/ingress due to the width and the poor condition of the road. Please refer to Global Response GR-5.
- I75-6** This comment is part of Attachment 1 of the Comment Letter I75. The comment states than an early traffic study for the proposed project indicated that there would be 740 vehicle trips a day that does not include traffic from deliveries, employees, etc. Please refer to Global Response GR-6.
- I75-7** This comment is part of Attachment 1 of the Comment Letter I75. The comment states that the improvements to Carter Avenue were not explained. Please refer to Global Response GR-5.
- I75-8** This comment is part of Attachment 1 of the Comment Letter I75. The comment references an attached photo of the gate that would have to be removed from Carter Avenue in order to allow for the proposed two-way traffic. Please refer to Global Response GR-5.
- I75-9** This comment is part of Attachment 1 of the Comment Letter I75. The comment states that the fire department could use the county access road and expresses concerns regarding evacuations. Please refer to Global Response GR-4 and Global Response GR-5.
- I75-10** This comment is part of Attachment 1 of the Comment Letter I75. The comment states that the Draft EIR does not mention the pedestrian usage at the Grove/Bailey Canyon Park/Carter Avenue intersection. See Response to Comment I75-4. As discussed in Final EIR Section 3.3.12, The proposed project would include off-site improvements to Carter Avenue, between the southeastern portion of the project site boundary and Lima Street, which includes a 6-foot sidewalk on the north side of Carter Avenue. Regarding pedestrian safety along Carter Avenue, please refer to Global Response GR-5.

- I75-11** This comment is part of Attachment 1 of the Comment Letter I75. The comment states that the hazardous design of the Carter Avenue egress would result in issues with pedestrian safety. Please refer to Global Response GR-5.
- I75-12** This comment is part of Attachment 1 of the Comment Letter I75. The comment states that rescue equipment and vehicles would not be able to reach residents of the proposed project and that this issue was not studied or considered in the Draft EIR. Specific requirements for provision of fire apparatus access roads are provided in Draft EIR Appendix F2. Please refer to Global Response GR-4 .
- I75-13** This comment is part of Attachment 1 of the Comment Letter I75. The comment states that land outside of the proposed project parcels would be subject to City General Plan policies and City ordinances. The comment does not raise new or additional environmental issues concerning the adequacy of the Draft EIR.
- I75-14** This comment is part of Attachment 1 of the Comment Letter I75. The comment states that the SEIR for the City's General Plan Housing Element Update includes the proposed project and the Stonegate Project. The Stonegate project has been accounted for as a cumulative project (see Draft EIR Section 5.3, Cumulative Projects).
- I75-15** This comment is part of Attachment 1 of the Comment Letter I75. The comment states that the proposed project needs to include two evacuation routes for adequate safety and that the project does not comply with City design standards or streets and therefore would result in a significant impact. Please refer to Global Response GR-3. Global Response GR-4 and Global Response GR-5.
- I75-16** This comment is part of Attachment 1 of the Comment Letter I75. The comment states that the proposed project street design does not comply with City design standards regarding width of proposed streets, as outlined in the City's municipal code. Please refer to Global Response GR-5.
- I75-17** This comment is part of Attachment 1 of the Comment Letter I75. The comment states that City streets require at least 30 feet of road easement in order to comply with City street design standards. Please refer to Global Response GR-5.
- I75-18** This comment is part of Attachment 1 of the Comment Letter I75. The comment summarizes the Draft EIR's statement regarding consistency with City design standards and road improvements to Carter Avenue. The comment does not raise new or additional environmental issues concerning the adequacy of the Draft EIR.
- I75-19** This comment is part of Attachment 1 of the Comment Letter I75. The comment states that the project should not be approved because proposed roads do not meet the fire apparatus minimum of 24 feet, does not meet the required 30 feet in width, ingress/egress requirements, and would result in approximately 740 additional vehicle trips. Please refer to Global Response GR-5. Regarding additional vehicle trips, please refer to Global Response GR-6.
- I75-20** This comment is part of Attachment 1 of the Comment Letter I75. The comment suggests that the egress should be analyzed to determine its adequacy as a second evacuation route. Please refer to Global Response GR-4 and Global Response GR-5.

- I75-21** This comment is part of Attachment 1 of the Comment Letter I75. It is a portion of a traffic study done for the proposed project. The comment does not raise new or additional environmental issues concerning the adequacy of the Draft EIR.
- I75-22** This comment is part of Attachment 1 of the Comment Letter I75. The comment is a photo of Carter Avenue to demonstrate its width and current condition. The comment does not raise new or additional environmental issues concerning the adequacy of the Draft EIR. Please refer to Global Response GR-5 regarding discussion of the existing and proposed width of Carter Avenue.
- I75-23** This comment is part of Attachment 1 of the Comment Letter I75. The comment is an image of the parcel map for a section of road between Lima and Monastery Gate. The comment does not raise new or additional environmental issues concerning the adequacy of the Draft EIR.
- I75-24** This comment is part of Attachment 2 of the Comment Letter I75. The comment provides background regarding the history of the proposed open space dedication area. The City notes that the comment provides background information and does not raise an issue related to the adequacy of the Draft EIR.
- I75-25** This comment is part of Attachment 2 of the Comment Letter I75. The comment states that there is no benefit to owning Hillside land due to its fire hazard severity level, and the landslide potential when it's above several existing housing developments in Pasadena. Because no development is proposed in this area, and because the area would be conserved in perpetuity, the proposed open space conservation easement would not result in increases to fire hazards or landslide potential.
- I75-26** This comment is part of Attachment 2 of the Comment Letter I75. The comment states that a parcel donated to the City is zoned as Open Space under the Protected and Preserved zoning designation, and as such the public would have no access to that parcel. Therefore, the parcel donation would provide no benefit to the public. As stated in Draft EIR Section 3.1, Project Location and Project Site, open space areas lie to the north of the Mater Dolorosa Retreat Center. Of this open space area, 35 acres are proposed to be preserved as protected open space; however, these 35 acres are not considered part of the project site, and no development would occur within this area.
- I75-27** This comment is part of Attachment 2 of the Comment Letter I75. The comment states that it is unknown what and how much protected land the Monastery is proposing to donate. According to Draft EIR Section ES.1, Project Location and Project Site, open space areas lie to the north of the Mater Dolorosa Retreat Center. Of this open space area, 35 acres is proposed to be conserved as part of the project to be protected open space; however, these 35 acres are not considered part of the project site.
- I75-28** This comment is part of Attachment 2 of the Comment Letter I75. The comment suggests that the City should not accept the 35-acre conservation easement as it would be a liability to the City. The comment provides the opinions of the commenter and does not raise new or additional environmental issues concerning the adequacy of the Draft EIR.
- I75-29** This comment is part of Attachment 2 of the Comment Letter I75. The comment shows figures of parcel locations. The comment does not raise new or additional environmental issues concerning the adequacy of the Draft EIR.

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Comment Letter 176

From: Barbara Velturo <barbaravelturo@gmail.com>
Sent: Monday, October 4, 2021 12:57 PM
To: Vincent Gonzalez
Subject: Comment on DEIR
Attachments: INCONSISTENCY ANALYSIS.docx

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

Vincent Gonzalez
Vgonzalez@cityofsierramadre.com

From: Barbara Velturo
380 West Carter Avenue
Sierra Madre, CA 91024

barbaravelturo@gmail.com
(802) 558-8864

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

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

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

176-1

Much of the SPECIFIC PLAN for the "Meadows at Bailey Canyon" is INCONSISTENT WITH SIERRA MADRE'S GENERAL PLAN, ZONING ORDINANCES AND PLANS.

From the General Plan Introduction

The City of Sierra Madre General Plan is a long-range policy document which lays out the framework for all future growth and development within the City. The General Plan is the blueprint that sets the basis for future policy decisions, in that it organizes the desires of the Sierra Madre community with respect to the physical, cultural, economic, and environmental character of the City.

Most importantly, the Sierra Madre General Plan is a community-based document that reflects the community values and character as expressed in its goals and policies, while also serving as a technical document which provides information about the City. ***The General Plan shall be used as a guide by the City's decision makers to achieve the community's vision and preserve the history, character and shared values of the community for future generations.***

All those regulations have been carefully crafted and refined over decades, by Sierra Madre's volunteer and elected officials, citizens and hired consultants, to PROTECT the unique character of our VILLAGE OF THE FOOTHILLS. As knowledge has evolved of climate change and the increasing man made dangers of FIRE, DROUGHT and AIR POLLUTION, Sierra Madre has consistently acted to those protections, to keep our vision of our beautiful small town's character.

Because the General Plan is so critically important in guiding all future development decisions in a City, State law requires that a Specific Plan MAY NOT BE ADOPTED Unless it is Consistent with the General Plan. pursuant to §65454

The developers of the Meadows at Bailey Canyon hope to build by use of a SPECIFIC PLAN, which not only evades the VALUES, VISION and POLICIES of our GENERAL PLAN, our ORDINANCES and our CITY PLANS, but which eliminates the oversight of our Planning Commission which is intended to enforce and protect those values.

The following sections will show many critical inconsistencies with several parts of the Sierra Madre General Plan, the Sierra Madre Ordinances and the Sierra Madre Community Forest Plan. Some inconsistencies are readily apparent – some are inconsistent because the Developer failed to do the studies or present the evidence by which the City could ascertain consistency.

Luckily, the law does not allow a developer to so easily replace our City's values with its own. And it is up to Sierra Madre's Planning Commission and City Council to protect those values on behalf of the citizens of this town.

176-2

176-3

The SPECIFIC PLAN for the "Meadows of Bailey Canyon" is INCONSISTENT with the SIERRA MADRE GENERAL PLAN with regard to the Land Use Section of the General Plan

State law requires that Specific Plans must demonstrate consistency with the goals, objectives, policies and programs of a jurisdiction's General Plan. IF THEY DO NOT, THEY CAN NOT BE ADOPTED.

The proposed Meadows development is inconsistent with these GENERAL PLAN LAND USE GOALS, the policies which further define those goals and the Implementation measures to put those policies into effect. Those Goals and Policies establish what is valuable to the Citizens of Sierra Madre. They must be enforced and protected.

City of Sierra Madre 2015 General Plan – Land Use Goals

2. Preserve and enhance the diversity in the character of residential neighborhoods ensuring that new development is compatible in its design and scale with older established development in the surrounding neighborhood without attempting to replicate or mass produce a style of Development.
3. Ensure that development is done in harmony with its neighborhood, and preserves and protects privacy and mountain views of neighboring properties.
4. Ensure that development is done to maximize water conservation practices to reduce and minimize the impact on the City's local water supply and the ability to serve its water customers.
5. Institute conservation measures so that the demand for water matches the City's local supply.
8. Preserve existing and provide additional constructed and natural open space.
9. Preserve the hillside areas in order to protect the environment and mountain views, obtain a balance between developed areas and the hillside wilderness, and establish the role of the hillside as an entry point into wildland areas.

176-4

176-5

THE SPECIFIC PLAN IS NOT CONSISTENT WITH THE LAND USE GOALS AND POLICIES OF THE GENERAL PLAN WITH REGARD TO THE CHARACTER OF NEW DEVELOPMENT.

GOALS OF THE SIERRA MADRE GENERAL PLAN

2. Preserve and enhance the diversity in the character of residential neighborhoods ensuring that new development is compatible in its design and scale with older established development in the surrounding neighborhood without attempting to replicate or mass produce a style of Development.

176-6

3. Ensure that development is done in harmony with its neighborhood, and preserves and protects privacy and mountain views of neighboring properties,

1. Most building projects in Sierra Madre (except for this "Meadows" project which evades all our protective regulations by use of a Specific Plan) would be required by our Planning Application process to SHOW how their planned house or development fits into the neighborhood. A Sierra Madre Planning application requires a: "Neighborhood Analysis - a tabulated list of properties within a 300 foot radius of the project site comparing lot size and building data as presented by the Los Angeles County Assessor" "The analysis should calculate the median and average values for lot size and identify where the proposed project falls within the properties."

176-7

The Meadows Development has not done any such "Neighborhood Analysis" and we do not know if, under the Specific Plan, that analysis will be required, as their Specific Plan negates many of Sierra Madre's planning requirements.

But, unless that analysis IS done, and unless the results show that the project falls close to the median or average values of the surrounding properties, the project can NOT claim to be "consistent" with Sierra Madre General Plan, Ordinances, or our City's Values. The neighborhood surrounding the proposed development has a specific character, lot size and house size. That, and not some oversized house on an oversized lot in another part of town, is what must be compatible in design and scale.

176-8

2. The project's Specific Plan shows larger house sizes than is allowed in single family residential zones. Our General Plan requires adherence to those zoning requirements. The project can NOT claim to be "consistent" with Sierra Madre General Plan, Ordinances, the surrounding neighborhood or our City's Values when it varies from those requirements.

176-9

3. The project's Specific Plan shows greater lot coverage than is allowed in Single family residential zones. Our General Plan requires adherence to those zoning requirements. The project can NOT claim to be "consistent" with Sierra Madre General Plan, Ordinances, the surrounding neighborhood or our City's Values when it varies from those requirements.

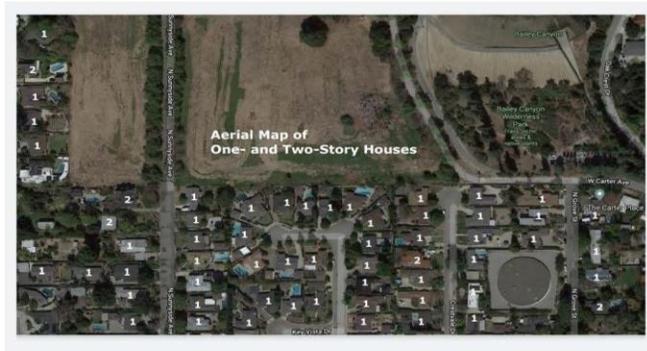
176-10

4. The project's Specific Plan shows greater setbacks than is allowed in Single family residential zones. Our General Plan requires adherence to those zoning requirements. The project can NOT claim to be "consistent" with Sierra Madre General Plan, Ordinances, the surrounding neighborhood or our City's Values when it varies from those requirements.

176-11

5. An aerial map of homes adjacent to the Parcel to be developed shows that only 5 homes of 59 in the neighborhoods to the west and south of the project are two story homes and 54 are single story homes. (Map below) We do not know if ANY homes in this proposed development will be one story, and doubt that they will even come close to the prevailing percentage of single story homes in the neighborhood, let alone conforming to the house and lot size that our planning application would require analyzed.

176-12



At the Developer's presentation to the city Council and the residents, in March 2021, a Council Member asked how many of the "Meadows" houses would be one story. The response was that it hadn't been decided, but that information would be in the Specific Plan. It is not! The Specific Plan makes no mention at all about how many houses, IF ANY, will be single story. At a Planning Commission meeting, Planning Director Gonzalez stated that there were only 4 designs to review. ALL designs previously shown were two story houses. And none of those previously presented designs appear in the Specific Plan – the designs of the houses to be built, along with their sizes are not shown.

176-13

The Developer has used a "Stock" response as part of its "Consistency Analysis" – ostensibly intended to cover any Goals and Policies which require the project to be consistent with its surrounding neighborhood.

176-14

Table 1. Consistency with City of Sierra Madre's General Plan Goals and Policies

Master Responses:

Response 1: The Specific Plan includes development regulations and design guidelines and standards for the project site created to be compatible with the surrounding neighborhood. The development will be designed in a manner that is sensitive to viewpoints through building design, site layout and building heights. The design guidelines and standards in Chapter 5 promote the high-quality standards that the City and the community value. In addition, multiple measures are in place that will provide buffers, additional setbacks for lots west of North Sunnyside Avenue and landscaping, as well as a Grading and Landscape buffer along the northern boundary of the Plan area, to ensure compatibility with existing structures in the adjacent neighborhood and Retreat Center. See Section 3.8.5, Good Neighborhood Plan for additional details. See Section 3.8.5, Good Neighborhood Plan for additional compatibility details in regard to the site's compatibility with surrounding uses.

176-14
Cont.

Those statements of "fact" unless supported by sufficient evidence are inadequate. In any case where the language merely states that the project would be consistent with itself—not the policy, it fails to establish consistency with the policy. It states the development would be "regulated" by its own design guidelines which are, in fact, inconsistent with this policy. No facts are presented to support the erroneous conclusion of consistency because it can't be done. The developer must address the inconsistency of the project with this policy, with facts.

Unless the developer shows the locations and numbers of ALL one and two story homes, and the lot sizes and house sizes for each of the 42 lots, they can NOT claim that their project is "consistent" with Sierra Madre General Plan, the surrounding neighborhood or our City's Values. The statement that something is so, without evidence, is invalid.

6. The orientation of the homes, as show on previous Site Plans, is NOT CONSISTENT with any other neighborhood in the city. The houses on the west side will all face east and the interior homes will all face north. There will be no homes facing each other. Each row of houses will sit on top of a pad, at the top of a slope. This will eliminate the community/neighborhood aspect of homes looking out onto the same street, that the entire city has and is a configuration not seen in any part of Sierra Madre. The project can NOT claim to be "consistent" with the General Plan, surrounding neighborhood or our City's Values.

176-15

A local architect had these comments that the design of the development did NOT at all fit into our City's standards and character. "It is also separated by making itself a separate enclave, rather than fitting in. This is due to two factors: One is the road layout. It definitely has a message of being separate. For instance, why isn't Carter improved and continued west to Sunnyside as a starting point in the layout?"

Two is that nowhere in Sierra Madre do we have these “Orange County-like” butcher the natural land forms to make these “line 'em-up” flat building pads. Completely un-natural looking, with useless steep slopes that result from doing this. These pads are for the purpose of setting cookie cutter house designs down quickly and cheaply to maximize speed and profit. They have nothing to do with urban form or even trying to fit into our town. This configuration does not exist anywhere in Sierra Madre. It is alien and unnatural.”

176-15
Cont.

7. The developer has shown no plans, no elevations nor any other studies to support its claim that no views will be impacted by the project. Simply SAYING that it will not is insufficient evidence. Unless they produce evidence to support their unsubstantiated comment, they can NOT claim that the project is "consistent" with Sierra Madre General Plan, the surrounding neighborhood or our City's Values.

176-16

8. The developer has shown no maps or plans that would support their claim that the project is “consistent” with the General Plan requirements attached. They have not shown how many of each lot size and their locations, or the size of the homes on each lot. We can analyze the size of the lots and the homes in the surrounding neighborhoods, but still can't know whether their project is consistent with our General Plan without knowing the developments lot sizes and house sizes.

Simply referring to “Design Standards” in a Specific Plan, which also includes the right to “amend” that plan, does not provide a true representation of what will be built and if it will complement the character of existing development. **Stating** that their development regulations and design standards make the development “compatible with the surrounding neighborhood” and “sensitive to viewpoints” does NOT show to any reasonable person that those things are so, especially when those neighborhood properties were built with more restrictions than will apply under the Specific Plan. The Specific plan sets zoning standards which, if applied, would automatically make the development NOT COMPATIBLE with the neighborhood and inconsistent with our General Plan, which requires that compatibility. Again, their “consistency” statement simply states the development would be “regulated” by its own design guidelines which are, in fact, inconsistent with our policies. No facts are presented to support the erroneous conclusion of consistency because it can't be done. The developer must address the inconsistency of the project with this policy, with facts.

176-17

Below are the Policies in the General Plan pertaining to developments. The Developers Specific Plan MUST demonstrate consistency with our CURRENT General Plan. It may not claim that consistency based on its own regulations or an “Amended” or future General Plan which incorporates those regulations

176-18

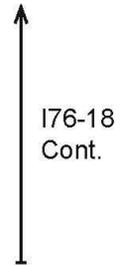
The developer has not proven Consistency with any of these policies or implementation measures. The Specific Plan’s stated Home Sizes, Lot Coverage and Setbacks alone make the development inconsistent with the zoning Ordinances that the General Plan policies intended to “maintain” and “protect”.

- Policy L4.1: Ensure that the expansion of existing uses is reflective of and complements the overall pattern of development, without changing the character of existing development.
- Policy L6.2: Ensure that any new or expanded structures in residential neighborhoods do not unreasonably obstruct significant mountain or basin views.
- Policy L7.1: Maintain maximum lot coverage and floor area ratios which allow for adequate buffering from neighboring properties, usable private yard area, air circulation and light.
- Policy L7.3: Limit the height of new buildings to reflect the height patterns on the street and within the Sierra Madre community.
- Policy L7.4: Encourage new residential development to be compatible with existing structures including the following:
 - a. Maintenance of front, side, and rear yard setbacks.
- Policy L10.4: Maintain development standards and minimum lot sizes which result in development with dimensions, quality, and aesthetics consistent with existing developments.
- Policy L15.1: In subdividing larger parcels, determine development density based on a calculation that uses slope as one of the primary factors, which means that the steeper the slope, the larger the minimum lot size.
- Policy L15.2: Ensure that development in the hillside areas be located in those areas resulting in the least environmental impact.
- Policy L15.3: Require that all access into hillside areas be designed for minimum disturbance to the natural features.
- Policy L15.5: Consider the impact of development on wildlife.
- Policy L16.1: Minimize the amount of grading and removal of natural vegetation.
- Policy L17.2: Require that all development be designed to reflect the contours of the existing landform using techniques such as split pads, detached secondary structures (such as garages), and avoiding the use of excessive cantilevers.
- Policy L17.3: Require that all development preserves, to the maximum extent possible, significant features of the natural topography, including swales, canyons, knolls, ridge lines, and rock outcrops.
- Policy L24.1: Require that new residential development be compatible with and complement existing structures on the block:
 - a. Maintain existing front yard setbacks on the block;



I76-18
Cont.

- Policy L24.5: Encourage the retention of existing mature, specimen trees.
 - Policy L37.8: Ensure that all development and new uses are compatible with adjacent uses, and yield no significant negative impacts to noise, air quality, water quality and traffic.
- Measure IM-12: The City shall continue to enforce and amend the R-1 (One Family Residential) Zoning Ordinance as necessary to ensure that development is compatible in design and scale with the neighborhood.
- Measure IM-59: The City shall continue to enforce the Institutional (I) Zoning Ordinance.



THE SPECIFIC PLAN IS NOT CONSISTENT WITH THE LAND USE GOALS AND POLICIES OF THE GENERAL PLAN WITH REGARD TO THE PRESERVATION OF OPEN SPACE

GOALS OF THE SIERRA MADRE GENERAL PLAN

- 8. Preserve existing and provide additional constructed and natural open space.
- 9. Preserve the hillside areas in order to protect the environment and mountain views, obtain a balance between developed areas and the hillside wilderness, and establish the role of the hillside as an entry point into wildland areas.

Our 2015 General Plan included the following Policies:

- Policy R3.2: Ensure that wildland open space, including the areas of the city designated as High Fire Hazard Severity Zone, is left in its natural state with the exception of brush abatement for public safety in order to aid the City in fighting fires.
- Policy R3.3: Ensure that natural open space within the High Fire Hazard Severity Zones remains undeveloped so as to mitigate the flood cycles that follow wild land fires in the natural open space.

And in the Pending update to our General Plan, the City has added a new policy to its Safety Element to make their intentions clear:

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

The planned project is in the Very High Fire Severity Zone and is part of the Wildland Urban Interface.

The Sierra Madre General Plan identifies and recognizes the value of Constructed and Natural Open Space within our Wildland Urban Interface, but states that NATURAL OPEN SPACE is the most precious because it can not be replaced once lost. The entire parcel to be developed is currently Natural Open Space, the most valuable.

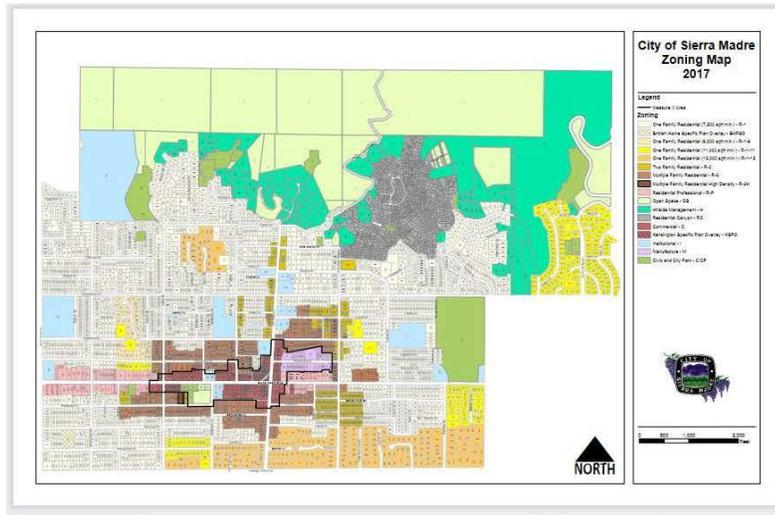
All other parcels which abut the Forest wilderness area recognize the City's goal to "Preserve the hillside areas in order to protect the environment and mountain views, obtain a balance between developed areas and the hillside wilderness, and establish the role of the hillside as an entry point into wildland areas". With the exception of a small part of the Canyon Zone all of those parcels are zoned either Hillside Management Zone or Open Space Zone, for the protection of Open Space and for Fire and Flood Safety. Sierra Madre Zoning Map shows the Open Space Zone in pale green, the Hillside Management Zone in a darker blue/green, and the solid green as City Parks.

176-19

176-20

176-21

176-22



176-22
Cont.

The most important values to our community of that open space are its protections as a buffer against wildfires and landslides as well as an area from which our firefighters and partners can stage their attacks against any fire that threatens our City. It is a safety asset for all of Sierra Madre.

176-23

But there is a further value of that specific area as described to us by a member of a conservation group.

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

176-24

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

176-25

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

176-26

The Developer has shown no consistency with any Goals or Policies that seek to Preserve and Protect Open Space, in developing the land.

However, the developer in the DEIR consistency analysis claims that its development is consistent with the General Plan’s goal to Preserve existing and provide additional constructed and natural open space.

They State: “The project would comply with the City’s goal of providing additional constructed open space. The proposed project establishes open spaces zones on the project site, including the incorporation of a neighborhood park at the southern area of the project site and dedication of approximately 35 acres of protected open space to the City, north of the Mater Dolorosa Retreat Center”

176-27

That statement is entirely untrue. The intent of the Goal is to Preserve existing and “add” additional open space. The Developers plan does not “preserve” ANY existing (natural) open space, nor provide any additional open space. It plans to CONVERT less than 5 acres of the 17 from Natural Open Space (the most precious, as stated in our General Plan) to Constructed Open Space, for the Park and for the landscaped buffer to protect the Monastery from the sights and sounds of the development. It has provided NO additional open space of any kind. Their development is inconsistent with the Goal of the General Plan

Though the DEIR states that the proposed “land above the retreat center is NOT part of the project site”, the developer still attempts to claim credit for that land as part of its “consistency” with the City’s goal to “Preserve existing and provide additional constructed and natural open space”. It would not be consistent with that goal, even IF that donation was part of the project.

Only 20 acres of that land is in Sierra Madre and subject to the City’s General Plan goals and policies. Those 20 acres of Sierra Madre land are already Preserved and Protected by the fact that they are zoned “Open Space” and cannot be developed for housing. That proposed donation in no way can serve to evidence any consistency with the General Plan goal –and there is no benefit to the public by the donation of any of the land proposed.

176-28

The developers have neither “**preserved existing**” nor “**provided additional**” open space.

The Developer further claims that the project is consistent with Objective L44: “The preservation of natural open space areas as crucial to the distinctive character of Sierra Madre, and as a key feature of sustainability and public safety” - based on the same referenced donation of land already preserved and protected by its zoning designation, and other land which is not IN Sierra Madre and which poses a significant liability if accepted.

176-29

These are the Goals and Policies in the General Plan pertaining to the preservation and protection of Open Space in Sierra Madre. The developer has NOT proven Consistency with any of these goals, policies or implementation measures.

Goal 8. Preserve existing and provide additional constructed and natural open space.

Goal 9. Preserve the hillside areas in order to protect the environment and mountain views, obtain a balance between developed areas and the hillside wilderness, and establish the role of the hillside as an entry point into wildland areas.

Policy L15.2: Ensure that development in the hillside areas be located in those areas resulting in the least environmental impact.

Policy L15.3: Require that all access into hillside areas be designed for minimum disturbance to the natural features.

Policy L15.5: Consider the impact of development on wildlife.

Policy L16.1: Minimize the amount of grading and removal of natural vegetation.

Policy L24.5: Encourage the retention of existing mature, specimen trees.

Policy L44.3: Establish the role of natural open space as an interface to the wilderness area.

Policy R1.1: Maintain and enforce the Hillside Management Zone Ordinance and other ordinances that seek to protect hillside areas.

Policy R3.2: Ensure that wildland open space, including the areas of the city designated as High Fire Hazard Severity Zone, is left in its natural state with the exception of brush abatement for public safety in order to aid the City in fighting fires.

Policy R3.3: Ensure that natural open space within the High Fire Hazard Severity Zones remains undeveloped so as to mitigate the flood cycles that follow wild land fires in the natural open space.

Policy R3.4: Ensure the protection of natural open space so as to maintain it as a preventative measure against flooding, and as a means of capturing stormwater runoff for groundwater recharge.

Policy R10.8: Continue to monitor construction projects with regard to grading and construction effects on trees, tree removal and replacement.

176-30

Measure IM-1: The City shall continue to enforce the Hillside Zone Ordinance and other ordinances that seek to protect the hillside areas.

Measure IM-5: The City shall amend the Open Space Ordinance to identify wildland open space as areas to remain in their natural state to mitigate flood cycles and capture stormwater runoff, except where brush abatement is necessary for fire safety

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Cont.

The Specific Plan does not provide two safe and acceptable methods of ingress and egress to the Proposed Development as required nor two evacuation routes.

The Specific Plan specifications for Carter Avenue do not comply with Sierra Madre Road Standards

The DEIR failed to consider or study a serious pedestrian Safety issue that would result from development of this project according to the Specific Plan.

176-31

A Traffic Study, in an Environmental Impact Analysis to amend our General Plan, done concurrently with this one for the Meadows at Bailey Canyon, also included this project. That analysis showed that the impact of all projects could ONLY meet acceptable standards if, in addition to other mitigations, they adhered to the Sierra Madre bicycle regulations and its Street Standards Ordinance for all access roads, which requires a 30 foot width.

The proposed housing project has admitted that it will not meet the City's bicycle requirements and has shown no intent or ability to widen all of Carter Avenue to the required 30 feet width. Unless it corrects those two issues in the Final EIR, it will remain INCONSISTENT with Sierra Madre's Ordinances and General Plan, and will not meet CEQA requirements to mitigate significant transportation impacts.

The pending Draft SEIR for the General Plan update/housing element, at the City's request, included Environmental impacts to Stonegate and the "Meadows" project (as potential future residential development) to be studied. In its analysis of impacts of ALL SITES, that DEIR made this requirement (among others) for the adequate safety of all proposed and potential development:

Access to/from each site would be required to meet the City's design standards with respect to location, width, and sight distance. With the above mitigation measures, the General Plan Update residential land uses can be added to the City housing supply without any remaining significant CEQA transportation impacts."

This is the Sierra Madre Ordinance setting forth the City Subdivision Standards for Streets that would need to be met:

§ 16.32.035. Street standards—Modification of same.

Except as otherwise required by Chapter 15.24 of this code, the city's public street standards shall require at least thirty feet of road easement to accommodate two travel lanes, one parking lane, and a pedestrian walkway. Notwithstanding Sections 16.32.020 and 16.32.030 of this code, the city council may determine, upon approval of a parcel or tentative tract map creating streets, that adjustment of the city's public street standards as to those streets is justified by other benefits to the policies stated in Section 17.52.010 of this code and that such adjustments do not unduly impact circulation and parking. (Ord. 1229 § 2, 2005)

Despite that ordinance, the Developer's Specific Plan for the "Meadows" states: "Site access, including road widths and connectivity, would also comply with all City requirements and would include the following:

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- Primary access to the project site would be provided from North Sunnyside Avenue. Carter Avenue would provide secondary egress and ingress access.
(They have not explained what is meant by "secondary egress and ingress access", how that would be managed and what, if any results could be obtained by that designation)

- All roads comply with access road standards of not less than 24 feet, unobstructed width."
(Access road standards of 24 feet are required for fire apparatus, not for two way traffic of hundreds of trips daily)

These findings in the SEIR of what is required for safe traffic must be enforced in any development to satisfy CEQA requirements and should be part of Sierra Madre ordinances as requirements for development. Unless the Project can provide this safe access it must be rejected.

There MUST ALSO be an explanation as to why there is a discrepancy in the findings and required mitigation between the Meadows Environmental Impact Report (paid for by the developer although the City of Sierra Madre is listed on the NOP as lead agency) and the one which considered the same project in the EIR to update the General Plan (paid for by the City of Sierra Madre).

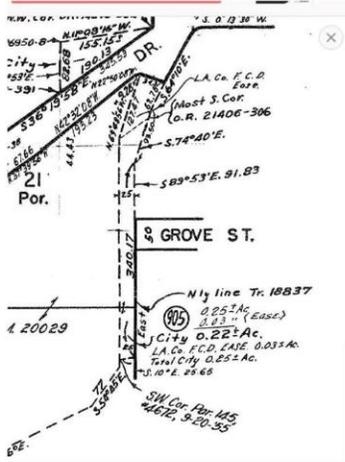
It is unknown who might have the right and ability to correct the deficiencies in this road. Unlike City streets, this section of road has its own parcel number in the LA County assessor's office, and is identified as "Government Owned" We have been unable to ascertain, through public records requests, the title and ownership of this section of land and all easements and rights of way included in it, or whether any entity has the sole right to improve it to comply with our City Street Ordinance. (LA County Assessor's Parcel Map is below"

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The Final EIR must also show whether or not the Developer is able to meet the required mitigations to bring its plan to an acceptable level, as well as comply with the City's bicycle regulations. If it is not able to comply, the project is inconsistent with the Sierra Madre Street Standards Ordinance and bicycle requirements and must be rejected.

PEDESTRIAN SAFETY

The Meadows DEIR made NO examination of Pedestrian safety in its analysis of Traffic and Circulation.

176-38

Carter Avenue, proposed by the developer to provide ingress and egress for hundreds of vehicles daily, does not meet any reasonable standards for its use for that purpose. Its width and condition and lack of sidewalks for the entire length from Lima Avenue to the current monastery gate are hazardous for pedestrians even with the lesser amount of current traffic.

Because of its location - directly adjacent to Bailey Canyon Park, which regularly results in overflow parking that clogs nearby streets, there is significant pedestrian traffic. Those pedestrians would be crossing the road that the "Meadows" plan proposes to use as and ingress and egress for hundreds of cars daily. Neither Carter Avenue, from the proposed project gate to its intersection with Lima, nor Grove Avenue, directly across from the Park entrance, have sidewalks. All of the many pedestrians walk in the narrow streets

176-39

It can also be expected that many people planning to visit Bailey Canyon Park will park on the west side of Carter (parking side) inside the development and cross 2 way traffic on that road to the developers "pedestrian walkway" (which it says will provide enhanced access to the park), exiting to the north side of that 24 foot section of Carter (with no sidewalks).

176-40

Cars exiting the development will be travelling at a high rate of speed down the wider, sloped portion of Carter within the development(12% slope) threatening those crossing from the west side parking, then making a left turn onto a narrow road and **intercepting** within a short block with pedestrians, unaccustomed to traffic from that direction. Without (at the very least) sidewalks, there WILL be pedestrian accidents.

176-41

Yet the DEIR never considered, nor made mention of any study of that dangerous condition and the danger to pedestrians crossing from the west side parking to the east side "pedestrian walkway" or simply to exit on the east side which is closer to the park.

The City has known for a long time that the parking on Grove Avenue, which barely leaves one lane open on weekends, requires those going to Bailey Canyon Park to walk in the Street. The single lane left on Grove, with cars parked on both sides, would make it difficult for rescue equipment to access those blocked homes if necessary. Yet that already hazardous situation, which would be greatly exacerbated by two way traffic from the potential project, was not at all studied or its impact considered in the DEIR.

176-42

The close proximity of that egress from the development to the County Access road should also be studied as to its adequacy as a second evacuation route, in light of first responders' need to access the development either by Carter Avenue within the development or by the County Access Road, close to the development exit.

176-43

A thorough study of pedestrian safety on and near this road, proposed as a second point of ingress and egress and a second evacuation route in case of fire, earthquake or landslide MUST be done as part of an adequate Traffic and Circulation Analysis.

176-44

The SPECIFIC PLAN for the "Meadows of Bailey Canyon" is INCONSISTENT with the SIERRA MADRE GENERAL PLAN, Ordinances and Community Forest Management Plan with regard to Trees and Tree Canopies.

FROM THE SIERRA MADRE CITY WEBSITE

The Community Forest Master Plan ensures the continuation and enhancement of the tree canopy for the beauty, wellbeing, livability, and long-term environmental health of the community of Sierra Madre.

The City of Sierra Madre's mission to grow and perpetuate the community forest is embodied in the Community Forest Master Plan. This mission is expressed through these overarching goals:

- Conserve and expand tree canopy cover equal to no net loss, with a gradual increase over time.
- Foster increased public awareness and education regarding the environmental value of trees as green infrastructure
- Promote increased shade-tree canopy for energy conservation, storm water capture, and improved air quality.
- Encourage species selection appropriate for local environmental conditions and sustainability
- Preserve and enhance community aesthetics and property values through increased canopy cover and diversity
- Apply Best Management Practices for planting, maintaining, and responding to changed environmental conditions in the community forest

The City of Sierra Madre places a high value on its tree canopy and is committed to the preservation and enhancement of the community forest over the next 50 years. A Tree Preservation and Protection Ordinance also protects the community's trees and the Energy, Environment, and Natural Resource Commission (previously the Tree Advisory Commission) oversees the implementation of the ordinance and makes recommendations to the City Council on management strategies. "

The Developers Specific Plan would entirely ignore the requirements of the City's Forest Management Plan and would replace approximately 90 mature, canopied trees and eliminate their environmental and aesthetic benefits. These mature trees, that have managed to survive droughts with little or no care or watering, would be replaced by an equal number of smaller trees which will require a great amount of water to keep established, if they can survive in the drought. Water we cant afford to use!

Meanwhile, the large "Protected" Oak Trees, if removed, have only a slim chance of surviving the transplant and will be lost.

The City has recognized the critical environmental and aesthetic value of its mature trees and their Canopies and has created a plan to protect them.

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176-46

The intent of the Specific Plan to remove all those trees to allow a "MAXIMUM PROFIT" configuration is INCONSISTENT with our Community Forest Plan, despite their claim to be guided by it.



176-47

The following explanation of the critical impact of the Developers Plan shows the immeasurable loss to the Community of these mature trees which will be destroyed to make way for oversized houses on smaller lots than allowed, further depleting the available open land for environmental sustainability by loss of the open land.

COMMENT SUBMITTED BY DANIEL GOLDEN

176-48

"101 mature trees will be removed, including 10 protected Oaks. The Oaks will be replaced with smaller Oaks and other small trees (requiring a great deal of water to become established--water that is not apparently accounted for in the questionable "net zero" pre-purchase arrangement suggested in the Specific Plan). SM has a Forest Management Plan with a mission to preserve "Canopies" for their environmental and aesthetic benefit.

The Specific Plan to swap these mature specimens for 24" boxed trees fails to factor in the massive loss of oxygen production that will be immediately generated. It would take 15 or more years for boxed trees to develop sufficient caliper to emit barely 35% of the oxygen created by the original stand of large mature trees. These large trees each generate over 270 lbs of oxygen per year--so long as they are not summarily uprooted and discarded by the developer. Remove the trees and you lose sufficient oxygen for some 60 families per year. My research, including studies published in the journal of Arboriculture and Urban Forestry, points out the devastating effects on community air quality from such profligate destruction.

176-49

Simply stated, trees grow air, inhibit particulate settling, preserve wildlife, keep ground temperatures in check, absorb storm runoff, help to prevent many human lung disorders, and

176-50

more. The new housing development, if approved, would actually and desperately itself need the offset of the canopy of mature trees on the property to help alleviate massive creation of heat island conditions--hardscape with foundations, driveway pads, sidewalks and paved streets supplanting the current breathable meadow space.

Summary removal of the trees without sufficient atmospheric impact analysis is one of many flaws in the developer's Specific Plan."

The Policy of the City of Sierra Madre is to carry out the objectives and recommendations of the Community Forest Management Plan. Those objectives are to Preserve Canopied Trees for the Benefit of the City and the Citizens of Sierra Madre.

THE SPECIFIC PLAN FOR THE MEADOWS IS NOT CONSISTENT WITH THAT POLICY.

- Policy R10.3: Carry out the objectives and recommendations of the Community Forest Management Plan.
- Policy R10.8: Continue to monitor construction projects with regard to grading and construction effects on trees, tree removal and replacement.

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THE SPECIFIC PLAN for the "Meadows at Bailey Canyon" is INCONSISTENT WITH SIERRA MADRE'S GENERAL PLAN, ZONING ORDINANCES AND PLANS.

Some inconsistencies are readily apparent – some are inconsistent because the Developer failed to do the studies or present the evidence by which the City could ascertain consistency. The Specific Plan for the "Meadows" project is inconsistent with all the following Goals and policies of our General Plan, as explained in each of the previous sections.

City of Sierra Madre 2015 General Plan – Land Use Goals

2. Preserve and enhance the diversity in the character of residential neighborhoods ensuring that new development is compatible in its design and scale with older established development in the surrounding neighborhood without attempting to replicate or mass produce a style of Development.
3. Ensure that development is done in harmony with its neighborhood, and preserves and protects privacy and mountain views of neighboring properties.
4. Ensure that development is done to maximize water conservation practices to reduce and minimize the impact on the City's local water supply and the ability to serve its water customers.
5. Institute conservation measures so that the demand for water matches the City's local supply.
8. Preserve existing and provide additional constructed and natural open space.
9. Preserve the hillside areas in order to protect the environment and mountain views, obtain a balance between developed areas and the hillside wilderness, and establish the role of the hillside as an entry point into wildland areas.

City of Sierra Madre – Policies

- Policy L4.1: Ensure that the expansion of existing uses is reflective of and complements the overall pattern of development, without changing the character of existing development.
- Policy L6.2: Ensure that any new or expanded structures in residential neighborhoods do not unreasonably obstruct significant mountain or basin views.



176-52

- Policy L7.1: Maintain maximum lot coverage and floor area ratios which allow for adequate buffering from neighboring properties, usable private yard area, air circulation and light.
 - Policy L7.3: Limit the height of new buildings to reflect the height patterns on the street and within the Sierra Madre community.
 - Policy L7.4: Encourage new residential development to be compatible with existing structures including the following: a. Maintenance of front, side, and rear yard setbacks.
 - Policy L10.4: Maintain development standards and minimum lot sizes which result in development with dimensions, quality, and aesthetics consistent with existing developments.
 - Policy L15.1: In subdividing larger parcels, determine development density based on a calculation that uses slope as one of the primary factors, which means that the steeper the slope, the larger the minimum lot size.
 - Policy L15.2: Ensure that development in the hillside areas be located in those areas resulting in the least environmental impact.
 - Policy L15.3: Require that all access into hillside areas be designed for minimum disturbance to the natural features.
 - Policy L15.5: Consider the impact of development on wildlife.
 - Policy L16.1: Minimize the amount of grading and removal of natural vegetation.
 - Policy L17.2: Require that all development be designed to reflect the contours of the existing landform using techniques such as split pads, detached secondary structures (such as garages), and avoiding the use of excessive cantilevers.
 - Policy L17.3: Require that all development preserves, to the maximum extent possible, significant features of the natural topography, including swales, canyons, knolls, ridge lines, and rock outcrops.
 - Policy L24.1: Require that new residential development be compatible with and complement existing structures on the block: a. Maintain existing front yard setbacks on the block;
 - Policy L24.5: Encourage the retention of existing mature, specimen trees.
 - Policy L37.8: Ensure that all development and new uses are compatible with adjacent uses, and yield no significant negative impacts to noise, air quality, water quality and traffic.
- Measure IM-12: The City shall continue to enforce and amend the R-1 (One Family Residential) Zoning Ordinance as necessary to ensure that development is compatible in design and scale with the neighborhood.
- Measure IM-59: The City shall continue to enforce the Institutional (I) Zoning Ordinance.



I76-52
Cont.

Our 2015 General Plan included the following Policies:

- Policy R3.2: Ensure that wildland open space, including the areas of the city designated as High Fire Hazard Severity Zone, is left in its natural state with the exception of brush abatement for public safety in order to aid the City in fighting fires.
- Policy R3.3: Ensure that natural open space within the High Fire Hazard Severity Zones remains undeveloped so as to mitigate the flood cycles that follow wild land fires in the natural open space.

And in the Pending update to our General Plan, the City has added a new policy to its Safety Element to make their intentions clear:

Objective Hz7: Avoid expanding development into undeveloped areas in Very High Fire Severity Zones

Policy L15.2: Ensure that development in the hillside areas be located in those areas resulting in the least environmental impact.

Policy L15.3: Require that all access into hillside areas be designed for minimum disturbance to the natural features.

Policy L15.5: Consider the impact of development on wildlife.

Policy L16.1: Minimize the amount of grading and removal of natural vegetation.

Policy L24.5: Encourage the retention of existing mature, specimen trees.

Policy L44.3: Establish the role of natural open space as an interface to the wilderness area.

Policy R1.1: Maintain and enforce the Hillside Management Zone Ordinance and other ordinances that seek to protect hillside areas.

Policy R3.2: Ensure that wildland open space, including the areas of the city designated as High Fire Hazard Severity Zone, is left in its natural state with the exception of brush abatement for public safety in order to aid the City in fighting fires.

Policy R3.3: Ensure that natural open space within the High Fire Hazard Severity Zones remains undeveloped so as to mitigate the flood cycles that follow wild land fires in the natural open space.

Policy R3.4: Ensure the protection of natural open space so as to maintain it as a preventative measure against flooding, and as a means of capturing stormwater runoff for groundwater recharge.

Policy R10.8: Continue to monitor construction projects with regard to grading and construction effects on trees, tree removal and replacement.



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Cont.

Measure IM-1: The City shall continue to enforce the Hillside Zone Ordinance and other ordinances that seek to protect the hillside areas.

Measure IM-5: The City shall amend the Open Space Ordinance to identify wildland open space as areas to remain in their natural state to mitigate flood cycles and capture stormwater runoff, except where brush abatement is necessary for fire safety

- Policy R10.3: Carry out the objectives and recommendations of the Community Forest Management Plan.
- Policy R10.8: Continue to monitor construction projects with regard to grading and construction effects on trees, tree removal and replacement.

The policies below should be enforced and alone provide a sufficient basis for the project to be rejected by the Planning Commission and City Council.

Measure IM-5: The City shall amend the Open Space Ordinance to identify wildland open space as areas to remain in their natural state to mitigate flood cycles and capture stormwater runoff, except where brush abatement is necessary for fire safety

Policy R3.2: Ensure that wildland open space, including the areas of the city designated as High Fire Hazard Severity Zone, is left in its natural state with the exception of brush abatement for public safety in order to aid the City in fighting fires.

Policy R3.3: Ensure that natural open space within the High Fire Hazard Severity Zones remains undeveloped so as to mitigate the flood cycles that follow wild land fires in the natural open space.

And the proposed Safety Element Objective:

Objective Hz7: Avoid expanding development into undeveloped areas in Very High Fire Severity Zones

We residents of Sierra Madre, who love our very unique and special City because it has enacted and enforces all these Goals and Policies, rely on Sierra Madre's Planning Commission and City Council to continue to protect those values on behalf of the citizens of this town.

Barbara Vellturo
380 W Carter Ave
Sierra Madre, CA 91024

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Cont.

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Response to Comment Letter I76

Individual
Barbara Vellturo
October 4, 2021

- I76-1** The comment introduces the comment letter and attachments. The commenter would like to be put on the list of people to notify when the Final EIR is complete.
- I76-2** The comment states that the Specific Plan is inconsistent with the City's General Plan and Zoning Ordinances. Please refer to response GR-7.
- I76-3** The comment states that the Specific Plan does not comply with the policies and goals of the City's General Plan. Please refer to response GR-7.
- I76-4** The comment states that the Specific Plan does not comply with the policies and goals of the City's General Plan. Please refer to Global Response GR-7.
- I76-5** The comment lists the goals in the City's General Plan – Land Use Element section. The comment does not raise new or additional environmental issues concerning the adequacy of the Draft EIR.
- I76-6** The comment states that the Specific Plan does not comply with the policies and goals of the City's General Plan. Additionally, the comment lists goals 2 and 3 of the City's General Plan. Please refer to Global Response GR-7.
- I76-7** The comment states that building projects such as the proposed project are required to demonstrate how the planned development would fit into the existing neighborhood through a Neighborhood Analysis. There is no mention of a formal neighborhood analysis within the City's General Plan. Please refer to Global Response GR-7.
- I76-8** The comment states that because a neighborhood analysis was not done, the proposed project cannot claim to be consistent with the City's General Plans and ordinances. See Response to Comment I76-7.
- I76-9** The comment states that the proposed project has larger house sizes than allowed under the single-family residential zone designation, and therefore the proposed project is not consistent with the City's General Plan. Please refer to response GR-7, General Plan Consistency. The project site is currently zoned and designated as Institutional (I). As discussed in Draft EIR Section 3.4, Discretionary Actions, under the proposed project, the land designation and zoning of the project site would be changed to Specific Plan (SP), which would then establish Residential Land (RL) and Open Space (OS) sections within the project site. The house sizes are allowable under these designations. Further, the Draft EIR analyzes the potential for environmental impacts resulting from the project as a whole, as the California Public Resources Code and the State CEQA Guidelines require. The project as a whole includes the zone change, and also the general plan amendment, adoption of the specific plan, and approval of the development agreement.
- I76-10** The comment states that the proposed project has a greater lot coverage than allowed under the single-family residential zone designation, and therefore the proposed project is not consistent with the City's General Plan. See Response to Comment I76-9 and Global Response GR-7.

- I76-11** The comment states that the proposed project has greater setbacks than allowed under the single-family residential zone designation, and therefore the proposed project is not consistent with the City's General Plan. See Response to Comment I76-9 and Global Response GR-7.
- I76-12** The comment shows an aerial image of the undeveloped project site and surrounding areas. The comment states that the public does not know if the homes in the proposed project will be single-story and if the house and lot sizes would be similar to those of the surrounding neighborhood. Please refer to responses I4-7 through I4-9, above, regarding lot sizes and number of stories. Additionally, according to Draft EIR Section 3.3.1, Residential Development, the proposed residences would be one to two stories.
- I76-13** The comment states that at a developer presentation in March of 2021, it was undecided as to if the houses would be single-story and that the final decision would be in the Specific Plan. The comment states that housing size and design information is not present in the Specific Plan. Please refer to responses I4-7 through I4-9, above, regarding lot sizes and number of stories. Building designs are found within Specific Plan Section 5.5, Architectural Design.
- I76-14** The comment expresses concern relating to the adequacy of the Draft EIR's General Plan consistency analysis. Please refer to response Global Response GR-7. Lastly, please refer to responses I4-7 through I4-9, above, regarding lot sizes and number of stories.
- I76-15** The comment states that the proposed project is not consistent with the neighborhoods of the City because of the house orientation. See response to Global Response GR-7. The comment provides concluding remarks and general opposition to the project that do not raise new or additional environmental issues concerning the adequacy of the Draft EIR.
- I76-16** Viewers at the Bailey Canyon Wilderness Park would consist of recreationists who would be afforded views of the San Gabriel Mountains to the north. The proposed project would not obstruct views of the San Gabriel Mountains from the Bailey Canyon Wilderness Park as the project site is located west of the wilderness park and the San Gabriel Mountains are located to the north. Views of the project site may also be afforded to recreationists within the Bailey Canyon Wilderness Park; however, Bailey Canyon Wilderness Park is concentrated with many existing, mature trees that obstruct significant, widespread views of the project site from this area. In addition, the proposed neighborhood park would be adjacent to the Bailey Canyon Wilderness Park across Carter Avenue, which would include trees and landscaping as shown in Figure 3-3, Proposed Park Conceptual Plan, in Draft EIR Chapter 3, Project Description. Proposed trees and landscaping within the eastern portion of the neighborhood park would help to buffer views of the proposed residential uses from Bailey Canyon Wilderness Park. While new residences may still be partially visible from Bailey Canyon Wilderness Park, neither the project site nor Bailey Canyon Wilderness Park are identified as protected hillside areas or scenic vistas within the City's General Plan. In addition, the design guidelines of the Specific Plan outline site planning and design, architectural design, and landscape design standards that would be implemented as a design of the project in order to ensure that development is consistent with surrounding development and that the proposed project would not significantly degrade views of the project site from Bailey Canyon Wilderness Park. Therefore, views of the project site from Bailey Canyon Wilderness Park would not be considered a substantial change to or from a scenic vista. Implementation of the proposed project would not result in a substantial adverse effect on a scenic vista, including views of and from the San Gabriel Mountains, in compliance with General Plan Policy L6.2. In addition, the conservation of open

space would preserve this hillside area in perpetuity, therefore preserving undeveloped views of the hillside from the City. Therefore, the proposed project would not conflict with General Plan objectives and policies governing scenic quality. Please refer to Global Response GR-7.

- 176-17** The comment states that the proposed project is not consistent with the City’s General Plan and does not provide sufficient evidence to prove that the proposed project is consistent. See Global Response GR-7.
- 176-18** The comment lists goals and policies in the City’s General Plan that have not been proven to be consistent. Please refer to Global Response GR-7.
- 176-19** The comment lists goals and policies in the City’s General Plan. Please refer to Global Response GR-7.
- 176-20** The comment states that the proposed project is in a Very High Fire Hazard Severity Zone as well as part of the Wildland Urban Interface. Please refer to Global Response GR-3.
- 176-21** The comment states that the proposed project site to be development is currently listed as Natural Open Space, which needs to be preserved. According to Draft EIR Section 4.11.1, Existing Conditions, in Section 4.11, Land Use and Planning, the project site is currently zoned and has a General Plan land use designation of Institutional (I), not as Natural Open Space. The City’s General Plan designate land uses to the north as Natural Open Space (NOS); to the east as NOS, Municipal (M), and Constructed Open Space (COS); and to the south and southwest as Residential Low Density (RL). Development would only occur within the proposed project site.
- 176-22** The comment provides a zoning map of the City and lists the zoning designation of the proposed project site’s surrounding areas. The comment does not raise new or additional environmental issues concerning the adequacy of the Draft EIR.
- 176-23** The comment states that the City values its open space as it provides protections against wildfire and landslides. The comment expresses the opinions of the commenter and does not raise new or additional environmental issues concerning the adequacy of the Draft EIR. Impacts related to wildfire were analyzed in Draft EIR Section 4.20, Wildfire, while impacts related to landslides were analyzed in Draft EIR Section 4.7, Geology and Soils.
- 176-24** The comment further describes the importance of open space to the City, as it relates to flood protection, water supply, and groundwater recharge. Impacts related to flood protection and groundwater recharge were analyzed in Draft EIR Section 4.10, Hydrology and Water Quality, while impacts related to landslides were analyzed in Draft EIR Section 4.7, Geology and Soils. Please see Global Response GR-1, for a discussion of water supply issues and Global Response GR-3, for a discussion related to wildfire issues.
- 176-25** The comment states that the proposed project will negatively affect alluvial fan habitat, which has a high conservation value due to its watershed value, adjacency to protected lands, potential for habitat restoration, and public access. As discussed in Draft EIR Section 4.4.5, Impacts Analysis, in Section 4.4, Biological Resources, the project site consists of ornamental, non-native grassland, and paved roadways. The project site does not support any native vegetation communities and the area appears to be regularly maintained, which limits the potential for many native plant species. No

sensitive communities or riparian habitat occur on the project site (Appendix C1 of the Draft EIR) and the project would not impact these habitats. However, due to the presence of riparian habitat north and east of the project site, associated with Bailey Canyon, impacts to riparian habitat associated with the proposed project could occur if invasive species are placed on site. Therefore, impacts would be potentially significant (Impact BIO-2). Mitigation measure MM-BIO-2, which prohibits the use of invasive species in the project's landscaping plan, would be implemented reduce impacts to nearby riparian habitat to less-than-significant. Lastly, impacts related to flood protection and groundwater recharge were analyzed in Draft EIR Section 4.10 and were found to be less than significant.

176-26 The comment suggests that optimization of the recharge potential of the undeveloped alluvial fan land would benefit all users of the Raymond Basin. Groundwater recharge was analyzed in Draft EIR Section 4.10, Hydrology and Water Quality, and were found to be less than significant.

176-27 The comment states that the proposed project does not comply with the City's General Plan goals and policies regarding protection and preservation of open space. See Global Response GR-7. Although the project would occur undeveloped land, this land is not classified as open space as it is not usable for public recreation and it does not possess important natural features (see Draft EIR Section 4.4, Biological Resources). The proposed project would implement various usable open space areas such as the proposed neighborhood park and a 35-acre open space hillside area, to be conserved and undeveloped.

176-28 The comment states that the proposed dedication of land does not mean the proposed project is consistent with the City's General Plan, because the developers do not preserve existing or provide additional open space.

176-29 The comment states that the proposed dedication of land does not mean the proposed project is consistent with the City's General Plan because this area would already be preserved, and that the developers do not preserve existing or provide additional open space. See Response to Comment 176- 27 and Global Response GR-7.

176-30 The comment states that the proposed project is not consistent with the City's General Plan and lists goals and policies pertaining open space preservation. See Response to Comment 176-27, Global Response GR-7, and Draft EIR Table 4.11-1, Project's Consistency with City of Sierra Madre's General Plan Goal and Policies.

176-31 The comment states that the Specific Plan does not provide two safe and acceptable methods of ingress/egress to the proposed project site; does not provide two evacuation routes; the specifications for Carter Avenue do not comply with City road standards; and that the Draft EIR fails to address pedestrian safety. See Global Response GR-4 and Global Response GR-5.

The Draft EIR addresses pedestrian safety. The project would include sidewalks along the proposed streets to promote pedestrian safety and mobility within the project site and local vicinity as well as a 6-foot sidewalk between the southeastern portion of the project site boundary and Lima Street, which includes a 6-foot sidewalk on the north side of Carter Avenue (see Final EIR Section 3.3.12). Moreover, Draft EIR Section 4.17, Transportation, includes analysis on the project's consistency with pedestrian safety policies. As a result, the analysis determined the project would not result in a hazardous roadway design or unsafe roadway configuration and impacts were found to be less than significant.

- 176-32** The comment states that the proposed project’s traffic study has impacts would be less than significant only if all parts of the proposed project met acceptable standards, which the proposed project does not because all access roads require a 30-foot width. Please refer to Global Response GR-5 and Global Response GR-7.
- 176-33** The comment quotes a section from the General Plan EIR, related to roadway safety and design. The comment does not raise new or additional environmental issues concerning the adequacy of the Draft EIR. The Stonegate project has been accounted for as a cumulative project (see Draft EIR Section 5.3, Cumulative Projects).
- 176-34** The comment quotes a City Ordinance 16.32.035 and questions whether existing roadways, including North Sunnyside Avenue and Carter Avenue meeting current City roadway requirements. Please refer to Global Response GR-5.
- 176-35** The comment states that an explanation is required as to why there’s a discrepancy in findings and required mitigation in the Draft EIR and the General Plan EIR. It should be noted that the proposed project is a separate project from the General Plan EIR, which is why the findings and mitigation measures differ. The project’s consistency with the City’s General Plan is analyzed in Final EIR Section 4.11. The comment does not raise new or additional environmental issues concerning the adequacy of the Draft EIR.
- 176-36** The comment states that it is unknown as to who would have the right and ability to correct the deficiencies of Carter Avenue. Please refer to Global Response GR-5. The comment does not raise new or additional environmental issues concerning the adequacy of the Draft EIR.
- 176-37** The comment states that the Final EIR needs to show that the developer would be able to meet the required mitigations and as well comply with the City’s bicycle regulations. Mitigation measures would be enforced through the project’s conditions of approval. Additionally, as discussed in Draft EIR Section 4.17.5, Impacts Analysis, although no bicycle facilities and improvements are proposed under the project, the project would not impact existing bicycle facilities in the vicinity of the project, including the existing bicycle lanes within Sierra Madre Boulevard. See Response to Comment I47-5 for additional discussion.
- 176-38** The comment expresses concern related to pedestrian safety. The Draft EIR addresses pedestrian safety. The project would include sidewalks along the proposed streets to promote pedestrian safety and mobility within the project site and local vicinity. Moreover, Draft EIR Section 4.17 includes analysis on the project’s consistency with pedestrian safety policies. As a result, the analysis determined the project would not result in a hazardous roadway design or unsafe roadway configuration and impacts were found to be less than significant.
- 176-39** The comment states that pedestrians would have to walk in narrow, hazardous streets as a result of the project’s proposed design. See Response to Comment 176-38.
- 176-40** The comment states that pedestrians would have to walk in narrow, hazardous streets resulting from the proposed project design. See Response to Comment 176-38.

- 176-41** The comment expresses safety concern related to steep grades on Carter Avenue. Please refer to Global Response GR-5.
- 176-42** The comment states that the proposed project would make it difficult for rescue equipment to access homes along Grove Avenue due to two-way traffic. North Grove Street is expected to experience a negligible level of traffic generated by the project, as reflected in the Report (Final EIR Appendix K). Any improvements to Grove Avenue would be the responsibility of the City of Sierra Madre. Please refer to Global Response GR-4.
- 176-43** The comment states that the proximity of the egress from the proposed project to the County access road should be studied. Please refer to Global Response GR-4
- 176-44** The comment states that pedestrian safety, second point of ingress and egress, second evacuation route in the case of a fire, earthquake and landslide hazards must be analyzed in order to have an adequate traffic and circulation analysis. See Response to Comment 176-31.
- As discussed in Draft EIR Section 4.7.1, Existing Conditions, in Section 4.7, Geology and Soils, two major landslides have occurred in the northern hillside areas of the City. However, the City's General Plan designates the project site as being located outside of any potential landslide zone. Additionally, the project site does not contain slopes susceptible to landslides and is not located within a seismic hazard zone; thus, the potential for earthquake-induced landslides is considered low (Appendix E of the Draft EIR). Additionally, development of the project would adhere to the most current CBC standards. Design and construction of the project in accordance with the CBC would minimize the adverse effects of strong ground shaking to the greatest degree feasible. In addition, as discussed above, the project would be required to implement PDF-GEO-1 through PDF-GEO-15 and MM-GEO-1, which include specific project recommendations from the geotechnical investigation. Therefore, the project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking. Regarding fire impacts, please refer to Global Response GR-3.
- 176-45** The comment states that the Specific Plan is inconsistent with the City's General Plan with regards to trees and tree canopies. The comment lists the applicable policies and goals related to trees and tree canopies. See Global Response GR-7, and Global Response GR-2.
- 176-46** The comment states that the Specific Plan ignores the requirements of the City's Forest Management Plan as it would replace approximately 90 mature, canopied trees. Please refer to Global Response GR-2.
- 176-47** The comment states that the Specific Plan's intent is to maximize profit, which would be inconsistent with the Community Forest Plan. Please refer to Global Response GR-2.
- 176-48** The comment quotes a comment submitted by Daniel Golden regarding the mature trees on the proposed project site, which states that the 101 mature trees, including 10 protected oaks, would be replaced with smaller oaks and trees. The planting of new trees would require a great deal of water, which raises concerns about the viability of the net zero water pre-purchase agreement. Please refer to Global Response GR-1 and Global Response GR-2.
- 176-49** The comment expresses concern relating to loss of oxygen caused by the removal of the tree canopy on the project site. See Response to Comment I24-1.

- 176-50** The comment expresses concern with the Draft EIR's analysis of tree removal impacts. See Global Response GR-2.
- 176-51** The comment states that the proposed project is not consistent with City's General Plan Policy R10.3 and Policy R10.8. Please refer to Global Response GR-2.
- 176-52** The comment states that the Specific Plan is inconsistent with the City's General Plan, zoning ordinances and plans. The comment lists the City's General Plan's goals and policies that are relevant to the proposed project. Please refer to Global Response GR-7.
- 176-53** The comment suggests that Measure IM-5, Policy R3.2, Policy R3.3, and Objective Hz7 should be enforced. Please refer to Global Response GR-3 for information about Hz7, and Global Response GR- 7. Measure IM-5 is directed at the City as the Applicant does not have authority to amend the City's Open Space Ordinance.
- 176-54** The comment provides concluding remarks and general opposition to the project that do not raise new or additional environmental issues concerning the adequacy of the Draft EIR.

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Comment Letter 177

From: aarrieta1@aol.com
Sent: Monday, October 4, 2021 3:55 PM
To: Vincent Gonzalez
Subject: DEIR Comments for The Meadows at Bailey Canyon

CAUTION: This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Dear Mr. Gonzalez:

Below are my comments/concerns with the DEIR for the proposed housing project known as The Meadows at Bailey Canyon. I ask that you retain a copy for the administrative record and respond to these comments in the final EIR. I would also like to be put on the list of people to notify when the final EIR is complete.

In general, I strongly object to this development project as it is not at all suitable for the City of Sierra Madre, nor for the area in which it is located. The proposed project is also significantly inconsistent with our General Plan and Municipal Code and opposed by the vast majority of residents in Sierra Madre.

My specific comments/concerns are as follows:

1. WATER: Regardless of what the developer promises to do, water is becoming an increasingly scarce resource. Lakes, rivers and reservoirs are drying up all over the Southwestern United States. There is no water source that can ever guarantee the delivery of water in the future under these conditions. Until the drought conditions improve, it would be the height of irresponsibility to bring additional users on line, such as what would occur with the additional of 42 homes. Our General Plan, Goal 4, states that use of local sources of groundwater rather than imported water (such as what is being proposed under the 'Net Zero Water Impact' proposal from NUW) must be used for new developments. The only solution if the drought continues is going to be rationing and higher water rates for existing users. The Meadows project would an already dire water supply situation into a catastrophe. The developer has promised this project will be a "net zero impact" on our water supply. However, our own City Manager, Jose Reynoso, stated in a Planning Commission meeting several weeks ago that purchasing 50 years of water for the 42 homes is not possible, because the water is not available and he's not sure when it will be. Therefore 'net zero impact' is not factual. As a result there will be a huge impact to our existing water supply. Even if the developer offers to retrofit areas in Sierra Madre to offset the water use by the Meadows, that will only be a short-term fix. If the drought gets worse as many experts project will occur, and the developer has already done these retrofits, it means the City has no further options except rationing and higher water rates. This is the height of irresponsibility to approve this project with the significant water issues at play.

2. FIRE: The proposed project site is within 5 miles of where 74 wildfires have burned since the beginning of the historical fire data record. Additionally, the proposed project site is designated as a Local Responsibility Area Very High Fire Hazard Severity Zone by the California Department of Forestry and Fire Protection (CAL FIRE). Our own City Policy H27 of the Safety Element of the General Plan states 'to avoid expanding development into undeveloped areas in Very High Severity Fire Zones. Additionally, City Policy R3.2 states 'to ensure that wildland open space, including the areas of the city designated as High Fire Hazard Severity Zone remains undeveloped so as to mitigate the flood cycles that follow wild land fires in the natural open space. Both of these Sierra Madre policies both emphatically state development must not occur in the very high fire severity zones, such as where the proposed project is. The CALDOR fire in central California started in August 2021 and is still not fully contained. To date it has burned 221,774 acres and burned 782 homes, many of which were built of the same 'fire resistant' materials, the developer is saying these homes would composed of. In 2020, there were 9,639 fires in California with 10,488 homes lost to wild fire, again, many of these homes were also composed of 'fire retardant' materials, and 31 lives lost. Last August, helicopters were using the fields at the Monastery for staging for fire-fighting efforts for the Bobcat fire. It is unconscionable that the City leadership would even consider a housing proposal in such a fire prone area that would endanger lives and property.

177-1

177-2

177-3

3. **TRAFFIC:** The November 10, 2020 Fehr and Peers traffic study indicated there would be a 118% increase in traffic on weekdays and 129% increase in traffic on weekends. With this data, there is no doubt the project will create extremely significant intrusion and increase of thru traffic. The DEIR indicated just from construction alone there would be close to 70,000 trips. The increased traffic from the project will result in a significant decrease in air quality. Also, the additional ingress/egress required for a project of this magnitude located at Carter creates a very dangerous area affecting car and pedestrian traffic, especially where Carter intersects with Grove and Lima. This area is already significantly congested with residents walking and driving. Either a car is going to hit head-on with another car or a pedestrian is going to get hurt or killed. Then if the traffic of another 42 homes is layed on top of this, it could become catastrophic. A critical purpose of having an additional ingress/egress is so that people can evacuate safely in the event of an emergency and so that emergency vehicles can quickly access the property. For the reasons outlined above, it would not be feasible under the conditions I describe now as well as what they would be should this project get approved. The traffic on Sunnyside will destroy the character of that street and the quality of life for the residents. I can remember attending a City Council meeting a few years ago where residents on Sunnyside were concerned about the traffic only coming from the Mater Dolorosa Retreat Center. If you now add to that the traffic coming from 42 additional homes, deliveries, guests, and a public park, Sunnyside will be ruined. Sunnyside also does not have sidewalks and simply cannot support the increase in traffic resulting from a project of this magnitude.

177-4

4. **TREES:** Chapter 2 - Tree Preservation: Goal 1: Continued preservation and enhancing the City's significant tree resources. The proposed project would remove over 100 trees, including protected oak trees. Additionally, every mature tree along the beautiful drive from the entry gates of the Monastery at the top of Sunnyside up to the Retreat Center will be destroyed. These are mature trees that have been there for many years and are irreplaceable.

177-5

5. **SEISMIC IMPACT:** The proposed project is within a few hundred feet of the significant Sierra Madre Earthquake Fault. The DEIR also states the soil on the proposed project site is weak and not currently suitable. A large monastery building was destroyed during a significant earthquake some years ago. It is not safe to build at this site so close to an active earthquake fault.

177-6

6. **AESTHETICS:** Contrary to the precepts in the General Plan and Municipal Code, neighbors immediately adjacent and to the west of the project will have their views, privacy and value of their properties significantly affected by this project. Despite commitments made by Mater Dolorosa over the years about mitigating the impact of their project on the neighbors, that is not the case. Policy L6.2 of the City's General Plan states that any new or expanded structures in residential neighborhoods do not unreasonably obstruct significant mountain or basin views. This project would not achieve that.

177-7

7. **LAST REMAINING OPEN SPACE:** The last large special open space in Sierra Madre will be destroyed with this project. As a result, wildlife such as deer, coyote, bobcats, falcons, bears and other wildlife will be displaced.

177-8

8. **LACT OF VIABLE ALTERNATIVES:** There have no viable alternatives presented to this proposed housing development. The DEIR does not show any environmental or other impacts from any alternative projects. From the beginning, only huge institutional projects have been shared or rather used to 'scare' residents into supporting this project. However, a reasonably sized and well designed institutional development has not been even explored. Many residents would be supportive of such a project because the lot coverage, traffic, water use and overall impact would be significantly less.

177-9

In conclusion, the City of Sierra Madre has no obligation to support, much less approve this poorly conceived and planned project and waive required compliance by the developer to existing zoning and General Plan requirements. For the reasons outlined above, I don't believe any of the outlined concerns and other serious concerns can be effectively mitigated without declining this project and seriously exploring other viable development alternatives.

177-10

Thank you.

Arlene Arrieta

Response to Comment Letter I77

Individual
Arlene Arrieta
October 4, 2021

- I77-1** The comment is introductory in nature and requests a copy of the comment letter and Responses to Comments are provided as part of the Final EIR. The commenter also requests to be put on the list of people to notify when the Final EIR is complete. Finally, the commenter states opposition to the project due to inconsistency with the surrounding area, City's General Plan, and Municipal Code. Please refer to Responses to Comments I77-2 through I77-10 below and Global Response GR-7 in regards to inconsistencies with the City's General Plan
- I77-2** The comment is concerned with project impacts on water availability, usage, and supply. The commenter questions whether 50 years of water supply is available for purchase. See Global Response GR-1.
- I77-3** The commenter raises concerns about the project's location in a designated Local Responsibility Area (LRA) Very High Fire Hazard Severity Zone (VFFHSZ). The commenter quotes Draft Safety Element Update (now the adopted Hazard Prevention Element) Policy Hz7 and Policy R3.2, regarding avoiding development in VFFHSZ areas, and the commenter describes fires in the project vicinity over the last few years. The comment expresses the commenter's opposition to the project specific to its relation to wildfires. Please refer to Global Response GR-3.
- I77-4** The comment states that the Fehr and Peers November 10, 2020 traffic study indicates that a significant traffic impact (and as associated air quality impact) would result from both operation and construction of the proposed project. For information regarding traffic impacts, please refer to Global Response GR-6. Furthermore, North Grove Street is expected to experience a negligible level of traffic generated by the project, as reflected in the traffic conditions analysis. Additionally, as concluded in Draft EIR Section 4.3, Air Quality, impacts to air quality, including air quality impacts from traffic in construction and operation, would be less than significant with implementation of MM-AQ-1.
- The comment also questions whether ingress/egress proposed for the project is adequate, specifically at Carter/Grove and Lima and along Sunnyside. Please refer to Global Response GR-5 . No changes to ingress/egress within Lima Avenue are proposed. In addition, all roadways within the project site, including Sunnyside, have been designed to meet all fire department access requirements.
- I77-5** The comment references the City General Plan Tree Preservation Goal 1, expresses concern of the proposed project's proposed removal of several on-site trees, including protected oak trees. The commenter also expresses concern that every mature tree along the drive from the entry gates of the Monastery at the top of Sunnyside up to the Retreat Center will be destroyed. Please refer to Global Response GR-2.
- I77-6** The comment expresses concern with the project site's distance from a known earthquake fault and soil stability. Draft EIR Section 4.7, Geology and Soils, explains that the project site is not located on a known active, potentially active, or inactive fault as delineated on the Alquist-Priolo Earthquake Fault Zoning Map. The closest earthquake fault to the project site is the Sierra Madre Fault, located approximately 700 feet to the north. As determined in Draft EIR Section 4.7 and Appendix E, the

potential for ground rupture on the project site is considered low. Furthermore, the proposed project would be required to comply with all existing regulations, including the California Building Code and the SMCC in order to ensure seismic safety. In addition, the project would comply with project design features PDF-GEO-1 through PDF-GEO-15, and MM-GEO-1, which includes project specific recommendations from the geotechnical investigation (included as Appendix E). Thus, impacts associated with seismicity were determined to be less than significant.

I77-7 The comment is concerned with the project's potential to impact views, privacy, and property values near the project site. Private views, privacy, and property values are not protected under CEQA, and impacts to the same are not considered "environmental impacts" for purposes of CEQA. However, the design guidelines of the Specific Plan establish site planning and design, architectural design, and landscape design standards that would address and protect visual character, privacy, and the quality of public and private views. See also Draft EIR Section 4.1, Aesthetics, for a detailed analysis of the project's potential for visual impacts. Lastly, as discussed in Draft EIR Section 4.11.5, Impact Analysis, of Section 4.11, Land Use and Planning, the project would be consistent with Policy L6.2, as the proposed project is designed in a manner that is sensitive to scenic viewpoints and/or viewsheds through building design, site layout, and building heights.

I77-8 The comment is concerned with the loss of open space and the potential displacement of wildlife. All potential impacts to sensitive wildlife species are analyzed in Draft EIR Section 4.4. Mitigation measures MM-BIO-1 through MM-BIO-3 would reduce impacts to biological resources, including wildlife, to a level that is less than significant. Additional impact analysis is provided in the Biological Resources Report provided as Appendix C1 of the Draft EIR. In addition, as discussed in Final EIR Section 3.3.3, Open Space Conservation Easement, the project would permanently dedicate approximately 35 acres of open space hillside land, located north of the existing Mater Dolorosa Retreat Center. This open space would be preserved and protected from future development by way of a conservation easement.

I77-9 The comment expresses support for a project alternative that includes a smaller institutional development than what is presented in the Draft EIR's alternatives analysis. See Response to Comment I73-5, above.

I77-10 The comment expresses general opposition to the project but does not identify any specific concerns with the environmental analysis.

Comment Letter 178

From: David Hughes <dthughes123@yahoo.com>
Sent: Monday, October 4, 2021 4:46 PM
To: Vincent Gonzalez
Subject: Mater Dolorosa Housing EIR

CAUTION: This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Mr. Gonzalez,

The purpose of this correspondence is to provide my comments on the findings of the Environmental Impact Report for the Meadows at Bailey Canyon Housing Development. I am a nearby resident at 660 Edgeview Drive. My comments are as follows:

178-1

Arborist Report

The arborist report provided by Dudek is not specific to protected tree species that are protected by the City Municipal Code. There are several coast live oaks on the site that are proposed for removal but the assessment of the trees in the report groups the coast live oaks together with other non-native nuisance species. The municipal code identifies these trees as "valuable long term community assets" so that a detailed analysis specific to the oaks is warranted. The detailed analysis should assess the specific age and condition of each oak tree and should analyze ways that these trees, especially the largest ones, can be avoided during construction and protected long-term.

178-2

The arborist report indicates that there are three very large trees on the site, measuring 26, 33, and 54 inches. The Municipal Code indicates that "Trees of an estimated age of one hundred years or more, or trees of high visibility or extraordinary aesthetic quality as determined by the tree advisory commission may be required to be replaced by large sized specimen trees, as deemed appropriate by the tree expert." The trees in question may well be more than 100 years old and given their size are likely of high aesthetic quality. However, the tree report gives them the same weight as the other non-protected trees such as Chinese elm and sugar gum. The oak trees on the site merit a specific analysis of their age, health, and aesthetic quality and a justification by the developer of why they cannot be saved if their removal is proposed. The EIR states that "trees include various trunk and branch maladies and health and structural conditions" and that only 29% are in good health. This is a disingenuous assessment of the trees because it lumps together trees that are poorly adapted to the site with the oak trees that are native to the site and likely pre-date any development in the area. The large oak trees in the area are in good health (per the report). Why are non-protected trees in poor health lumped together with the protected trees that are in good health?

Finally, the mitigation for oak trees, especially such large and impressive ones is inadequate. Adequately mitigating the loss of trees greater than 25 inches in trunk diameter is not possible in our lifetimes. The ecological benefits provided by large oak trees cannot be offset with small oak trees that will be established in a park setting - 1:1 mitigation is especially appalling. The removal of a 54-inch oak tree is not adequately mitigated by establishment of one 24-inch box tree that will likely have a trunk diameter of 1-2 inches. Protection of on-site oak trees should be prioritized. If the developer can justify that there is no other option besides their removal, then mitigation should be based on the size of the tree to be removed and the relative size of the replacement tree. Removal of a 10-inch tree should be offset by 10 trees with a diameter of one inch.

Aesthetics

The EIR states that: " Bailey Canyon Wilderness Park is concentrated with many existing, mature trees that obstruct significant, widespread views of the project site..." and that "proposed trees and landscaping within the eastern portion of the neighborhood park would help to buffer views of the proposed residential uses from Bailey Canyon Wilderness Park." So which is it? Will views from the wilderness park be affected by the development or will the proposed landscaping buffer these views? The EIR should include renderings of the before/after views from the wilderness park to justify their evaluation.

178-3

Biological Resources

The Biological Resources Report (not actually a report, but instead a three-page memorandum), indicates that Braunton's milkvetch - a federally endangered species - is known to occur within 2.7 miles of the project site. This species has the ability to persist in the soil for many years until soil disturbance stimulates its germination. So just because it wasn't seen doesn't mean it isn't there. The report states that there are areas on the site that may be suitable and that the species is associated with carbonate soils. However, no soils testing was performed to determine if suitable soil conditions exist in the grassland before making the judgement that the species isn't present. A mitigation plan should be developed in the event that grading on the site stimulates germination of this plant so that the state and federal government is consulted.

178-4

The biological report mentions mule deer observed on the site, but makes no mention of bears, bobcats, coyotes, and rabbits that utilize the property and the impacts the project will have on these mammals.

The project site is adjacent to areas with native habitat. The developer should be required to provide a list to homeowners of undesirable non-native invasive species that should not be planted on their property, to avoid weed infestations to the native habitat.

Traffic

Unbelievably - the EIR contains NO ANALYSIS regarding the increased traffic on the community that would result from this project. There is a transportation report that indicates "...a VMT-related impact would be considered significant if implementation of the proposed project meets the following two conditions: The baseline project generated VMT per service population or Home-based VMT per capita or Home-based-work VMT per employee exceeds the 15% below the Northwest Region1 baseline VMT, or The cumulative project generated VMT exceeds 15% below the Northwest Region baseline VMT."

178-5

How in the world am I supposed to make sense of those criteria?!? The fact is that Sierra Madre streets, especially Grandview and Michillinda (major arteries that will be primarily impacted by the project) are quite congested especially between 7:30 and 9:00 am when parents are taking their kids to school and people are going to work. Application of some state-wide VMT criteria (an incomprehensible standard) should not be the primary (apparently only!!) criterion for evaluating traffic impacts. Sierra Madre already has narrow streets that impede traffic flow on Grandview, and the nature of these streets and our community do not lend themselves to evaluation according to a one-size-fits-all approach.

Secondly, Sunnyside is a street with a significant gradient and no stop signs until reaching Grandview. Therefore there is no infrastructure to impeded speeding down Sunnyside from these new residents. Currently this is a quiet street (essentially a dead-end street) with little traffic. Adding 84 houses (and likely 168 new drivers or more) will result in more traffic and speeding down this street is a significant concern. Yet there is no analysis on the impacts these new drivers will have on neighboring residents.

Fuel Management/Fire Risk

The recent Bobcat fire and the danger this presented to the community reminds us that fire management is of utmost importance. The Fire Protection Plan states that: "While the eastern side of the project is most susceptible to an approaching wildfire, the adjacent Bailey Canyon Debris Basin is maintained free of vegetation providing an off-site fuel break." It is disingenuous to suggest that the basin provides a sufficient fuel break between lots of flammable vegetation and the new houses and to give the County Public Works Dept the responsibility that maintaining it free of vegetation is necessary for the protection of adjacent homes. The homes are at greater risk of catching fire from embers coming from burning vegetation on the hillsides. Has this been analyzed - how far can embers fly and how is the housing protected from flying embers?

178-6

The Fire Protection Plan indicates that all fuel management can be accomplished on site. Has the City or County Fire Department reviewed this document and agreed with this finding? If the fire department comes back and indicates that off-site vegetation management is needed for fire protection, then the City should require the site plan to be reconfigured rather than allow impacts to off-site vegetation.

Each home should have a specific fire protection plan to prevent flammable vegetation from being planted on each property and that each home is properly maintained to ensure they are adequately fire protected. There should a monitoring program conducted by city personnel and funded by the developer.

178-7

Greenhouse Gas Emissions

The EIR states that there will be an operational increase in greenhouse gas emissions from the new houses. Why are there no mitigation measures provided to reduce this impact? The City should require the developer to install solar panels on each new house to reduce the houses reliance on the electrical grid and reduce carbon emissions.

↑ 178-7
Cont.

Air Quality

The EIR identifies several potential threats to human health due to reduced air quality. These include issues such as valley fever and increased dust. However, the only mitigation measure is to have the contractor demonstrate to the city that they are using the appropriate equipment. Site watering is the primary proposed method of dust control. How often will the site be watered to reduce dust? Under what criteria will the contractor know that the site must be watered? The developer should fund a full-time city monitor to be onsite to ensure that all air quality standards are being followed.

↑ 178-8

The Phase I Analysis Report indicates that an underground storage tank was previously on the site and acknowledges that several dangerous chemicals (benzene, chloroform, etc) have been detected on site. The table provided in the report identifies levels that have been detected but it is not possible to tell from these tables if the levels these chemicals have been detected present a risk to human health.

There is no analysis to indicate if grading will send any of these dangerous chemicals into the air and if there is potential for valley fever to be spread. The air quality section indicates valley fever may be present, but provides no assessment for potential to be dispersed by project grading. The EIR says that the chances for valley fever to be present is low, and that if its there that it presents only a small danger to adjacent humans. Essentially, the analysis is we don't know if its present and if it is, don't worry about it. That is an inadequate assessment for a grading project that has occupied homes on three sides.

I look forward to seeing responses to these concerns.

↑ 178-9

Sincerely,

David Hughes
660 Edgeview Drive
dthughes123@yahoo.com

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Response to Comment Letter I78

Individual
David Hughes
October 4, 2021

I78-1 The comment provides an introduction to comments that follow and does not raise any concerns with the adequacy of the Draft EIR.

I78-2 The comment raises concerns regarding the removal of mature trees on-site, the findings of the arborist report, the adequacy of the Draft EIR analysis of the health of the mature trees on-site, and the adequacy of the proposed mitigation. Please refer to Global Response GR-2.

More specifically, the comment states that the oak trees should have detailed specific analysis which includes the tree age, condition, and determination of which ones can be preserved during construction. Each oak tree was assessed for its health and structure condition, diameter at standard height, height, width, and potential for preservation. The results of the individual tree assessment can be found in Final EIR Appendix C2.

The tree assessment and mitigation requirements recorded in the tree report (Final EIR Appendix C2) are completed to standards established by the City's Municipal Code and satisfy the requirements for this project.

I78-3 The comment expresses concern regarding the Bailey Canyon Wilderness Park and existing views that would be impacted as a result of the proposed project. Additionally, the comment questions if views from the wilderness park would be affected by the development or if the proposed landscaping would buffer these views. The comment also states that the Draft EIR should include renderings of the before/after views from the wilderness park to justify their evaluation.

Visual simulations are not warranted to adequately analyze visual impacts. For more information, please refer to Draft EIR Section 4.1, Aesthetics. Please refer to Response to Comment I76-16.

I78-4 This comment states that per the Biological Resources Report, the Braunton's milk-vetch, a federally endangered species, is known to occur within 2.7 miles from the project site, and that the site is potentially suitable for the species as it is associated with carbonate soils. The comment also states that no soils testing was performed to determine if suitable soil conditions exist before making the judgment that the species isn't present, and a mitigation plan should be developed in the event that grading on the site stimulates germination of this plant so that the state and federal government is consulted. Further, the comment states that the biological report mentions multiple other wildlife species that utilize the property that will be impacted by the project, and finally that the project site is adjacent to areas with native habitat and the developer should be required to provide a list to homeowners of undesirable non-native invasive species that should not be planted on their property to avoid weed infestations to native habitat.

The Sensitive Resources Analysis for the Project Located at 700 North Sunnyside Avenue, Sierra Madre Memorandum (Sensitive Resources Analysis) (Draft EIR Appendix C1) and Draft EIR Section 4.4, Biological Resources, analyzed potential impacts to special-status plant and wildlife species

(endangered, rare, or threatened species), as well potential impacts to riparian habitat or other sensitive natural communities. No federal or state-listed plant or wildlife species are expected to occur in the project site. The project site does not support any native vegetation communities and the area appears to be regularly maintained, which limits the potential for many native plant and wildlife species. More specifically, the site undergoes weed abatement on a biannual basis (through a City contract with the County of Los Angeles). Furthermore, Draft EIR Figure 4.4-1, Vegetation and Land Cover Map, illustrates the project site's vegetation and land cover consists of ornamental vegetation lining paved roadways and non-native grassland. The non-native grasslands are mowed and composed of almost entirely non-native grasses and herbaceous annuals, and it was determined that no sensitive communities or riparian habitat occur on the project site. Additionally, soil testing and sampling was completed as part of the Geotechnical Investigation (Appendix E to the Draft EIR), and the findings indicated that artificial fill covered the majority of the project site, and that mitigation measure MM-GEO-1 would be required to remove and recompact artificial soil.

Regarding Braunton's milkvetch, specifically, this species was not identified at the project site during pedestrian surveys conducted during the appropriate blooming period, and as concluded in Appendix B of Appendix C1 of the Draft EIR, Braunton's milk-vetch is not expected to occur due to reason stated previously, and the last California Natural Diversity Database (CNDDDB) occurrence is 2.7 miles from the project site. Therefore, the potential impacts to this species is considered to be less than significant, and further analysis is not warranted.

178-5 The comment expresses concern that the Draft EIR contains no analysis regarding the increased traffic on the community that would result from the project. The commenter states that there is existing congestion on Sierra Madre streets, especially Grandview and Michillinda, and that application of VMT criteria should not be the primary criterion for evaluating traffic impacts. The commenter also states that there is no infrastructure to impede speeding on Sunnyside and that addition of the new homes and amount of additional drivers on the surrounding roadways is a significant concern and no analysis is provided. Please refer to Global Response GR-6. In addition, concerns about illegal activity, such as speeding is not within the scope of the required environmental analysis under CEQA.

178-6 The comment expresses concern about the Bailey Canyon Debris Basin being a sufficient fuel break, and the risk of embers catching homes on fire. As stated in Draft EIR Section 4.20, Wildfire, the Bailey Canyon Debris Basin will act as a fuel break in addition to the fuel modification areas that would also create reduced fuel on the site. For a visual representation of the Fuel Modification Area, please see Appendix E of the FPP (Appendix F2). As stated in Draft EIR Section 4.20, buildings would comply with ignition resistant construction standards of the 2019 CBC (Chapter 7A) and Chapter 5 of the UWI code which would address vulnerabilities of the structure such as roofs, eaves, exterior walls, vents, appendages, windows, and doors. These standards would help structures perform at high levels (resist ignition) during the typically short duration of exposure to burning vegetation from wildfires.

The comment also asks if the City or County Fire Department has reviewed this Draft EIR and agreed with the finding. The City of Sierra Madre Fire Department (SMFD) reviewed and agreed with the conclusions of the FPP and Draft EIR Section 4.15, Public Services. The comment also suggest that each home should have a specific FPP and a monitoring program should be conducted to ensure the homes are protected. The FPP would be applicable to all homes within the project site.

178-7 The comment asks why there are no mitigation measures to address the operational increase in greenhouse gas emissions as a result of the project. The comment also states that the City should require the developer to install solar panels on each proposed house to reduce the demand on the electrical grid and reduce carbon emissions.

An Air Quality and Greenhouse Gas Emissions Analysis Technical Report is included as Appendix B of the Draft EIR. As part of the Air Quality and Greenhouse Gas Emissions Analysis Technical Report, a localized significance threshold (LST) analysis was prepared to determine potential impacts to nearby sensitive receptors during construction of the project. The impacts were analyzed using methods consistent with those in the SCAQMD's Final Localized Significance Threshold Methodology (2009).

This analysis determined that construction activities associated with the project would result in temporary sources of on-site fugitive dust and construction equipment emissions. As shown in Table 4.3-10 of the Draft EIR, with the implementation of Mitigation Measure MM-AQ-1, construction activities would not generate emissions in excess of site-specific LSTs and no impacts to nearby sensitive receptors would occur.

As stated in Table 4.8-6 of Draft EIR Section 4.8, Greenhouse Gas Emissions, the proposed project would include solar roof installations in accordance with the 2019 Title 24 building standards. In addition, as discussed in Section 4.8.5, Impact Analysis, of Section 4.8, estimated annual project-generated greenhouse gas emissions would be approximately 794 MT CO_{2e} per year as a result of project operations and amortized construction. This would be less than the significance threshold of 3,000 MT CO_{2e} per year as discussed in Section 4.8.3, Thresholds of Significance. Therefore, project impacts to greenhouse gas emissions would be less than significant and no additional mitigation would be required.

178-8 The comment expresses concern related air quality, specifically dust control and how it will be monitored. Additionally, the comment expresses concern about the chemicals identified in the Phase 1 ESA from an underground storage tank being released into the air as a result of grading. As stated in Draft EIR Section 4.3, Air Quality, the project would implement dust control measures as a project design feature in compliance with SCAQMD Rule 403, including watering the exposed area two times per day (55% reduction in PM₁₀ and PM_{2.5}) and limit vehicle travel on unpaved roads to 15 miles per hour. As concluded in Draft EIR Section 4.9, Hazards and Hazardous Materials, the proposed project would not expose the public to a reasonably foreseeable significant hazard as a result of construction.

178-9 This is a concluding statement by the commenter that does not raise concerns regarding the adequacy of the Draft EIR.

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Comment Letter 179

10-4-21

Victor Gonzales, Director of Planning
and Community Preservations.

Oppose the plan to change from
institutional to R-1 single housing
because . . .

179-1

1. Traffic would increase to 200-400
vehicles a day.

179-2

2. We are in an unprecedented
drought, we don't have enough water
and borrowing what we need!!

179-3

3. This is in a high fire zone, part
of Sierra Madre north of Grand View
were evacuated in the Bobcat
fire a year ago.

179-4

4. The Sierra Madre earthquake of 1991
destroyed one of the Monastery's buildings
22 homes around Sunnyside were
condemned and there was 12.5 million
in damages.

Thank You

179-5

Bertha D. Patayas

626 325 3354 BERTHA D. PATAYAS
103 E. Sierra Madre Blvd.
Unit C
Sierra Madre, Ca 91024

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Response to Comment Letter I79

Individual
Bertha D. Patsavas
October 4, 2021

- I79-1** This introductory comment expresses general opposition to the proposed change in zoning and land use designation of the site. Please refer to Global Response GR-7.
- I79-2** The comment states that traffic would increase to 200-400 vehicles a day as a result of the project. Please refer to Global Response GR-6.
- I79-3** The comment expresses concern with drought and availability of water to serve the project. See Global Response GR-1.
- I79-4** The comment states that the project is located in a Very High Fire Hazard Severity Zone, where previous fires or evacuations have occurred. Please refer to Global Response GR-3.
- I79-5** The comment mentions the 1991 earthquake, which destroyed one of the Monastery buildings. See Response to Comment I45-6. The proposed project would be required to comply with all existing regulations, including the California Building Code and the SMCC in order to ensure seismic safety. In addition, the project would comply with project design features PDF-GEO-1 through PDF-GEO-15 and MM-GEO-1, which includes project specific recommendations from the geotechnical investigation (included as Drat EIR Appendix E).

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Comment Letter 180

From: Shelby Moser <shelby.moser@gmail.com>
Sent: Monday, October 4, 2021 9:55 AM
To: Vincent Gonzalez
Subject: Comments on the DEIR for the 'Meadows Project'

CAUTION: This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Shelby Moser
273 E Alegria Ave, Sierra Madre, CA 91024
shelby.moser@gmail.com

Dear Vincent Gonzalez,

I am writing to express my concern over the Project moving forward at this time. I hope the City Council and Commission will not allow this project to continue for the following reasons. First, it is not wise to begin such a huge development during our current drought. Although it's been stated repeatedly that the proposed structures would not deplete Sierra Madre water, that overlooks the fact that all water in CA is scarce, including for current residents. We're surrounded by cities who have gone back to stricter watering limitations for citizens, yet Sierra Madre has not.

180-1

More to the point of my concern is the hazardous area in which this project is proposed. I was one of the many families who had to pack and prepare for evacuation during the Bobcat fire, not to mention many before that. Had things gotten worse, the exact area in which these new homes are proposed would require precious resources (water, personnel) that are already spread thin for current residents during our increasingly longer and hazardous fire seasons. I would consider the Housing Project to be in a 'Very High Fire Severity Zone', which should be avoided.

180-2

Finally, I'm not convinced that this project wouldn't create further traffic flow issues, which would contribute to the problems I state just above regarding an already hazardous area.

180-3

I appreciate you taking the time to read and consider my concerns.

Shelby Moser

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Response to Comment Letter I80

Individual
Shelby Moser
October 4, 2021

- I80-1** The comment is concerned with the project's potential impacts on water supplies and availability, in light of current drought conditions. See Global Response GR-1.
- I80-2** The comment expresses concern regarding the hazardous area in which the project site is located, specifically due to prior wildfires in the area, evacuations, and the Very High Fire Hazard Severity Zone designation. Please refer to Global Response GR-3 and Global Response GR-4.
- I80-3** The comment is concerned with potential impacts to traffic flow. Please refer to Global Response GR-6.

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Comment Letter I81

From: Maria Karafilis <mariakarafilis@gmail.com>
Sent: Monday, October 4, 2021 10:32 AM
To: Vincent Gonzalez
Subject: questions on DEIR for Meadows at Baily Canyon

CAUTION: This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Maria Karafilis
642 Fairview Ave, Sierra Madre, CA 91024
mariakarafilis@gmail.com

Thank you for the opportunity to comment on the DEIR for the "Meadows at Bailey Canyon"

Below are additional comments and questions in addition to those I already have submitted. Please retain a copy for the administrative record.

Please respond to these comments in the Final EIR and please put me on the list of people to notify when the Final EIR is complete.

I strongly object to the proposed housing development. It is inconsistent with the Policies and Values of our General Plan. In addition to my prior comments, I am especially concerned with:

1) 101 mature trees will be removed, including 10 protected Oaks. The Oaks will be replaced with smaller Oaks and other small trees (requiring a great deal of water to become established) SM has a Forest Management Plan with a mission to preserve "Canopies" for their environmental and aesthetic benefit. 101 large canopied trees will be destroyed. Why are you flouting the SM Forest Management Plan and denuding the area? How will you prevent rock and landslides and impact on wildlife when these mature trees are destroyed?

2) I strongly oppose a change in zoning, a change in our General Plan and a change in the regulations that other residents have to follow.

I81-1
I81-2
I81-3

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Response to Comment Letter I81

Individual
Maria Karafilis
October 4, 2021

- I81-1** This introductory comment expresses general opposition to the project but does not raise any issue concerning the adequacy of the Draft EIR. The commenter will be notified when the Final EIR is complete and available to the public.
- I81-2** This comment states that 101 mature trees will be removed including 10 protected Oak trees. The commenter expresses concern regarding project inconsistencies with the City's Forest Management Plan to preserve canopies as well as rock landslides and impacts on wildfire associated with loss of trees. Please refer to Global Response GR-2. As concluded in Draft EIR Section 4.7, Geology and Soils, the project site is located outside of any potential landslide zone and is not located within a seismic hazard zone, therefore, impacts associated with landslides would be less than significant.
- I81-3** The comment expresses general opposition to the proposed change in land use designation of the project site but does not raise any concerns regarding the adequacy of the Draft EIR.

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Comment Letter 182

From: Vicki Jennelle <vmeiser@aol.com>
Sent: Monday, October 4, 2021 3:37 PM
To: Vincent Gonzalez
Subject: The Meadows at Bailey Canon

CAUTION: This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Dear Mrs. Gonzalez,

I am a resident of 465 N. Sunnyside Avenue and am writing to express my continuing concern with regards to the prospect of developing the 20 acres of land located at the top of Sunnyside Ave.

182-1

I know that the EIR that was funded by the developer has said that there will be minimal impact to our environment, but as a resident I could not disagree more. The increased traffic and taxation of our current infrastructure (roads, sewers, water) will have a significant impact on the quality and safety of the lives of those who reside in close proximity to this development.

182-2

We already have water concerns (as I note by the banner hanging over Baldwin Avenue asking that we conserve water and the "water droplet" scarecrow outside of the city building). I know that the developer is stating that there will be "net zero" water impact on our city, but that cannot be accurate. It's a great catch phrase that makes developing the land with large homes seem like a non-issue. We don't know how long the developer will be in business and cannot project what the water needs/cost will be of those 42 homes over the next 40 years and more.

182-3

Last year was my first year as a resident of Sierra Madre (since February of 2012) that I feared for our safety with the fires coming as close as they did to the city. Homes built up into the hillside pose a greater risk of catching fire & spreading it. I know that they will be built with high fire code standards (as is my home built in 2011) but there will no longer be a staging area for local fire resources if 42 homes are present.

182-4

Traffic will be a nightmare. Residents, cleaning personnel, yard workers, pool workers and the many many daily delivery vehicles are going to turn Sunnyside Ave. into another Michilinda- or worse.

182-5

I think it is proper to provide a greenbelt for the neighbors who would be directly impacted by this project, but installing a public park will just CREATE MORE UNWANTED TRAFFIC. **Please do not add this burden to the already unpalatable project.**

182-6

In short, why can't the city put a measure on the ballot to see if the people of this city will fund buying the land over a number of years? Please do not support this project as it is currently being presented.

182-7

Respectfully,

Vicki Jennelle
465 N. Sunnyside Ave.
Sierra Madre, CA 91024
626-325-3195

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Response to Comment Letter I82

Individual
Vicki Jennelle
October 4, 2021

- I82-1** The comment is an introduction to comments that follow.
- I82-2** The comment expresses general concerns regarding environmental impacts, including impacts to transportation/traffic, roads, sewers, and water. The proposed project's impacts on the environment have been addressed throughout Draft EIR Chapter 4, Environmental Analysis. Impacts to transportation have been addressed in Draft EIR Section 4.17, Transportation, and impacts to utilities have been addressed in Draft EIR Section 4.19, Utilities and Service Systems (with a few clarifying changes made to Final EIR Section 4.19). Lastly, regarding the commenter's concern related to development fees, the development fees from the proposed project would be paid by the Applicant would offset the costs associated with the increased demand for public services and utilities.
- I82-3** The comment expresses concern regarding water supply and the project's net-zero water impact. Please refer to Global Response GR-1.
- I82-4** The comment expresses concern regarding the project's impacts to wildfire. Please refer to Global Response GR-3.
- I82-5** The comment expresses concern regarding the project's impacts to traffic. Please refer to Global Response GR-6.
- I82-6** The comment expresses concern regarding the impacts to traffic related to the proposed park. The project's impacts to transportation have been addressed in Draft EIR Section 4.17. Please refer to Global Response GR-6.
- I82-7** The comment expresses general opposition to the proposed project and includes suggestion for the City to buy the land associated with the proposed project. The comment does not raise any issue concerning the adequacy of the Draft EIR.

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Comment Letter I83

**Comments re: Draft EIR, Monastery Housing Development
By
Bruce H. Jones, D.D.S.**

Background

My name is Bruce H. Jones. I am a retired dentist living with my wife at 662 W. Alegria Ave, a location which will be heavily negatively impacted by the Monastery Housing Project should it come to completion.

I83-1

I offer the following as personal and community credentials:
I have been associated with Sierra Madre since the mid-1950's when immediate family members moved here. I established my first dental practice at 71 W. Sierra Madre in 1976 and moved into an apartment in town shortly thereafter. Since January, 1980 my wife and I have lived at 662 W. Alegria Ave. and raised our two sons, ages 39 and 35, there. Our sons have since married and moved out of the area. From 1977 to about 1984 I was a member of the Sierra Madre Volunteer Fire Department. I had a second career as civilian employee of Pasadena Police Department from 1990-2009. In 2005 I was a member of the Mayor's Ad Hoc Committee on Level of Service which considered and recommended changes to the Fire Department which resulted in the current structure of the Sierra Madre Fire and Paramedic Department. of A few years ago I was invited to meet with then-City Manager Gabe England to go over the 2005 Committee proceedings and give him some oral history on my experiences on the SMVFD. Since 1999 I also serve as a volunteer photographer for the Los Angeles County Fire Department which exposes me to the experience and knowledge of the members of that department.

I83-2

Please consider the following points:

Fire

In the history of Sierra Madre there have been numerous wildfires which have put the City in danger. I recall two that burned behind the Monastery and retreat house complex and came close to destroying one or both. In 1977 I fought that fire as a member of

I83-3

[1]

SMVFD. I recall a few years later another fire that burned the same area. In 1993 the Altadena (Kinneloa Mesa) Fire came dangerously close to the western border of the City. Sometime around 2000 the Santa Anita Fire burned across the front range behind the City and was stopped at the eastern edge of Bailey Canyon. I do not believe the fuel behind the proposed development area has burned since the late 1970's. This fuel is very dangerous and should it burn it would be very destructive to the surrounding homes including the proposed development. The developer may reassure the City that the proposed homes are fire-safe or even fire resistant but I point out the Northern California wildfires of this past summer 2021 as proof that nothing of that sort exists. Under the current drought and wildfire conditions it will be very difficult, if not impossible, to insure the homes in the new development. Certainly it will be expensive.

183-3
Cont.

Water

The developer claims "water neutrality" for the project. I believe the current drought renders this claim Invalid. We have for several years had to engage in rather severe water conservation measures and I contend the additional need for water for the development will only make the problem worse. I also question the ability of the current City infrastructure to supply and additional 42 homes. Only recently new mains were installed in northwest Sierra Madre and by observation, I question their capacity to do so.

183-4

Municipal Services

Our water, sewer and storm drain infrastructure is strained to the limit right now. Does the developer offer to re-construct that infrastructure to handle the additional impact of the 42 homes in the development? This would mean digging up streets to install new piping which will further negatively impact the surrounding neighborhood.

183-5

Public safety and emergency services

I question the ability of our Fire and EMS (Emergency Medical Service) departments to adequately serve the additional residents of the new development. I have no numbers but I have seen incidences where Fire and EMS services are brought under pressure, either due to Mutual Aid obligations or

183-6

[2]

disaster-level incidents. I also question the age and condition of our current apparatus. Likewise, will our police department be able to handle the additional calls that will be inevitable with the additional residents? At the moment there is only one way in and out of the proposed development. If Carter is widened there is direct impact on Bailey Canyon Park and the properties across the street.

183-6
Cont.

Negative impacts of the construction process itself

The construction process alone will cause significant negative impact to the residents near the development and will also injure the City infrastructure. During the process there will be passage of many pieces of heavy equipment on streets originally built for automobiles used by the residents. Large grading equipment will have to come first. Then cement batch trucks. As the process goes forward there will be deliveries of materials for all phases of construction such as lumber and roofing materials. The weight alone will damage the pavement and might possibly damage the underground utilities such as our new water mains, sewer and storm drain pipes and gas mains.

183-7

Dust, noise and air pollution from the equipment and the process itself is unavoidable and will be severe.

183-8

Traffic will inevitably be heavy along Michillinda, Sunnyside and related cross streets as trucks seek the most convenient route to the development. Traffic will most certainly be congested along Michillinda as slow and heavy trucks mix with the daily school traffic.

183-9

Traffic

While I have no hard numbers I will make a guess that the 42 proposed homes will be occupied by persons who own about two cars apiece. This is 84 cars going in and out of the development about twice a day. This has a definite negative impact on the current residents; air pollution, noise and difficulty of accessing our homes during peak traffic periods. At the moment there is only one way in and out of the development.

183-10

[3]

Closing thoughts

In my 42 years of living in Sierra Madre and with my direct involvement in the community I have not once seen or heard of the Passionist Fathers having any direct involvement in Sierra Madre. I view this project as a means for the Passionist Fathers to handle whatever financial problems they might have as quickly and as lucratively as possible with no concern for the surrounding residents or the City itself. Have they considered the historical artifacts near the top of the property – the Stations of the Cross? Has there been any consideration to the possibility of burial sites anywhere in the development area?

183-11

I also point out the failed development at #1 Carter. My sons were at Maranatha High School at the time. I was very close to how this development came about which was very questionable. The political wrangling nearly split the City and friends became enemies. So far, nothing has been done at #1 Carter and all we have is several acres of bare dirt.

183-12

Developers have no conscience. The developer will simply come in, do their business and leave the community with no care of the long term health of the community. To me, the entire process of the Passionist Fathers selling to a developer for a fast project has the bad odor of simply making a “quick buck”.

183-13

Sierra Madre is a quiet Foothill Village and should remain so. Please do not allow those involved to sell out our City for money alone.

Has it been considered for the City to purchase or arrange for purchase of the property? I would be willing to donate a significant amount to join with others to do so.

183-14

Thank you for your consideration of my comments.



[4]

Response to Comment Letter I83

Individual
Bruce H. Jones
October 4, 2021

- I83-1** The comment includes an introductory comment introducing the commenter and comments to follow. The comment does not raise specific issues concerning the adequacy of the Draft EIR.
- I83-2** The comment provides personal background relating to the commenter. The comment does not raise specific issues concerning the adequacy of the Draft EIR.
- I83-3** The comment provides an overview of the history of wildfires in the area and dangers associated with wildfire. Please refer to Global Response GR-3.
- I83-4** The comment expresses concern regarding the project's net-zero water impact and the ability of existing water supply infrastructure to serve the project. Please refer to Global Response GR-1.
- I83-5** The comment expresses concern regarding water, sewer, and storm drain infrastructure, which have been addressed in Draft EIR Section 4.19 (with a few clarifying revisions made in Final EIR Section 4.19). As discussed in this section, the proposed project would result in less than significant impacts to water, sewer, and storm drain infrastructure.
- I83-6** The comment expresses concern regarding the project's impacts on fire protection, emergency medical service (EMS), police protection, and access. These issues have been analyzed in Draft EIR Section 4.15, Public Services. As discussed in this section, SMFD has reviewed the project and has determined that it would not have a significant effect on service demands. Therefore, through payment of appropriate development fees by the project applicant, the proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities. As the SMFD also provides EMS, the project would not result in significant impacts to EMS services. Similarly, regarding police protection, while new development places increased demand on police protection services, due to payment of development fees, participation in mutual-aid agreements, and the project's minimal increase in population, it is not anticipated that the proposed project would result in the need for construction or expansion of police facilities. Please refer to Global Response GR-4 in regard to emergency access concerns.
- I83-7** The comment expresses concern regarding construction of the proposed project, specifically physical impacts to the existing streets and underground utilities. Environmental impacts associated with construction have been addressed throughout Draft EIR Chapter 4, Environmental Analysis. In addition, please refer to comment I65-12 regarding the physical impact of heavy load and equipment.
- I83-8** The comment states that dust, noise pollution, and air pollution from construction would result in significant and unavoidable impacts. Dust, noise pollution, and air pollution have been analyzed in Draft EIR Sections 4.3, Air Quality, and 4.13, Noise. As discussed in these sections, impacts to air quality and noise during construction would be less than significant with mitigation.

- 183-9** The comment expresses concern related to traffic, particularly construction-related traffic on Sunnyside Avenue and Michillinda Avenue. Please refer to Global Response GR-6. It should be noted that under CEQA, an increase in traffic is no longer used to assess whether a project would have a significant effect on traffic under CEQA, including construction-related traffic. Rather, CEQA now requires that the transportation impacts of a project be assessed solely through the calculation of VMT, and for which, this project was determined to have a less than significant impact. As discussed in Global Response GR-6, Appendix K to this Final EIR includes a Traffic Study, which was prepared strictly for informational purposes and discusses the expected changes in traffic conditions. As discussed in Appendix K, the performance of the study intersections, as measured by LOS, would result in no measurable difference as a result of the project, and all of the intersections will function well-within the City’s standards.
- 183-10** The comment expresses concern regarding air pollution, noise, and ingress/egress impacts associated with traffic as a result of the proposed project. Please refer to Global Response GR-6 and Response to Comment 183-9 for discussion related to traffic. Impacts to air pollution and noise have been analyzed in Draft EIR Sections 4.3 and 4.13. As discussed in these sections, impacts to air quality and noise would be less than significant with mitigation.
- 183-11** The comment raises economic, social, or political issues that do not appear to relate to any physical effect on the environment in addition to impacts to historical resources and burial sites. Draft EIR Section 4.5, Cultural Resources, provides an analysis of potential impacts to cultural resources, including historical resources and burial sites. As discussed in this section, the proposed project would not cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5. Impacts would be less than significant. In addition, with implementation of MM- CUL- 1, MM-CUL-2, and MM-CUL-3, potential impacts to previously undiscovered archaeological resources would be less than significant.
- 183-12** The comment raises economic, social, or political issues associated with another project that do not appear to relate to any physical effect on the environment. No further response is required because the comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR.
- 183-13** The comment expresses the general opinions of the commenter that do not appear to relate to any physical effect on the environment. No further response is required because the comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR.
- 183-14** The comment expresses general opposition to the proposed project and includes a suggestion for the City to buy the land associated with the proposed project. The City acknowledges this recommendation and notes that this comment does not raise any issue concerning the adequacy of the Draft EIR.

Comment Letter 184

From: johnwiedeman@yahoo.com
Sent: Monday, October 4, 2021 2:36 PM
To: Vincent Gonzalez
Subject: Sierra Madre Quality project fails to develop high quality housing, fails to address traffic issues, and fails to ensure community compatibility with our distinctive small town.

CAUTION: This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

It ain't right!
Go! Gonzolez and cohorts.
We bad!

184-1

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Response to Comment Letter I84

Individual
John Wiedeman
October 4, 2021

- I84-1** The comment expresses general opposition to the project and general traffic concerns. Please refer to Global Response GR-6 for discussion related to traffic.

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Comment Letter 185

From: Tricia Searcy <tricia_searcy@yahoo.com>
Sent: Monday, October 4, 2021 1:22 PM
To: Vincent Gonzalez
Cc: Barbara Velturo; Alexander Arrieta
Subject: Comments on DEIR for the Meadows at Bailey Canyon Specific Plan Project
Attachments: MeadowsSPEIR_Dr_Peer_4_2_21_MIG2_full6-22_DudekResponses6.25.21 (005)-1.pdf; Traffic Study - LOS Memo_Final -1.pdf; Lot Line Adjustment Letter 1.pdf; Lot Line Adjustment Letter 2.pdf

CAUTION: This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

October 4, 2021

To: Vincent Gonzalez, Planning Director
 232 W. Sierra Madre Boulevard
 Sierra Madre, CA 91024
vgonzalez@cityofsierramadre.com

From: Tricia Searcy
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 Sierra Made, CA 91024
tricia_searcy@yahoo.com

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) for the Meadows at Bailey Canyon Specific Plan Project.

It is evident to even the most casual observer that this EIR is filled with misstatements of fact, omissions of material fact, and obfuscation of the project's noncompliance with applicable laws, city policies, and our General Plan.

Below are my detailed comments. Please retain a copy for the administrative record.

Please respond to these comments in the Final EIR and please put me on the list of people to notify when the Final EIR is complete.

Comments to the Draft Environmental Impact Report (EIR) for the Meadows at Bailey Canyon Specific Plan Project.

I. ES. 1 Project Location, Project Site at p. ES-1

This section fails to address the problems articulated on page 3 of MIG's June 22, 2021 third-party peer review of the project ("the MIG Review") submitted as an attachment to this comment.

In this section, the DEIR revises the proposed open space down from 45 to 35 acres and continues to say the "open space dedication area is not considered part of the project site." As pointed out by MIG, "if this is not part of the project then it should not be referenced as one of the objectives...nor described as a community benefit. If it is part of the project then it should be further described in the project description, including a location map, how it will be provided, how it will be protected, and what it will be used for. If it will be accessible to or otherwise used by the public, it needs to be included in the project description and the environmental setting and analyzed as part of the project." P.3 MIG Review.



MIG twice made clear that the open space needs to be defined and that "[i]f it will be accessible to or otherwise used by the public it potentially could have, at the least, potential impacts on biological resources, and wildland fire potential. If the actions under this project will not result in access, improvements, or use by the public, then such should be stated and, further that such use or action would be subject to a separate environmental review at a later date if it is made available to the public." P. 3 MIG Review. This still hasn't been done.

185-2
Cont.

Is the open space part of the project or not? If not, it must be taken out of the project description and not presented as a community benefit. If it is, it must be clearly described, including how it will be provided, protected, what its use will be, and a separate comprehensive environmental review should be conducted, including, but not limited to, biological resources and wildfire potential, and made available to the public.

185-3

II. E.S. 2 Project Description at p. ES-2.

185-4

There are three standards that a project description must meet: it must be clear, stable, and finite. The project does not meet this standard because it is unclear, unstable, and not finite as set forth below.

The project description states that it would include "approximately 3.39 acres of open space (including 3.04-acre dedicated neighborhood park) and identifies "open space dedication as a community benefit."

185-5

If 3.04 acres of the 3.39 acres is the park, then that leaves .35 acres of open space. Under Project Location above, the area is identified as 35 acres. In project objective number 5, 30 acres is referenced and the area is clearly misidentified as being near Colby Canyon and Colby Canyon Trail. (see Objective 5. Preserve the hillside open space area by dedicating approximately 30 acres north of the Mater Dolorosa Retreat Center to the City, in order to preserve a portion of Colby Canyon and the Colby Canyon Trail, which would be used by wildlife for movement up and down slope; preserve native vegetation communities and drainages; and preserve land adjacent to the Colby Canyon stream). Colby Canyon is above the city of La Canada nowhere near this project. See map below. Thus, the location, boundaries, and acreage of the "open space" are not clear.

Please clearly describe and accurately map the proposed "open space" along with identifying how it will be provided, protected, what its use would be and provide a separate comprehensive environmental review as recommended by MIG. See MIG Review p.3.

185-6

Please remove all references to preservation of Colby Canyon, Colby Canyon trail and stream as a project objective and/or community benefit and specifically describe what "community benefit" will be provided by any proposed "open space."

185-7

In addition, the project description is unclear, unstable and not complete or finite because the boundaries have yet to be determined. As stated at p. ES-1, "The Mater Dolorosa Retreat Center currently is on the same legal parcel as the project site, which is currently split within three different lot [sic]; however, a lot line adjustment would be processed to adjust the boundaries of the three existing lots that make up the Mater Dolorosa Retreat Center and the project site. The lot line adjustment would consolidate the two lots that make up on [sic] legal lot for the project site into one and adjust the site's northern boundary farther to the north."

185-8

The developer applied for a lot line adjustment in April 2021 and it was rejected for several reasons. Among other things, the "proposed lot line adjustment will result in the creation of two parcels from one existing parcel, which is in violation of the Subdivision Map Act, as it relates to the Lot Adjustments." See Memo from Clare Lin to Jonathan Frankel dated May 3, 2021 including the comments from Kevork Tcharkhoutian to Chris Cimino (attached). Please clarify the boundaries of the project site and address the eight (8) specific problems raised in the attached document.

185-9

With regard to the vague and unattainable term "net zero water impact," MIG has confirmed, "[n]et zero water use is not a community benefit: it is no different than the amount of water currently being used and its only benefit is to provide service to the project similar to utilities, street improvements etc: **remove it from the sentence.**" P.3 MIG Review (emphasis mine).

185-10

All references to "net zero water" as a community benefit should therefore be removed as per MIG's recommendation.

The project description is also fatally unclear and unenforceably vague in its statement that, "[c]ommunity benefits would include...establishing a dedicated funding source for long-term park maintenance." What exactly does "dedicated funding

185-11

source for long-term park maintenance” mean? How much money is being committed, if any, and for how long? Where is it coming from? How much is long term park maintenance expected to cost? What sort of maintenance will be required? Elsewhere it is indicated that the city will need to establish a public maintenance district for the park. Establishing a new public department and staffing it will cost money—how much is it expected to cost? How many staff will be involved? Where will this new department be located in the city? Please provide these pertinent facts and an analysis to answer these questions

185-11
Cont.

The project description is also unclear, unstable, and subject to change with regard to the description of the proposed residences such that it is impossible to determine if the project is consistent with the city’s General Plan and ordinances.

The residential development is described as consisting of “42 detached single-family dwellings ranging from 2,700 to 3,800 square feet with a minimum lot size of 8,500 square feet. The gross density of the project is approximately 2.5 dwelling units per acre. The proposed residences would be one to two stories.” At p.3-3.

185-12

How many of the residences will be two story? The neighboring houses are primarily one story. How many of the lots will be the “minimum lot size of 8,500?” Please state what size *all* the lots are, how many stories each house will be, along with what the designs of the houses will be. None of these significant details are included here or in the SP. Thus, the project description is unclear, unstable, and not finite.

III. E.S.2.1 Project Objectives at p. ES-2

Objective number 5 should be removed (see text below and see comments above). All references to Colby Canyon should be removed as it is nowhere near the project.

185-13

5. Preserve the hillside open space area by dedicating approximately 30 acres north of the Mater Dolorosa Retreat Center to the City, in order to preserve a portion of Colby Canyon and the Colby Canyon Trail, which would be used by wildlife for movement up and down slope; preserve native vegetation communities and drainages; and preserve land adjacent to the Colby Canyon stream.

Please remove Objective number 6 or describe in detail what street improvements are provided for that would “facilitate safe and efficient access.” There are no sidewalks on North Sunnyside which is a narrow, old residential road ending at the monastery gate. Nowhere in this report is there any factual support for achieving this objective—no sidewalks and no street improvements are planned for the street leading up to the project—references are only to the streets inside the project. As it stands, the project will greatly increase danger to pedestrians and create traffic jams on a tiny street unsuitable as a primary ingress and egress.

185-14

It is asserted under “Project Location” that “Carter would be improved to provide secondary egress and ingress access to the site,” but no specific improvements are identified and LA county has stated that it will not widen the street. Thus, it is unclear how Carter, which also has no sidewalks and is used by many pedestrians on a daily basis visiting Bailey Canyon Park, could be improved to make it safe.

185-15

Please describe in detail what improvements will be made to the section of Carter leading up to the project that will provide safe ingress and egress and how it will be accomplished. If this cannot be done, the sentence should be removed.

185-16

With regard to Objective 7, a development agreement is not a public benefit nor is there “enhanced connectivity to the Bailey Canyon Wilderness Park and trail system. The public already has open and easy access to these things and the development agreement is strictly a benefit to the developer.

185-17

These sentences should be removed.

IV. ES.5 Project Alternatives at pp. ES 4-5.

This section must describe a reasonable range of alternatives **sufficient to foster informed decisionmaking and public participation**. This section, however, provides only one paragraph summary descriptions of alternatives made up of conclusory statements that fail to adequately describe and evaluate the comparative merits of each alternative. What

185-18

projects, if any, were actually considered? There is zero analysis of the environmental impact of any factual alternative. Due to the lack of qualitative and quantitative analysis, this section provides insufficient information to meet the requirements for Alternatives Analysis or for any possibility of informed, rational decisionmaking.

185-18
Cont.

Please provide factual information (e.g bids) on what *specific projects were actually considered, if any*, and provide analysis of the environmental impact of each specific project alternative sufficient to allow for informed, rational decisionmaking.

V. Aesthetics—Lighting at pp. ES 6-7

This section asks if the project creates a new source of substantial light or glare which would adversely affect day or nighttime views in the area. In determining less than significant impact, the analysis here improperly relies on PDFs (Project Design Features) instead of applicable regulations and requirements.

185-19

The PDFs are circular in nature in that they refer back to the Specific Plan (SP) for validation instead of applicable regulations and requirements. See MIG Review p. 4.

Further, as stated by MIG, “PDFs need to address the specific provisions that are being referenced in the SP so the reader doesn’t have to guess at what is being referred to. In addition, merely saying that the project will comply with the SP is still circular: the SP can be changed and may no longer address issues of concern to the EIR.” MIG Review p. 4.

Saying the project meets its own “guidelines” or “development standards” is meaningless. Please do as MIG suggested and “reference back to the regulations /requirements and specify what they are in the narrative of the relevant EIR topical section.” MIG Review p.4.

185-20

This comment/suggestion applies to all PDFs in the EIR and elsewhere in the document, particularly with regard to the Consistency Analysis. Circular statements that the project meets its own guidelines are used to erroneously support conclusions of consistency with the terms of applicable laws and policies.

In addition, regarding PDF AES-2, specifying that “[s]olar panels shall be oriented to the south to maximize efficiency and establish visual consistency across buildings” **exacerbates rather than mitigates** the problem of substantial light and glare as the neighboring communities are to the south and west.

185-21

VI. ES-1 Air Quality at p. ES-9-10

This section asks if the project would result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard as well as if it would expose sensitive receptors to substantial pollutant concentrations.

185-22

In determining less than significant impact, the analysis improperly rejects the recommendations spelled out by the independent reviewer, MIG.

The whole point of retaining an independent reviewer is to ensure that environmental impacts are fairly evaluated. Allowing the developer to reject MIG’s recommendations and do what it wants without regard to the health and well being of the surrounding community eviscerates the value of hiring an independent reviewer and puts the community at significant risk.

The project should be held to all the standards outlined in MIG’s review for the reasons set forth therein. Please see the MIG review (attached) at pp. 7-8 for their comments, analysis and reasoning.

185-23

In summary, MIG twice recommends that “MM-AQ-1 be revised to use the SCAQMD thresholds of significance as the performance standard for the mitigation measure, because 1) the standard is the same as that utilized as a threshold in the EIR, and 2) it provides specificity beyond that currently captured in the EIR (i.e. the performance standard for

185-24

'functionally equivalent diesel PM emissions totals' is not clearly identified in the mitigation measure)." (MIG Review p. 8 emphasis theirs)

↑ 185-24
Cont.

MIG further recommends that for diesel PM, "MM-AQ-1 be clarified to require functionally equivalent **diesel PM emissions reductions for the purposes of the EIRs LST analysis** and a corresponding update to the construction health risk assessment for the **purposes of the EIR's diesel PM analysis.**" (MIG Review p. 8 emphasis theirs).

185-25

MIG's review at p. 6, indicates that several GP policies have been removed. Dudek's response to MIG's comment questioning why they have been removed states that, "These specific ones have been removed(sic) as they are directed to the City and not the responsibility of the project. Please specify what has been removed and what the implications are. What exactly is the responsibility of the City and not the project.

185-26

VII. ES-1 Utilities and Service Systems at p. ES-46: Water

This section asks if there will be sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years and concludes that there will be less than significant impact because "the project applicant will provide funds to the City to purchase supplemental water from the San Gabriel Valley Municipal Water District (SGVMWD) in an amount equal to the anticipated total indoor and outdoor water demand of each residential unit over a 50-year period. This purchase would be in addition to the City's existing agreement with SGVMWD providing for the purchase of supplemental imported water. "

185-27

Please address the facts that the proposed mitigation is not possible because:

- 1) **As admitted by Interim City Manager, Jose Reynoso, water is currently unavailable for purchase and there is no guarantee of future availability;**
- 2) **the agreement calls for the purchase price to be at 2021 rates for the next 50 years when, in fact, price of water will most certainly increase; and**
- 3) **the agreement would need to be in perpetuity to be less than significant impact.**

VII. Zoning General Plan and Policy Conflicts 4.1-8

The project site is currently zoned Institutional, and the existing General Plan land use designation is also Institutional. The proposed project is **in direct conflict with the zoning code and General Plan** because, among other things, it would change the land use designation to Specific Plan. To say that it is consistent because the Specific Plan would *change* the zoning code and General Plan is oxymoronic. If it were consistent, zoning code and General Plan amendments would obviously not be necessary. Failure to admit this basic inconsistency highlights the problem throughout this report of claiming consistency even where the project is in direct conflict with the city's General Plan and policies.

185-28

In an attempt to show consistency with city policies and the General Plan, this report improperly uses language that fails to establish consistency with the policy at issue by stating that the project would be consistent with itself—not the policy. In several instances, it states the development would be "regulated" by its own design guidelines which are, in fact, inconsistent with the policy. No facts are presented to support erroneous conclusions of consistency when it can't be done. Please address the inconsistency of the project with city policies and the General Plan with facts instead of circular reasoning.

185-29

Moreover, because the project location and description are so unclear, unstable, and not finite (subject to change) as stated above at pp.1-5, it is impossible to determine whether the project is consistent with the city's General Plan and ordinances.

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VIII. 4.15.5 Impacts Analysis: Fire Protection

This section asks if the project would result in substantial adverse physical impacts associated with the provision of fire protection services and concludes that "SMFD has reviewed the project and has determined that it would not have a significant effect on service demands....Therefore, through payment of appropriate development fees by the project applicant, the proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities. Impacts would therefore be less than significant." P. 4.15-9

185-31

The conclusion is not supported by the facts given that the city is already short staffed. A fully staffed fire department consists of 15 firefighters and the City has only 10 and "SMFD does not have any signed mutual aid agreements for fire protection." p.4.15-1.

Please explain *how* payment of development fees would be used to mitigate the adverse impact of overburdening an already overburdened fire department and explain the grounds for SMFD's determination that the project would not have a significant impact on services demands.

IX. Wildfire

This section describes the existing wildfire conditions within the vicinity, regulations, and a Fire Protection Plan (FPP).

185-32

As indicated in the MIG review, the Fire Protection Plan "is not really a clear-cut plan for fire protection...it is an amalgam of often generic narrative reference already existing fire safety regulations, and information not specific to the project: it is difficult to sort what is being provided for the site in terms of fire protection that is not already required." p. 5 MIG Review.

Please implement MIG's recommendation "that the FPP be modified to be more project specific **including an exhibit showing the FPP.**" (emphasis theirs). As it stands, the FPP is, according to MIG, "an artifice of a plan that really is just compliance with existing regulations." p. 5 MIG Review.

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The Fire Plan is exceptionally important given Sierra Madre's history of fire and it is a source of great anxiety in the community that this be properly addressed. Right now the plan appears to place responsibility on individuals stating that "each property owner would be individually responsible to adopt, practice, and implement a "Ready, Set, Go!" approach to site evacuation." p.4.20-10. It's hard to imagine how this could be a sufficient fire plan.

185-34

With regard to access and evacuation, the section on roads at 4.20-13 fails to address the significant problem that there is not adequate ingress and egress due to the condition and width of both Sunnyside and Carter leading into the project.

It states only that, "[t]he project would include reconfiguration of North Sunnyside Avenue, located *within the western portion of the site*, which would be moved farther to the west. In addition, the project would result in improvements to Carter Avenue to provide secondary egress and ingress access to the site." p. 4.20-13 (emphasis mine). Further it is incorrectly asserted that, "All roads comply with access road standards of not less than 24 feet, unobstructed width and are capable of supporting an imposed load of at least 75,000 pounds." P. 4.20-13. This is not so—Carter is 20 feet in width.

185-35

How will Carter be improved to provide adequate ingress and egress when the County will not allow it to be widened? No improvements are mentioned for the portion of Sunnyside leading up to the project that would make it a viable access road either.

185-36

Please address the conflict with City policy Hz7 "to avoid expanding development into undeveloped areas in Very High Severity Fire Zones" in the update to the City's Safety Element.

185-37

Please address the conflict with City Policy R3.2 to "ensure that wildland open space, including the areas of the city designated as High Fire Hazard Severity Zone remains undeveloped so as to mitigate the flood cycles that follow wild land fires in the natural open space."

185-38

X. 4.17 Transportation at p. 4.17-1 at pp. 4.17-3-4

This section describes the existing transportation conditions, evaluates potential impacts and mitigation measures.

This section fails to adequately address conflicts with the following city policies:

Policy L51.2: Limit the development of new roadways or the expansion of existing roadways.

The project conflicts directly with this policy by developing new roadways (3 new streets) and expanding existing roadways (Carter and Sunnyside, although it's unclear what the project will do, if anything, to the existing roadways).

No facts have been presented to support the conclusion that the project is consistent with this policy. Please provide factual support for this conclusion.

Policy L51.5: Encourage and support the use of non-automotive travel throughout the City.

The project conflicts directly with this policy by failing to provide bicycle facilities and creating safety hazards for pedestrians on surrounding streets.

Objective L52: Improving streets to maintain levels of service, vehicular, cyclist and pedestrian safety.

The project conflicts with this policy by *greatly increasing safety hazards* for pedestrians and cyclists on the surrounding streets. Neither north Sunnyside nor Carter has sidewalks, the roads are narrow, and both streets are used by many pedestrians walking the neighborhood and visiting Bailey Canyon Park. Families park on nearby Grove Street and walk in the street up to Bailey Canyon because there are no sidewalks and will be put at increased danger by the significant increase in cross traffic.

No facts have been presented that the project will improve streets. On the contrary, it will create hazards for pedestrians and cyclists. Please provide facts in support of the conclusion that the project is consistent with this objective.

Policy L52.9: Explore the possibility of sidewalk continuity where feasible.

There is no provision for sidewalks to accommodate pedestrians on either Carter or Sunnyside leading up to the project. As such, the project conflicts directly with this policy.

No facts have been presented to support the conclusion that the project is consistent. Please provide facts to support this conclusion.

Policy L52.8: Require the incorporation of bicycle facilities into the design of land use plans and capital improvements, including bicycle parking within new multi-family and non-residential sites or publicly accessible bicycle parking.

It is acknowledged that the project directly conflicts with this policy, but there is no good reason nor mitigation provided.

Objective L53: Protecting residential neighborhoods from the intrusion of through traffic.

The November 10, 2020 Fehr and Peers traffic study (attached) establishes that by project completion there will a 118% increase in traffic on weekdays and 129% increase in traffic on weekends. Given these facts, it is indisputable that the project will create significant intrusion of thru traffic, conflicting directly with this objective.

There is nothing to support the conclusion that the project is consistent with this objective. Please provide any factual support that the project is consistent with this objective.

Housing Policy 5.4: Incorporate transit and other transportation alternatives such as walking and bicycling into the design of new development.

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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.

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Cont.

There are no facts to support the conclusion that the project is consistent with this policy. If there any such facts, please provide them.

Circulation Goal 1. A balanced transportation system which accommodates all modes of travel including automobiles, pedestrians, bicycles, and transit users.

185-47

The project conflicts with this policy in that it does not provide bicycle facilities and creates significant safety hazards to pedestrians on the small surrounding streets leading up to the site which have no sidewalks, are narrow and in disrepair.

Circulation Goal 2. Safe and well-maintained streets.

The project conflicts with this policy by *greatly increasing safety hazards* for pedestrians and cyclists on the surrounding streets. Neither north Sunnyside nor Carter has sidewalks, the roads are narrow, and both streets are used by many pedestrians walking the neighborhood and visiting Bailey Canyon Park. Families park on nearby Grove Street and walk in the street up to Bailey Canyon because there are no sidewalks and will be put at increased danger by the significant increase in cross traffic.

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There are no facts to support this conclusion that the project is consistent with the goal of safe and well-maintained streets.

If there are any facts, particularly with regard to the surrounding streets that lead up to the project that support the conclusion that the project is consistent with this goal, please provide them. Has any study been done/will any study be done to determine the impact on safety for pedestrians? Is there any plan to improve the poor condition of Carter? What is the plan?

Circulation Goal 3. Preservation of quiet neighborhoods with limited thru traffic.

The November 10, 2020 Fehr and Peers traffic study (attached) establishes that by project completion there will a 118% increase in traffic on weekdays and 129% increase in traffic on weekends. Given these facts, it is indisputable that the project will create significant intrusion of thru traffic, disturbing the surrounding quiet neighborhood and conflicting directly with this policy.

185-49

There are no facts in this section that support the conclusion that the project would preserve quiet neighborhoods with limited thru traffic. If there are any facts that support for the conclusion that the project is consistent with this policy, please provide them.

Objective C30: Improving traffic safety.

The project conflicts with this policy by *greatly increasing safety hazards* for pedestrians and cyclists on the surrounding streets. Neither north Sunnyside nor Carter has sidewalks, the roads are narrow, and both streets are used by many pedestrians walking the neighborhood and visiting Bailey Canyon Park. Families park on nearby Grove Street and walk in the street up to Bailey Canyon because there are no sidewalks and will be put at increased danger by the significant increase in cross traffic.

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There is nothing in this section to indicate how the project could improve traffic safety in any way. If there are any facts that support for the conclusion that the project is consistent with this objective, please provide them. Please indicate if any safety study has been done and, if not, why not?

Policy C30.3: Maintain safety and efficient circulation without impacting the village atmosphere.

See above response to Objective C30. There is nothing in this section to indicate how the project could maintain safety and efficient traffic circulation. If there are any facts to support the conclusion that the project is consistent with this policy, please provide them. Please indicate if any safety study has been done and, if not, why not?

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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**

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 2nd 2021, and the current review is for the 2nd draft of the EIR.

We previously provide a partial review of the 2nd draft on June 17th, 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 17th 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 17th) comments have been modified since the June 17th submittal.

Please also note that our review was focused on the Dudek revisions made directly in response to our comments on the original draft of the EIR: although we looked through the numerous other revisions made in the current draft, and in a few cases made additional comment, we did not "line read" the numerous changes that were made that were not related to our original comments, largely due to time and scope constraints.

Let us know if you have any questions.

185-53

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Meadows SP EIR Draft Peer Review Comments, Interim Progress Draft Comments 2nd Draft, June 17

Comment Location	MIG Comment	Dudak Response	Dudak Response (2nd Round)
DEIR Executive Summary			
P. ES 2, 4th, Para 2nd Sentence	Modify to read as follows: Public access for within both of these roads: ...	Revised here and in PD OK. Also chapter will need to be modified track with other comments/exchanges in other parts of the EIR.	Complete
DEIR CHAPTER 1.0: INTRODUCTION			
P. 1.1, 1st Para, last sentence	The creation of a separate lot for the 45 acres of open space needs to be included in the project description, if indeed it is part of the project. In addition, an exhibit needs to be provided showing the location of the 45-acre open space area.	Additional details have been included in Section 3.3.3 of the PD and Figure 3-4. An exhibit still needs to be provided per our earlier comment.	See Figure 3-4, which has been incorporated and included in the 2nd submittal to MIG
Subsection 1.3.2, Notice of Preparation and Scoping	<ul style="list-style-type: none"> 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. The subsection also needs to indicate when the NOP scoping meeting was held and a summary of what issues or comments were raised by the public needs to be included. If there was a sign-in sheet (electronic or otherwise) that should also be included in the Appendix as part of the record. It also appears that written comments received during the review period have not been addressed, in particular the 11-page letter from California Department of Fish and Wildlife. This letter includes comments specific to the project that have not been addressed in the ADEIR, among other items: potential impacts to the Crotch Burrtle Bee, loss of trees (including those not protected by the City's Tree Preservation Ordinance) and potential resulting impacts on raptor foraging for sensitive species, and potential project edge condition effect on adjacent riparian/wetlands areas. These and other issues raised need to be addressed in the CDFW letter need to be directly addressed in the Biological Resource Chapter of the ADEIR. 	<p>SCH do longer send the standard acknowledgement letter since converting to the online portal. There should only be 6 comment letters (one of the NAHC ones was included by accident and the SCH one is not needed). Necessary revisions have been made</p> <p>OK</p> <p>Table has been added</p> <p>OK</p> <p>No scoping meeting was held for the project. See response under bio regarding the CDFW comment letter, which has been incorporated. This item needs to be discussed further.</p>	It is unclear what needs to be discussed here. MIG agreed okay with the bio response. We will go ahead and leave discussion as is and discuss with City so they concur on our approach.
	<ul style="list-style-type: none"> Include Cultural Tribal Resources in the list of issue areas addressed in the EIR 	Added OK	Addressed
DEIR CHAPTER 2.0: ENVIRONMENTAL SETTING			
	Existing conditions needs to include a description of site vegetation including a description of the 101 (mostly mature) trees on the project site. The setting also needs to describe the potential riparian/wetlands areas to the east.	Added OK	Addressed
DEIR CHAPTER 3.0: PROJECT DESCRIPTION			
P. 3.1, 2nd Para, 3rd Sentence	Typo: add the word "acres" after the number 3.75	Added OK	Addressed



185-53
Cont.

City of Sierra Madre

Comment Location	MIG Comment	Dudak Response	Dudak Response (2nd Round)
P. 3-1, 2nd Para, Last Sentence	With respect to the park, specify whether the project includes the dedication and developer construction of the 3.03-acre public park. Elsewhere in the EIR text it is implied that it will be dedicated but it is not clear whether it will be improved or constructed, please clarify.	Revised OK – Based on the revised language the park will be improved as part of the project – correct?	Per open space on the project site will be constructed, open space would be dedicated to the north of the site, clarified in text.
P. 3-1, 3rd Para, 4th Sentence	Add the following to the end of the sentence: "between Carter Avenue and North Sunnyside Avenue".	This sentence talks about existing access roads which are Carter and North Sunnyside, not between Carter and North Sunnyside. Minor revisions made for clarifications OK.	Addressed
P. 3-1, 3rd Para, last Sentence	This sentence references the 45-acre protected open space area that will be dedicated but further indicates that it is not part of the project site. This is not part of the project then it should not be referenced as one of the objectives on page 3-2 nor described as a community benefit. If it is part of the project then it should be further described in the project description, including a location map, how it will be provided, how it will be protected, and what it will be used for. If it will be accessible to or otherwise used by the public, it needs to be included in the project description and the environmental setting analyzed as part of the project.	The proposed open space dedication is a community benefit but not subject to the SP. Additional details have been included in Section 3.3.3 (see response below). Acreage of open space has been removed to show this more generally and a new figure has been added. See earlier comment. Its attainment is one of the Project Objectives which makes it part of the project. One of the alternatives evaluated in the ADEIR also indicates that it would not be provided under such alternative which makes its provision clearly conditional on approval of this project. The open space site needs to be defined per our earlier comment. It will be accessible to or otherwise used by the public it potentially could have, at the least, potential impacts on biological resources, and wildland fire potential. If the actions under this project will not result in access, improvements, or use by the public, then such should be stated and, further that such use or action would be subject to a separate environmental review at a later date if it is made available to the public.	Open space has been defined and included as Figure 3-4 of the EIR. In addition, the discussion about the open space dedication has been removed from the alternatives discussion. Objective 5 has been revised throughout as follows, to indicate the benefits of this dedication: 1. Preserve the hillside open space area by dedicating approximately 20 acres north of the Mater Dolores Retreat Center to the City, in order to preserve a portion of Dolby Canyon and the Dolby Canyon Trail, which would be used by wildlife for movement up and down slope; preserve native vegetation communities and drainages; and preserve land adjacent to the Dolby Canyon stream.
P. 3-3, First Sentence	This sentence asserts that there are several features of the project that are community benefits. Except for the public park, these are not community benefits, unless street or other improvements extend beyond the boundaries of the project site, these features are merely items that are needed to support the project, and if there is no project there would be no need for these features. Please note that CEQA allows but does not require a project to describe community or other benefits.	Removed mention of street improvements and underground utilities in relation to community benefits, and added the open space dedication as a benefit of the project. Although not required under CEQA, we believe it is important to show the non-required benefits the project would be providing. Net zero water use is not a community benefit. It is no different than the amount of water currently being used and its only benefit is to provide a service to the project similar to utilities, street improvements etc. remove it from the sentence. - COMMENT ON NEW REVISIONS TO OBJECTIVES – See comment above on 45-acre open space dedication.	Open space has been defined and included as Figure 3-4 of the EIR. EIR has been revised based on discussions with the applicant and the city related to net zero water, and additional details have been added.
P. 3-3, Sec. 3.3.1, 4th Sentence	This sentence reads: The overall density of the project is approximately 2.5 dwelling units per acre. More specificity is needed. 2.5 dwellings per acre equals 17,424 SF average lot size. If this is the gross density for the site, accounting for and including the buffer and open space areas, it must be identified as such.	It is gross density. Revised OK.	Addressed
P. 3-4, First Sentence	This sentence uses a future tense. Is not it included in the SP and, if so, the conceptual landscape should be included in the EIR project description.	Figure has been created. The tense is still wrong in this sentence "The Specific Plan would incorporate a Conceptual Landscape Plan (see Figure 3-5, Conceptual Landscape Plan), which would utilize fire-resistant and drought-tolerant tree and plant species to create a natural and safe environment." – Correct to say	Revised. Although please note that the original language was consistent with the tense used throughout the EIR ("The Specific Plan would..."). This is typical CEQA language that does not provide

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Comment Location	MIC Comment	Dudek Response	Dudek Response (2 nd Round)
		"The Specific Plan incorporates..."	confirmation to the public know that the project/Specific Plan would be approved
P. 3-4, Subsections 3.3.5.1 and 3.3.5.2	The numbering on these subsections is off - please correct.	Fixed OK	Addressed
P. 3-4, Subsections 3.3.5.2	There appear to be some words missing (after the word "portion") in the 7 th 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 nd paragraph	This sentence reads: "In addition, to achieve a net-zero impact on local water supplies, the project Applicant shall work with the City to pay an off-site retrofit program in order to offset water use by reducing demand in the other areas of the City." This narrative needs to be more detailed as it is too vague. See additional discussion under General Comments.	Revised. The provided revision is confusing because the initial language references a retrofit program while the revised language references the pre-purchase of water rights directly from MWD. Please clarify: is the retrofit program no longer being considered?	Correct. Retrofit program no longer considered and instead the applicant will purchase water rights directly from MWD.
P. 3-7 Sect 3.3.11 - Project Design Features	In general, the project design features (PDF) need to also be included in their respective topical sections; otherwise, it is too hard for the reader to follow.	A PDF section has been included throughout each section OK - will verify in individual sections.	Addressed
P. PDFs AES-1 & 2	Both of these PDFs are somewhat circular in nature in that they refer back to content in the Specific Plan. Instead of identifying them as PDFs please reference back to the regulations/requirements and specify what they are in the narrative of the relevant EIR topical section. In addition, AES-1 is inappropriate as a PDF because it refers to "guidelines" in the context of using PDFs as requirements vs. something actually built into a project's design (i.e. something you can see on a site plan or elevation) PDF "need to be similar to project conditions of approval. Permissive terms like "guidelines" or "should" or "work with" are generally not appropriate because they are not specific, subject to interpretation and often not enforceable.	These PDFs have been incorporated as PDFs per the applicant's legal counsel. Revised PDF-AES-1 to state "development standards" instead of guidelines, and have been incorporated in the aesthetics section - Notwithstanding the advice of the applicant's legal counsel these revisions provided do not address the concerns raised in our original comment. The PDF's need to address the specific provisions that are being referenced in the SP so the reader doesn't have to guess at what is being referred to. In addition, merely saying that the project will comply with the SP is still circular: the SP can be changed and may no longer address issues of concern to the EIR.	"Guidelines" has been removed from PDFs and the PDFs match what is in the SP. Revised both aesthetics PDFs throughout (in PD, AES section, and area summary) to be more precise and to include the associated section numbers in the Specific Plan
P. 3-8, PDF UTIL 1	If this PDF is necessary to provide potable water to the project, this needs to be a mitigation measure. It also needs to be in perpetuity and needs to have a trigger (prior to grading, or building, etc.) trigger. In its present form it is too vague to be a PDF or a mitigation measure. Additional analysis and detail are needed in the DEIR if this approach is necessary to assure that the project will have a reliable potable water supply.	This will be done as a part of the project. Added timing component - Appreciate the timing component but additional background into would be useful. We were unable to find the mitigation measure (we recommended that the PDF be converted to a mitigation measure). There does not appear to be anything in the DEIR in the way of background/supplemental information about how water rights can be pre-purchased from MWD, and whether it is feasible or if MWD is willing to sell such right. Additional information about this unusual approach to obtaining water for a residential project would be helpful to the reader the mechanics and implication of such an approach.	Revised this and the utilities section per Jonathan's discussions with the City

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Comment Location	MIS Comment	Dudak Response	Dudak Response (2 nd Round)
p. 3-8, Wildfire PDF's (and Fire protection plan).	<p>While much of the narrative in the PDF's refers back to the Fire Protection Plan (FPP) the FPP is not really a clear-cut plan for fire protection -- the only place the word "plan" shows up in the FPP Table of Contents is the "conceptual site plan". While the FPP contains lots of valuable information about risk analysis, anticipated fire behavior and other fire safety issues, it is an amalgam of often generic narrative -- reference already existing fire safety regulations, and information not specific to the project; it is difficult to sort what is being provided for the site in terms of fire protection that is not already required.</p> <p>We recommended that the FPP be modified to be more project specific, including an exhibit showing the FPP. The more focused FPP, using the FTP's in the EIR as the foundation, should also be incorporated into the Specific; this approach, with a single mitigation measure in the EIR requiring compliance with the FPP will be less unwieldy and more accessible compared to stacking mitigation measures in the EIR.</p>	<p>The FPP is general and points out what is required by code because that is what its purpose is and the regulations included are what is applicable to the project, hence their inclusion in the plan. Based on the analysis of the fire environment (which is provided in the FPP), it is determined that the planned approach, with fuel mod zones, ignition resistant structures, access providing primary and secondary alternatives, water and fire flow to the code, etc. ... the project can be considered to include necessary protections such that risk is reduced to acceptable levels. This is evidenced by the fire marshal agreeing with the plan's conclusions and accepting the document. The regulations included are what is applicable to the project, hence their inclusion in the plan. We have revised the PDFs to include just one PDF stating compliance with FPP.</p> <p>If the FPP basically identifies existing provisions that are required by code anyway is a separate plan really needed? It may be easier to just identify and briefly describe (much of this information appear to be in the plan anyway) what are the applicable regulations and requirements are that would be applied to the project instead creating the artifice of a plan that really is just compliance with existing requirements.</p> <p>A large part of what is incorporated in the plan relates to fire risk analysis and the wildfire environment, and this information is good and necessary to have, but it doesn't need to be included in a "plan" per se.</p> <p>We are also recommending that additional detail be provided about project water service/efflow; below is the excerpt from the FPP that addresses this issue:</p> <p>"Water service for the project site would be provided by the City of Sierra Madre as the project site is within the City's service area. The internal waterlines will supply sufficient fire flows and pressure to meet the demands for required on site fire hydrants and interior fire sprinkler systems for all structures".</p> <p>This passage is generic and somewhat conclusory and provides no substantiation as a minimum it needs to identify fireflow and duration standards for the project.</p> <p>In addition, per our original comment, an exhibit highlighting the features of the FPP is important to include in the EIR and the FPP is important to provide, especially as we understand that this is likely an issue that is important to Sierra Madre residents, and such an exhibit will make the FPP more understandable....</p>	<p>FPP will be significant to have and it highlights wildfire requirements and highlights what the project is doing in terms of addressing wildfire risks. We will leave the FPP in place. However, we are have revised the FPP language per suggestions regarding water service. Lastly, most if not all of the summary items are included in the FPP and are not amenable to being graphically depicted. Note that App. E does depict the Fuel Mod Plan and App. D gives specific details for construction features.</p>
P. 3-7, Sec. 3.3.9	<p>Grading Plan. Additional detail needs to be provided. What are the slopes on the tiers (greater than 2:1)? What is the average slope and where is the 12% slope located? Also, the word "tiered" is misspelled in the second sentence.</p>	<p>Added OK:</p>	<p>Addressed</p>

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Comment Location	MIG Comment	Dudak Response	Dudak Response (2 nd Round)
P. 3-9, Sec. 3.4 - Discretionary Actions	One of the bullet points under this section reads: "Approval of the Development Agreement between the Applicant and the City." A Development Agreement has not been mentioned up to this point and must be described in more detail in the project description, including the basic content and purpose of the DA. Also, if the DA addresses the dedication of the 45-acre open space area then it needs to be included as part of the project description.	Additional details on the DA have been added OK.	Addressed
P. 3-10, Sec. 3.5	This section identifies responsible agencies but only lists Los Angeles Regional Water Quality Control Board. This is too short. Please identify other agencies. WWD? California Fish and Wildlife? The EIR consultant and/or applicant should be able to provide this.	LA public works (including flood control) for new easements within Sunnyside has been added. Also, Caltrans has been added per NOP comment letter OK.	Addressed
DEIR CHAPTER 4.0: Environmental Analysis			
4.0.1 Mineral Resources to the list of environmental issues addressed		Done OK.	Addressed
DEIR CHAPTER 4.3: AESTHETICS			
P. 4.1 - 5, 2 nd Para, 3 rd Sentence	This sentence is inconsistent with the second paragraph on Page 4.1-1 under the "Project Site" subsection which indicates that the site has a "high of 1,210 feet above sea level (AMSL) at the northwestern portion of the site, to a low of 1,107". Please revise to reconcile these two passages.	Revised - If public benefits to achieve project objectives is to be through a DA then the basic "deal points" of the DA need to be better identified in the DEIR. These numbers are still inconsistent. Please revise.	Revised. This number was supposed to indicate the proposed elevations (rather than existing) so that is why the numbers still differ.
P. 4.1-8, 1st Para, 2nd Full Sentence	This sentence references the City's Dark Sky Program. The Dark Sky Program needs to be referenced and described in Section 4.1.2 - Relevant Plans, Policies, and Ordinances.	It is included under the General Plan. Added some clarification OK.	Addressed
DEIR CHAPTER 4.2: AGRICULTURE AND FORESTRY RESOURCES			
DEIR CHAPTER 4.3: AIR QUALITY			
General Comment	There are inconsistencies between the way information is presented in the EIR Air Quality Section and the air quality / greenhouse gas technical report contained as EIR Appendix B. For example, whereas the Appendix B indicates that the utilization of Tier IV construction equipment would be a project design feature, the EIR incorporates this provision as a mitigation measure. To this end, the EIR incorporates emissions values in its tables that differ from corresponding tables in Appendix B (e.g., emissions identified in Table 4.3-6 in the EIR differ from those shown in Table B of Appendix B). MIG recommends updating the EIR / Appendix B, so that project design features / mitigation measures are identified in a consistent manner and that emissions values between the two documents are consistent between corresponding tables.	The Appendix B and EIR Air Quality Section will be updated to be completely consistent. This may have been a version issue as the most recent Appendix B reflected this as mitigation. OK. Please provide this information when completed. NEW COMMENT ON GP Policies - Page 4.3-17 - Several from the last draft have been removed: why were they removed?	We revised some of the policies throughout the sections to make sure they are consistent with Table 4.11-1 in the land use and planning section. These specific ones have been removed as they are directed to the City and not the responsibility of the project.
Page 4.3-20, Section 4.3.3.1.1	The first paragraph states, "The project would implement dust control strategies as a project design feature." The proposed project would be required to comply with SCAQMD Rule 403, which provides requirements for the control of fugitive dust during construction activities. MIG recommends revising the text to indicate the project would comply with the requirements of SCAQMD Rule 403 and that the dust control measures noted in the bullet's following this text reflect the assumptions accounted for in the CalEEMod runs.	Text was revised as commenter suggested OK.	Addressed
Page 4.3-28, "Health Effects of Other Criteria Air	The text indicates that construction of the project would not exceed thresholds for PM ₁₀ and PM _{2.5} ; however, the emissions estimates contained in Table 4.3-8 (compared against LSTs) indicates particulate matter emissions would be	The text was revised to reflect the exceedance of the LST thresholds OK.	Addressed

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Comment Location	MIG Comment	Dudak Response	Dudak Response (2 nd Round)
<p>Pollutants, Fourth Paragraph Page 4.3-29, Section 4.35, MM-AQ-1</p>	<p>potentially significant. MIG recommends revising this text to reflect localized particulate matter emissions could be potentially significant.</p> <p>MM-AQ-1 generally requires the project applicant utilize CARB-certified Tier 4 Interim engines or equipment outfitted with CARB verified diesel particulate filters, but also provides an exemption pathway, should it be determined that the aforementioned equipment standards are not readily available in the South Coast Air Basin. The exemption pathway sets forth various requirements before this option can be taken into consideration, one of which is that "functionally equivalent diesel PM emission totals ... be achieved for the project from other combinations of construction equipment." MIG disagrees with using a mass-based standard as the performance metric for the project, because receptor exposure to diesel PM concentrations has a different health risk effect, depending on the age of the receptor at time of exposure. Reduction in mass-based emissions would have a different benefit in year 1 of construction than it would in year 2. In addition, a reduction in total mass does not necessarily result in reductions at the receptor. MIG recommends MM-AQ-1 be revised to use the SCAQMD thresholds of significance as the performance standard for the mitigation measure, because 1) the standard is the same as that utilized as a threshold in the EIR, and 2) it provides specificity beyond that currently captured in the EIR (i.e. the performance standard for "functionally equivalent diesel PM emission totals" is not clearly identified in the mitigation measure).</p>	<p>The mitigation measure is in place to reduce emissions PM₁₀, PM_{2.5}, 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 PM₁₀ and PM_{2.5} 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"> 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 PM₁₀ exhaust emissions and a 90.4% reduction PM_{2.5} 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. Both on-site fugitive and exhaust emissions sources contribute to LST PM₁₀ and PM_{2.5} 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. 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.). The EIR evaluates LST significance based on the construction phase with the highest on-site PM₁₀ and PM_{2.5} 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. 	<ol style="list-style-type: none"> 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 PM₁₀, PM_{2.5}, 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. 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 PM₁₀ and PM_{2.5}, it also reduces total PM₁₀ and PM_{2.5} (which includes fugitive dust PM₁₀ and PM_{2.5}). As additional measures to reduce fugitive dust PM₁₀ and PM_{2.5} are not needed for the project, this addition is not necessary. Furthermore, adding this to a mitigation measure that is focused solely on off-road equipment engines would cause confusion for the reader. 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 PM₁₀ and PM_{2.5}. The health risk assessment was prepared evaluating emissions of DPM statewide where construction activity is likely to occur. At this stage in project development, information is not refined enough to parse out the equipment over different regions of the project. As such, if a change in equipment proposed compared to what was evaluated in the EIR the analyses would be revised consistent with the EIR to evaluate the DPM emissions statewide, not within specific regions of the site. Therefore, as long as total DPM emissions of the project are the same or less than what was evaluated in the EIR, HRA impacts would be the same or less as what was evaluated in the EIR.

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		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. For the reasons above, it is MIC's opinion our comment is valid for diesel PM. MIC 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.	
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.	The CalEEMod modeling is updated to reflect the land use sizes as shown in the project description. 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.	Yes, the parks acreage in CalEEMod includes the acreage for the landscape buffer to conservatively account for any water use during operation. As CalEEMod default assumptions were not relied upon during construction, any small change in acreage would not affect the construction modeling or emissions from what is presented in the EIR. Furthermore, the final acreage of 2.04 acres park and 1.04 acre landscape buffer are less than the 4.49 acres modeled and thus what is modeled is conservative.
Appendix B, Section 1.3, Page 3	The first paragraph on page 3 of Appendix B indicates the project would involve the construction and operation of a detention basin at the park that would have a footprint of approximately 77 by 60 feet, or approximately 4,620 square feet. In contrast, the EIR Project Description describes this project element as a "63,500-cubic foot retention storage gallery." With the footprint identified in Appendix B and the capacity identified in the EIR Project Description, the retention/detention basin would have an approximate depth of 13.7 feet. MIG recommends: 1) The EIR and Appendix B provide additional clarification / details on this project element, 2) Confirm the grading (i.e., net cut / fill) estimates reflect the spoils that would be generated by this activity; and 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 (6) Scrapers, but no dedicated excavating equipment.	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. OK	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 rd trimester and ages 0-2 and 2-16 age bins per OEHHA guidance.	Clarification was added to Appendix B to reflect the FAH. OK	Addressed
Appendix B, Page 24, Table 5	The table indicates the CO LST at a distance of 25 meters for SPA 9 is 535 pounds per day; however, based on the LST lookup tables provided by the SCAQMD, the CO LST is 623 pounds per day (635 pounds per day is for SPA	The LST was revised to 535 in Appendix B and the EIR. OK	Addressed

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Comment Location	MIG Comment	Dudak Response	Dudak Response (2 nd Round)
	<p>8. MIG notes that despite this inconsistency, the utilization of 535 pounds per day for the CO LST assessment provides a conservative assessment of potential impacts.</p>		
Appendix B, Page 30, Section 2.5, "Consistency Criterion No. 2"	<p>The analysis indicates that, despite the project involving a land use / zoning change, the approximately 42 new residences allowed for under the proposed Specific Plan would be within the 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 allowed by the project would be consistency with the growth projections accounted for in the 2016 RTP/SCS.</p>	<p>Additional clarification was added to the EIR and Appendix B to address the history of development in the City.</p> <p>OK.</p>	Addressed
Appendix B, Page 33, Table 8	<p>A footnote in this table indicates that adjustments have been made to the CalEEMod file to reflect compliance with SCAGMD Rule 1113; however, based on MIG's review of the CalEEMod output files (which also indicate such adjustments were made), it does not appear any alterations to CalEEMod default values have been made. Please provide clarification if adjustments have been made to the model with regard to residential / non-residential / parking architectural coating rates and what the adjusted application rates (in terms of grams VOC per liter coating) were assumed.</p>	<p>The footnote was removed as no changes to CalEEMod were made for architectural coatings.</p> <p>OK.</p>	Addressed
Appendix B, Page 37, "Construction Health Risk"	<p>Appendix B discusses the maximum individual cancer risk but does not disclose where the MEIR is. MIG recommends the EIR be revised to disclose where the MEIR is located.</p>	<p>Appendix B and the EIR were updated to include the location of the MEIR.</p> <p>OK.</p>	Addressed
Appendix B, AERMOD Modeling	<p>MIG has reviewed the AERMOD input file, and has the following concerns regarding the dispersion modeling conducted for the proposed project:</p> <ul style="list-style-type: none"> 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. 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. 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. 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 	<p>The source release parameters for the construction HRA are provided in Table 7 of Appendix B of the HRA. This is further confirmed starting on page 47 of Appendix B to Appendix B, the AERMOD.ADO output file.</p> <p>The HRA reflects the anticipated construction activity of the project. While construction activity may at times be concentrated in one or more areas of the site, when evaluating construction impacts over the entire project, construction activity will occur in accordance to the site plan where building occurs. No changes are necessary.</p> <p>On-site haul truck trips and vendor truck trips were previously included in the HRA. Offsite truck trips were added to the HRA and the EIR and Appendix B were revised.</p> <p>The meteorological data as identified in Table 7 of Appendix B is also verified on page 68 of Appendix B of Appendix B in the AERMOD.ADO output file.</p> <p>The HRA models on-site construction equipment as 400 surface-based the volume sources. This approach is generally consistent with the referenced SCAGMD Final LST methodology document; however, the SCAGMD's methodology uses elevated volume surfaces with dimensions of 10 meters x 10 meters, resulting in 36 sources per acre (as opposed to 27 sources per acre) and an initial vertical dimension of 1.4 meters.</p>	<p>The Final LST methodology was used as the basis for the plume height of 5 meters. In accordance with the EPA guidance, the Plume Width is the vehicle width plus 6 meters and the release height is 1/2 the plume height. So the 10 x 10 meter methodology does not apply as it doesn't follow the more updated and relevant source parameters for volume sources. These source parameters better model the actual source compared to what is recommended in the LST document.</p>

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Comment Location	MIG Comment	Dudak Response	Dudak Response (2 nd Round)
	<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>	
DEIR CHAPTER 4.4: BIOLOGICAL RESOURCES			
General Comment	<p>Please note that this section will require substantial revisions because it does not address the issues raised by the 11-page letter from California Department of Fish and Wildlife, including numerous project specific issues raised (See prior comment on Section one). These comments will need to be addressed.</p>	<p>CEFW concerns have been incorporated. Here is an overview of where issues are addressed:</p> <p>Specific Comments</p> <ol style="list-style-type: none"> 1. Nesting Birds – Surveys and Buffers <ol style="list-style-type: none"> a. MM-BIO-1 provided in Section 4.4.5 of the DEIR meets the suggested survey and buffers. 2. Crotch Burds Bee <ol style="list-style-type: none"> a. This species did not come up in the CNDOB search for the Bio Analysis included as Appendix C-1 of the DEIR. b. Based upon the classroom training a few of us, Dudak biologists got, Brock's CDFW-approved survey methodology, and my experience in using that classroom training and approved methodology at Strauss, the species would not be expected to have burrows or refugia on the project site. Additionally, the plant species used for food sources are not present. c. There was a recent court ruling that threw out the proposed listing for Crotch since CESA does not cover insects. 3. California Endangered Species Act – Least Bell's Vireo <ol style="list-style-type: none"> a. This species did come up in the CNDOB search for the Bio Analysis included as Appendix C-1 of the DEIR <ol style="list-style-type: none"> 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"> 1. There is no potential habitat in the vicinity of the project. ii. No impacts and no CESA ITP. 4. Bat Species <ol style="list-style-type: none"> a. Eleven bat came up from the CNDOB search for the Bio Analysis included as Appendix C-1 of the DEIR. <ol style="list-style-type: none"> i. It includes the three species CDFW mentions 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"> i. Only one had a low potential to occur because it roosts in trees, but only individuals, and not maternity 	Addressed

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Comment Location	MIS Comment	Dudak Response	Dudak Response (2 nd 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"> a. This would need to be addressed in the Project Description for the development b. I agree that no invasive species should be used, ever or anywhere, but especially that close to natural open space. <p>6. Tree Removal</p> <ul style="list-style-type: none"> a. This is discussed and mitigated (MM-BIO-2) in Section 4.4.5 of the DEIR. <p>7. Fuel Modification – Impacts to resources in areas adjacent or mitigation lands</p> <ul style="list-style-type: none"> a. Figure 3-9 of the DEIR indicates the fuel modification would not impact any adjacent natural habitats. <p>8. Human-Wildlife Interface</p> <ul style="list-style-type: none"> a. Bear safe garbage containers: <ul style="list-style-type: none"> i. Needs to be addressed in the Specific Plan, HOA, or other management entities for the development. b. Mountain Lion interactions now that the species is a candidate for listing under State ESA <ul style="list-style-type: none"> i. Not analyzed in the DEIR, but since the project vicinity is not expected to support natural areas (nonrma's don't like human activity) and is not part of wildlife corridor, direct and indirect impacts are not expected. ii. Taking away the ruse deer grazing area will actually decrease the likelihood of human-lion interactions. <p>9. Biological Baseline Assessment Need</p> <ul style="list-style-type: none"> a. Provided as Appendix C-1 of the DEIR b. The species mentioned were analyzed. <p>10. Biological Direct, Indirect, and Cumulative Impacts Need</p> <ul style="list-style-type: none"> a. Analyzed in Section 4.4 of the DEIR <p>11. Wetland Resources</p> <ul style="list-style-type: none"> a. CDFW mentions indirect impacts to the basins to the east. <ul style="list-style-type: none"> i. It is expected that since the Project involves more than 1 acre of disturbance that during construction, erosion-control measures would be implemented as part of the Storm Water Pollution Prevention Plan (SWPPP) for the Project. Prior to the start of construction activities, the Contractor is required to file a Permit Registration Document (PRD) with the State Water Resources Control Board (SWRCB) in order to obtain coverage under the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with the Construction and Land Disturbance Activities (Order No 2009-009-DWG, NPDES No. CAS000002) or the latest approved general permit. 	

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		<p>b. CDFW notes, based upon aerial imagery, a potential depression in the southeast corner of the site that could be a vernal pool.</p> <p>i. This area was noted in the desktop analysis and the survey did include an investigation that was negative on it being a vernal pool or depression.</p> <p>General Comments</p> <ol style="list-style-type: none"> Jurisdictional Waters <ol style="list-style-type: none"> 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. Project Description and Alternatives <ol style="list-style-type: none"> See Chapter 8 of the DEIR Compensatory Mitigation for Impacted Sensitive Habitats <ol style="list-style-type: none"> 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. Long-term Management of Mitigation Lands <ol style="list-style-type: none"> None needed since no sensitive or riparian habitats are being impacted. Translocation/Savage of Plants and Animal Species <ol style="list-style-type: none"> As stated in Section 4.4.1 of the DEIR, no special-status species are expected. Moving out of Harm's Way – Wildlife <ol style="list-style-type: none"> 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. OK 	
P. 4.4.1, Sec. 4.4.1, Existing Conditions	Potential Riparian and/or wetlands feature to the east of the project site, as well as any other natural features must be addressed in this section.	Added: The project site is adjacent to wetlands and riparian features across the roadway which separates the project site from Bailey Canyon Wilderness Park (USFWS 2020).	Addressed
P. 4.4.1, Description of Project Site	The 100+ trees on the project site need to be described and referenced in the existing conditions subsection.	Added: "Locally Protected Trees One hundred and one trees were inventoried within the biological study area including ten coast live oak (<i>Quercus agrifolia</i>) trees. All 10 of the oak trees meet the City's criteria for a protected oak tree. Appendix B presents the location of the individual trees mapped and assessed for the proposed project. Overall, the trees exhibit growth and structural conditions that are typical of their location in an undeveloped urban landscape. The trees include various trunk and branch malades and health and structural conditions. As presented in Appendix A, 29% of the individually mapped trees (29 trees) exhibit good health, 49% (49 trees) are in fair health, and 24% (24 trees) are in poor health. Structurally, 6% (6 trees) of the individually mapped trees are considered to exhibit good structure, and 77% (77 trees) exhibit fair structure, and 18% (18 trees) have poor structure. The trees in good condition exhibit acceptable vigor, healthy foliage, and adequate structure, and lack any major malades. Trees in fair condition are typical, with few malades but declining vigor. Trees in poor condition exhibit declining vigor, unhealthy	Added policy RT0.2 back in the bio and land use section. Added text regarding tree replacement ratio, required under MM-BIO-3.

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		<p>foliage, poor branch structure, and excessive lean. No pests or pathogens were observed on site.</p> <p>Trees within the biological study area vary in size and stature according to species and available growing space. The site's trees are composed of single- and multi-stemmed trees, with single-stemmed trunk diameters that range from 2 to 44 inches, and multi-stemmed trunk diameters that range from 4 to 76 inches. Tree heights vary from 8 to 55 feet. Tree canopy extents range from 5 feet to approximately 70 feet.* OK</p> <p>COMMENT ON NEW TEXT ADDED, PAGE 4.4-8 – Policy R10.2 was deleted in the current draft. Add this policy back into the text as it relates to the project.</p> <p>COMMENT ON NEW TEXT ADDED, PAGE 4.4-13 - Consider including an estimate of the number of trees that will be provided as part of the project, including trees in the new park and street trees. Recommended that a minimum of 1:1 replacement be provided for existing trees that are removed; alternatively, payment to the City's tree mitigation fee can be made.</p>	
P. 4.4-9, Impact Analysis	Under Impact 1 or elsewhere in this section there needs to be a discussion of the impacts related to the loss of the 101 trees on the project site regarding potential loss of raptor foraging area. This issue also needs to be addressed in the cumulative impact section. Also see California DFW NOP letter comment on 1:1 replacement of the trees to be removed.	<p>Added: "One hundred and one trees were inventoried within the biological study area that could provide nesting habitat for birds. These trees could also be used by raptors for foraging in the area, however, common prey for raptors, including California ground squirrel (<i>Dipodomontus deserti</i>) and desert cottontail (<i>Sylvilagus auduboni</i>) were not observed or not abundant enough to provide a unique resource for raptors." OK</p> <p>California Fish and Game Code does not require replacement for trees. Only trees protected by the City Ordinance will be compensated for per the City's requirements. Yes, we know full they nonetheless made the comment and other commenters may pick up on this comment – easier to acknowledge now than to have to deal with it in RTC later.</p>	Comment regarding the replacement of trees at a 1:1 ratio has already been addressed in MM-BIO-3
P. 4.4-12, 1 st Para, Last two sentences	These two sentences need to specify that MM-BIO-1 would reduce potential impacts to less than significant.	Added "...and it would reduce potential impacts to less than significant" to last sentence. OK	Addressed
P. 4.4-12, Last Para, Last sentence	Indicate that with MM-BIO-3 that impacts would be less than significant.	Added "...and it would reduce potential impacts to less than significant" to last sentence. OK	Addressed
DEIR CHAPTER 4.5: CULTURAL RESOURCES			
P. 4.5-22, MM-CUL-1	Change the last sentence to read as follows so the MM is not permissive/optional: The WEAP training could shall include a discussion of the types of archaeological resources that may potentially be uncovered during project excavations, save protecting these resources, and appropriate actions to be taken when these resources are discovered.	<p>Revised OK</p> <p>COMMENT ON NEW TEXT ADDED, PAGE 4.5-1, 2nd Para – Among other changes to this paragraph was the addition of the following sentence which is a fragment "Because of its proximity and because the project site is being acquired from the Water Obsolete Retreat Center". Please correct this sentence.</p>	Revised

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DEIR CHAPTER 4.6: ENERGY			
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. OK	Addressed
Page 4.6-11, "Summary", First Paragraph	MIG recommends providing additional context with regard to how the Pavley regulations have reduced OHG emissions. For example, "reduced OHG emissions from California passenger vehicles by about 22% in 2012, compared to XYZ."	Additional context was added to this section. OK	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. OK <i>NOTE: additional revisions to the Energy section that were made will be reviewed/verified. OK - verified</i>	Addressed
DEIR CHAPTER 4.7: GEOLOGY AND SOILS			
P. 4.7-1, 1 st Para.	Please also reference the Paleo study in this paragraph.	Info on paleo has been added to this section. <i>This comment is not addressed; please reference the Paleo Study.</i>	Added reference the paleo records search
P. 4.7-1, 4 th Para, 3 rd Sentence	This sentence indicates that the site has been altered with the placement of artificial fill in the upper 7 feet. However, the Geologic report indicates that artificial fill can be located as much as 18 feet BGS. Revise this sentence to be consistent with the Geologic report.	Revised discussion. <i>This revision was not made; please include this revision.</i>	Revised
P. 4.7-1, 4 th Para, 3 rd sentence	Change the word "extent" to "extend".	Revised. OK	Addressed
P. 4.7-2, 3 rd Para, 3 rd 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 4.7-2.	Revised. OK	Addressed
P. 4.7-4, 1 st Para, 2 nd and 3 rd 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. OK	Addressed
P. 4.7-5, 1 st Para, 1 st 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. https://www.cityofserramonte.com/residents/emergency_management/vrhp OK	Addressed

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<p>P. 4.7.7, 3rd 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 recompact in areas of proposed Grading.</p> <p>Consistent with the recommendation of Leighton Associates peer review (see page 5) removal of all artificial fill, which may be as deep as 18 feet needs to occur.</p> <p>Please revise the narrative to more accurately reflect the geologic study.</p>	<p>Revised: Note that per the Geotech only the top 7 feet were needed to be mitigated</p> <p>The geotechnical analysis provided by GeoSoils Consultants for this project discusses artificial fill on page 4:</p> <p><u>Artificial Fill (af):</u> The artificial fill consisted of brown, silty, very fine sands and fine to coarse sands that were dry to damp, and loose to medium dense. The thickness of the fill ranged from 5 to 18 feet. The artificial fill is uncertified and unsuitable for structural support, therefore, it should be removed and recompact in areas of proposed Grading.</p> <p>On page 10 the analysis also indicates the following:</p> <p><u>Artificial Fill</u> Previously placed artificial fill on the site is not suitable for structural support and support of structural fill.</p> <p><u>Mitigation:</u> Removing and 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 memo on page 9:</p>	<p>Revised section and title</p>

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		<ul style="list-style-type: none"> Remedial removals and overexcavation of the site prior to compacted fill placement should include removing all artificial crosst (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. <p>Based on Lighton'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 st Para, 1 st 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 nd 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 nd Para, 3 rd sentence	This is an incorrect reference as Impact GEO-6 relates to Paleo Resources.	Revised numbering OK.	Addressed
P. 4.7-9, last Para, last sentence.	Reference to impact GEO-7 is incorrect as it does not exist.	Revised numbering OK.	Addressed
P. 4.7-10 - Mitigation Measures MM GEO-1 thru 16	<p>It is unclear what the source is of these mitigation measures. They appear at least in part to be taken from guidelines included in the applicant's geotechnical study. Consequently, much of the language is not suitable for mitigation measures as it is often permissive and sometimes vague. In addition, the full set of 16 mitigation measures are very hard to follow for the lay reader, include technical terms and jargon, reference other sources and requirements are sometimes repetitive to one another. In general, they are not that suitable as mitigation measures.</p> <p>It is recommended that what are now shown as mitigation measures be repackaged and incorporated into a revised Geotechnical report as explicit recommendations from the Geologist, and that a single mitigation measure indicating that the project will comply with the recommendations of the Geo report is used to replace the 16 current mitigation measures. That way it is clear that the Geologist has signed off on the recommendations.</p> <p>Please also note that where the issue of the removal of artificial fill (indicated by the Geo report to occur as deep as 18 feet), the recommendation will need track with our earlier comment on page 4.7-7.</p>	<p>These measures have been taken from the recommendations provided in the Geotech and added as PDF's per comments from the applicant's legal counsel and then revised from PDF's to MMs per City comments. They were originally packaged/included in the Geosols consultant's Geotech report. Therefore, we made them PDF's where they are not mitigating an impact. The only mitigation that was directly tied to geo impacts was the one related to artificial fill. Therefore, we left this as mitigation and revised the rest as PDF's as to not make it look like we have impacts when we do not.</p> <p>While these PDF/MM's may have been based on the GeoSoils study - "Taken from the recommendations provided in the Geotech..." there appear to be differences. For example, the mitigation referenced in the GeoSoils report regarding artificial fill does not appear to be included in the PDF's and we could not find any reference to artificial fill in the PDF's. Nor did we see reference to the mitigation (immediately prior to the Artificial Fill mitigation) for 7 feet of removal/recompaction related to hydro-consolidation and seismic settlement.</p> <p>In order to assure consistency, we continue to recommend that either the EIR provide a mitigation measure requiring compliance with the Geo Study recommendations or, if PDF's are desirable, have your Geologist review and provide their document their documented sign-off "seal of approval".</p>	<p>Artificial fill is a mitigation measure as it directly addresses impacts. PDF's are standard recommendations that would be implemented and thus have not been included in the MMs. MM would be expanded to address the concerns above and we will check PDF's to make sure they are consistent.</p> <p>Geo PDF's came directly from the Geotech. PDF's have already been incorporated to ensure compliance with geo study, which has already been reviewed by MIS consultant. We will leave discussion as is.</p>

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DEIR CHAPTER 4: APPENDIX B: GREENHOUSE GAS EMISSIONS			
Appendix B, Section 3.4.2.1, Page 62/63	Appendix B employs the use of a 3,500 MTCO ₂ e annualized threshold on the basis that the project consists of residential development, however, the project also involves the development of a public park. Given that the SCAQMD-interim GHG emission threshold for mixed-use projects is lower than the residential threshold at 3,000 MTCO ₂ e, MIG recommends employing that threshold instead as it is more conservative.	The EIR and Appendix B were updated to reflect the 3,000 MT CO ₂ e threshold. OK.	
Appendix B, Section 3.5.1	The SCAQMD-interim GHG emission thresholds were intended to address GHG emissions through the year 2020, consistent with the goals set forth in AB 32. The proposed project is anticipated to become operational in 2029, six years after 2020. For this reason, the SCAQMD-interim GHG emission thresholds are not directly applicable to the project, as they do not capture the additional GHG emission reductions required to keep the state on track for meeting its future goals (e.g., 2030 GHG emission reduction goals outlined in SB 32). MIG recommends providing additional context and support for why the SCAQMD-interim threshold are appropriate for use and why the project's mass emissions are not significant and/or utilize a multi-threshold justification approach for why the project would not result in a significant impact with regard to GHG emissions.	Additional context was added to the EIR and Appendix B to justify the use of the threshold. The additional context and explanation provides factual substantiation for the 3,000 MTCO ₂ e threshold, however, MIG continues to recommend providing additional context for the project's GHG emissions, such as comparison to per capita metrics contained in the latest Scoping Plan.	The project has an established GHG significant threshold of 3,000 MTCO ₂ e per year based on the SCAQMD interim thresholds. No additional comparison is needed to the Scoping Plan's statewide emissions targets. A consistency analysis of the Scoping Plan is provided in threshold (b) of the EIR's GHG section.
Appendix B, Section 3.2.3	MIG recommends cross-referencing the discussion of the SCAG RTP/SCS shown in Section 2.2.3.2 in Section 3.2.3.	The EIR and Appendix B were updated to cross-reference the discussion for SCAG's RTP/SCS. OK.	Addressed
Appendix B, Table 15	MIG recommends the consistency analysis presented in this table be updated, based on the most current regulations, plans, etc. provided in Section 3.2. For example, under the "Vehicle/Mobile Sources" line on page 72, the analysis indicates the project is compliant with and subject to the RTP/SCS targets for 2015; however, the SCAG recently adopted Connect SoCal the 2020-2045 RTP/SCS. The row directly below that also does not reflect the latest LCFS requirements.	The EIR and Appendix B were updated to reflect these changes. OK.	Addressed
DEIR CHAPTER 4: HAZARDS AND HAZARDOUS MATERIALS			
NA	MIG has no comments on Chapter 4.9. With respect to Wildfire issues, please cross reference comments on related PDF's and the Fire Protection Plan under the Project Description and the Wildfire Chapter (4.20).	Revised FPP discussion - See cross comments on FPP	Addressed
DEIR CHAPTER 4: HYDROLOGY AND WATER QUALITY			
P. 4.10-8, 3 rd 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 nd Para, 5 th sentence	This sentence is conclusory in indicating that the estimated potable water demand is "minimal" and demand needs to be compared existing supply; although the demand may be small it is not zero and may be substantial when compared to	See revisions. The project wouldn't contribute to the City's water demand since it would purchase water directly from MWD. Added recharge discussion as well. OK.	Addressed

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	existing supply. The discussion under this impact statement should also discuss the potential for recharge for the infiltration facility under the park.		
P. 4.10-9, 2 nd Para, 7 th sentence	Absent further explanation and detail this implicit reference to the water supply PCDF is too vague to be used as a mitigation or a PCDF. See discussion of PCDF under Project Description.	Revised PCDF to add timing (see PD) See other comments on water supply.	Addressed
P. 4.10-9, 2 nd Para, 9 th 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 less than significant. " This assertion has not been substantiated in the preceding narrative nor has it been substantiated elsewhere in the EIR.	See revisions See other comments on water supply.	Addressed
P. 4.10-12, Impact Statement 5.	There is no discussion under this impact statement about a sustainable groundwater management plan (or even if there is one). Please include this discussion including the disposition/status of such a plan.	Revised OK	Addressed
P. 4.10-12, 2 nd para, 2 nd to last sentence	See comment on P. 4.10-9, 2 nd Para, 7 th sentence.	Revised OK	Addressed
P. 4.10-13, 1 st para, last sentence	It is difficult to understand the purpose of this general statement as there is not discussion about how This Project is consistent with the plan and why.	See additions OK	Addressed
DEIR CHAPTER 4.11: LAND USE AND PLANNING			
P. 4.11-1, Last Para, 1 st sentence	This sentence reads: "The surrounding area to the north and east of the project site is zoned as Hillside Management (H)". This is confusing: is the retreat which is directly north of the project zoned Institutional or Hillside Management? Elsewhere in the EIR the zoning is indicated as Institutional. Please clarify.	Clarified OK	Addressed
P. 4.11-2, 4 th Para.	Reference is made and most of this paragraph refers to state housing law. Please include a discussion of relevant state housing law under the relevant State Policies. Also, it should be noted that the SCAO RHNA allocation was finalized in early February. (The allocation of 204 units was not changed.) Please revise this paragraph accordingly.	Added Revised to 6 th cycle OK	Addressed
P. 4.11-3, Reference to Community Forest Management Plan	This plan is not discussed at all in the analysis and needs to be addressed under Impact 2 of this chapter. include a discussion of how the project is consistent with this plan. This discussion is particularly important to demonstrate no net loss of tree canopy given that the project proposes the removal of 101 mostly mature trees. This plan also must be referenced in the Biological Resources Chapter.	Consistency with this plan is included on page 4.11-28. Additional info has been added here and in the bio section OK	Addressed
Table 4.11-1 (Consistency) Objective L51	Similar to Goal 1 above this does not describe how the project is consistent with	Added info here and under Goal 1 OK	Addressed

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Table 4.11-1 (Consistency) Policy L51.5	Please describe other travel modes (beyond pedestrian).	Added OK	Addressed
Table 4.11-1 (Consistency) Objective L52	This response needs to indicate how the project will maintain levels of service.	Added. Cited LOS study. OK	Addressed
Table 4.11-1 (Consistency) Policy L52.9	This sentence needs to address the specific issue raised by this Policy (sidewalk continuity), instead of repeating the same narrative used to respond to many of the circulation policies.	Revised OK	Addressed
Table 4.11-1 (Consistency) Objective L53	Again, this objective appears to repeat a response from another goal/policy and does not actually address intrusion of through traffic. Please revise to address this issue.	Revised OK	Addressed
Table 4.11-1 (Consistency) Policy RA.3	This analysis does not directly address issues raised – does the SP have requirements that limit lighting height below the house eave or have a restriction on residential lighting pole height?	These are all the details known at this time and included in the specific plan. However, this gets at light spillover which has been addressed in the response. This doesn't really answer the question about specific restrictions in the SP – if it is unknown if lighting will be attached to home above an eave or allow light trespass on to adjacent properties or high skies, then it must be considered inconsistent. This seems like a pretty easy fix that could be made in the SP.	Added clarification under this policy. The eave is the edge wrap around part of a roof so it would not make sense to put any lights above there.
Table 4.11-1 (Consistency) Tree Preservation, Goal 1	This response does not directly address this goal and only addresses protected trees; and the goal covers trees not subject to the Tree Preservation Ordinance. Explain how the loss of the other 91 trees is consistent (or not) with this goal.	See added discussion. OK	Addressed
Table 4.11-1 (Consistency) Tree Preservation, Goal 2	Please include an estimate of the number and size of the new trees that will be planted as part of the project in order to demonstrate consistency with this goal.	Additional details were added but the exact number of trees is not known at this time. See previous comment in Biology Section. Provide a rough estimate or ranges to show that the trees will be replaced.	Revised
Table 4.11-1 (Consistency) Policy R10.2	See comment under tree preservation Goal 1 above	See added discussion This policy has now been deleted (with no explanation), but needs to be re-included since it directly relates to tree loss on the site.	We removed this as it seemed to be addressed to the City, not the applicant/project. However, we added back in per this comment.
Table 4.11-1 (Consistency) Policy R12.3	This response needs to include a reference to the water retention facility that will be built underneath the park.	Added OK	Addressed
Table 4.11-1 (Consistency)	Instead of providing this very generic response identify the specific City requirement is for smoke detection systems in new homes.	Revised	Addressed

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Policy H2.1		OK	
Table 4.11-1 (Consistency) Policy H2.3	The review indicated presumably does not include the review of building plans. Please revise this response to better demonstrate consistency with this policy.	Revised	Addressed
Table 4.11-1 (Consistency) Policy C.4.3	This response does not address the issue raised in Policy C.4.3 (i.e., maximize passive prevention measures). Please revise to directly address this policy.	OK: Added some details but exact passive prevention measures are not known at this time	Addressed
Table 4.11-1 (Consistency) Policy C.3.5	This response needs to include a description of the water retention facility that will be built under the park.	Added	Addressed
Pages 4.11-27 & 28	All of this text is confusing and appears to belong in another section – possibly Recreation or Public Services? Please revise accordingly.	OK Removed discussion of the parkland dedication ordinance as it is not a plan. Left the rest and clarified discussion	Addressed
DEIR CHAPTER 4.12: MINERAL RESOURCES			
NO COMMENTS ON THIS SECTION			
DEIR CHAPTER 4.13: NOISE			
Page 4.13.2, Section 4.13.1.2	Please update the EIR's general description of noise-sensitive land uses to specifically include open space / recreation areas (such as Bailey Canyon Wilderness Park). This will provide consistency with the City's General Plan definition of noise-sensitive land uses (General Plan pg. 6-21).	Open space/recreation areas added, as suggested.	Addressed
Page 4.13.2, Section 4.13.1.2	The EIR states "noise measurements were conducted on and near the project site . . . to characterize the existing ambient noise environment" and that monitoring locations were selected to "represent sample existing noise-sensitive receivers on and near the project site." The EIR's discussion of ambient noise levels does not include any discussion on the effect State and regional public health orders limiting gatherings, school openings, non-essential travel, and other activities intended to control the spread of COVID-19 may have had on the ambient noise monitoring results. These orders have generally been acknowledged to lower vehicle traffic volumes and associated traffic noise levels. A discussion on the effect of public health orders on the ambient noise monitoring results is warranted given the EIR states that the primary noise sources at the site consisted of "light traffic along adjacent roadways" and "distant traffic."	Language added regarding noise measurements during the COVID pandemic and public health orders, as suggested. OK	Addressed
Page 4.13.3, Section 4.13.2, "Federal Transit Administration"	The EIR indicates guidance and methodology from the FTA's Transit Noise and Vibration Impact Assessment Guidance Manual is used in the EIR's vibration analysis, but no information on the FTA's methodology or standards is presented in the EIR's regulatory setting section. We note the construction vibration threshold discussed on EIR page 4.13.7 is based on Caltrans' guidance. The EIR needs to be clarified how FTA guidance and methodologies were used in the noise and vibration analysis, if at all.	Analysis of construction noise and vibration is based upon both FTA and Caltrans guidance and methodologies, and the FTA impacts assessment manual is referenced numerous times in the Impacts section. Clarification added. OK	Addressed
Page 4.13.4, Section 4.13.2, "California"	MIG understands OPR updated its General Plan guidelines in 2017, however, the information presented in the EIR is not consistent with the City's General Plan Land Use Compatibility for Community Noise Exposure (General Plan Table 6-8). The	As suggested, a copy of Table 6-8 is provided in the revised noise section. OK – the file we have includes a comment to add this table.	Yes—this will be added

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Department of Health Services Guidelines*	City's General Plan noise guidelines constitute the local standards that apply to the project. These standards need to be presented in the EIR's regulatory setting section.		
Page 4.13-4, Section 4.13-2, "California Department of Transportation"	The EIR presents information and vibration standards contained in Caltrans' 2013 Transportation and Construction Vibration Guidance Manual; however, Caltrans released an updated version of this document in 2020. The EIR should be updated with this latest information.	Caltrans' vibration manual references have been updated. OK	Addressed
Page 4.13-4, Section 4.13-2, "City of Pasadena General Plan" and "City of Pasadena Municipal Code"	The EIR provides more information on the City of Pasadena's General Plan and Municipal Code standards than the City of Sierra Madre's standards; however, the project is not located in the City of Pasadena. The EIR states Pasadena General Plan policies are "applicable" to the project and implies the Pasadena code standards are, too; however, the EIR is not clear if the requirements of Pasadena Municipal Code Section 9.36.70 pertaining to allowable construction hours are, in fact, applicable to the project. MIG notes Pasadena's allowable construction hours are more stringent than Sierra Madre's. The EIR must take a clear position on whether each of the presented Pasadena standards are "applicable" to the project or presented solely for information and contextual purposes only.	Discussion of Pasadena's noise standards has been revised to explain that Pasadena standards are provided for information only. The impacts analysis has been revised so as to assess the proposed project in the context of City of Sierra Madre standards, not Pasadena standards. OK	Addressed
Page 4.13-6, Footnote 1	This note states the City of Sierra Madre has a prohibition on construction equipment or any other noise source emitting a noise level in excess of 90 dBA at 25 feet. MIG interprets the City's Code to apply an 80 dBA L _{max} 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 _{max} 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). MIG notes discussion with the city may be necessary to determine whether the construction equipment standards are energy-averaged (L _{eq}) or maximum noise levels (L _{max}). Section 9.32.050 uses the term noise level, which is defined in Section 9.32.020 as "the maximum continuous sound level of repetitive peak level." In addition, Section 9.32.060 A refers to 90 dBA under its "most noise condition." Finally, General Plan Table 6-9 refers to "maximum permissible" noise levels and limits.	Based upon our reading of the City's Municipal Code we don't believe that the intent was to use L _{max} as the base metric for this standard. Please see the City's definition of "noise level", here: https://libran.municipalcode.com/city-of-sierra-madre/codes/code-of-ordinances?code=TI19PUPEMOWE_CH9-32-ND_9.32.020E Please see the FHWA's definitions, here: https://www.fhwa.dot.gov/Environment/noise/resources/twahep17053.pdf 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 _{max} noise metric. The use of the L _{eq} noise metric to characterize typical noise during construction as opposed to the absolute maximum is consistent with normal standards of the practice, as well as standards promulgated by such agencies as the Federal Transit Administration (which uses 1-hour, 8-hour, and 30-day averages depending upon the level of analysis), and numerous cities and counties. Based on the Code definition of "noise level" it is probable that the L _{eq} metric is Code standard. While L _{max} is more conservative, L _{eq} would be more consistent with typical construction noise evaluations. MIG recommends the City review planning or enforcement records to ascertain whether this standard has historically been interpreted one way or the other.	Jonathan—This is asking the City to check and confirm whether the L _{eq} or the L _{max} noise metric is their chosen basis for the standard. Please discuss with Vincent.

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<p>Page 4.13.7, Section 4.13.3</p>	<p>The EIR states construction noise would be significant if it exceeds either: 1) 80 dBA $L_{eq}(1-hr)$ at a distance of 25 feet for any allowable construction hour, or 2) 85 dBA L_{eq} at or beyond a noise sensitive receiver's property boundary.</p> <p>Regarding the first threshold, as stated in MIO's comment on Page 4.13-6, Footnote 1, MIO does not interpret the City's code to apply an 80 dBA $L_{eq}(1-hr)$ standard for construction noise. Rather MIO interprets the City's code to only apply an 85 dBA L_{max} standard that is applied at any point outside the property line. In addition, as stated in MIO's comment on Page 4.13-4, Section 4.13-2, the EIR is not clear what is meant by "any allowable construction hour" (i.e., whether City of Sierra Madre or City of Pasadena allowable hours prevail). Given the above, the EIR needs to be clarified regarding: 1) which numeric standard for construction equipment noise levels is correct, and 2) what are the allowable construction hours applicable to the project.</p>	<p>Please see previous response. Ok. Applicable standard (L_{eq} or L_{max}) pending City confirmation.</p>	<p>Jonathan—same as above. Please discuss with Vincent.</p>
<p>Page 4.13.8, Section 4.13.4, Impact 1.</p>	<p>The EIR's construction noise analysis indicates worst case noise levels were predicted at distances of 25 feet from existing residences and 75 feet from the retail center. The basis for this difference is not clear—is it due to the grading and landscaping buffer on the northern portion of the site? In addition, since the City of Sierra Madre and Pasadena regulates construction noise levels at the property line, the EIR needs to be very clear whether modeled construction noise distances are measured to the property line or the existing residential structures. MIO notes the EIR appears to use the property line but states (emphasis added) "construction activity phases near the southern and western project site boundaries would take place within approximately 25 feet of existing residences . . ."</p>	<p>Correct, the difference is due to the grading and landscape buffer.</p> <p>Language has been clarified that construction noise levels are assessed at the property line.</p> <p>OK.</p>	<p>Addressed</p>
<p>Page 4.13.9 and 4.13-10, Section 4.13.4, Impact 1 and Table 4.13-3</p>	<p>The EIR's construction noise analysis uses the L_{eq} metric to evaluate construction noise levels. As noted in our comment on EIR Page 4.13-6, the use of the L_{eq} metric does not appear to be consistent with the City Code, which MIO interprets to apply an L_{max} standard. If the L_{max} standard is applicable this section of the EIR will require revision to present L_{max} and L_{eq} noise levels.</p>	<p>Please see response above regarding MIO's interpretation of the City's construction noise standard.</p> <p>OK Applicable standard (L_{eq} or L_{max}) pending City confirmation.</p>	<p>Jonathan—same as above. Please discuss with Vincent.</p>
<p>Page 4.13.9 and 4.13-10, Section 4.13.4, Impact 1 and Table 4.13-3</p>	<p>EIR Table 4.13-3 presents estimated construction noise levels on a dBA L_{eq} (8-hr) basis. As noted in our comment on EIR Page 4.13-6, the use of the L_{eq} metric does not appear to be consistent with the City Code, which MIO interprets to apply an L_{max} standard. If the L_{max} standard is applicable Table 4.13-3 will require revision to present L_{max} and L_{eq} noise levels. If the L_{eq} metric is consistent with Code requirements, a footnote explaining the L_{eq} 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 (L_{eq} 1-hr).</p>	<p>Please see prior response. Footnote added.</p> <p>OK.</p>	<p>Addressed</p>
<p>Page 4.13.10, Section 4.13.4, Table 4.13-3</p>	<p>For the Balance Site (Grading phase), the predicted noise level at 75 feet is 72 dBA while the predicted noise level at 500 feet is 70 dBA. Please double check the 500-foot 70 dBA estimate, as this does not appear to be correct.</p>	<p>We have revised accordingly, thanks.</p> <p>OK.</p>	<p>Addressed</p>
<p>Page 4.13.10, Section 4.13.4, Table 4.13-3</p>	<p>Table 4.13-3 lists the distance from construction activities to noise receptors. The table presents a single distance (e.g., 25 feet) when in actuality construction equipment was set at variable distances from the modeled receptor (i.e., equipment for receptors west and south of the site was modeled at 25, 50, and 75 feet away). Since modeled noise levels are energy-averaged for all equipment, the distances in Table 4.13-3 needs to be clarified, or additional information presented on modeled equipment distances. For example, some Building Construction equipment was modeled 300 feet away from receptors locations, not 25 feet as listed in the table.</p>	<p>Because construction equipment cannot physically occupy the same point, and because construction equipment working on a site are in motion, the equipment "consist" was spread around the site at varying distances in a manner that, in our professional opinions, would represent a conservative but reasonable working scenario.</p> <p>OK.</p>	<p>Addressed</p>

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<p>Page 4.13-11, Section 4.13-4, Impact 1, Off-site Traffic Noise</p>	<p>MIG notes that listing a single distance in Table 4.13-3 would be appropriate if an L_{eq} value is used to evaluate construction noise levels (since the RCNM model uses the single knobel value for L_{eq} reporting purposes).</p> <p>The EIR uses the City of Sierra Madre Code (45 dBA) and City of Pasadena Code (+5 dBA) to evaluate the significance of potential increase in off-site traffic noise levels. It is MIG's opinion these thresholds are not appropriate for the following reasons:</p> <ul style="list-style-type: none"> Each City's respective code requirement governs non-transportation noise is applied at the noise generating/ noise receiving land use property line. 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. 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. <p>MIG recommends the EIR use the more common threshold approach of a +1 (where noise levels would transition to or remain unacceptable), +3 (where noise levels would transition from acceptable to conditionally acceptable), and +5 dBA increase (where noise levels would remain acceptable) that considers increases in traffic noise levels in the context of noise and land use compatibility guidelines. Alternatively, if a revised threshold is not applied, the EIR needs to provide a more robust discussion of potential traffic noise level thresholds and additional justification for why the code standard is a suitable and appropriate threshold for use.</p>	<p>Agreed. Revised accordingly.</p> <p>OK</p>	<p>Addressed</p>
<p>Page 4.13-12, Section 4.13-4, Impact 1, Interior Noise Impact</p>	<p>The EIR states, "While current CEQA noise-related guidelines do not require an assessment of exterior-to-interior noise intrusion or noise exposure to occupants of newly created residences or non-residential uses attributed to the development of the project, the State requires that interior noise levels not exceed a CNEL of 45 dB within residences." MIG concurs an assessment of noise exposure to occupants of new residents is not required by CEQA pursuant to CBIA v. BAAQMD, however, we note CEQA does not preclude such an analysis of residential noise exposure. In addition, an evaluation of how project-related traffic noise levels may exacerbate interior noise levels at existing residences is warranted and needs to be topically addressed in the EIR.</p> <p>Finally, MIG is not aware of any provision in CEQA that specifically excludes consideration of interior noise levels in non-residential development. The EIR should be clarified to indicate whether the project could exacerbate interior noise levels at existing commercial land uses.</p>	<p>Comment noted. Discussion of potential for interior noise level increases added.</p> <p>OK</p>	<p>Addressed</p>
<p>Page 4.13-13, Section 4.13-4, Impact 1,</p>	<p>The EIR's discussion of neighborhood park noise is not consistent. The EIR indicates park usage would be passive in nature, not include sound amplification, and open between 6 AM and 10 PM. The EIR then states that sound amplifying equipment could be permitted by City permit provide noise does not exceed 60 dBA.</p>	<p>Discussion of park use and associated potential for noise impact revised.</p> <p>OK</p>	<p>Addressed</p>

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<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>MIO recommends the discussion of neighborhood park noise levels be revised to provide a clearer description of planned park uses and activities. It is not clear why the EIR states potential event noise levels are speculative since the municipal code appears to set a general decibel limit for sound-amplifying equipment associated with such an event. In addition, the EIR should not present noise levels from a park land use with a public address system if such a system is not proposed as part of the project. Finally, additional details on the discussion of noise levels from the City of Chula Vista (e.g., time of day, noise monitoring duration, etc.) would provide additional context and evidence for the EIR's conclusions regarding noise levels.</p> <p>MIO also recommends the discussion of the neighborhood park be clarified to indicate if there are any stationary sources associated with the proposed stormwater retention facilities (e.g., pumps) that could generate noise levels that have the potential to impact noise-sensitive receptors.</p>		
<p>Page 4.13-13, Section 4.13-4, Impact 2</p>	<p>MIO notes Caltrans' Transportation and Construction Vibration Guidance Manual (2020) does not explicitly set a vibration standard, although the 0.2 inches per second annoyance criteria reference in the</p> <p>The 0.12 inches per second estimate in the EIR is identified by Caltrans as "strongly perceptible" and the level at which vibration may "begin to annoy" (Caltrans 2020, Tables 4 and 5), although these responses are for steady-state vibration levels. MIO recommends additional information be provided in the EIR on Caltrans' range of human response and annoyance criteria (either in the regulatory setting or impact analysis) and that the total duration of vibration-generating activities be considered a factor in evaluating vibration.</p>	<p>Comment noted. The statement is correct - 0.2 inches is a common threshold applied for CEQA purposes.</p> <p>As noted, the referenced tables refer to steady-state operations, not transient.</p> <p>OK.</p>	<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. MIO notes this level of noise reduction is effective due to the EIR's use of the L_{eq} metric to evaluate construction noise, however, if the L_{max} 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 L_{eq} vs. L_{max}. Regarding noise barrier performance, to our knowledge L_{max} would, if anything, be more effective than a theoretical L_{eq} situation in which ambient L_{eq} levels were within 10 dB of the construction noise levels. In this case however, ambient L_{eq} 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 L_{max} or L_{eq}.</p> <p>OK Applicable standard (L_{eq} or L_{max}) pending City confirmation</p>	<p>Justification—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 MIO's opinion the construction noise modeling is likely conservative in nature (i.e., likely to overpredict noise levels), the EIR needs to explain the basis/rationale for these varying assumptions.</p>	<p>Spec and actual L_{max} 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>

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		same structure barriers, with no alterations in the "with project" versus "without project" cases. No noise barrier analysis is included.	
		OK	
DEIR CHAPTER 4.14: POPULATION AND HOUSING			
P. 4.14-1, Para. 6, 1 st sentence	Please clarify that the 2020-2045 RTP/SCS has not yet been adopted.	The 2020-2045 RTP/SCS was adopted on September 3, 2020. The date of adopted has been added.	Addressed
		OK	
P. 4.14-7, Para. 3, 0 th 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	Addressed
		OK	
P. 4.14-8, last citation	Please update this reference.	This is the latest citation, unsure of what updates are needed here	Addressed
DEIR CHAPTER 4.15: PUBLIC SERVICES			
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	Addressed
		OK	
P. 4.15-3, 1 st Para., 2 nd 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	Addressed
		OK	
P. 4.15-7, 1 st Para., 1 st 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	Addressed
		OK	
P. 4.15-7, 1 st Other Public Services	Please specify what other services and facilities are covered by this fee.	Done.	Addressed
		OK	
P. 4.15-8, last Para. 2 nd 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 nd 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 rd Para. last sentence	Do not include this sentence – see parallel discussion under the fire protection section.	See response above. Removed text.	Addressed
		OK	

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P. 4.15-11, 1 st Para, 2 nd 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 th sentence	Remove the word negligible.	Done OK	Addressed
DEIR CHAPTER 4.16: RECREATION			
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 st 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 th 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
DEIR CHAPTER 4.17: TRANSPORTATION			
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 ^a Para, 3 rd sentence	This description of roadways is not consistent with Figure 3-4 – please revise/reconcile.	Removed discussion OK	Addressed
DEIR CHAPTER 4.18: UTILITIES AND SERVICES			
P. 4.18-2, 3 rd Para, 2 nd sentence	Strike the word "recently". Also, the phrase "water supply from the treated Colorado River" is confusing. Should it read "treated water supply from the Colorado River" since the river itself is not treated?	Done OK	Addressed
P. 4.18-8 – Urban Water Management Plans	Please indicate when the 2020 update of the UWMF is expected to be completed.	Per info from the City, this is the latest plan. The City is in the process of updating the 2020 UWMF and should have it completed in a few months. OK – thanks for the check (leave as is)	Addressed

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P. 4.19-12, 1 st Para., 4 th sentence	Please specify whether the 8.64 MOY water demand estimate includes water use for the park.	Done OK	Addressed
P. 4.19-12, 1 st Para., 1 st sentence	This sentence is problematic and is unsubstantiated. First this is not a redevelopment project as the site is now undeveloped, and 8.64 MOY is not minimal and there is no substantiation that water saving through the Green Building Code would make water use minimal.	Removed sentence OK	Addressed
P. 4.19-14 – General Comment	General comment – since most of this language is identical or very similar to the language in Impact 1 with respect to water, make the corresponding changes to the language in this impact statement.	Condensed text OK	Addressed
P. 4.19-14 – 2 nd 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 nd comment, above OK	Addressed
P. 4.19-14 – last para., 2 nd 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
DEIR CHAPTER 4.18: TRIBAL CULTURAL RESOURCES			
NO COMMENTS ON THIS CHAPTER			
DEIR CHAPTER 4.20: WILDFIRE			
1			
DEIR CHAPTER 5: CUMULATIVE EFFECTS			
P. 5-4, 1 st sentence.	Make the following changes to this sentence: As discussed in Section 4.3.1.4.1, South Coast Air Basin Attainment Designation, the SCAB has been designated as a national nonattainment area for ozone (O ₃) and particulate matter (PM ₁₀ and PM _{2.5}) and particles less than 10 microns in diameter (PM ₁₀) and a California nonattainment area for ozone (O ₃), PM ₁₀ , and particles less than 2.5 microns in diameter (PM _{2.5}).	Done OK	Addressed
P. 5-10, 5 th para., 1 st sentence	The part of this sentence in parentheses seems irrelevant to the rest of the sentence: please clarify or delete.	Deleted OK	Addressed
DEIR CHAPTER 6: GROWTH INDUCEMENT			
P. 6-2, last para., 2 nd sentence	The RHNA has now been approved: please update this sentence.	Done OK	Addressed
DEIR CHAPTER 7: SIGNIFICANT IRREVERSIBLE CHANGES			
NO COMMENTS ON THIS CHAPTER			
DEIR CHAPTER 8: ALTERNATIVES			
P. 8-1, 1 st para., 2 nd sentence	Remove the reference to land use and planning as there are no mitigation measures applicable to this issue area.	Bio mitigation is applicable to LU. Left as is for consistency. Disagree as this creates confusion and the bio does not create a conflict with a land use plan, policy etc. We continue to recommend this deletion.	For discussions with the applicant's legal counsel, we left this as is. This is because, as discussed in comments above, trees would need to be replaced to

185-53
Cont.

Meadows SP EIR Draft Peer Review Comments, April 2, 2021

			Ensure consistency with the Community Forest Management Plan.
P. 8-5, last para, 2 nd sentence.	Revise this sentence as follows: "There are no known or locally important mineral resources existing on the project site and the proposed project would result in less than <u>significant</u> impacts to mineral resources".	Revised OK	Addressed
P. 8-7, 2 nd para, 3 rd 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 nd para, 2 nd sentence	Jurisdictional and riparian areas to the north and east of the site were not identified in the elsewhere in the EIR, please revise/reconcile as necessary.	Discussion is included under thresholds 2 and 3 in the biological resources section I thought it was now said in the bio section that the project did not affect these areas; please verify/clarify.	Correct. Removed from discussion in alt.
P. 8-14 2 nd para, 4 th 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 rd sentence	The project description did not previously indicate that an HOA would be used to maintain the park, which is a public park and there is little information to support that 42 homes on smaller lots would be able to support park maintenance and 34 larger lot homes would not. Please revise to be consistent with the project description and substantiate the assertion that 34 homes are not feasible with respect to the park: at a minimum, the land could be dedicated to the City under this alternative.	Added maintenance entities to the PD and removed reference to the HOA here to avoid confusion Please provide additional clarification about what kinds of fees are anticipated to differentiate between DIF fees and monthly maintenance fees.	Added



185-53
Cont.



MEMORANDUM

Date: 11.10.2020
To: Jonathan Frankel
From: Billing Liu & Steven J Brown, PE
Subject: Traffic Conditions with the Proposed Sierra Madre Residential Project

OC20-0744

The following documents the expected changes in traffic conditions with the proposed 42-unit residential project (Project) in Sierra Madre, California. The Project is located on the north of Sunnyside Avenue and Fairview Avenue intersection and adjacent to the Mater Dolorosa Retreat Center in the City of Sierra Madre. The Project proposes 42 single-family units on a vacant land and is proposed to be built out and occupied in 2025.

EXISTING CONDITIONS

The following intersections and roadway segments would provide access to the site and are most likely to experience direct traffic effects, if any, from the Project:

Intersections:

1. Sunnyside Avenue & Fairview Avenue
2. Sunnyside Avenue & Sierra Madre Boulevard
3. Michillinda Avenue & Sierra Madre Boulevard
4. Michillinda Avenue & Foothill Boulevard

Roadway Segments:

1. Sunnyside Avenue between project site & Fairview Avenue
2. Sunnyside Avenue between Fairview Ave & Sierra Madre Boulevard
3. Sierra Madre Boulevard between Michillinda Avenue & Sunnyside Avenue
4. Michillinda Avenue between Fairview Avenue & Sierra Madre Boulevard
5. Michillinda Avenue between Sierra Madre Boulevard & Foothill Boulevard

Traffic counts were collected for the above intersections and segments in October 2020. Due to the COVID-19 pandemic in 2020, travel activity and traffic volumes were potentially atypical throughout the study area and Southern California. Thus, we reviewed multiple data sources in order to select a growth factor applying to existing counts to represent 2020 condition in a non-COVID environment. The findings from different data sources are listed below:

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1. LADOT Data

LADOT analyzed the loop detector data for 12 intersections from March 10th to April 30th in 2020 and summarized the weekday volume for stages of “stay-at-home” conditions. Based on this study, the daily vehicle volume was reduced by 37% to 58% compared on non-COVID condition. However, data from other sources suggest that traffic conditions in Spring 2020 were different than October 2020, as many businesses and some schools have returned to at least partial on-site operating conditions.

2. Caltrans Performance Measurement System (PeMS) Data

PeMS collects real-time data from over 39,000 individual detectors on the freeway system across all major metropolitan areas in California. Based on the Project location, we reviewed the nearest I-210 freeway data, which is at Michillinda Avenue. **Table 1** presents the weekday Average Daily Traffic (ADT) values in February and October 2020. The October ADT were reduced by 6% to 14% compared to February pre COVID-19 conditions.

Table 1: PeMS ADT Data at I-210 and Michillinda Avenue

Location	Fed ADT	Oct ADT	Change
I-210 E Before On Ramp	102,812	88,722	-14%
I-210 E After On Ramp	108,810	96,592	-11%
I-210 W Before On Ramp	113,636	107,188	-6%
I-210 W After On Ramp	108,459	101,337	-7%

Source: Caltrans PeMS Website, 2020

3. Streetlight Data

Streetlight uses smartphones as sensors to measure travel activities on all streets. In this analysis, ADT data was collected from February to September 2020 at the 5 project study roadway segments to track the traffic changes after COVID-19. As shown below, the traffic decreased by approximately 45% in April and then gradually came back to approximately “normal” conditions in September. **Table 2-A** shows weekday conditions, while **Table 2-B** shows weekend conditions.

185-54
Cont.



Table 2-A: Weekday ADT

Segment	Pre-COVID	Post-COVID						
	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep
Sunnyside Avenue between Project Site and Fairview Avenue	369	297	195	294	308	400	413	523
Sunnyside Avenue between Fairview Avenue and Sierra Madre Boulevard	1,947	1,669	1,221	1,605	1,960	2,108	2,211	2,098
Sierra Madre Boulevard between Michillinda Avenue and Sunnyside Avenue	7,045	5,905	4,211	5,603	6,506	6,987	7,289	7,178
Michillinda Avenue between Fairview Avenue and Sierra Madre Boulevard	8,611	6,984	4,320	6,301	7,985	8,392	8,895	8,678
Michillinda Avenue between Sierra Madre Boulevard and Foothill Boulevard	11,801	9,416	6,325	8,581	10,366	10,928	11,435	11,154
<i>Total</i>	29,773	24,271	16,272	22,384	27,225	28,815	30,243	29,631
Change compared to Pre-COVID		-18%	-45%	-25%	-9%	-3%	2%	0%

Source: Streetlight, 2020

185-54
Cont.



Table 2-B: Weekend ADT

Segment	Pre-COVID	Post-COVID						
	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep
Sunnyside Avenue between Project Site and Fairview Avenue	401	304	155	334	327	433	371	809
Sunnyside Avenue between Fairview Avenue and Sierra Madre Boulevard	2,046	1,833	1,228	1,764	1,956	2,111	2,268	2,553
Sierra Madre Boulevard between Michillinda Avenue and Sunnyside Avenue	7,013	6,106	4,025	5,436	6,537	7,244	7,662	7,928
Michillinda Avenue between Fairview Avenue and Sierra Madre Boulevard	9,037	7,685	4,212	6,011	7,926	8,933	8,993	9,199
Michillinda Avenue between Sierra Madre Boulevard and Foothill Boulevard	12,160	10,374	6,461	8,609	10,195	11,769	12,019	11,951
Total	30,657	26,302	16,081	22,154	26,941	30,490	31,313	32,440
Change compared to Pre-COVID		-12%	-46%	-26%	-10%	2%	5%	9%

Source: Streetlight, 2020

I85-54
Cont.



As the COVID-19 pandemic is still affecting regional travel, we applied an upward adjustment of 10% to the October 2020 counts to represent a worst-case condition prior to COVID-19.

MATER DOLOROSA RETREAT CENTER EVENT TRIPS

Mater Dolorosa Retreat Center is adjacent to the Project site in the north and held many weekly and special events before the COVID-19 pandemic. We were provided with 2019 data for the center, which included the date, duration, arrival window, departure window and estimated round trips for each event. We analyzed this information to estimate the average weekday and weekend trips associated with the center. The retreat center generated approximately 69 trips per weekday and 35 trips per weekend day in 2019. There were 13 AM peak hour trips (12 inbound/1 outbound) and 3 PM peak hour trips (1 inbound/2 outbound) per weekday.

TABLE 3 - Mater Dolorosa Historical External Event Trips in 2019

	Daily	AM Peak Hour			PM Peak Hour		
		In	Out	Total	In	Out	Total
Weekday	69	12	1	13	1	2	3
Weekend	35						

Source: Fehr & Peers, 2020

EXISTING (2020) PRE-COVID CONDITION

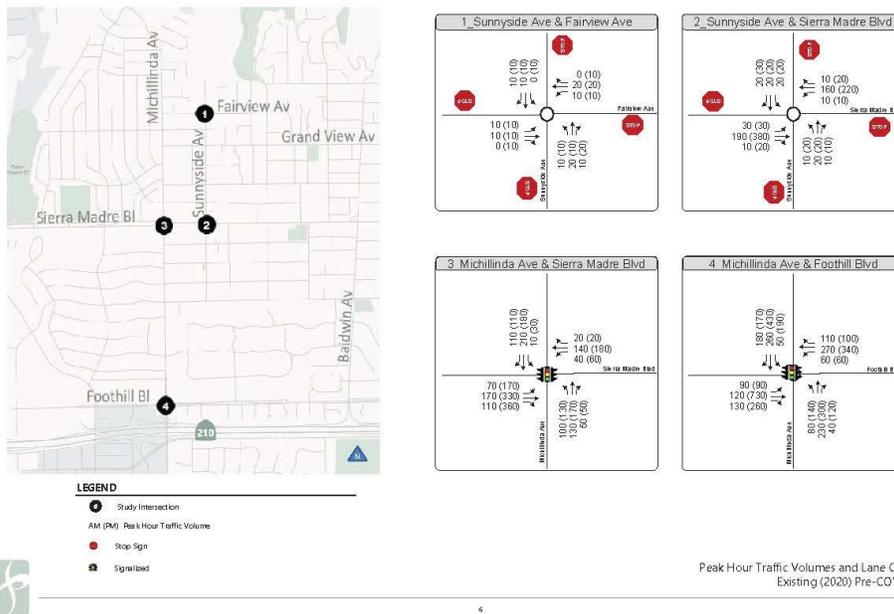
We estimated the existing (2020) pre-COVID condition by applying the 10% growth factor and adding the retreat center trips to represent a full non-COVID traffic condition. Table 4 and Figure 1 present the segment ADT and peak hour intersection traffic.

TABLE 4 - Existing (2020) Pre-COVID Segment ADT

Segment	Weekday	Weekend
Sunnyside Avenue between Project Site and Fairview Avenue	340	310
Sunnyside Avenue between Fairview Avenue and Sierra Madre Boulevard	490	400
Sierra Madre Boulevard between Michillinda Avenue and Sunnyside Avenue	6,970	6,290
Michillinda Avenue between Fairview Avenue and Sierra Madre Boulevard	7,390	6,930
Michillinda Avenue between Sierra Madre Boulevard and Foothill Boulevard	9,550	8,200

Source: Fehr & Peers, 2020

185-54
Cont.





TRIP GENERATION

As shown in **Table 5-1**, the Project is expected to generate approximately 396 weekday daily trips, including approximately 31 trips (8 inbound/23 outbound) during the AM peak hour, and 42 trips (26 inbound/16 outbound) during the PM peak hour. On a typical weekend day, the Project will generate approximately 401 daily trips, including 39 trips (10 inbound/29 outbound) in AM peak hour, and 39 trips (25 inbound/14 outbound) in PM peak hour (**Table 5-2**).

TABLE 5-1 - Weekday Trip Generation Estimates

Land Use	Units	ITE Code	Quantity	Daily	AM Peak Hour			PM Peak Hour		
					In	Out	Total	In	Out	Total
Single-Family	DU	210	42	396	8	23	31	26	16	42
Net New Trips				396	8	23	31	26	16	42

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
Net New Trips				401	10	29	39	25	14	39

Notes:

1. DUs = Dwelling Units

Source: Fehr & Peers, 2020

TRIP DISTRIBUTION

The Project trip distribution reflects the spatial distribution of trips traveling to and from the Project site. To determine where Project trips will travel, we applied a "select zone analysis" using the Southern California Association of Governments (SCAG) travel demand model. This method predicts where trips travel to/from for the area immediately surrounding the Project. The estimated trip distribution of the Project trips is shown on **Figure 2**.

185-54 Cont.

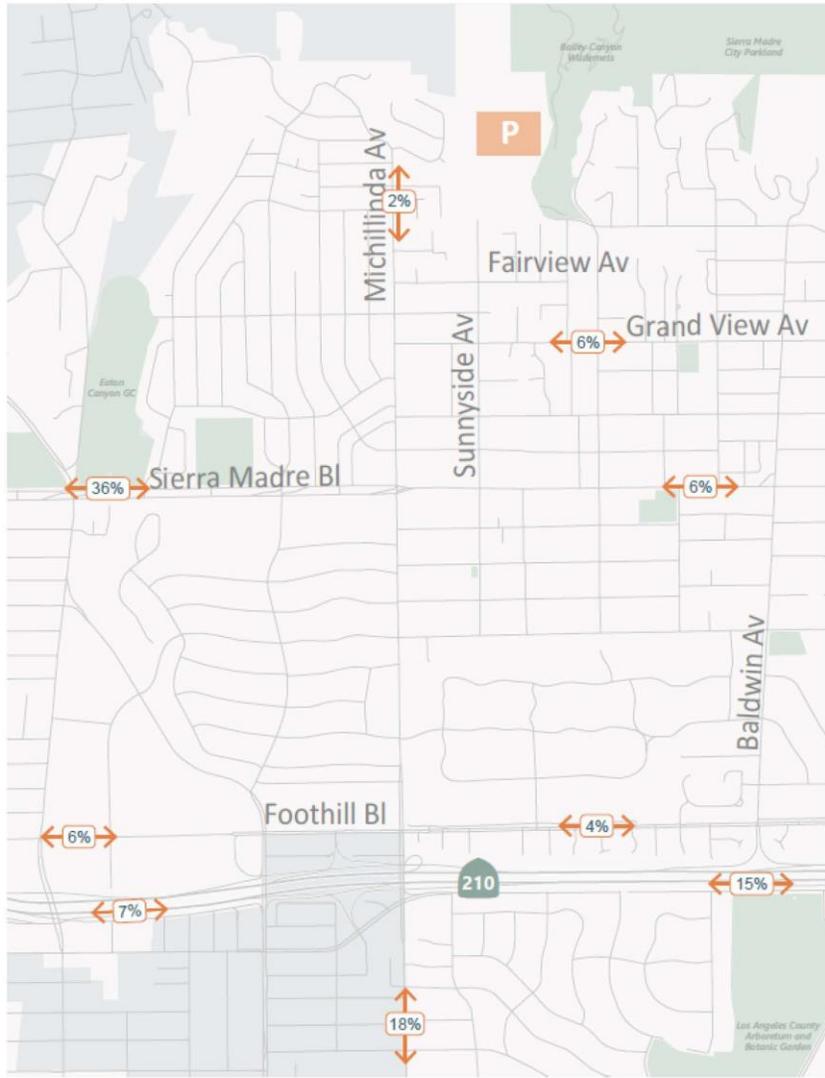


Figure 2
Trip Distribution

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Cont.



TRAFFIC FORECASTS

The proposed Project was assumed to be built and occupied by 2025. The following traffic scenarios were developed and analyzed as part of this study:

- Existing (2020) Pre-COVID Condition
- Build-out (2025) without Project Condition
- Build-out (2025) with Project Condition

The best tool to determine background growth in the area is the SCAG model. The SCAG model predicts 2040 travel conditions in consideration of land development and transportation changes. It also includes a work-from-home assumption to reflect anticipated changes in how people travel. The results of these assumptions lead to a conclusion that traffic levels will slightly decrease in the study area by 2040. To be conservative, we assumed that the 2025 conditions will not decrease in comparison to existing (pre-COVID) conditions.

We added the Project trips to the study segments and intersections following the trip distribution identified above. The following **Table 6-1** and **Table 6-2** present the level of change expected on the study roadways as a consequence of the Project. The peak hour intersection traffic of Build-out (2025) with Project condition is shown in **Figure 3**.

TABLE 6-1 – Weekday Build-out (2025) with Project Segment ADT

Segment	2025 without Project	2025 with Project	Increase%
Sunnyside Avenue between Project Site and Fairview Avenue	340	740	118%
Sunnyside Avenue between Fairview Avenue and Sierra Madre Boulevard	490	850	73%
Sierra Madre Boulevard between Michillinda Avenue and Sunnyside Avenue	6,970	7,310	5%
Michillinda Avenue between Fairview Avenue and Sierra Madre Boulevard	7,390	7,390	0%
Michillinda Avenue between Sierra Madre Boulevard and Foothill Boulevard	9,550	9,680	1%

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185-54
Cont.
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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%

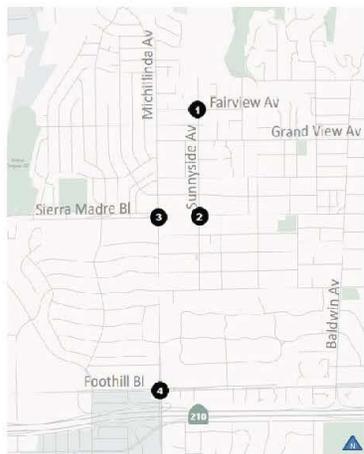
Source: Fehr & Peers, 2020

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Cont.

INTERSECTION LOS ANALYSIS

LOS is a measure of traffic operating conditions, which varies from LOS A (indicating free-flow traffic conditions with little or no delay) to LOS F (representing over-saturated conditions where traffic flows exceed design capacity resulting in long queues and delays). These ratings represent the perspective of drivers and indicate the comfort and convenience associated with driving. The analysis determines the intersection volume-to-capacity (V/C) ratio and corresponding LOS for the turning movements and intersection characteristics at signalized intersections. “Capacity” represents the maximum volume of vehicles in the critical lanes that have a reasonable expectation of passing through an intersection in one hour under prevailing roadway and traffic conditions. Traffic conditions for signalized intersections were evaluated using the Vistro Version 7.0 software - also reference as stop method¹. 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:

¹ Intersection Capacity Utilization (ICU) method was applied in Vistro to estimate the roadway intersection capacity and LOS for signalized intersections.



- LEGEND**
- Study Intersection
 - AM (PM) Peak Hour Traffic Volume
 - Stop Sign
 - Signalized

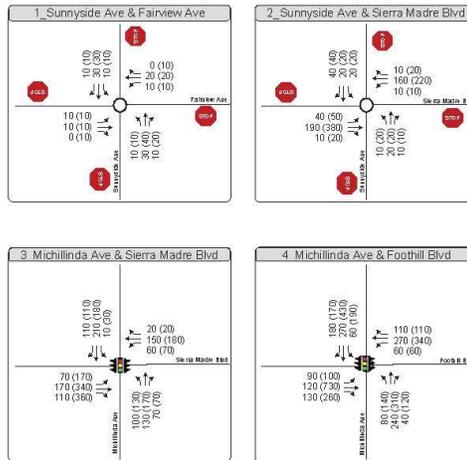


Figure 3
Peak Hour Traffic Volumes and Lane Configurations
Build-out (2025) With Project Condition

185-54
Cont.



TABLE 7 - Intersection LOS Analysis

Intersection	Analysis Method	Existing (2020) Pre-COVID / Build-out (2025) without Project				Build-out (2025) with Project			
		AM V/C	AM LOS	PM V/C	PM LOS	AM V/C	AM LOS	PM V/C	PM LOS
1 - Sunnyside Ave & Fairview Ave	HCM 6th Edition		A		A		A		A
2 - Sunnyside Ave & Sierra Madre Blvd	HCM 6th Edition		A		B		A		B
3 - Michillinda Ave & Sierra Madre	ICU	0.36	A	0.53	A	0.36	A	0.54	A
4 - Michillinda Ave & Foothill Blvd	ICU	0.40	A	0.59	A	0.40	A	0.59	A

Source: Fehr & Peers, 2020

185-54
Cont.

CONCLUSION

Development of the proposed Project would result in 396 trips being generated on a typical weekday and 401 trips on a typical weekend. As a result, the traffic volume changes on the study roadways of approximately 0 to 120 percent according to the location. The performance of the study intersections, as measured by LOS, would result in no measurable difference as a result of the Project.

From: Clare Lin
Sent: Monday, May 3, 2021 8:31 AM
To: 'Jonathan Frankel'
Subject: FW: 700 N Sunnyside Monastery
Attachments: SAMPLE LLA.pdf; APN MAPS AND MUNI CODE.pdf; LOT LINE ADJUSTMENT NEW FORM.docx

Hi Jonathan,
Please see the comments below.

Thanks,

Clare Lin
Senior Planner
Planning & Community Preservation
www.CityofSierraMadre.com
(626) 355-1536 | clin@cityofsierramadre.com

From: KEVORK TCHARKHOUTIAN [mailto:hyecity@live.com]
Sent: Sunday, May 2, 2021 9:47 PM
To: Chris Cimino <CCimino@cityofsierramadre.com>; Vincent Gonzalez <vgonzalez@cityofsierramadre.com>; Clare Lin <clin@cityofsierramadre.com>
Subject: FW: 700 N Sunnyside Monastery

Hi Chris/Vince/Clare

After reviewing the applicant's submittals please see below my response . I wanted to discuss this before I forward it to the applicant's engineer.

Thanks

Kev

700 N Sunnyside Monastery

The following is a review of documents submitted by the applicant for a lot line adjustment at 700 N. Sunnyside Ave. Congregation of the Passion-Mater Dolorosa Community Lot line adjustment documents were received by the City on April 22, 2021 The applicant is tentatively requesting approval of a lot line adjustment between three parcels owned by the applicant

- 1. Currently the three parcels in question are tied together as one as evidenced by assessor parcel number(APN) 5761 -002 -008 .The applicant is starting with one legal parcel namely 5761-002-008 and the proposed lot line adjustment will result in the creation of*

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APPLICATION
PENDING REVIEW

two parcels from one existing parcel, which is in violation of the Subdivision Map Act, as it relates to Lot Line Adjustments..

2. The applicant must research the title of the three parcels prior to their tie as one parcel namely APN number 5761- 002 - 008
3. Applicant must provide the City with the lot tie covenant and recorded documents which tied the 3 parcels, portion of lot 20, portion of lot 19, and portion of section 17. One option would be to untie or undo the lot tie covenant, thus reverting to 3 parcels , and as a result of the Lot Line Adjustment the existing 3 parcels would have 2 resulting parcels, in compliance with the SMA.
4. Applicant to submit a corporate resolution from the nonprofit corporation owning the property. The corporate resolution must state that the applicant authorizes Mr. Adam Browning and an authorized agent of NUWI, Sierra Madre LLC, (that agent shall be named) are authorized by the congregation to submit, coordinate the approval of the lot line adjustment, and authorized to sign the official certificate of compliance document.
5. Applicant's surveyor must submit traverse sheets with closure calculations
6. The certificate of compliance submitted by the applicant is incomplete and does not conform to the City's official lot line adjustment form. Please see attached certificate of compliance form, in MS Word to be filled out notarized and executed by the authorized parties. The certificate of compliance must be recorded with the LA County recorder's office upon approval by the City of Sierra Madre. Please see attached a sample of the format to follow in order to record the signed certificate of compliance document.
7. Applicant or applicant's engineer or land surveyor must prepare a brief executive summary to address the requirements of the Sierra Madre municipal code sections 16 - 20-020 Subsections A1, A3 ,A4 and A7 .Please see attached sections of the code.
8. The Title report by Chicago Title Company attached to the submittal is for parcel APN 5761-001-001, which is not the parcel subject to the Lot Line Adjustment. The parcel to be considered and shown on the applicant's submittal is 5761-002-008.

185-56

Attachments:

Kev Tcharkhoutian P.E.

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Response to Comment Letter I85

Individual
Tricia Searcy
October 4, 2021

- I85-1** The comment expresses general opposition to the proposed project and provides as an introduction to comments that follow.
- I85-2** The comment expresses concern regarding the discussion of the proposed open space conservation area. As discussed in Final EIR Section 3.2, Project Objectives, one of the objectives of the proposed project is to preserve the hillside open space area by conserving approximately 35 acres north of the Mater Dolorosa Retreat Center to the City in order to preserve a portion of Bailey Canyon and the Bailey Canyon Trail, which would be used by wildlife movement up and down slope; preserve native vegetation communities and drainages; and preserve land adjacent to the Bailey Canyon stream. It should be noted that no development is proposed within this 35-acre open space hillside conservation area that would potentially result in environmental impacts, nor is the City proposing any land use action for the 35-acre hillside open space area. Therefore, an analysis of environmental impacts associated with the proposed 35-acre hillside open space area is not required. It should be noted that A few minor changes were made to Final EIR Section 3.3.3 to clarify the conditions of the open space conservation easement. Lastly, Draft EIR Figure 3-4 shows the approximately 35 acres of open space hillside land to be conserved, located north of the existing Mater Dolorosa Retreat Center.
- I85-3** The comment expresses concern regarding the discussion of the proposed open space conservation area and whether or not it is a part of the proposed project. Please refer to Response to Comment I85-2.
- I85-4** The comment expresses the commenter's opinions regarding the project description of the Draft EIR. In addition, the comment is an introduction to other comments regarding the project description that follow.
- I85-5** The comment raises concerns regarding the amount of acreage that would be dedicated to open space. As discussed in Chapter 3, Project Description, of the Final EIR, approximately 35 acres would be preserved as open space off-site and will not be developed. Within the project site, 3.39 acres would be developed as open space, which includes a 3.04 acre proposed neighborhood park. Final EIR Chapter 3 includes a few additional clarifications related to the project description, including a few errors correcting the open space deduction from 30 acres to 35 acres. These revisions do not raise new or additional environmental issues concerning the adequacy of the Draft EIR.
- I85-6** The comment requests that the proposed open space and details associated with its protection are identified. The commenter also requests a separate comprehensive environmental review associated with the proposed open space. As discussed in Chapter 3, Project Description, of the Final EIR, in addition to the development of an approximately 3.04-acre dedicated neighborhood public park at the southernmost portion of the project site, the proposed project would include development of approximately 0.35 acres of passive open space located to the east of North Sunnyside Avenue and west of Carter Avenue, adjacent to Streets A and B (see Figure 3-2, Conceptual Site Plan see Figure 3-3, Proposed Park Conceptual Plan). In addition to the 3.39 acres of open space and neighborhood park, to be developed on the project site, to be developed on the project site, the proposed project also proposes conservation of approximately 35 acres of open space hillside land,

located north of the existing Mater Dolorosa Retreat Center (see Figure 3-4, Open Space Conservation Easement Area). No development would occur within this 35-acre open space hillside area. Conveyance of this open space hillside land to the City would be effectuated through execution of a development agreement between the City and project applicant/landowner. The Applicant/landowner would be subject to record of conservation easements in favor of the City, which would prevent development of the open space conservation easement area. Therefore, because no development is proposed in this area, and because the area would be conserved in perpetuity, comprehensive environmental review of the open space conservation is not required.

- 185-7** The comment requests that references associated with Colby Canyon and Colby Canyon trail and stream are removed and requests clarification regarding the community benefits associated with the proposed open space. Please refer to Response to Comment 142-26 regarding Colby Canyon and Colby Canyon trail. The community benefit associated with the proposed open space conservation includes conservation of this open space hillside area. As described in Objective 5 in Final EIR Section 3.2, Project Objectives, advantages associated with this preservation include preservation of a portion of Bailey Canyon and the Bailey Canyon Trail, which would be used by wildlife for movement up and down slope; preserve native vegetation communities and drainages; and preserve land adjacent to the Bailey Canyon stream.
- 185-8** The comment expresses states that the project description is unclear, unstable, and not complete because the project site boundaries have not yet been determined and accurately describes the discussion regarding the proposed lot line adjustment. As discussed in Chapter 3, Project Description, of the Draft EIR, the proposed project site is 17.30 acres and does not include the area already developed as the Mater Dolorosa Retreat Center (see Draft EIR Figure 3-1, Project Location).
- 185-9** The comment references a prior lot line adjustment application that was submitted to the City and returned to the project application for corrections. The comment then references Attachment 4 to the comment letter, which lists six directives the commenter believes the are relevant to any future lot line adjustment related to the project. The attachment also describes the prior lot line adjustment application and makes a statement about the relevancy of a title report attached to the prior lot line adjustment application. None of these comments raise any environmental issues relevant to the Draft EIR or its adequacy. No response is required.
- 185-10** The comment expresses concern relating to the net-zero water impact associated with the project. Please refer to Global Response GR-1.
- 185-11** The comment asks for clarification about the dedicated funding source for the long-term park maintenance. As stated in Draft EIR Section 3.3.2, Neighborhood Park and Open Space, the proposed project would be maintained by a landscape maintenance district or similar public maintenance entity. The proposed project would be located at the southernmost portion of the project site (see Figure 3-3, Proposed Park Conceptual Plan). Maintenance activities associated with the proposed park would include trash removal, landscape maintenance, and maintenance of park facilities such as play structures and picnic areas. Estimated number of employees are not known at this time but it is anticipated that the park would be maintained by existing City staff. The comment also raises economic issues that do not appear to relate to any physical effect on the environment. No further response is required because the comment does not raise an issue related to the adequacy of the Draft EIR.

- 185-12** The comment states that the project description is unclear, unstable, and subject to change because there is a range of sizes in homes, and whether or not they would be one or two stories, and because the architectural design are not stated. Please refer to responses 14-7 through 14-9, above, regarding lot sizes and number of stories. As discussed in Specific Plan Section 3.3, the proposed project would implement a cohesive set of diverse, architectural styles that are intended to complement the architectural diversity of the existing structures of the City. Regarding the commenter’s concern that these details make it impossible to determine if the project is consistent with the City’s General Plan and Ordinances, please refer to Draft EIR Section 4.11, Land Use and Planning, as well as GR-7, General Plan Consistency, for an overview of the project’s consistency with the City’s General Plan policies and applicable plans and ordinances.
- 185-13** The comment states that Objective 5 should be removed. Please refer to Response to Comment 142-26.
- 185-14** The comment expresses concern that there are no details provided to substantiate Objective 6 and that the project would increase safety concerns on this roadway. Draft EIR Section 3.3.6, Access and Circulation Network, provides details regarding improvements proposed within North Sunnyside Avenue. This would include reconfiguration of North Sunnyside Avenue, located within the western portion of the site, which would be moved farther to the west. North Sunnyside Avenue would transition from a width of 40 feet at its existing terminus to a varying 54- to 56.5-foot right-of-way within the project site, with curbs and gutters, parking and planting areas on both sides, a landscaped parkway and sidewalk on the west side, and tree plantings on the east side of the street. The commenter also stated that no improvements to North Sunnyside Avenue outside the boundaries of the proposed project site would occur. However, in order to address commenters’ concerns related to safety issues along Carter Avenue and outside of the boundaries of the proposed project site, the project applicant is proposing off-site widening to Carter Avenue, between the southeastern portion of the project site boundary and Lima Street, which would ensure that Carter Avenue would comply with existing code within and outside of the project site (see Final EIR Section 3.3.12 and Global Response GR-5 for details).
- Regarding the commenter’s safety concerns, please refer to Final EIR Section 4.17.5, Impacts Analysis, in Section 4.17, Transportation. As discussed in this section, the project does not include any project elements that could potentially create a traffic hazard for motor vehicles, bicycles, or pedestrians due to a proposed, non-standard design feature. The proposed project’s circulation system is designed to interconnect with the existing adjacent public street system and discourage cut-through automobile traffic. Access points would not create a hazard for vehicles or people entering or exiting the site. Additionally, the project would not result in a hazardous roadway design or unsafe roadway configuration; place incompatible uses on existing roadways; or create or place curves, slopes, or walls that impede adequate sight distance on a roadway.
- 185-15** The comment states that the details of improvements of Carter Avenue are not clearly explained and expresses safety concerns associated with those improvements. Please refer to Global Response GR-5.
- 185-16** The comment requests an explanation of improvements proposed along Carter Avenue, leading up to the project site. Please refer to Global Response GR-5.
- 185-17** The comment expresses the opinions of the commenter that the development agreement and enhanced connectivity to Bailey Canyon Wilderness Park would not be public benefits. Although the development agreement is not in itself a public benefit, the public benefits associated with the project

would be effectuated through execution of a development agreement between the City and project applicant/landowner. In addition, although access to Bailey Canyon Wilderness Park already exists, pedestrian access to the Bailey Canyon Wilderness Park and trail would be enhanced through a pedestrian path in the southeast corner of the project site as well as a sidewalk along the northern side of Carter Avenue just outside of the proposed project site, which would provide pedestrian access to the entrance/parking lot of the Bailey Canyon Wilderness Park, off of Carter Avenue (see Final EIR Section 3.3.12 for details).

185-18 The comment expresses concern that the alternatives section is insufficient. Please refer to Response to Comment I26-10.

185-19 The comment says that the PDFs outlined in the Draft EIR need to specify what applicable provisions, which was suggested by MIG in the third-party review process. It should be noted that Admin Draft of the Draft EIR that MIG peer reviewed is not the same version as the Draft EIR that went out for public review. This comment, provided by MIG on the Admin Draft EIR, was addressed in the Draft EIR and can be found in Draft EIR Section 3.3.13, Project Design Features, Table 3-2.

185-20 The comment says that the PDFs outlined in the Draft EIR need to specify what applicable provisions, which was suggested by MIG in the third-party review process. See Response to Comment I85-19, above.

185-21 The comment states that PDF-AES-2 exacerbates impacts associated with substantial light and glare to the existing neighborhoods to the south and west.

A discussion has been added to Final EIR Section 4.1.5, Impact Analysis, in Section 4.1, Aesthetics, to address this concern. As disclosed in this section, if installed, solar panels on residential rooftops would be fully integrated into roof designs and would be oriented to the south to maximize exposure to the sun. Modern solar panels are designed to be highly absorbing of incoming light to both maximum energy generation potential and to minimize potential for reflective light (i.e., glare). Typically, the potential for glare associated with solar panels is reduced by the use of anti-reflective coatings (a standard component of modern panel technology) and by the mounting angle of installed panels. Under most circumstances, rooftops panels are installed at a pre-specified and specific tilt/angle in order to maximize exposure to the sun. With typical mounting angles/tilt, the angle of reflective light is similar to the angle of inbound light and as such, any reflective light associated with the panel surface is reflected at an angle and height that is located "higher" in elevation than surrounding land uses. At the project site, the potential installation of solar panels atop detached single-family residences is not anticipated to generate substantial glare that would be received by single-family residences to the south and west due to mounting heights and angles, the greater elevation of the project site (and future single-family residences) in relation to existing residential development to the south, and due to screening associated with the installation of landscaping along the southern and western boundaries of the project site as depicted in the Conceptual Landscape Plan (see Draft EIR Figure 3-5). As discussed above, additional discussion has been added to Draft EIR Section 4.1.5, Impacts Analysis, in Section 4.1, Aesthetics, to further substantiate why impacts relating to solar panel glare would be less than significant.

185-22 The comment asks whether the project would result in a cumulatively considerable net increase in of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard. The comment also asks whether the project would expose sensitive receptors to substantial pollutant concentrations and expresses concern that the project rejects the recommendations made by MIG regarding health and well-being to the community.

As discussed in Draft EIR Section 4.3.5, Impacts Analysis, in Section 4.3, Air Quality, based on the project-generated construction emissions, the project would not result in a cumulatively considerable increase in emissions of nonattainment pollutants. Impacts would be less than significant. In addition, regarding sensitive receptors, construction activities would generate emissions in excess of site-specific LSTs for PM₁₀ and PM_{2.5}; therefore, localized construction impacts during construction of the project would be potentially significant (Impact AQ-1) and mitigation is required. However, mitigation measure MM-AQ-1 would be implemented to reduce localized construction impacts during construction of the project (Impact AQ-1) to less than significant with mitigation. The comments provided by MIG in the third-party review process, including comments related to air quality and health risks associated with air quality impacts were previously addressed in the Public Review version of the Draft EIR.

185-23 The comment states that the project should be held to the standards outlined in MIG's review. It should be noted that Admin Draft of the Draft EIR that MIG peer reviewed is not the same version as the Draft EIR that went out for public review. These comments, provided by MIG on the Admin Draft EIR, have been considered and addressed in the Draft EIR.

185-24 The comment states that the project should use the SCAQMD thresholds of significance as the performance standard for MM-AQ-1 as suggested by MIG as part of the third-party independent review process. Dudek and MIG coordinated in the approach of what threshold to use and ultimately decided to mass based standards. The mitigation measure is in place to reduce emissions PM₁₀, PM_{2.5}, and Diesel Particulate Matter (DPM) emissions from project construction. The mitigation measure is not solely in place to reduce DPM emissions and health risk impacts. As such, the functional equivalent must reduce the same mass emissions to ensure the PM₁₀ and PM_{2.5} mass thresholds for LSTs are not exceeded.

185-25 The comment states MIG's recommendation associated with MM-AQ-1 and diesel PM.

As discussed in Draft EIR Section 4.3, impacts to air quality would be less than significant with implementation of MM-AQ-1. The request made by MIG on the Admin Draft EIR is not necessary to facilitate the emission reductions needed by the mitigation measure. The engine tier level specified in the MM-AQ-1 reduces emissions of PM₁₀, PM_{2.5}, and DPM to below levels of significance. In addition, MM-AQ-1 reduces engine exhaust PM emissions solely. It does not specify or refer to reducing fugitive emissions of PM. While MM-AQ-1 reduces exhaust PM₁₀ and PM_{2.5}, it also reduces total PM₁₀ and PM_{2.5} (which includes fugitive dust PM₁₀ and PM_{2.5}). As additional measures to reduce fugitive dust PM₁₀ and PM_{2.5} are not needed for the project, this addition is not necessary. Furthermore, adding the suggested language by MIG to a mitigation measure that is focused solely on off-road equipment engines would cause confusion for the reader. Nonetheless, MM-AQ-1 has been updated, per MIG's requests, to include specific pathways for which an exemption can be granted an example engine technologies that can be used that are functional equivalents to Tier 4 Interim for reducing engine PM₁₀ and PM_{2.5}. The health risk assessment (HRA) was prepared evaluating emissions of DPM site-wide where construction activity is likely to occur. At this stage in project development, information is not refined enough to parse out the equipment over different regions of the project. As such, if a change in equipment proposed compared to what was evaluated in the Draft EIR, the analysis would be revised consistent with the Draft EIR to evaluate the DPM emissions sitewide, not within specific regions of the site. Therefore, as long as total DPM emissions of the project are the same or less than what was evaluated in the Draft EIR, HRA impacts would be the same or less as what was evaluated in the Draft EIR.

- I85-26** The comment asks what General Plan policies have been removed from the Admin Draft EIR because they are not the responsibility of the project to implement and what is the responsibility of the City and not the project. The policies that apply to the project are listed in Draft EIR Section 4.11, Land Use and Planning, in Table 4.11-1. All other goals and policies listed in the City’s General Plan are not applicable to the project. More specifically, goals and policies not listed in Table 4.11-1 would not apply to the project because they do not geographically cover the project site or because they fall under the responsibility of the City and would not be under the purview and responsibility of the project or project applicant. For example, Goal 7 of Chapter One: Land Use of the General Plan is to “Preserve and enhance the pattern of development in the downtown area to facilitate commerce.” The project is not located in the downtown area of the City and therefore would not apply. For another example, Policy L7.5 calls for “Review and update the R1 Zoning Ordinance and other implementing ordinances every two years…” and Policy L7.6 calls to “Consider implementing a design review process.” Given the nature of these policies, they would be under the responsibility of the City to implement and therefore would not apply to the project.
- I85-27** The comment expresses concern regarding the net-zero water impact. Please refer to Global Response GR-1.
- I85-28** The comment expresses concern regarding the project’s inconsistency with the existing zoning and land use designation of the project site. The commenter is correct that the project is inconsistent with various goals and polices the General Plan but as stated in Draft EIR Section 4.11.5, Impacts Analysis, the conflicts do not result in a significant environmental impact. In addition, as described in Draft EIR Section 3.4, Discretionary Actions, the proposed project would include amendments to the Zoning Code and the City’s General Plan to change the land use designation for the project site from Institutional to Specific Plan. Please refer to Global Response GR-7.
- I85-29** The comment expresses concern with the language used in the consistency analysis of the Draft EIR. Please refer to Global Response GR-7. It should be noted that this comment was provided by MIG on the Admin Draft EIR, which is not the same version as the Draft EIR that went out for public review. These comments, provided by MIG on the Admin Draft EIR, have been considered and addressed in the Draft EIR.
- I85-30** The comment expresses general concerns regarding the adequacy of the project description and consistency analysis presented in the Draft EIR. See Response to Comment I85-12 and I85-29, above.
- I85-31** The comment states that fire analysis is not substantiated by facts as the Sierra Madre Fire Department (SMFD) is understaffed and does not have signed mutual aid agreements for fire protection. The comment also asks for an explanation as to how development fees would mitigate adverse impacts. A comprehensive analysis of the project’s impacts to fire protection services is presented in Draft EIR Section 4.15, Public Services. As stated in Draft EIR Section 4.15.5, Impact Analysis, the current staffing level at the City’s station is at 10 sworn personnel. In response to a request for information, the SMFD noted a fully staffed station would be at 15 sworn personnel with a goal to increase staffing to 21 sworn personnel. However, the SMFD also indicated that existing facilities are sufficient to accommodate the proposed. Payment of development fees by the project applicant, as required by Chapter 15.52 of the SMMC, would be used to offset the costs of increased personnel or equipment that could be required in order to maintain acceptable service ratios, response times, and other performance objectives and impacts would be less than significant.

- I85-32** The comment states that, per comments provided by MIG, the FPP is not specific enough to the project. The purpose of the FPP is to point out what is required by code and the regulations included are what is applicable to the project. Based on the analysis of the fire environment (which is provided in the FPP), it is determined that the project would include necessary protections such that risk is reduced to acceptable levels. This is evidenced by the fire marshal agreeing with the FPP's conclusions and accepting the document.
- I85-33** The comment requests that, per comments provided by MIG, the FPP is modified to be more specific to the project and include an exhibit showing the FPP. See Response to Comment I85-32, above.
- I85-34** The comment states that the "Ready, Set, Go!" approach outlined in the FPP is not a sufficient fire plan. Per the FPP and as discussed in Draft EIR Section 4.20, Wildfire, various additional features will be implemented into the project to address wildfire issues. These include compliance with the enhanced ignition-resistant construction standards of the 2019 CBC (Chapter 7A) and Chapter 5 of the UWI code; incorporation of fire prevention and landscaping standards, per Chapter 17.52 of the SMMC; vegetation management; project site access, including road widths and connectivity, which would be consistent with the City's roadway standards and the 2019 CFC Section 503; and drainage and water quality improvements. In addition, the project would provide for at least 100 feet of FMA around all buildings; 200 feet of FMA on the southern side of the project; 62 to 100 feet of FMA on the eastern side; and over 100 feet of FMA on the northern side. Installation and maintenance of project roads, service utilities, fuel modification, drainage and water quality improvements, and other associated infrastructure would not exacerbate wildfire risks provided that the appropriate fire prevention and vegetation management activities are implemented as required by the FPP and SMMC. Impacts to wildfire would be less than significant.
- I85-35** The comment expresses concern regarding access and evacuation impacts associated with the existing width of both Sunnyside and Carter Avenue leading up to the project. As discussed in Draft EIR Section 4.20, the proposed driveways and roadways (proposed and existing) providing access to the project site would comply with the City's roadway standards and the 2019 CFC Section 503. Additionally, all access roads would meet SMMC standards, requiring roadways to have a minimum 20-foot unobstructed width (30- and 36-foot-wide roadway surfaces are proposed) and a minimum 26-foot width within 25 feet of hydrants. Therefore, the project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant. Please also refer to Global Response GR-4 and Global Response GR-5.
- I85-36** The comment expresses concern regarding access issues the portions of Sunnyside and Carter Avenue that are outside of the project site and will not be widened. Please refer to Global Response GR-5 and Response to Comment I85-35.
- I85-37** The comment expresses concern regarding the project's consistency with General Plan Policy Hz7. Please refer to Global Response GR-3.
- I85-38** The comment expresses concern regarding the project's consistency with General Plan Policy R3.2. Please refer to Global Response GR-3.
- I85-39** The comment describes Draft EIR Section 4.17. The comment is an introduction to comments that follow, related to the transportation analysis.

- 185-40** The comment expresses concern regarding the project's consistency with General Plan Policy L51.2. Please refer to Global Response GR-7. As concluded in Draft EIR Section 4.11, the project would be consistent with this policy because the project would not build any new roadways beyond the project site and would only include the reconfiguration of North Sunnyside Avenue and improvements to Carter Avenue.
- 185-41** The comment expresses concern regarding the project's consistency with General Plan Policy L51.5 as the project would fail to provide bicycle facilities and create safety hazards. As discussed in Draft EIR Section 4.11.5, the proposed project would provide for a circulation system using non-vehicular modes of transportation in a system of pedestrian pathways within the project site. In addition, the proposed project's residents would have access to existing transit facilities, including transit connection for Routes 78 and 268 and stops for the Gateway Coach located at the intersection of North Sunnyside Avenue and West Grand View Avenue and at the intersection of Michillinda Avenue and West Grand View Avenue. Therefore, although the proposed project would not provide new bicycle facilities, the project would be consistent with Policy L51.5. Please refer to Global Response GR-7. Regarding safety concerns, please refer to Response to Comment 185-42, below.
- 185-42** The comment states that the project conflicts with General Plan Objective L52 as the project would increase safety hazards to pedestrians and bicyclists. Please refer to Global Response GR-7. The Specific Plan includes a Mobility Plan, including a Pedestrian Plan, which will improve both North Sunnyside Avenue and Carter Avenue and develop new Streets A, B, and C to provide adequate circulation within the project site. In addition, as described in Draft EIR Section 4.17.5, although no bicycle facilities and improvements are proposed under the project, the project would not impact existing bicycle facilities in the vicinity of the project, including the existing bicycle lanes within Sierra Madre Boulevard. See Response to Comment 147-5 for additional discussion.
- 185-43** The comment states that the project conflicts with General Plan Policy L52.9 as the project would increase safety hazards to pedestrians and bicyclists. Please refer to Response to Comment 185-42, above. As discussed in Draft EIR Section 4.11.5, the proposed project would provide sidewalks throughout the project site and includes a pedestrian path, which would extend from the east side of Carter Avenue and pedestrian access to Bailey Canyon Wilderness Park to the east of the site as well as an additional 6-foot sidewalk on the north side of Carter Avenue, between the southeastern portion of the project site boundary and Lima Street (See Final EIR Section 3.3.12 and Figure 3-11, Proposed Off-Site Improvements and Figure 3-12, Carter Avenue Offsite Improvement Plan). Please refer to Global Response GR-7.
- 185-44** The comment states that there is no good reason or mitigation provided associated with conflicts with General Plan Policy L52.8. Please refer to Global Response GR-7.
- 185-45** The comment states that the project conflicts with General Plan Objective L53 and cites a study prepared by Fehr and Peers. As discussed in Draft EIR Section 4.11.5, the proposed project would extend public access into the project site along North Sunnyside Avenue. Adequate circulation would be provided throughout the project site through development of A, B, and C, and through internal public access along Carter Avenue. Carter Avenue would become an egress and ingress lane and would still allow access to the Mater Dolorosa Retreat Center. Because no existing residential uses would use Carter Avenue or North Sunnyside Avenue for access, the proposed project would not result in intrusive through traffic. These proposed circulation improvements would be used to serve the proposed project

residents and would also allow access to the Mater Dolorosa Retreat Center. Due to their location, these proposed improvements would not result in through traffic in adjacent neighborhoods and the project would be consistent with this policy. Please refer to Global Response GR-7.

Regarding the study cited prepared by Fehr and Peers, the study states that the project would result in a 118% increase in weekday build-out (2025) at the segment of Sunnyside Avenue between the Project site and Fairview Avenue and a 129% increase at the segment of Sunnyside Avenue between the project site and Fairview Avenue, the intent of Objective L53 is to protect residential areas from significant increases in traffic volume created by non-residential sources and/or use of residential streets as a short-cut due to congestion on a major roadway. It is not meant to apply to an extension of a residential area, as this would imply that no residential area could ever be expanded beyond the initial phase. The residential nature of the project is consistent with the adjacent area, such that the site and the surrounding area will become one “neighborhood” with respect to traffic conditions. Please also refer to Global Response 6 (GR-6), Traffic.

185-46 The comment states that the project conflicts with Housing Policy 5.4 as it does not provide bicycle facilities and creates safety hazards to pedestrians. As discussed in Draft EIR Section 4.11.5, the proposed project includes a Mobility Plan, which provides for a circulation system using private vehicular and non-vehicular modes of transportation in a system of public roadways and pedestrian pathways within the project site. Therefore, the proposed project would be consistent with this policy. Please also refer to Global Response GR-7.

185-47 The comment states that the project conflicts with Circulation Goal 2 as it as it does not provide bicycle facilities and creates safety hazards to pedestrians and bicyclists. As discussed in Draft EIR Section 4.11.5, the proposed project would be consistent with this policy and would provide for a circulation system using private vehicular and non-vehicular modes of transportation in a system of public roadways and pedestrian pathways within the project site. These transportation improvements include reconfiguration of North Sunnyside Avenue, located within the western portion of the site; improvements of Carter Avenue; and construction of Streets A, B, and C, which would run east to west within the project site. In addition, a pedestrian path extending from the east side of Carter Avenue would provide pedestrian access to Bailey Canyon Wilderness Park to the east of the site. Sidewalks would also be provided throughout the project site. Lastly, the project applicant is proposing off-site widening to Carter Avenue, between the southeastern portion of the project site boundary and Lima Street, and would include a 6-foot sidewalk within the northern portion of Carter Avenue at this location (see Final EIR Section 3.3.12 and Global Response GR-5 for details). Please refer to Global Response GR-7.

185-48 The comment states that the project conflicts with Circulation Goal 2 as it creates safety hazards to pedestrians and bicyclists. As discussed in Draft EIR Section 4.11.5, the proposed project would extend public access along North Sunnyside Avenue and include new Streets A, B, and C to provide circulation throughout the project site. Carter Avenue would also be improved and would be publicly accessible from within the project site and would become an ingress and egress secondary access road at the southeastern portion of the site. Lastly, the project applicant is proposing off-site widening to Carter Avenue, between the southeastern portion of the project site boundary and Lima Street, and would include a 6-foot sidewalk within the northern portion of Carter Avenue at this location (see Final EIR Section 3.3.12 and Global Response GR-5 for details). The project would implement street sections that slow traffic and create a safe and pleasant small neighborhood environment. Therefore, the project

would create safe and well-maintained streets and be consistent with this policy. Please refer to Global Response GR-5 and Global Response GR-7.

- 185-49** The comment states that the project conflicts with Circulation Goal 3, per a study prepared by Fehr and Peers in 2020. As discussed in Draft EIR Section 4.11.5, the proposed project would extend public access along North Sunnyside Avenue and include new Streets A, B, and C to provide circulation throughout the project site. Carter Avenue would also be improved and would be publicly accessible from within the project site and would become an egress and ingress secondary access road at the southeastern portion of the site. Lastly, the project applicant is proposing off-site widening to Carter Avenue, between the southeastern portion of the project site boundary and Lima Street, and would include a 6-foot sidewalk within the northern portion of Carter Avenue at this location (see Final EIR Section 3.3.12 and Global Response GR-5 for details). Thus, the proposed project would be consistent with Circulation Goal 3. Regarding the study cited prepared by Fehr and Peers, see Response to Comment 185-45.
- 185-50** The comment states that the project conflicts with Objective C30 as it increases safety hazards. The proposed project would extend public access along North Sunnyside Avenue and include new Streets A, B, and C to provide circulation throughout the project site. Carter Avenue would also be improved and would provide secondary egress and ingress access to the site, as well as internal circulation. Lastly, the project applicant is proposing off-site widening to Carter Avenue, between the southeastern portion of the project site boundary and Lima Street, and would include a 6-foot sidewalk within the northern portion of Carter Avenue at this location (see Final EIR Section 3.3.12 and Global Response GR-5 for details). As discussed in Draft EIR Section 4.17, the proposed project would not result in new traffic hazards, including due to a geometric design feature, the proposed project would extend public access along North Sunnyside Avenue and include new Streets A, B, and C to provide circulation throughout the project site. Please refer to Global Response GR-5 and Global Response GR-7.
- 185-51** The comment states that the project conflicts with Objective C30.3 as it does not maintain safety. Please refer to response 185-50.
- 185-52** The comment states that the transportation section ignores safety concerns and traffic impacts. Draft EIR Section 4.17.5 addresses whether or not the project would substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment. Draft EIR Section 4.17 details consistency with existing General Plan policies and objectives highlighting the need for safety. Moreover, the project would include sidewalks along the proposed streets to promote pedestrian safety and mobility within the project site and local vicinity and would not result in a hazardous roadway design or unsafe roadway configuration. Please refer to Global Response GR-6 for information about traffic impacts and Global Response GR-5, related to safety along Carter Avenue.
- 185-53** The comment is an attachment to the comment letter and includes MIG's third party peer review of the Draft EIR, dated June 22, 2021, as well as Dudek's responses during MIG's first and second review of the Draft EIR. It should be noted that this comment was provided by MIG on the Admin Draft EIR, which is not the same version as the Draft EIR that went out for public review. These comments, provided by MIG on the Admin Draft EIR, have been considered and addressed in the Draft EIR. The comments provided by MIG in their third-party review are referenced and addressed in responses 185-19, 185-20, 185-22, 185-23, 185-24, 185-25, 18532, and 185-33, above. No further response is required.

- 185-54** The comment is an attachment to the comment letter and includes a Traffic Conditions with the Proposed Sierra Madre Residential Project Memorandum prepared by Fehr & Peers on November 10, 2020. The City notes that the comment provides background information and does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. The information stated in this memo is referenced and addressed in responses 185-45 and 185-49, above. No further response is required.
- 185-55** The comment includes an email chain between Clare Lin, a Senior Planner at the City, Jonathan Frankel, the project Applicant, Kevork Tcharkhoutian, and Chris Cimino, dated May 3, 2021. The City notes that the comment provides background information and does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. The information stated in this email correspondence are referenced and addressed in response 185-9. No further response is required.
- 185-56** The comment provides continued email response from Kevork regarding Attachment 3 (see Response to Comment 185-55, above). The City notes that the comment provides background information and does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. The information stated in this email correspondence are referenced and addressed in Response to Comment 185-9. No further response is required.

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Comment Letter 186

From: Wendy Thermos <wendythermos@yahoo.com>
Sent: Monday, October 4, 2021 4:55 PM
To: Vincent Gonzalez
Subject: Draft EIR for The Meadows project

CAUTION: This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

After reading the Draft EIR for The Meadows project, I urge you to reject this project.

Several important issues are glossed over or simply not addressed in the Draft EIR, making the proposed project at odds with the city's General Plan and incompatible with the surrounding community.

186-1

One of the most glaring issues is traffic. It's simply unrealistic to claim that 42 homes will have no traffic impacts. The Draft EIR focuses entirely on traffic circulation within the project and fails to address impacts on surrounding neighborhoods. There's no analysis of environmental impacts at all, just an unsupported conclusion that there are no traffic impacts. Where are the traffic studies we were promised? This is a stunning omission.

186-2

Water supply is also given inexcusably short shrift. The developer's claim that the project will have "net zero" water-use relies on fuzzy logic. California, as you surely know, is in a severe, persistent drought. Water rights can't be "guaranteed" into the future, given the increasingly pessimistic projections being made by the state of California and our local water agencies, and no amount of money for purchase of so-called "rights" is going to change that. Granting permission for projects to stick more straws in a diminishing supply not only flies in the face of common sense, it is an insult to those of us who are increasingly being asked to cut our water use. Simply put, we are being asked to cut our water use so that a single property owner and a developer can make a boatload of money.

186-3

Allowing 42 homes to be built in an officially designated extreme-high-fire-danger zone is also inadequately addressed in the Draft EIR, to the point where I'm wondering, Why have an EIR at all? The bottom line is that such construction is completely at odds with Sierra Madre's General Plan. Yet somehow, again, the authors of the Draft EIR see no significant impacts. As with the other flawed statements made in the Draft EIR, granting approval to this claim would be governmental foolishness at its worst.

186-4

Sincerely,
Wendy Thermos
Homeowner on the 400 block of Grove Street for 28 years

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Response to Comment Letter I86

Individual
Wendy Thermos
October 4, 2021

- I86-1** The comment expresses general opposition to the project but does not raise any specific issues concerning the adequacy of the Draft EIR.
- I86-2** The comment is concerned with the potential for traffic impacts in the neighborhoods surrounding the proposed project site. Please refer to Global Response GR-6.
- I86-3** The comment is concerned with potential impacts to water supply and the feasibility of the net zero water-use approach. See Global Response GR-1.
- I86-4** The comment expresses general opposition to the project, and concern with the project site's location in a Very High Fire Hazard Severity Zone, and perceived inconsistencies between the project and the City's General Plan. Please refer to Global Response GR-3 and Global Response GR-7.

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Comment Letter I87

From: Laura Kalayjian <drLaurak@hotmail.com>
Sent: Monday, October 4, 2021 3:01 PM
To: Vincent Gonzalez
Subject: Comment regarding draft EIR for Meadows project

CAUTION: This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Dear Mr. Gonzalez, My name is Laura Kalayjian and I live at 660 Edgeview Dr. Sierra Madre. My phone number is 626-836-9539.

I am commenting on the Draft EIR for the Meadows.

#1 The draft proposes to cut down 10 protected Coast Live Oak trees. A 1:1 replacement is not nearly enough restitution for mature Oak trees. Why didn't the developers incorporate these trees in their plot design. Saving protected oak trees is more in line with the character of Sierra Madre.

#2 Why are there no solar panels on any of these new units? The California solar mandate is a building code that requires new construction homes to have a solar photovoltaic (PV) system as an electricity source. This code, which went into effect on January 1, 2020, applies to both single-family homes and multi-family homes that are up to three stories high.

#3 Who will do the monitoring of the air quality on the construction site and how will that be available to neighboring community? As a parent to children, also known as "sensitive receptors", I want to be able to hold the developer accountable to mitigate the impact of toxic and carcinogenic pollutants as described in the appendix.

Thank you, Laura Kalayjian

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Response to Comment Letter I87

Individual
Laura Kalayjian
October 4, 2021

- I87-1** This is an introductory comment introducing the commenter and comments to follow.
- I87-2** The comment expresses concern over the removal of 10 protected Coast Live Oak trees and states the proposed 1:1 replacement is not enough restitution for mature Oak trees. The commenter asks why the developers didn't incorporate these trees into their design, which would be more in line with the character of Sierra Madre. Please refer to Global Response GR-2.
- I87-3** The comment asks for clarification on whether solar panels will be required. As stated in Table 4.8-6 of Draft EIR Section 4.8, Greenhouse Gas Emissions, the proposed project would include solar roof installations in accordance with the 2019 Title 24 building standards. Draft EIR Chapter 3, Project Description, and Section 4.1, Aesthetics, describe Project Design Feature PDF-AES-2, which would ensure solar panels would comply with requirements outlined in the Specific Plan, which includes the following, to reduce potential for glare:
- Solar panels shall include materials and elements that are consistent with the selected architectural style and shall be fully integrated into the roof design.
 - Solar panels shall be oriented to the south to maximize efficiency and establish visual consistency across buildings.
 - Flashing, sheet metal, and framing should be colored to match the roof material

As the project includes solar roof installations, it would not conflict with the City's General Plan Housing Element Policy 5.3, or the California solar mandate. The future submittal of the TTM will include additional detail regarding solar on the proposed homes.

- I87-4** The comment asks for additional details regarding air quality monitoring during project construction, and requests mitigation for any impacts of toxic and carcinogenic pollutants on sensitive receptors.

An Air Quality and Greenhouse Gas Emissions Analysis Technical Report is included as Appendix B of the Draft EIR. As part of the Air Quality and Greenhouse Gas Emissions Analysis Technical Report, a localized significance threshold (LST) analysis was prepared to determine potential impacts to nearby sensitive receptors during construction of the project. The impacts were analyzed using methods consistent with those in the SCAQMD's Final Localized Significance Threshold Methodology (2009).

This analysis determined that construction activities associated with the project would result in temporary sources of on-site fugitive dust and construction equipment emissions. As shown in Table 4.3-10 of the Draft EIR, with the implementation of Mitigation Measure MM-AQ-1, construction activities would not generate emissions in excess of site-specific LSTs and no impacts to nearby sensitive receptors would occur. MM-AQ-1 would ensure that, "prior to the City's issuance of the demolition and grading permits for the Project, the Applicant shall demonstrate to the satisfaction of the Planning Division that its construction contractor will use a construction fleet wherein all 50-horsepower or greater diesel-powered equipment is powered with California Air Resources Board

(CARB)-certified Tier 4 Interim engines or equipment outfitted with CARB verified diesel particulate filters.” The City of Sierra Madre Planning Division will be responsible for overseeing the implementation of MM-AQ-1. The project contractor is required to abide by the South Coast Air Quality Management District (SCAQMD) rules. The SCAQMD has the discretion to perform random inspections, but the City of Sierra Madre would ultimately be responsible for compliance with mitigation measures.

Comment Letter 188

From: Colleen Allen <angelorum@webtv.net>
Sent: Monday, October 4, 2021 3:22 PM
To: Vincent Gonzalez
Subject: DEIR comments / concerns for the Meadows at Bailey Canyon

CAUTION: This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Dear Mr. Gonzalez,

Thank you for the opportunity to comment on the DEIR for the "Meadows at Bailey Canyon".

Below are my comments. Please retain a copy for the administrative record.

Please respond to these comments in the Final EIR. Thank you.

I am opposed to changing the zoning and building new homes on the Monastery property. Having lived on Grove Street for over 48 years, I am especially concerned about the following issues and how they will impact my neighborhood.

My first concern is fire. Living in a high fire hazard zone, I am concerned that there will not be enough exits for the families exiting the Meadows area. In our past mountain fires, the traffic was so congested on Grove Street, it was bumper to bumper traffic. It was chaotic. The air was filled with smoke, ash and embers. It was difficult to breathe. This caused a sense of panic. In the 1993 Kinneloa Fire, it was most difficult to exit south on Grove Street to Grandview. (Fairview was closed off.) Some of my neighbors had a difficult time exiting their driveways to go south on Grove because the cars coming down our street would not let them merge. In the event of a future disaster, residents of the Meadows exiting on Grove would only worsen the impact on traffic. Currently, Grove Street suffers with added traffic from hikers, especially weekend hikers. They park their vehicles on both the east and west sides of Grove. In the event of an emergency, can a fire truck safely drive past so many parked vehicles?

Earthquakes are another concern. I understand that there are two faults on the building site. Why wasn't this information included in the DEIR? I was here when the main monastery building was demolished due to the 1991 earthquake. Sierra Madre was designated as the epicenter, and it registered a 5.8 on the Richter scale. Grove Street was hit hard! If the main monastery building was so severely damaged as to raze it, why hasn't there been more investigation into the potential seismic hazards of this property? Both future buyers and current residents deserve to know the risks. I would like to see an in depth, independent study done to determine both the seismic safety and potential risks of this building site.

This proposed project requires massive soil excavations. If we experience heavy rains in the future, I can easily foresee mud coming down Grove Street and possibly impacting my property. Back In 1994, there was a flash flood in Bailey Canyon. I recall the day very well. I was hiking through the Monastery when it happened. I could feel the rumble of the earth below me. I think it was the force of the water cascading down the mountains into the basin. A sense of fear overcame me. Immediately, I knew I needed to get home. By the time I arrived, it was raining intensely. Later that day, I learned that two residents lost their lives in the flash flood. Mr. Henderson and his son were hiking in Bailey Canyon when the flash flood swept them up and quickly took their lives. If the proposed project is approved, could this tragedy happen again?

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My last concern is the pedestrian traffic on Carter. I hike up Grove Street to Bailey Canyon on a daily basis. There is a tremendous amount of foot traffic. I would like to see a more in depth study on the pedestrian safety for Carter and Grove Streets.

I 188-8

Thank you for hearing my comments on the DEIR for the Meadows at Bailey Canyon.

I 188-9

Sincerely,

Colleen Allen
431 Grove Street
Sierra Madre, Ca 91024
angelorum@webtv.net

Response to Comment Letter I88

Individual
Colleen Allen
October 4, 2021

- I88-1** The comment is introductory in nature and requests that their comments be responded to in the Final EIR. The City acknowledges this comment, and it is not related to the adequacy of the Draft EIR.
- I88-2** The comment expresses general opposition to the project but does not raise any specific issues related to the adequacy of the Draft EIR.
- I88-3** The comment expresses concern about evacuation during a fire being impacted due to the increase in residents. Please refer to Global Response GR-4.
- I88-4** The comment expresses concern regarding two faults on the project site and that information about the 1991 earthquake was not included. Please refer to response I42-19.
- I88-5** The comment expresses concern related to seismic hazards and previous seismic events that occurred near the project site. The comment requests an independent study investigating seismic hazards. Please refer to response I42-20.
- I88-6** The comment expresses concern about the soil excavations causing mud to flow onto nearby properties in the case of a rainfall event. As stated in Draft EIR Section 4.7, Geology and Soils, the project would have the potential to increase soil erosion on the project site. Impacts are determined to be less than significant with the implementation of PDF-GEO-1 through PDF-GEO-15 as well as Best Management Practices required by the implementation of the project's Stormwater Pollution Prevention Plan.
- I88-7** The comment expresses concern about hazardous flooding that could occur in the area. As stated in Draft EIR Section 4.10, Hydrology and Water Quality, the project does reduce the number of impervious surfaces on the site but does include a new on-site drainage system that would help collect off-site flows and the underground storage would help reduce runoff flow velocity. Impacts related to an increase in flooding would be less than significant.
- I88-8** The comment expresses concern about pedestrian safety on Carter Avenue and Grove Street and would like to see a more in-depth study on pedestrian safety. Please refer to Global Response GR-5. More specifically, in order to address commenters' concerns related to safety issues along Carter Avenue and outside of the boundaries of the proposed project site, the project applicant is proposing off-site widening to Carter Avenue, between the southeastern portion of the project site boundary and Lima Street, which would ensure that Carter Avenue would comply with existing code within and outside of the project site (see Final EIR Section 3.3.12 and Global Response GR-5 for details). These proposed improvements would also assist in further reducing safety impacts on Grove Street.
- I88-9** The comment provides concluding remarks that do not raise new or additional environmental issues concerning the adequacy of the Draft EIR.

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Comment Letter I89

From: Alexander Arrieta <alexanderarrieta23@gmail.com>
Sent: Monday, October 4, 2021 2:57 PM
To: Vincent Gonzalez
Cc: Rachelle Arizmendi; Gene Goss; Robert Parkhurst; Kelly Kriebs; Edward Garcia; Jose Reynoso; Barbara Velluro; Tricia Searcy; MATTHEW BRYANT
Subject: Fwd: DEIR COMMENTS
Attachments: Alex Arrieta DEIR FINAL Comments 10-4-21.docx

CAUTION: This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

October 4, 2021

To: Vincent Gonzalez, Planning Director

232 W. Sierra Madre Boulevard, Sierra Madre, CA 91024
vgonzalez@cityofsierramadre.com.

From: Alex Arrieta

645 Edgeview Drive

Sierra Madre, CA 91024

alexanderarrieta23@gmail.com

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) for the Meadows at Bailey Canyon Specific Plan Project.

Attached are my detailed comments. Please retain a copy for the administrative record.

Please respond to these comments in the Final EIR and please put me on the list of people to notify when the Final EIR is complete.

Overall, I strongly object to this project as it is not at all appropriate or suitable for the City of Sierra Madre and the designated area in which it is located. The proposed project is also significantly inconsistent with our General Plan and Municipal Code. As indicated in my attached comments, there have been no viable alternatives presented for evaluation to compare to this project, which is unacceptable, considering the

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I89-4

significant size, scope and impact of this project. Lastly, the project is opposed by the vast majority of the residents of Sierra Madre.

I 189-5

My specific concerns and comments are listed below in the attached document.

I 189-6

Alex Arrieta

I80-Attachment 1

October 4, 2021

To: Vincent Gonzalez, Planning Director
232 W. Sierra Madre Boulevard, Sierra Madre, CA 91024
vgonzalez@cityofsierramadre.com

From: Alex Arrieta
645 Edgeview Drive
Sierra Madre, CA 91024
alexanderarrieta23@gmail.com

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) for the Meadows at Bailey Canyon Specific Plan Project.

Below are my detailed comments. Please retain a copy for the administrative record.

Please respond to these comments in the Final EIR and please put me on the list of people to notify when the Final EIR is complete.

Overall, I strongly object to this project as it is not at all appropriate or suitable for the City of Sierra Madre and the designated area in which it is located. The proposed project is also significantly inconsistent with our General Plan and Municipal Code. Lastly, the project is opposed by the vast majority of the residents of Sierra Madre. My specific concerns and comments are listed below.

Comments to the Draft Environmental Impact Report (EIR) for the Meadows at Bailey Canyon Specific Plan Project

WILDFIRE RISK

- I. Page 52 Question and Page 282 #7: Would the project expose people or structures either directly or indirectly to a significant risk of loss, injury or death involving wildfires? The DEIR states there are no guarantees that a given structure will not burn during extreme fire conditions, or cause harm to persons. The proposed project site is within 5 miles of where 74 wildfires have burned since the beginning of the historical fire data record. Additionally, the proposed project site is designated as a Local Responsibility Area Very High Fire Hazard Severity Zone by Cal Dept of Forestry and Fire Protection (Cal Fire) **Please state why the impact is less than significant and**

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why no mitigation measures would be required in building 42 homes in this zone.

The 2020 Bobcat Fire burned 116,000 acres and many parts of Sierra Madre needed to be evacuated. The CALDOR Fire, started in August, 2021 and is still not contained. To date it has burnt 221,774 acres and destroyed 782 homes, many of which were constructed of the same fire-retardant materials these homes would be built with. The DEIR states that based on its analysis there would be a fire within 5 miles of the project site on a regular basis. Additionally, the proximity of the project to large expanse of open space to the North (Angeles National Forest) and northeast, and the terrain within the San Gabriel Mountains, has the potential to funnel Santa Ana winds, thereby increasing local wind speeds and increasing wildfire hazard in the vicinity of the project. **Please address the conflict with City policy Hz7 "to avoid expanding development into undeveloped areas in Very High Severity Fire Zones" in the update to the City's Safety Element.**

Please address the conflict of this proposed project with City Policy R3.2 to "ensure that wildland open space, including the areas of the city designated as High Fire Hazard Severity Zone remains undeveloped so as to mitigate the flood cycles that follow wild land fires in the natural open space."

Please state why with the sobering statistics on hundreds of thousands of acres and homes burned in areas just like the proposed project site, built with the same fire-retardant materials but likely with more significant fire department resources, the project insists on building homes in a fire-prone zone. Please state how the project intends to safeguard existing homes and residents.

WATER SUPPLY

1. Page 52: Would the project decrease groundwater supplies? Stating 'NO' is not factual. Interim City Manager, Jose Reynoso, stated in the Planning Commission meeting where the city's water supply was discussed that the developer's 'Net Zero Water Impact' from the project is predicated on the city being able purchase 50 years of water for the 42 homes. However, he indicated that the water is not available for purchase and does not know when the water would be available for purchase. Therefore, this is not a viable option. The city's existing water supply would need to be tapped into for this project, during an extreme drought. Consequently, this not only not a viable option, but will severely impact the city's existing, limited water supply. **Please state that if the water to be purchased under the 'Net Zero Water Impact' is not available as is the case according to the City Manager, how the proposed project would meet the need for 42 homes while not tapping into the existing limited water supply.**

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Cont.

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2. Page 62: Would project have sufficient water resources? **Please state that if the water to be purchased under the ‘Net Zero Water Impact’ is not available as is the case according to the City Manager, how the proposed project would meet the need for 42 homes while not tapping into the existing limited water supply.**

189-18
Cont.

3. Goal 4 of General Plan - Use of local sources of groundwater rather than imported water for new development projects. The project is inconsistent with this policy because it needs to purchase 50 years’ worth of water for the 42 homes. As addressed before, the City Manager has stated this is not an option as the water is not available. **Please state how the project intends to address so that it is not inconsistent with this critical policy, especially in light of the water not being available for purchase.**

189-19

4. Policy Hz2.4 - Consider water availability in terms of quantity. The project is inconsistent with this critical policy of the General Plan because it would need to purchase the water from San Gabriel Water District to achieve Net Zero Impact. As stated previously, the city is not able to purchase this water. **Please state how the project intends to secure sufficient water for this project if the proposed net zero water impact solution is not viable, as we’ve been told by the City Manager.**

189-20

3. Page 294: Hydrology and Water Quality

Objective R14: Ensuring adequate water availability for future growth in the city. **Please state that if the water to be purchased under the ‘Net Zero Water Impact’ is not available as is the case according to the City Manager, how the proposed project would meet the need for 42 homes while not tapping into the existing limited water supply.**

189-21

Objective R15L: Conserving water during times of drought. The State of California is in the midst of the most severe drought in many years and it’s anticipated to get more severe. **Please state how the City plans to conserve water during this time with the addition of 42 homes.** As referenced above, the Net Zero Water Impact ‘solution’ is not factual and therefore not viable since the City Manager indicated the water is not available for purchase. As a result, Sierra Madre residents will be asked to conserve more water. **Please state why existing Sierra Madre residents must be forced to conserve more water so that an additional 42 homes can be built.**

189-22

189-23

189-24

PUBLIC SERVICES

1. Fire Services would be insufficient for additional 42 homes. SM Fire Department current staffing level is 10 staff, but indicates it should be 15 staff with ultimate goal to be at 21 staff. The SM Fire department does not have agreements with other city

189-25

fire departments. **Please indicate how the increased demand for SM Fire Department needs from servicing 42 homes would be met.**

↑ 189-25
Cont.

Page 275 Policy Hz2.5 - Assess the impacts of incremental increases in development density and related traffic congestion on fire hazards and emergency response time, and ensure through the development review process that new development will not re-sult in a redirection of fire protection services below acceptable levels. **Please state how the addition of 42 homes on a new development with limited space for fire-trucks will be serviced effectively. Also, please state how a Sierra Madre Fire De-partment staffed with ten employees that is supposed to be staffed with 15 and ultimately 21 employees will be able to effectively and safely handle the increased demand of 42 homes in a Very High Fire Risk Zone.**

189-26

189-27

AESTHETICS, VIEWS: POLICY L6.2 - Ensure that any new or expanded structures in residential neighborhoods do not unreasonably obstruct significant mountain or basin views.

189-28

Objective L17 - Protecting views to and from hillside areas in order to maintain the im-age and identity of the city as a village of the foothills. P.115 - 4.1.3 Thresholds of sig-nificance. According to Appendix G of the CEQA Guidelines, a significant impact re-lated to aesthetics would occur if the project would have a substantial adverse effect on a scenic vista. 42 homes, most of which are two-story homes, would create a substan-tial adverse effect on a scenic vista.

189-29

Page 116 - 4.1.5 Impacts Analysis: Would the project have a substantial adverse effect on a scenic vista: **Please indicate how scenic vistas of the hills and Monastery meadows which current residents on the West and South Side currently have will be preserved with two story homes being built.**

189-30

ZONING

Page 119 - The land on which the proposed project is based is currently zoned institu-tional and a direct violation of the Sierra Madre General Plan. Therefore the currently proposed project is in direct conflict with the current zoning and inconsistent with the General Plan. The developer uses circular, and frankly moronic reasoning when it states 'if approved, the proposed project would not conflict with the applicable zoning and land use designation, as amendments to the General Plan and Zoning Code would be approved concurrently with the proposed project.' Any proposed development pro-ject must comply with the existing and relevant zoning and General Plan. **Please state how the currently proposed project is in compliance with the current zoning for the land, which is Institutional?**

189-31

Page 146 Further circular and faulty reasoning: "The approval of the Specific Plan would provide zoning and development standards that allow for greater gross floor area,

↓ 189-32

lot coverage...for the new residential development parcels. **Please state why the project applicant should not be held to the same requirement all other Sierra Madre residents are held to, with the relevant General Plan and Zoning requirements be-ing institutional.**

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189-32
Cont.

TAC HEALTH RISKS

The project construction TAC health risk impacts would be potentially significant (Impact AQ-2) and mitigation is required. **Please state what mitigation measures will be im-plemented.**

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189-33

Page 153 'Because construction of the proposed project would exceed the SCAQMD localized significance thresholds for PM10 and PM2.5, the potential health effects asso-ciated with criteria air pollutants are considered potentially significant (Impact Aq-1) and mitigation is required. The proposed mitigation is to use CA Air Resource Board (CARB) certified Tier 4 engines. However, exemptions can be granted. **Please state how this extremely serious health concern can be effectively mitigated when the primary mitigation option can be given an exemption.**

↑
189-34

LOCALIZED SIGNIFICANCE THRESHOLD ANALYSIS

P. 154 **Please state why off-site emissions from vendor trucks, haul trucks and worker vehicle trips are not included in the LST Analysis. As a result, this is not a comprehensive analysis and must be re-done.**

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189-35

TREE PROTECTION

Chapter 1 Land Use of the Sierra Madre General Plan Goal 8: Preserve existing and provide additional open space. Objective L4: Mitigating the impacts of new develop-ment on the City's open space, trees...**Please state how this objective is achieved with the building of 42 homes on the last remaining open space in Sierra Madre and with 100 trees being removed.**

↑
189-36

Chapter 2 - Tree Preservation. Goal 1: Continued preservation and enhancing the City's significant tree resources. **Please state how this goal is achieved with the planned removal of 100 trees. Replacing very mature trees, some that are can-opy, and removal of 10 oak trees that are protected and that would constitute a significant impact if removed, with 24 inch box trees is far from an equitable miti-gation. This is unacceptable and does not meet this critical goal.**

Objective R10: Maintaining and enhancing the City's significant tree resources.

↓

Sierra Madre Municipal Code: Chapter 12.20 (Tree Preservation). It is unlawful to remove any protected tree on any undeveloped property. **Please state how removing 10 protected oak trees is not a direct violation of this code.**

Community Forest Management Plan: Goals: Conserve and expand tree canopy cover equal to no net loss with a gradual increase over time. **Please state how removal of multiple trees that serve as tree canopy on the main Sunnyside Drive is not a direct violation of this goal.**

Page 167: There are 41 special status plant species with four species listed under the Federal and/or California Endangered Species Act on the proposed project land. Additionally, there are 43 special status species with recorded occurrences on the project site. 37 species are listed under the Federal and/or California endangered Species Act. **Please state how building on this land with the aforementioned protected species is not a direct violation of the relevant Federal and/or California Endangered Species Act.**

CONSISTENCY ANALYSIS WITH EXISTING NEIGHBOR HOMES

Table 4.11-1 Projects Consistency with City of Sierra Madre General Plan and Policies

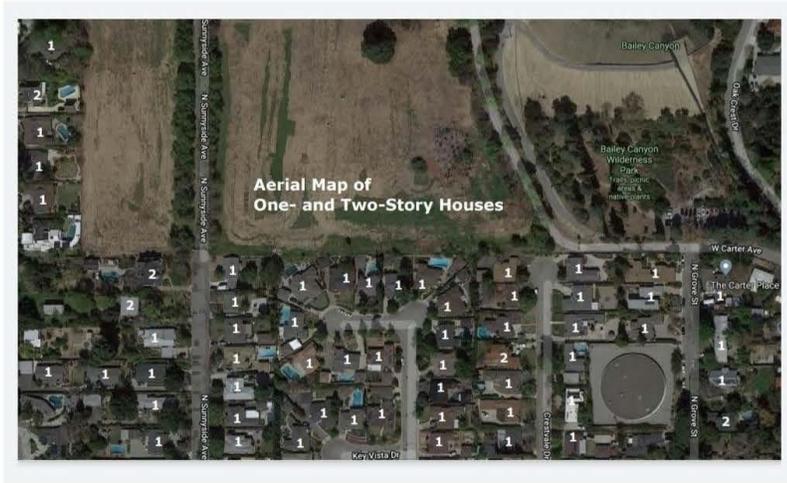
Objective L6: Development that is done in harmony with its neighborhood and preserves and protects the privacy, mountain and basin views of neighboring properties.

189-36
Cont.

189-37

189-38

Please state how this project of 42 homes will protect the privacy and views of existing residents on the South and West side when two story homes will be there blocking visibility.



189-38
Cont.

Policy L20.1 requires that new residential development be compatible with and complement existing structures on the block. The picture above reflects existing homes in the immediate, surrounding blocks being almost entirely single-story homes. However, the proposed project of 42 homes, is planned to be mostly two-story homes with average square footage much larger than existing homes. **Please state how the proposed development is consistent with this critical General Plan policy**

NON-VEHICULAR IMPROVEMENTS

Policy L51-8 - Prioritize improvements for non-vehicular improvements for non-vehicular modes like bicycles, pedestrians and transit to eliminate the need for new or expanded roadways and intersection improvements like traffic signals. The DEIR states the project is inconsistent on this critical policy because the project would not implement this. **Please state how the project intends to address this critical policy.**

189-39

EARTHQUAKE/SEISMIC ASSESSMENT

Policy Hz10.2 General Plan: Conduct a comprehensive geologic investigation to show where active faults pose a hazard to structures. The study that was completed is far from being comprehensive. **Please conduct an exhaustive geologic assessment on seismic risks associated with building within several hundred feet of the Sierra Madre Earthquake Fault.**

189-40

CONSTRUCTION

Construction of the project will result in 68,440 trips by workers during construction. **Please state how this exceedingly high number of additional trips into this small area will not create significant traffic congestion, unhealthy air quality, excessive noise and disruption to existing residents.**

189-41

TRIBAL CULTURAL RESOURCES - 4.18

Seven tribes have not responded to the initial letter sent March 30 about the proposed development potentially having adverse impact on them. During a global pandemic its anticipated response may require secondary communications. **Please state how these seven tribes will be informed of their rights and please issue a second communication to ensure they are informed and have an opportunity to respond.**

189-42

PROJECT ALTERNATIVES

This section must describe a reasonable range of alternatives **sufficient to foster informed decision-making and public participation**. This section, however, provides only one paragraph summary descriptions of alternatives made up of conclusory statements that fail to adequately describe and evaluate the comparative merits of each alternative. There is zero analysis of the environmental impact of the alternatives. Due to the lack of qualitative and quantitative analysis, this section provides insufficient information to meet the requirements for Alternatives Analysis or for any possibility of informed, rational decision-making.

189-43

Please provide factual information and analysis regarding the environmental impact of each alternative sufficient to allow for informed, rational decision-making.

II. ES. 1 Project Location, Project Site at p. ES-1

This section fails to address the problems articulated on page 3 of MIG's June 22, 2021 third-party peer review of the project ("the MIG Review") submitted as an attachment to this comment.

189-44

In this section, the DEIR revises the proposed open space down from 45 to 35 acres and continues to say the “open space dedication area is not considered part of the project site.” As pointed out by MIG, “if this is not part of the project then it should not be referenced as one of the objectives...nor described as a community benefit. If it is part of the project then it should be further described in the project description, including a location map, how it will be provided, how it will be protected, and what it will be used for. If it will be accessible to or otherwise used by the public, it needs to be included in the project description and the environmental setting and analyzed as part of the project.” P.3 MIG Review.

MIG twice made clear that the open space needs to be defined and that “[i]f it will be accessible to or otherwise used by the public it potentially could have, at the least, potential impacts on biological resources, and wildland fire potential. If the actions under this project will not result in access, improvements, or use by the public, then such should be stated and, further that such use or action would be subject to a separate environmental review at a later date if it is made available to the public.” P. 3 MIG Review. This still hasn’t been done.

Is the open space part of the project or not? If not, it must be taken out of the project description and not presented as a community benefit. If it is, it must be clearly described, including how it will be provided, protected, what its use will be, and a separate comprehensive environmental review should be conducted, including, but not limited to, biological resources and wildfire potential, and made available to the public.

II. E.S. 2 Project Description at p. ES-2.

There are three standards that a project description must meet: it must be clear, stable, and finite. The project does not meet this standard because it is unclear, unstable, and not finite as set forth below.

The project description states that it would include “approximately 3.39 acres of open space (including 3.04-acre dedicated neighborhood park) and identifies “open space dedication as a community benefit.”

If 3.04 acres of the 3.39 acres is the park, then that leaves .35 acres of open space. Under Project Location above, the area is identified as 35 acres. In project objective number 5, 30 acres is referenced and the area is clearly misidentified as being near Colby Canyon and Colby Canyon Trail. (see Objective 5. Preserve the hillside open space area by dedicating approximately 30 acres north of the Mater Dolorosa Retreat Center to the City, in order to preserve a portion of Colby Canyon and the Colby Canyon Trail, which would be used by wildlife for movement up and down slope; preserve native vegetation communities and drainages; and preserve land adjacent to the Colby Canyon stream). Colby Canyon is above the city of La Canada nowhere near this project. See map below. Thus, the location, boundaries, and acreage of the “open space” are not clear.

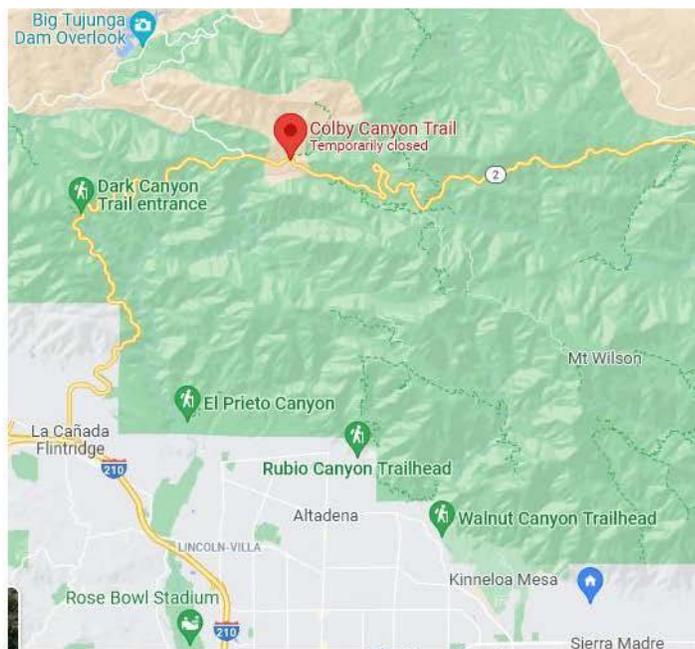
189-44
Cont.

189-45

Please clearly describe and accurately map the proposed "open space" along with identifying how it will be provided, protected, what its use would be and provide a separate comprehensive environmental review as recommended by MIG. See MIG Review p.3.

Please remove all references to preservation of Colby Canyon, Colby Canyon trail and stream as a project objective and/or community benefit and specifically describe what "community benefit" will be provided by any proposed "open space."

189-45
Cont.



189-46

The project description states that, "[c]ommunity benefits would include the new public park, net-zero water impact, establishing a dedicated funding source for long-term park maintenance, and the open space dedication."

It's fatally unclear what this description means. What are the details of the "dedicated funding source for long-term park maintenance?" How much money is being committed, if any, and for how long? Where is it coming from? How much is long term park maintenance expected to cost? What sort of maintenance will be required? Elsewhere it is indicated that the city will need to establish a public maintenance district for the park. Es-

189-47

establishing a new public department and staffing it will cost money—how much is it expected to cost? How many staff will be involved? Where will this new department be located in the city?

↑ 189-47
Cont.

As MIG has confirmed, “[n]et zero water use is not a community benefit: it is no different than the amount of water currently being used and its only benefit is to provide a service to the project similar to utilities, street improvements etc: **remove it from the sentence.**” P.3 MIG Review (emphasis mine).

189-48

All references to “net zero water” as a community benefit should be removed.

The project description is also unclear, unstable, and subject to change with regard to the description of the proposed residences such that it is impossible to determine if the project is consistent with the city’s General Plan and ordinances.

The residential development is described as consisting of “42 detached single-family dwellings ranging from 2,700 to 3,800 square feet with a minimum lot size of 8,500 square feet. The gross density of the project is approximately 2.5 dwelling units per acre. The proposed residences would be one to two stories.” At p.3-3.

189-49

How many of the residences will be two story? The neighboring houses are primarily one story. How many of the lots will be the “minimum lot size of 8,500?” Please state what size *all* the lots are, how many stories each house will be, along with what the designs of the houses will be. None of these significant details are included here or in the SP. Thus, the project description is unclear, unstable, and not finite.

III. E.S.2.1 Project Objectives at p. ES-2

Objective number 5 should be removed (see text below and see comments above). All references to Colby Canyon should be removed as it is nowhere near the project.

189-50

5. Preserve the hillside open space area by dedicating approximately 30 acres north of the Mater Dolorosa Retreat Center to the City, in order to preserve a portion of Colby Canyon and the Colby Canyon Trail, which would be used by wildlife for movement up and down slope; preserve native vegetation communities and drainages; and preserve land adjacent to the Colby Canyon stream.

Please remove Objective number 6 or describe in detail what street improvements are provided for that would “facilitate safe and efficient access.” There are no sidewalks on North Sunnyside which is a narrow, old residential road ending at the monastery gate. Nowhere in this report is there any factual support for achieving this objective—no sidewalks and no street improvements are planned for the street leading up to the project—references are only to the streets inside the project. As it stands, the project will greatly

189-51

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.

189-51
Cont.

189-52

189-53

VI. ES-1 Utilities and Service Systems at p. ES-46: Water

This section asks if there will be sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years and concludes that there will be less than significant impact because “the project applicant will provide funds to the City to purchase supplemental water from the San Gabriel Valley Municipal Water District (SGVMWD) in an amount equal to the anticipated total indoor and outdoor water demand of each residential unit over a 50-year period. This purchase would be in addition to the City’s existing agreement with SGVMWD providing for the purchase of supplemental imported water.”

Please address the facts that the proposed mitigation is not possible because:

- 1) **As admitted by Interim City Manager, Jose Reynoso, water is currently unavailable for purchase and there is no guarantee of future availability;**
- 2) **the agreement calls for the purchase price to be at 2021 rates for the next 50 years when, in fact, price of water will most certainly increase; and**
- 3) **the agreement would need to be in perpetuity to be less than significant impact.**

189-56

VII. Zoning and General Plan Conflicts 4.1-8

The project site is currently zoned Institutional, and the existing General Plan land use designation is also Institutional. The proposed project **is in direct conflict with the zoning code and General Plan** because, among other things, it would change the land use designation to Specific Plan. To say that it is consistent because the Specific Plan would *change* the zoning code and General Plan is oxymoronic. If it were consistent, zoning code and General Plan amendments would obviously not be necessary.

In addition, because the project location and description are so unclear, unstable, and not finite (subject to change) as stated above at pp.1-5, it is impossible to determine whether the project is consistent with the city’s General Plan and ordinances.

189-57

VIII. 4.15.5 Impacts Analysis: Fire Protection

This section asks if the project would result in substantial adverse physical impacts associated with the provision of fire protection services and concludes that “SMFD has reviewed the project and has determined that it would not have a significant effect on service demands....Therefore, through payment of appropriate development fees by the project applicant, the proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities. Impacts would therefore be less than significant.” P. 4.15-9

189-58

The conclusion is not supported by the facts given that the city is already short staffed. A fully staffed fire department consists of 15 firefighters and the City has only 10 and “SMFD does not have any signed mutual aid agreements for fire protection.” p.4.15-1. Please explain *how* payment of development fees would be used to mitigate the adverse impact of overburdening an already overburdened fire department and explain the grounds for SMFD’s determination that the project would not have a significant impact on services demands.

189-58
Cont.

IX. Wildfire

This section describes the existing wildfire conditions within the vicinity, regulations, and a Fire Protection Plan (FPP).

As indicated in the MIG review, the Fire Protection Plan “is not really a clear-cut plan for fire protection... it is an amalgam of often generic narrative reference already existing fire safety regulations, and information not specific to the project: it is difficult to sort what is being provided for the site in terms of fire protection that is not already required.” p. 5 MIG Review.

Please implement MIG’s recommendation “that the FPP be modified to be more project specific **including an exhibit showing the FPP.**” (emphasis theirs). As it stands, the FPP is, according to MIG, “an artifice of a plan that really is just compliance with existing regulations.” p. 5 MIG Review.

189-59

The Fire Plan is exceptionally important given Sierra Madre’s history of fire and it is a source of great anxiety in the community that this be properly addressed. Right now the plan appears to place responsibility on individuals stating that “each property owner would be individually responsible to adopt, practice, and implement a “Ready, Set, Go!” approach to site evacuation.” p.4.20-10. It’s hard to imagine how this could be a sufficient fire plan.

With regard to access and evacuation, the section on roads at 4.20-13 fails to address the significant problem that there is not adequate ingress and egress due to the condition and width of both Sunnyside and Carter leading into the project.

It states that, “[t]he project would include reconfiguration of North Sunnyside Avenue, located *within the western portion of the site*, which would be moved farther to the west. In addition, the project would result in improvements to Carter Avenue to provide secondary egress and ingress access to the site.” p. 4.20-13 (emphasis mine). Further it is incorrectly asserted that, “All roads comply with access road standards of not less than 24 feet, unobstructed width and are capable of supporting an imposed load of at least 75,000 pounds.” P. 4.20-13. This is not accurate —Carter is 20 feet in width.

189-60

How will Carter be improved to provide adequate ingress and egress when the County will not allow it to be widened? No improvements are mentioned for the portion of Sunnyside leading up to the project that would make it a viable access road either.

Please address the conflict with City policy Hz7 “to avoid expanding development into undeveloped areas in Very High Severity Fire Zones” in the update to the City’s Safety Element.

189-61

Please address the conflict with City Policy R3.2 to “ensure that wildland open space, including the areas of the city designated as High Fire Hazard Severity Zone remains undeveloped so as to mitigate the flood cycles that follow wild land fires in the natural open space.”

X. 4.17 Transportation at p. 4.17-1 at pp. 4.17-3-4

This section describes the existing transportation conditions, evaluates potential impacts and mitigation measures.

This section fails to adequately address conflicts with the following city policies:

Policy L51.2: Limit the development of new roadways or the expansion of existing roadways.

The project conflicts directly with this policy by developing new roadways (3 new streets) and expanding existing roadways (Carter and Sunnyside, although it’s unclear what the project will do, if anything, to existing roadways.

No facts have been presented to support the conclusion that the project is consistent with this policy. Please provide factual support for this conclusion.

Policy L51.5: Encourage and support the use of non-automotive travel throughout the City.

The project conflicts directly with this policy by failing to provide bicycle facilities and creating safety hazards for pedestrians on surrounding streets.

189-62

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.

189-62
Cont.

189-63

189-64

The project conflicts with this policy by *greatly increasing safety hazards* for pedestrians and cyclists on the surrounding streets. Neither north Sunnyside nor Carter has sidewalks, the roads are narrow, and both streets are used by many pedestrians walking the neighborhood and visiting Bailey Canyon Park. Families park on nearby Grove Street and walk in the street up to Bailey Canyon because there are no sidewalks and will be put at increased danger by the significant increase in cross traffic.

There are no facts to support this conclusion that the project is consistent with the goal of safe and well-maintained streets.

If there are any facts, particularly with regard to the surrounding streets that lead up to the project that support the conclusion that the project is consistent with this goal, please provide them. Has any study been done/will any study be done to determine the impact on safety for pedestrians? Is there any plan to improve the poor condition of Carter? What is the plan?

Circulation Goal 3. Preservation of quiet neighborhoods with limited thru traffic.

The November 10, 2020 Fehr and Peers traffic study (attached) establishes that by project completion there will a 118% increase in traffic on weekdays and 129% increase in traffic on weekends. Given these facts, it is indisputable that the project will create significant intrusion of thru traffic, disturbing the surrounding quiet neighborhood and conflicting directly with this policy.

There are no facts in this section that support the conclusion that the project would preserve quiet neighborhoods with limited thru traffic. If there are any facts that support for the conclusion that the project is consistent with this policy, please provide them.

Objective C30: Improving traffic safety.

The project conflicts with this policy by *greatly increasing safety hazards* for pedestrians and cyclists on the surrounding streets. Neither north Sunnyside nor Carter has sidewalks, the roads are narrow, and both streets are used by many pedestrians walking the neighborhood and visiting Bailey Canyon Park. Families park on nearby Grove Street and walk in the street up to Bailey Canyon because there are no sidewalks and will be put at increased danger by the significant increase in cross traffic.

There is nothing in this section to indicate how the project could improve traffic safety in any way. If there are any facts that support for the conclusion that the project is consistent with this objective, please provide them. Please indicate if any safety study has been done and, if not, why not?

Policy C30.3: Maintain safety and efficient circulation without impacting the village atmosphere.

189-64
Cont.

See above response to Objective C30. There is nothing in this section to indicate how the project could maintain safety and efficient traffic circulation. If there are any facts to support the conclusion that the project is consistent with this policy, please provide them. Please indicate if any safety study has been done and, if not, why not?

Overall, this section completely ignores the significant safety concerns and traffic impacts on the surrounding community by focusing on the streets inside the development to the exclusion of the impact on the neighboring streets. How exactly is the project going to deal with these problems?

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I89-64
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I89-65
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Response to Comment Letter I89

Individual
Alexander Arrieta
October 4, 2021

- I89-1** This comment requests the following comments (Comments I89-2 through I89-66) be included in the responses to comments of the Final EIR. As shown, the commenter's request has been recorded as part of this Final EIR.
- I89-2** The comment expresses general opposition for the project. The comment does not raise any specific issue concerning the adequacy of the EIR; therefore, no further response is required or provided.
- I89-3** The comment states that the proposed project is inconsistent with the City of Sierra Madre General Plan as well as the Municipal Code. Please refer to Global Response GR-7.
- I89-4** The comment is concerned with the range of reasonable alternatives considered in the Draft EIR. Please refer to Response to Comment I26-10.
- I89-5** The comment expresses general opposition for the project. The comment does not raise any specific issue concerning the adequacy of the Draft EIR; therefore, no further response is required or provided.
- I89-6** The comment references an attachment to the comment letter. This comment is an introduction to the ones that follow and does not relate to the adequacy of the Draft EIR.
- I89-7** This comment is introductory in nature and does not raise any specific issue concerning the adequacy of the Draft EIR. Please refer to Response to Comment I89-1.
- I89-8** The comment and expresses general opposition to the project. The comment does not raise any issue concerning the adequacy of the Draft EIR; therefore, no further response is required or provided.
- I89-9** The comment is concerned with the project's consistency with the City of Sierra Madre General Plan as well as the Municipal Code. Please refer to Global Response GR-7.
- I89- 10** The comment is an introduction to comments that follow and is not related to the adequacy of the Draft EIR.
- I89- 11** The comment reiterates information about existing wildfire risk conditions. This information can be found in Draft EIR Section 4.9, Hazards and Hazardous Materials. The comment does not raise any specific issue related to the adequacy of any specific section or analysis of the Draft EIR. Therefore, no further response is required or provided.
- I89-12** The comment asks why the impact is less than significant and why no mitigation would be required for project implementation. Please refer to Global Response GR-3. As stated in Draft EIR Section 4.9 and Section 4.20, Wildfire, the project would be required to adhere to the design measures provided in the FPP (see Draft EIR Appendix F2). The purpose of the FPP is to assess potential impacts and identify ways to mitigate those impacts for the specific project area. The FPP includes measures such as using ignition resistant construction materials and fuel modification around homes. There is no mitigation required as impacts would be less than significant.

- 189-13** The comment discusses general fire history in the City and California as a whole and notes that many of the homes destroyed in the fires were constructed with the same fire-retardant materials that are suggested for the proposed project. As discussed in the FPP (Appendix F2), there are no guarantees that a given structure will not burn during extreme fire conditions.
- 189-14** This comment restates information about fire being expected within 5 miles of the project site on a regular basis as well as an increased wildfire hazards near the project. The City notes this information on fire history. The comment is not related to the adequacy of the Draft EIR.
- 189-15** The comment is concerned with potential conflicts between the project and City Policy Hz7 from the Draft Safety Element Update (now the adopted Hazard Prevention Element). Please refer to Global Response GR-3.
- 189-16** The comment is concerned with potential conflicts between the project and Policy R3.2 from the Draft Safety Element Update (now the adopted Hazard Prevention Element). Please refer to Global Response GR-3.
- 189-17** The comment expresses concern about homes being built in a fire prone area and asks how the project intends to protect existing homes and residents. Please refer to Global Response GR-3.
- 189-18** The comment expresses concern related to decrease in groundwater supplies, availability of water to be purchased under the project's net-zero water impact and impacts to the City's water supply under extreme drought. It should be noted that the SMWD has determined that there would be adequate water supply and water is available for purchase. Please refer to Global Response GR-1. In addition, the project's impact to groundwater was addressed in Draft EIR Section 4.10.5, Impacts Analysis, in Section 4.10, Hydrology and Water Quality. As discussed in this section, the project would not substantially decrease groundwater supplies or interfere with groundwater recharge. Therefore, impacts associated with groundwater supplies and recharge would be less than significant.
- 189-19** The comment is concerned with the project's inconsistency with Goal 4 of the General Plan. Please refer to Global Response GR-7. Regarding inconsistency with Goal 4, use of local sources groundwater rather than imported water, the project would not result in a significant environmental impact on water supplies (see Global Response GR-1). Therefore, this inconsistency would not result in a significant environmental impact (see Final EIR Section 4.11, Land Use and Planning). Regarding the availability of water to be purchased under the project's net-zero water impact, please refer to Global Response GR-1.
- 189-20** The comment is concerned with the project's consistency with Policy Hz2.4 of the General Plan. The commenter also asks how water would be secured if water is not available for purchase under the project's net-zero water impact. Please refer to Global Response GR-1. As discussed in Final EIR Section 4.19.5, supplemental water is not available for purchase, the applicant would provide funds to the City to support the creation of a lawn retrofit program or improvements to existing water infrastructure, which achieve a commensurate level of water reduction. In addition, it should be noted that in Final EIR Section 4.11.5, Impacts Analysis, in Section 4.11, Land Use and Planning, in Table 4.11-1 it was determined that the project is consistent with this policy as the proposed project would achieve a net-zero impact on local water supplies through the purchase of supplemental water in order to offset the demand placed on existing supplies and provide supplemental water to the City, available to serve the public; creation of a lawn retrofit program; or improvements to existing water

infrastructure, such as pipe leakage fixes (see PDF-UTL-1 in Final EIR Section 4.19.4, Project Design Features). As determined in Draft EIR Section 4.19 (with clarifying revisions made in the Final EIR Section 4.19), there would be adequate water availability to meet the demand of the proposed project. Additionally, the proposed project would include a new water system within the planned roadways consisting of a network of mainlines for potable water delivery to the site.

- 189-21** The comment refers to Objective R14 of the General Plan and asks how water would be secured if water is not available for purchase under the project's net-zero water impact. Please refer to Global Response GR-1, and Response to Comment 189-20.
- 189-22** The comment refers to Objective R15L of the General Plan asks how the City plans to conserve water in time of drought with the addition of 42 homes. Please refer to Global Response GR-1. In addition, as concluded in Table 4.11-1, in Final EIR Section 4.11.5, the project would be consistent with this policy through the purchase of supplemental water to offset additional demand.
- 189-23** The comment is concerned with the viability of the project's net-zero water impact solution. Please refer to response to Global Response GR-1 and Response to Comment 189-20.
- 189-24** The comment is concerned with the potential for Sierra Madre residents to have to conserve more water as a result of the project. However, residents will not be forced to conserve more water as a result of this project. The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. Therefore, no further response is required or provided.
- 189-25** The comment is concerned with the sufficiency of fire service. As stated in Draft EIR Section 4.15.5, Impacts Analysis, in Section 4.15, Public Services, payment of development fees by the project applicant would be used to offset the cost of increased personnel or equipment that could be required to maintain service levels. SMFD reviewed the Draft EIR and determined that impacts would be less than significant.
- 189-26** The comment refers to Policy Hz2.5 and asks how new homes in a new development with limited space for firetrucks would be serviced effectively. As concluded in Table 4.11-1, in Draft EIR Section 4.11.5, the project would be consistent with this policy. In addition, SMFD has reviewed the project and has determined that it would not have a significant effect on service demands. Through payment of appropriate development fees by the project applicant, the proposed project would ensure adequate service levels of fire protection. Please refer to Global Response GR-4.
- 189-27** The comment asks how the SMFD would be able to effectively and safely handle the increased demand of the 42 homes in a VHFHSZ. Please refer to Global Response GR-3 and Draft EIR Section 4.15, Public Services.
- 189-28** The comment refers to Policy L6.2 of the General Plan. Please refer to Global Response GR-7. In addition, as discussed in Draft EIR Section 4.11.5, Impact Analysis, of Section 4.11, Land Use and Planning, the project would be consistent with Policy L6.2, as the proposed project is designed in a manner that is sensitive to scenic viewpoints and/or viewsheds through building design, site layout, and building heights.

- 189-29** The comment refers to Objective L17 from the General Plan and is concerned with potential impacts to scenic vistas. Please refer to Response to Comment I76-16.
- 189-30** The comment is concerned with potential impacts to private views of hills and meadows as well as scenic vistas. Please refer to Response to Comment I76-16 and I77-7.
- 189-31** The comment is concerned with the project's inconsistency with the site's existing zoning designation. The commenter is correct that the project would require a zoning designation change. Please refer to Global Response GR-7.
- 189-32** The comment is concerned with the project's need for zoning designation change. Please refer to Global Response GR-7.
- 189-33** The comment asks what mitigation measures would be implemented to mitigate Impact AQ-2, related to TAC health risks. As stated in Draft EIR Section 4.3, Air Quality, MM-AQ-1, which includes requirement of Tier 4 construction equipment, would reduce Impact AQ-2 to less than significant levels.
- 189-34** The comment expresses concern about the exemption within mitigation measure MM-AQ-1. MM- AQ-1 states:

An exemption from this requirement may be granted if: (1) the Applicant documents equipment with Tier 4 Interim engines are not reasonably available, and (2) functionally equivalent diesel PM emission totals can be achieved for the project from other combinations of construction equipment (Tier 3 with level 3 diesel particulate filter, electric, compressed natural gas, hydrogen, etc.). For example, if a Tier 4 Interim piece of equipment is not reasonably available at the time of construction and a lower tier equipment is used instead (e.g., Tier 3), another piece of equipment could be upgraded to a Tier 4 Final or replaced with an alternative-fueled (not diesel-fueled) equipment to offset the emissions associated with using a piece of equipment that does not meet Tier 4 Interim standards. Before an exemption may be granted, the Applicant's construction contractor shall: (1) demonstrate that at least two construction fleet owners/operators in Los Angeles County were contacted and that those owners/operators confirmed Tier 4 Interim equipment could not be located within Los Angeles County during the desired construction schedule; and (2) the proposed replacement equipment has been evaluated using the California Emissions Estimator Model (CalEEMod) or other industry standard emission estimation method, and documentation provided to the Planning Division confirms that necessary project-generated functional equivalencies in the diesel PM emissions level are achieved.

The exemption would not be granted if the contractor only demonstrates that one of these conditions are met. If the exemption was granted, diesel PM emission levels would need to be reduced below the same threshold as the emissions produced if Tier 4 Interim engines were available. Therefore, given that diesel PM levels would be functionally equivalent with implementation of this exemption, impacts would remain less than significant with the implementation of this mitigation measure.

- 189-35** The comment asks why off-site emissions from vendor trucks, haul trucks, and worker vehicle trips are not included in the LST analysis. As stated in Draft EIR Section 4.3.5, Impacts Analysis, according to the SCAQMD’s Final Localized Significance Threshold Methodology “off-site mobile emissions from the project should not be included in the emissions compared to the LSTs.”¹¹ As SCAQMD is the regional agency responsible for regulation and enforcement of air quality policy and regulations, SCAQMD methodology was used.
- 189-36** The comment is concerned with the project’s consistency with the City’s tree protection policies and regulations of the General Plan, Municipal Code, and Forest Management Plan. Please refer to Global Response GR-2.
- 189-37** The comment expresses concern over how the project would impact special status species protected under the Federal/California Endangered Species Act. As concluded in Draft EIR Section 4.4.5, Impacts Analysis, of Section 4.4, Biological Resources, impacts to special status species would be less than significant.
- 189-38** The comment is concerned with the project’s consistency with General Plan policies regarding neighborhood compatibility. As concluded in Draft EIR Section 4.11, the project is consistent with Objective L6 and Policy L20.1 of the General Plan through development regulations and design guidelines to be compatible with the surrounding development and natural landscape. The project would be designed to be sensitive to scenic viewpoints with site layout and building heights. It should be noted that impacts to private views are not considered environmental impacts pursuant to CEQA. Nonetheless, design guidelines for the proposed project specifically are designed to protect the privacy of adjacent neighbors and would avoid balconies with overlooking views into adjacent properties.
- 189-39** The comment expresses concern regarding inconsistency with Policy L51.8, as the project would not implement bicycle facilities. Policy L51.8 prioritizes alternative forms of transportation to eliminate need for expansion of roadways, the project would not impact existing bicycle facilities, but would ultimately expand roadways and not provide bicycle facilities. Not constructing bicycle facilities, as required to be consistent with Policy L51.8, would not result in significant environmental impacts. Explanations as to why the project is consistent or inconsistent with certain polies can be found in Final EIR Table 4.11-1. Please refer to Global Response GR-7.
- 189-40** The comment asks for a comprehensive geologic assessment to be conducted for the project site. A geologic assessment was performed for this project site and can be found in Appendix E. As stated in Draft EIR Section 4.7, Geology and Soils, with the implementation of PDF-GEO-1 through PDF-GEO-15 and MM-GEO-1, seismic risks would be reduced to less than significant level.
- 189-41** The comment expresses concern about the trips generated by construction vehicles and how the increase in trips would impact traffic, air quality and noise. The construction emissions associated with the proposed project, including vehicle trips related to construction, have been addressed in Draft EIR Section 4.3.5. Similarly, noise impacts associated with construction, including vehicle trips related to construction, have been addressed in Draft EIR Section 4.13.5, Impacts Analysis, in Section 4.3, Noise. As discussed in both sections, air quality and noise impacts associated with the project would be less than significant. Regarding traffic, please refer to Global Response GR-6.

¹¹ SCAQMD. 2009. Final Localized Significance Threshold Methodology. Revised July 2009.

- 189-42** The comment asks that tribes that have not yet responded to the notification of the project to be sent additional communication for them to have an opportunity to respond. The time frames for invitations to consult, responses to invitations to consult, and the closing of the formal consultation process is set by state statute. As stated in Draft EIR Section 4.18, Tribal Cultural Resources, the NAHC provided the City with a list of eight Native Americans who should be contacted pursuant to SB 18 and AB 52 because of their cultural affiliation to the project site and surrounding area. In compliance with AB 52, the City contacted all tribal representatives that have requested formal project notification on March 30, 2021. In compliance with SB 18, the City contacted all NAHC-listed traditionally geographically affiliated tribal representatives on March 30, 2021. One Native American Contact, Gabrieleño Band of Mission Indians-Kizh Nation, responded to the City's notification letter on April 5, 2021, and indicated that the project site is within the Gabrieleño Band of Mission Indians-Kizh Nation ancestral territory and requested to engage in formal consultation. The City has engaged in consultation with the tribe, the details of which are provided in Draft EIR Section 4.18.
- 189-43** The comment is concerned with the level of environmental analysis performed for the project alternatives. Please refer to Response to Comment I26-10 and Chapter 8, Alternatives, of the Draft EIR for detailed analysis of each alternative.
- 189-44** The comment states that the open space has not been defined, asks what the benefit is to the community, and asks if open space would be available to the public. The open space has been defined in Figure 3-4 of the Draft EIR. Project Objective 5 describes the benefits of the open space easement, which include in preservation of a portion of Bailey Canyon and the Bailey Canyon Trail, which would be used by wildlife for movement up and down slope; preservation of native vegetation communities and drainages; and preservation of land adjacent to the Bailey Canyon stream (see Final EIR Section 3.2, Project Objectives). This open space area would not be open to the public. Also, please refer to response I85-6 which discusses that, because no development is proposed in this area, and because the area would be conserved in perpetuity, comprehensive environmental review of the open space conservation easement is not required.
- 189-45** This comment requests clarification on the open space areas within the project. Specifically, the commenter asks where the remaining 0.35 acres of open space would be located on the project site. As discussed in Draft EIR Section 3.3.2, Neighborhood Park and Open Space, the development of an approximately 3.04-acre neighborhood public park at the southernmost portion of the project site as well as development of approximately 0.35 acres of passive open space located to the east of North Sunnyside Avenue and west of Carter Avenue, adjacent to Streets A and B (Please refer to Figure 3- 2, Conceptual Site Plan). This comment also states that the name Colby Canyon is incorrectly used. Please refer to Response to Comment I42-26. In addition, Draft EIR Figure 3-4 shows the approximately 35 acres of open space hillside land to be conserved, located north of the existing Mater Dolorosa Retreat Center. Lastly, Final EIR Chapter 3 includes a few additional clarifications related to the project description, including a few errors correcting the open space deduction from 30 acres to 35 acres. These revisions do not raise new or additional environmental issues concerning the adequacy of the Draft EIR.
- 189-46** This comment identifies that the name Colby Canyon is incorrectly used. Please refer to Response to Comment I42-26. The comment also asks what community benefit would be provided by the open space. As stated in Draft EIR Section 3.2, the open space would be used for wildlife movement, preserve native vegetation communities and drainages, and preserve land adjacent to Bailey Canyon Stream.

- 189-47** The comment restates information included in the Draft EIR related to community benefits and asks for clarification about the dedicated funding source for the long-term park maintenance. Please refer to response I85-11.
- 189-48** The comment states that net-zero water is not a community benefit. However, the net-zero water solution minimizes the project’s burden on existing City infrastructure and further reduces the impact on the environment. Please refer to Global Response GR-1, for additional information related to net-zero water impact.
- 189-49** The comment is concerned about project description details, including the proposed range of home sizes and home stories (both one- and two-story homes). Please refer to response I85-12.
- 189-50** The comment requests that Objective 5 be removed as the reference to Colby Canyon is incorrect. Please refer to Response to Comment I42-26.
- 189-51** The comment asks how the project would facilitate safe and efficient access outlined in Objective 6 and expresses concern about the lack of improvements to streets outside of the project. The comment expresses concern about Carter Avenue being used as ingress and egress to the project site and notes that the current state of West Carter Avenue needs improvement if it will be used as an ingress and egress before the implementation of the project and should be a cost paid by the development. Please refer to Global Response GR-5. It should be noted that the project applicant is proposing off-site widening to Carter Avenue, between the southeastern portion of the project site boundary and Lima Street, including a 6-foot wide sidewalk along the northern portion of Carter Avenue (see Final EIR Section 3.3.12 and Global Response GR-5 for details).
- 189-52** The comment is concerned with whether the enhanced connectivity to Bailey Canyon Wilderness Park would provide a community benefit given that there is already public access to the park. Although public access to Bailey Canyon Wilderness Park already exists, pedestrian access to the Bailey Canyon Wilderness Park and trail would be enhanced through a pedestrian path in the southeast corner of the project site as well as a sidewalk along the northern side of Carter Avenue just outside of the proposed project site, which would provide pedestrian access to the entrance/parking lot of the Bailey Canyon Wilderness Park, off of Carter Avenue (see Final EIR Section 3.3.12, Neighborhood Park and Open Space for details). The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. Therefore, no further response is required or provided.
- 189-53** The comment express concerned with the proposed PDFs related to aesthetics. Please refer to response I85-21.
- 189-54** The comment request that the Draft EIR apply SCAQMD thresholds of significance as the performance standard for MM-AQ-1, as suggested by MIG as part of the third-party independent review process. Please refer to responses I85-22 through I85-25, above. Dudek and MIG coordinated on the approach of what threshold to use and ultimately decided to mass based standards. The mitigation measure is in place to reduce PM₁₀, PM_{2.5}, 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 PM₁₀ and PM_{2.5} mass thresholds for LSTs are not exceeded.

- 189-55** The comment asks what General Plan policies have been removed because they are not the responsibility of the project to implement and what is the responsibility of the City and not the project. Please refer to Response to Comment I85-26.
- 189-56** The comment expresses concern over the feasibility of the net-zero water solution. Please refer to Global Response GR-1 and Response to Comments I85-27 and I89-18.
- 189-57** The comment is concerned with the project's inconsistency with the project site's existing Zoning Code and General Plan land use designations. Please refer to Global Response GR-7.
- 189-58** The comment expresses concern regarding how payment of development fees would be used to mitigate impacts to fire services. Please refer to Response to Comment I89-25.
- 189-59** The comment states that the FPP should be more project specific and that the FPP places responsibility on individuals for fire planning. The comment is concerned with the sufficiency of the "Ready, Set, Go!" approach outlined in the FPP. The FPP is general and relies on what is required by code because the purpose of the regulations is to help reduce fire hazards. Based on the analysis of the fire environment (which is provided in the FPP), it was determined that with the planned approach for wildfire protection, which includes fuel modification zones, ignition resistant structures, access providing primary and secondary alternatives, water and fire flow to the code, etc., the project would have all the necessary protections such that wildfire risk is reduced to acceptable levels. This is evidenced by the fire marshal agreeing with the FPP's conclusions and accepting the document. The responsibility of implementing these policies does not fall on individuals. See response I85-34 regarding the "Ready, Set, Go!" approach.
- 189-60** The comment expresses concern about the adequacy of Carter Ave being used for ingress and egress in the case of evacuation. Please refer to Global Response GR-4 and Global Response GR-5.
- 189-61** The comment expresses concern with the project's potential inconsistency with Policy Hz7 and R3.2 from the Draft Safety Element Update (now the adopted Hazard Prevention Element). Please refer to Global Response GR-3.
- 189-62** The comment states that the project is inconsistent with policies and objectives relating to transportation in the general plan. Please refer to Global Response GR-7, Final EIR Section 4.11, Land use and Planning, and Final EIR Section 4.17, Transportation.
- 189-63** The comment states that the project would result in significant traffic impacts and would be inconsistent with Objective L53 of the general plan. Please refer to Global Response GR-6 and Global Response GR-7.
- 189-64** The comment states that the project is inconsistent with policies and objectives relating to transportation and safety in the general plan, specifically related to walking and bicycling. Please refer to Global Response GR-7 as well as Final EIR Section 4.11, Land use and Planning, and Final EIR Section 4.17, Transportation.
- 189-65** The comment expresses general concern about safety and traffic on neighboring streets by focusing roadway improvements within the boundaries of the project site. Please refer to Response to Comment I85-52, Global Response GR-5. More specifically, in order to address concerns related to safety issues along Carter Avenue and outside of the boundaries of the proposed project site, the

project applicant is proposing off-site widening to Carter Avenue, between the southeastern portion of the project site boundary and Lima Street, which would ensure that Carter Avenue would comply with existing code within and outside of the project site (see Final EIR Section 3.3.12 and Global Response GR-5 for details).

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Comment Letter I90

From: john clarke <jack1947cool@gmail.com>
Sent: Monday, October 4, 2021 3:02 PM
To: Vincent Gonzalez
Subject: DraftEIR Comments

CAUTION: This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Please include my comments on the Draft EIR for response in the final EIR.

I 190-1

Neighbourhood Incompatibility: The Project is incompatible with the surrounding neighbourhood and fails to capture the true spirit of the neighbourhood. The 42 homes are larger and on smaller lots; the Project has an over abundance of two story homes while the neighbourhood has primarily one story homes; the Project has sidewalks and wide roads while the neighbourhood has no sidewalks and narrow roads; the Project will remove mature trees while the neighbourhood is full of trees that provide shade and beautiful canopies.

I 190-2

Traffic Dangers: The Project creates severe traffic and safety issues for the residents of Carter, Grove, Lima and Sunnyside that are not addressed by the Project. Cars regularly speed on these streets, run stop signs and compete with pedestrians who are forced to share the roads, as there are no sidewalks. These streets were not designed as thru streets for a 42 unit development. The street size on Carter Avenue by Bailey Canyon (proposed as an ingress/egress to the Project) cannot accommodate autos, pedestrians, emergency and county construction equipment. The Draft EIR fails to represent the severe danger relying on a roadway of 20 feet can cause.

I 190-3

I 190-4

Wildfire Dangers: The Project proposes building in a very high fire hazard zone as stated by the Sierra Madre Fire Department. The City's General Plan goal clearly states to avoid building in this zone to avoid future wildfire situations that have devastated towns and communities in California. Utilizing Carter Avenue as the second means of egress/ingress for emergency purposes is questionable as Carter is a small one car lane that would have difficulty accommodating emergency vehicles and residents evacuating. In recognition of this, it is increasingly becoming extremely difficult to buy homeowner's insurance if you live in the foothills. In reality, a fire of 42 homes would likely spread endangering all of Sierra Madre and its residents.

I 190-5

I 190-6

I 190-7

I 190-8

Water Dangers: The Project appears to address water usage in a disingenuous fashion by promoting 'net-zero' water impact. The true definition of net-zero water is 'Net zero water creates a water-neutral building where the amount of alternative water used and water returned to the original water source is equal to the building's total water consumption'. This Project clearly does not meet this definition and has to create one of its own, which implies no impact on Sierra Madre water usage with the additions of 42 homes and families, landscaping and pools. In reality, the Project's 'net zero' proposes to buy 50 years of water to offset water usage. There is no inflationary factor built into the price calculations and it is unlikely that the cost of water today will be the same in 50 years, or 10 years, or 5 years, particularly given a long lasting drought. It is an illogical work around to appear to be a solution to the scarcity of water in a years long drought. It does not solve the problem of 'no water' and uses 'smoke and mirrors' to promote the wrong project in the wrong place at the wrong time. In addition, the Project failed to discuss the importance of the property in percolating water to restore our groundwater or mention that the property is an alluvial fan that is instrumental in this process.

I 190-9

I 190-10

I would urge the Planning Commission and City Council to reject this Project and seek alternatives that are more Sierra Madre Quality and Sierra Madre Smart.

I 190-11

Thank you,

John Clarke

Response to Comment Letter I90

Individual
John Clark
October 4, 2021

- I90-1** This comment requests the following comments (Comments I90-2 through I90-11) be included in the responses to comments of the Final EIR. As shown, the commenter's request has been recorded as part of this Final EIR.
- I90-2** The comment expresses concern over the compatibility of the project with the current neighborhood. As analyzed in Draft EIR Section 4.11, Land Use and Planning, the project is consistent with Goal 2 and 3 of the General Plan through development regulations and design guidelines to be compatible with the surrounding neighborhood. In addition, the design guidelines of the Specific Plan establish site planning and design, architectural design, and landscape design standards that would address and protect visual character, privacy, and the quality of public and private views. See also Draft EIR Section 4.1, Aesthetics, for a detailed analysis of the project's potential for visual impacts, which were determined to be less than significant. It should be noted that although the project would result in removal of trees on site, the proposed landscape plan would result in an increase of trees on site as compared to existing conditions.
- I90-3** The comment expresses safety concerns related to increased traffic and safety issues with cars speeding, running stop signs, and sharing the roads with pedestrians. Regarding an increase in traffic, please refer to Global Response GR-6. Please refer to Response to Comment I85-52, related to safety concerns.
- Concerns about illegal activity, such as speeding and running stop signs is not within the scope of the required environmental analysis under CEQA. As such, no response is required.
- I90-4** The comment states that the streets surrounding the project, specifically Carter Avenue by Bailey Canyon would not be able to accommodate cars, pedestrians, emergency vehicles and construction equipment. Please refer to Global Response GR-5.
- I90-5** The comment states that the project is within a VHFHSZ and that the City's general plan states to avoid building in this zone. Please refer to Global Response GR-3.
- I90-6** The comment expresses concern regarding Carter Avenue being used as the second means of egress/ingress for emergency vehicles and evacuation. Please refer to Please refer to Global Response GR-4 and Global Response GR-5.
- I90-7** The comment expresses concern over the ability for residents to be able to get homeowners insurance in the foothills. Ability to obtain insurance is not within the scope of the required environmental analysis under CEQA. As such, no response is required.
- I90-8** The comment suggests that fire within the 42 homes would put other residents in danger. Please refer to Global Response GR-3 and the language below from the FPP (Appendix F2 of the Draft EIR):

As determined during the analysis of this site and its fire environment, the project site, in its current condition, may include characteristics that, under favorable weather conditions, could have the potential to facilitate fire spread. Under extreme conditions, wind-driven wildfires from nearby undeveloped land could cast embers onto the property. Once the project is built, the project's on-site fire potential will be much lower than its current condition due to conversion of wildland fuels to buildings, parking areas, managed landscapes, fuel modification areas, improved accessibility for fire personnel, and structures built to the latest ignition and ember resistant fire codes.

- I90-9** The comment expresses concern over the Net Zero Water Impact. Please refer to Global Response GR- 1 and Response to Comment I2-13.
- I90-10** The comment states that the project failed to discuss the alluvial fan and the benefit it has to groundwater recharge. Please refer to Response to Comment I32-2.
- I90-11** The comment expresses general opposition for the project. The comment does not raise any issue concerning the adequacy of the Draft EIR.

Comment Letter I91

Vincent Gonzalez,

Dear Vincent, I am concerned about several areas of the "Meadows" DEIR as outlined in their report.

I 191-1

TREES: I've been told by the developer that they plan to replace the trees that will be cut down and will not only replace the 100 mature identified trees but also will plant several more throughout the development. However, many of the established, mature trees are irreplaceable given the fact that they are more fire-resistant, provide more shade and most importantly, less water to maintain. I believe that the project needs to at least preserve the grove of coastal oaks which are providing habitat for birds and food for the deer and bears.

I 191-2

WATER: In addition to the Net-Zero plan of off-setting the increased use of water, the project needs to include the ban of lawns and swimming pools. There can be no mitigation or replacement of water in this time of extreme drought, particularly since there is no excess water available to be purchased.

I 191-3

I 191-4

WILDFIRE: I am seriously concerned about the circulation plans of traffic in terms of evacuation in case of a wildfire. While the homes will be built to a higher standard than most of the surrounding homes, the problem is in an eventual evacuation procedure. There is a bottleneck at the area where Carter enters the proposed development, and at the junctions of Grove, Lima, and Sunnyside. Carter narrows to a point where fire equipment entering the area of the Monastery and the evacuating vehicles from the development and residents from Grove and Lima will create a back-up on all the side streets.

I 191-5

Mitigation can come in the form of a fire road where there is a barrier between the park and the south-side neighbors. This fire road could be integrated into the park plans so that it would be a part of the park itself and not used as a permanent road but could be utilized in case of an emergency.

I 191-6

Thank you for the chance to give feedback on this important development.

I 191-7

Pat Alcorn
741 E. Grandview Ave.
Sierra Madre

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Response to Comment Letter I91

Individual
Pat Alcorn
October 4, 2021

- I91-1** The comment expresses general concern about the project. The comment does not raise any issue concerning the adequacy of the Draft EIR.
- I91-2** This comment expresses concern about the removal and replacement of trees from the project site. The comment specifically is concerned about mature trees being more fire resistant, having more shade, and require less water to maintain. As stated in Draft EIR Section 3.3.4, the Conceptual Landscape Plan would use fire resistant and drought tolerant tree species. The comment also states that the developer has told them that the developer plans to replace the trees that have been cut down. Relocation of existing protected and non-protected trees is being evaluated and will be determined in the final design phase of the project and will be based on the existing conditions of the trees. Please refer to Global Response GR-2.
- I91-3** The comment states that the project should include a ban of lawns and swimming pools in addition to the Net Zero Water Impact to reduce water usage. Impacts to water supply is less than significant with the inclusion of PDF-UTL-1 and no mitigation, such as a prohibition on lawns or pools, would be required.
- I91-4** The comment states that there is no water available to be purchased and there can be no mitigation or replacement of water available. Please refer to Global Response GR-1.
- I91-5** The comment expresses concern about evacuation in the case of a wildfire, specifically at the entrance to the project on Carter Avenue. Please refer to Global Response GR-4 and Global Response GR-5.
- I91-6** The comment suggests a mitigation measure in the form of a fire road to be integrated into park plans to be utilized in the case of an emergency. Please refer to FPP (Appendix F2 of the Draft EIR) and Global Response GR-4.
- I91-7** The comment provides concluding remarks that do not raise new or additional environmental issues concerning the adequacy of the Draft EIR.

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Comment Letter I92

From: Chris Spensley <chrisspensley@icloud.com>
Sent: Monday, October 4, 2021 2:01 PM
To: Vincent Gonzalez
Subject: Fwd: Questions on DEIR for Bailey Meadows Development

CAUTION: This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Sent from my iPhone

Begin forwarded message:

From: Maria Karafilis <mariakarafilis@gmail.com>
Date: October 4, 2021 at 11:54:10 AM PDT
To: Chris Spensley <chrisspensley@icloud.com>
Subject: Questions on DEIR for Bailey Meadows Development

From: Christopher Spensley
642 Fairview Ave
Sierra Madre, CA 91024

Thank you for the opportunity to comment on the DEIR for the "Meadows at Bailey Canyon"

Please retain a copy for the administrative record.

Please respond to these comments in the Final EIR and please put me on the list of people to notify when the Final EIR is complete.

I strongly object to the proposed housing development. It is inconsistent with the Policies and Values of our General Plan. I am especially concerned with:

- 1) 101 mature trees will be removed, including 10 protected Oaks. The Oaks will be replaced with smaller Oaks and other small trees (requiring a great deal of water to become established) SM has a Forest Management Plan with a mission to preserve "Canopies" for their environmental and aesthetic benefit. 101 large canopied trees will be destroyed. **Why are you flouting the SM Forest Management Plan and denuding the area? How will you prevent rock and landslides and impact on wildlife when these mature trees are destroyed?**

I
I92-1
I
I92-2
I
I92-3
I
I92-4

2) **I strongly oppose a change in zoning, a change in our General Plan and a change in the regulations** that other residents have to follow.

I 192-5

3) In the Alternatives section presented in the Draft EIR, **why did you choose to feature only a maximum-sized institution building as opposed to one we could have such as an assisted-living facility such as the Kensington, which is under 60,000 sq feet, as would be a high school? Why are you not presenting all options to citizens?** Please present another institutional option.

I 192-6

4) **How, specifically, will the project ensure there will be no increased fire risk and address successfully two crucial elements in the proposed safety element given the area is an extremely high fire severity zone?** The two safety elements below are particularly relevant—please address specifically in the EIR:

I 192-7

Hz 2.12 All new residential developments in hazard areas shall have at least two emergency evacuation routes (i.e., points of ingress and egress)

Objective Hz7: Avoid expanding development into undeveloped areas in Very High Fire Severity Zone

Response to Comment Letter I92

Individual
Christopher Spensley
October 4, 2021

- I92-1** This comment requests the following comments (Comments I92-2 through I92-7) be included in the responses to comments of the Final EIR. As shown, the commenter's request has been recorded as part of this Final EIR.
- I92-2** The comment expresses general opposition for the project. The comment does not raise any issue concerning the adequacy of the Draft EIR.
- I92-3** The comment expresses concern regarding tree removal and incompatibility with the Sierra Madre Forest Management Plan. Please refer to Global Response GR-2.
- I92-4** The comment asks how removal of trees will impact wildlife and rock and landslides. As concluded in Draft EIR Section 4.7, Geology and Soils, the project site is located outside of any potential landslide zone; therefore, impacts associated with landslides would be less than significant. Regarding wildfire, please refer to Global Response GR-3.
- I92-5** The comment expresses opposition to the proposed change in zoning and regulations. As stated in Draft EIR Section 4.11, Land Use and Planning:
- Implementation of the project would require amendments to the General Plan, Zoning Code, Zoning and Land Use maps, and approval of the Specific Plan. The General Plan and Zoning Code amendments would primarily change this land use designation from Institutional to Specific Plan. The approval of the Specific Plan would provide guidelines and standards for the implementation of future development of the project.
- The comment does not raise any issue concerning the adequacy of the Draft EIR.
- I92-6** The comment asks for another institutional alternative to be provided and states that the Draft EIR is not presenting all options to citizens. Please refer to Response to Comment I26-10.
- I92-7** The comment asks how the project will have no increased fire risk and is concerned that the project is not consistent with elements of the proposed Draft Safety Element (now the adopted Hazard Prevention Element). Please refer to Global Response GR-3 and Response to Comment I90-8.

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Comment Letter 193

From: S Hood <scottthehood@gmail.com>
Sent: Monday, October 4, 2021 4:35 PM
To: Vincent Gonzalez
Subject: comments on draft EIR, The Meadows at Bailey Cayon

CAUTION: This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

The EIR appears too often to be a cut and paste job from the library of Dudek from past multi-acre housing developments that is sadly not tailored to the proposed "Meadows..." project. When a topic becomes unavoidably specific to this project, the depth of research becomes very shallow. The EIR is therefore inadequate, which makes it hard to comment on specifically. Nonetheless, following are brief comments on the sections on Fire and Trees that serve as examples of problems with this draft EIR. Note these comments do not represent the only problems with the EIR.

193-1
 193-2

Fire

- The EIR states that wildfires have "burned within 5 miles of the project site". Using 5 miles is an irresponsibly wide margin as to past threats and certainly future threats from wildfires. Everyone in town knows fires have come much closer, probably within a few hundred yards (quote that instead). To put 5 miles into perspective, the Mount Wilson Observatory is only 3.5 miles from the project site. The EIRs use of "within 5 miles" seems like a shade of corruption in service of the client. At the very least this wording should be changed from "within 5 miles" to "within 1 mile". And even that understates proximity.
- Given the risk of wildfires, the report should do a study of how close fires have actually come as well as a study of the directions and angles of the surrounding canyons and potential directions of burns. And it should account for the much higher risk today and in the future compared to past wildfires.
- The EIR attempts to brush over the enormous wildfire risk and increased risk of having the project completed by stating that the project "would not exacerbate wildfire risks provided that the appropriate fire prevention management activities are implemented as required by FPP and SMMC." This places the responsibility and blame on the very limited resources of the city without any analysis as to the city's capabilities and resources.
- According to the California Fire Marshall Fire Severity Map, the proposed project site sits far within the most severe fire risk zone, a higher zone rating than many fires that have occurred in recent years and at the same risk level as places such as Paradise.
- While the purpose of the report is to explore the impacts from the project, the above bullet points should be considered and mentioned. A bridge of more flammable material between the mountains and existing houses south of the proposed project certainly increases the risk. Putting the responsibility onto the city and its agencies is irresponsibly convenient.

193-3
 193-4
 193-5

Trees

The removal of 101 mature trees is a significant impact, not to mention a great irony given the name of the project.

- Cutting down trees releases carbon dioxide into the atmosphere. Mature trees, which these are, release even more carbon.
- Mature trees have deeper roots established over decades or even up to over 200 years. Deeper roots are more resistant to drought, obviously a major issue, and to other effects of climate change.
- This project is in the highest fire danger area according to the California Fire Marshall. Old trees are much more resistant to fire given their thick bark and elevated crowns. Young coast live oaks cannot survive fire, but old mature ones can.

193-6

- Young coast live oaks will not provide the shade cover of mature trees.
- All of the 101 trees are part of an ecosystem developed over decades if not hundreds of years. Removing them will have a great effect on other plants and animals that is not even attempted to be understood in this report.
- Coast live oaks are affected by sudden oak death, a pathogen that has been killing them off in certain areas across the state. These trees are becoming more and more rare. It should not be considered a replacement to kill mature coast oaks and put in young oaks without fire resistance and mature root structures.
- The EIR does not address whether the young coast live oaks will come from trees grown from acorns sourced from a different region or from the trees that are to be cut down? If they are from a different region, this would reduce the genetic diversity of the species.
- It is unlikely that the 10 young coast live oak trees will all live through the first few years, which means this area is certain to have less coast oak trees in the near future.
- What is also certain is that the 10 young trees will be much smaller, so the biomass of these young trees will be far less than the mature trees there now.
- Bringing in nursery trees grown in other regions may bring in the sudden oak death pathogen possibly leading to the death of far more of our trees.
- The EIR does not identify the other trees on the chopping block. While they may get around any current protected tree status, this does not mean they do not have unique qualities or declining numbers and are very likely important to our environment.

↑
I93-6
Cont.

Scott Hood, Sierra Madre resident

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Please do not send any business related emails to this email address. They will not be responded to or acted upon.
Please use official business email address only.

Response to Comment Letter I93

Individual
Scott Hood
October 4, 2021

- I93-1** This comment expresses the opinion of the commenter and does not provide a critique or comment specific to any component or issue of the Draft EIR; however, please refer to Responses to Comments I93-2 through I93-19, below, for responses relative to specific environmental issues raised by the commenter.
- I93-2** The comment is an introduction to comments that follow.
- I93-3** The comment expresses concern about the use of a 5-mile radius of fire history around the site and suggests that a 1-mile radius around the site would provide a better idea of how close fires have gotten to the site. A 5-mile radius is a more conservative approach which includes an assessment of multiple fires over a larger area and provides a greater understanding of fire behavior in the project vicinity. A fire history map has been provided in the FPP (Appendix F2) which shows fire history in the site vicinity.
- I93-4** The comment suggests that the Draft EIR should include analysis on the proximity of fires as well as the direction the fire has come from. This analysis can be found in the FPP (Appendix F2) under the Fire Behavior Modeling that was performed using BehavePlus software. This analysis provides information about the type and intensity of fire given the topography, vegetation, and weather of the site. Information about fire history is also found in Section 2.2.4 of the FPP (see Appendix F2).
- I93-5** This comment expresses concern over the responsibility placed on the City of Sierra Madre's resources and the project being located in a VHFHSZ. Please refer to Global Response GR-3. As stated in Draft EIR Section 4.15.5, Impacts Analysis, in Section 4.15, Public Services, the Sierra Madre Fire Department would provide fire protection services to the project site and impacts would be less than significant.
- I93-6** This comment expresses concern about the tree removal and replacement that will happen as a result of this project. The commenter's concerns about tree removal include tree resistance to drought and wildfire, impacts to plants and wildlife, the removal of non-protected trees with their own unique qualities, and release of carbon dioxide. Please refer to Global Response GR-2. Mitigation measure MM-BIO-3 would replace protected trees and the proposed Conceptual Landscaping Plan includes the planting of an increased number of trees at the project site, as compared to existing conditions. The commenter's concern related to carbon dioxide generation is not a topic that is within the scope of the environmental analysis required by CEQA. Nonetheless, the amount of tree reduction proposed is not significant enough to result in any loss of carbon dioxide. As such, no response is required.

Additionally, the comment expresses concern about the trees that will be replacing the trees removed as a result of the project. The comment is specifically concerned with sudden oak death being introduced to the area, survival of replacement trees, and genetic diversity reduction of the species. Nurseries inspect trees and make sure that they are pest and disease free before sale and planting. In addition, implementation of MM-BIO-3, Protected Tree Replacement, would be implemented to reduce the impacts to the City's protected trees to less than significant by requiring the 1:1 replacement of those protected trees impacted by development and conducting a 5-year monitoring program to ensure their continued viability. All tree replacement would comply with City of Sierra Madre regulations outline in Chapter 12.20 of the SMCC.

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Comment Letter I94

From: CAROL Parker <acpparkercalif@msn.com>
Sent: Monday, October 4, 2021 4:53 PM
To: Vincent Gonzalez
Subject: Against the housing at the Monastery

CAUTION: This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Dear Mr Gonzalez,

I am a lifetime resident of Sierra Madre. And, this is a wonderful town and must be respected for its small town values and culture.

I 194-1

If these homes are built it will drastically change Sierra Madre in too many negative ways.

1. We are already living in a terrible drought. The idea of purchasing more water is clearly unrealistic and seems like a very irresponsible idea. If a developer can "purchase" water, then why don't cities do the same for farming areas and to help put out more fires? And, for humans to drink water? This is pure insanity.

I 194-2

2. The traffic is already horrible and the people who live on the hill will be speeding up and down Sunnyside and Lima to get to school, work, shop.....and are a danger to the people who live on these very narrow streets. Have you ever tried to drive from Lima to Baldwin on SMBldvd? It is already overcrowded and these residents will add to the traffic problems which already exist.

I 194-3

3. The beautiful trees are going to be cut down? How horrible. Why can the developer cut down trees but we residents who need trees trimmed or cut down or ignored.. I am referring to city trees on private property. Plus, there is not enough emphasis on GLOBAL WARMING. Why??

I 194-4
I 194-5

I dread the dirt and trucks and overcrowding of our streets if these homes get built. It will be a nightmare.

I 194-6

Sincerely,
Carol Parker
368 Marposa

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Response to Comment Letter I94

Individual
Carol Parker
October 4, 2021

- I94-1** The comment expresses general opposition to the project. The comment does not raise any issue concerning the adequacy of the Draft EIR.
- I94-2** The comment expresses concern regarding the feasibility of the purchase of future water. Please refer to Global Response GR-1.
- I94-3** The comment expresses concern regarding speeding on the narrow streets of Lima Street and Sunnyside Avenue and expresses that the streets are already overcrowded. Concerns about illegal activity, such as speeding is not within the scope of the required environmental analysis under CEQA. Regarding traffic conditions, please refer to Global Response GR-6.
- I94-4** The comment expresses concern over the tree removal. Please refer to Global Response GR-2.
- The commenter also expresses frustration about residents being ignored when trees need to be cut down or trimmed. The comment does not raise any issue concerning the adequacy of the Draft EIR; therefore, no further response is required or provided.
- I94-5** The comment expresses concern over global warming impacts. Please refer to Draft EIR Section 4.8, Greenhouse Gas Emissions, for information about greenhouse gas emissions and climate change.
- I94-6** The comment expresses general opposition to the project. The comment does not raise issues concerning the adequacy of the Draft EIR.

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Comment Letter I95

From: ghickman1@aol.com
Sent: Monday, October 4, 2021 4:42 PM
To: Vincent Gonzalez
Subject: Hickman Comments DEIR Meadows at Bailey Canyon Specific Plan
Attachments: DEIR Meadows Bailey Canyon Specific Plan Hickman Comments 10.04.21ver1.1.pdf

CAUTION: This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Oct. 04. 2021
4:41PM

Hello Mr. Gonzalez,
Please find my DEIR comments in the attachment regarding the Meadows at Bailey Canyon Specific Plan.

- An e-mail reply confirming receipt would be welcome.

regards,
Glenn Hickman
480 Fair View Ave

I
↓ I95-1

October 4, 2021

To: City of Sierra Madre
Planning
232 W. Sierra Madre Boulevard
Sierra Madre, Ca. 91024

Attn: Director Vincent Gonzalez
vgonzalez@cityofsierramadre.com

From: Glenn Hickman
480 Fairview Ave.
Sierra Madre, Ca. 91024

Cc: <https://www.stophousingproject.com/>
<https://www.preservesierramadre.com/>

Re: Draft Environmental Impact Report for The Meadows at Bailey Canyon Specific Plan
Hickman Comments

Thank You for the opportunity to comment as found below. Please retain a copy for the administrative record. Please respond to these comments in the Final EIR and please include me in the list of people to notify when the Final EIR is available.

Irrespective of whether my following comments are deemed material for inclusion in the EIR, at minimum they should be advanced as mitigation measures and matured throughout the development process, including into the Specific Plan, the Subdivision Map (recorded covenants and conditions of approval) and HOA (Cc&R's and bylaws). Some of my comments are highlighted with symbols and pertain to the entire section regarding those processes and documents: "*" relevant to the: 1) subdivision map covenants and conditions of approval; "!" relevant to the 2) specific plan; "#" relevant to the 3) HOA CCR's and bylaws if part of the residential ownership.

***! # INSOLVENCY – INCOMPLETED PROJECT: Special Development Completion and Sales Bond:**

- **Background:** Sierra Madre has several abandoned subdivision projects blighting its community. An incomplete subdivision of this magnitude and potential blight, should the economy or other factors result in Owner/Developer insolvency, warrants a Special Development Bond for a Bonding Company to complete the development in a definitive timeframe. A Subdivision Covenant and Condition of Approval is required to execute this and should not be confused with the performance and bonding requirements the Owner/Developer requires of the Contractor. After all the controversy regarding this Development and all the sweat equity and resources to be expended by any and all entities would it not be in the City's and City Leadership's best interests to negate the risk of an Incomplete Development – Community Blight?

CEQA PROCESS ISSUES

- **Responsible Agencies Not Identified:** Responsible Agencies of relevance appear to have been overlooked in the Application. Bailey Canyon Debris Basin and Park: 1) Calif Dept of Parks & Recs; 2) California Dept of Water Resources Division of Safety of Dams; 3) Los

DEIR Meadows Bailey Canyon Specific Plan Hickman Comments 10.04.21ver1.1.docx

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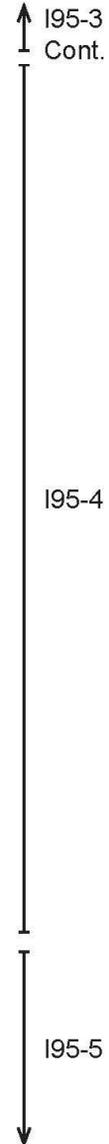
Angeles County Dept of Public Works; 4) LA County Flood Control District (during the EIR process, not just the Subdivision Mapping process as found in the Municipal Code).

- **8.5 Alternatives Under Consideration:** Given the Relevance that this Project forges for proponents by advancing Revenue to the General Fund and also compliance with RHNA Housing (be it in the future per the General Plan DEIR); and opponents evidenced by Community Outrage in need of Community Calming, uncertainty of outcomes in a complex multi-approval process (zone change, specific plan, etc. etc.), it appears logical that the “rule of reason” would suggest the DEIR consider a General Obligation Bond Alternative to Purchase the Property, which it did not.
 - **Proposed Alternative 4: General Obligation Bond Alternative: to purchase the property and append Existing Bailey Park with a “Conservation Park”:** would counter the perceptions by some of a Legislative Taking from the People in favor of One Stakeholder, the Monastery. It would provide site suitability (mitigation of seismic uncertainty and hazard, provide for the City of Sierra Madre to meet Quimby City-wide Park Goals, current conformance with the General Plan and current Zoning; calming of the Community to avoid possible Political backlash, etc.), including economic viability for the Landowner which has been professed to be of major consequence.
 - Community Folklore, associated with Preserve Sierra Madre, an advocacy coalition, suggests that an \$11 million dollar purchase of the property was proposed to no avail. That said, a credible and transparent Alternative should be considered for what might oblige \$200 to \$300 dollars per year on the property taxes for 30 years for a \$20 to \$30 million dollar purchase. This Alternative should not be summarily dismissed based on rhetoric or folklore and pursued with credible resources and legitimacy.
 - Jaffray Sanders, institutional financial consultants, (which I have no connections), is an obvious nationally recognized entity to facilitate a credible CEQA Alternative for an Alternative 4, General Obligation Bond or similar institutional placement in mitigation to development.
 - Alternative 1: No Project/No Build Alternative: is a typical EIR alternative; however the proposed Alternative
 - **Alternatives 2: Existing Zoning and Land use Designation Communal Residential Facility Alternative & Alternative 3: Existing Zoning and Land Use Designation: Private School Alternative -or- Any Institutional Alternative (added for emphasis):** would more than likely never come to consideration because of the two Late Quaternary Faults on the property; and history of the Sierra Madre Earthquake and Epicenter (possibly under the property) rendering sever damage to an Institutional Structure for removal.

***I# 4.7 GEOLOGY AND SOILS: HAZARD IS SITE SIGNIFICANT: To Suggest NO PROJECT – No Alternatives 2 & 3 – No Structures – Potential Alternative 4 and Alternative 1**

- **DEIR Documents:** Table ES-1 Summary of Project Impacts: Geology and Soils: & Appendix E, Geologic Section of EIR: “Would the project directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving: a. Rupture of a known earthquake fault.....Geology Special Publication 42?” is “Less than Significant.”
 - **Less than Significant is Premature:** The impact statement of “Less than significant” is premature and the corroborating Appendix E (even with the borings taken to suggest a

DEIR Meadows Bailey Canyon Specific Plan Hickman Comments 10.04.21ver1.1.docx



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I95-4

I95-5

- **Site-Specific Geological History:** This specific site’s recent geological and seismic history has not been completely and correctly characterized. 1) A major institutional structure (3 stories, circa 1920’s) was so severely damaged from the Sierra Madre named 5.8 magnitude earthquake, June 28, 1991, at 7:43, that it was demolished. 2) The USGS Quaternary Fault Map depicts faults which traverse the project site and in fact were probably the underlying cause for the earth movement resulting in the institutional buildings fatal damage and demolition. At the scale of the maps found in Exhibit E and or the USGS Interactive Fault Mapping.....the faults in question could exist directly under the proposed project. Appropriate Field Exploration (refuting Appendix E to be adequate) will determine age and location with more certainty given the site-specific seismic history, future risk and IF the site was the Epicenter for the Sierra Madre Quake.
- **Precedent of Nearby Geological and Seismic History Requiring Detailed Exploration:** The geological and seismic history at the City of Arcadia’s Foothills Middle School, within 3 miles of the project, also within seismic risk to the active RAYMOND Fault, required detailed field exploration and seismic modeling/analysis in 2010 in order to rule out an on-site fault hazard.
- **Minimum Earthquake Insurance Mitigation:** At a minimum, a mitigation should compel the Developer to secure Earthquake Insurance, with written commitments, to pass thru as a mandatory requirement for the new home buyers, recorded in the Final Map, and a CCR/By-laws of the HOA. A commitment to secure and require Earthquake Insurance would avoid the risk of future community blight resulting from an earthquake rendering residential structures in disrepair due to lack of insurance. Clearly, post-earthquake Community Blight was evident after several of the regional earthquakes.

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***! # 4.14 POPULATION AND HOUSING: ADU’s - Use & Occupancy:**

- **No ADU’s In Perpetuity.** There should be No Future means, administrative, legislative, or otherwise, to convert through any process, in any venue, the Properties in this subdivision so as to add an ADU. This is a new development which unto itself, will be adding to the City’s RHNA legislated requirements (as narrated in the DEIR and as found in the DEIR General Plan Amendment) to conform with RHNA legislation. Addition of an ADU in the future would be double dipping to meet legislation and disingenuous to the CEQA process. This development unlike existing housing stock will be in conformance with the Cities duties to address the State’s demand for the democratization for housing. Tracking No ADU’s should specifically be addressed in this CEQA process and thereafter monitored in the progression of development and post occupancy of the homes. It should run with the legal description for each parcel and into the HOA CC&R and bylaws. A failure in this transparency with an untimely introduction at any time may result in a CEQA and Development process challenge. Latent ADU scoping may constitute a project change after the review period ends and prior to approval of the project.

195-8

***! # 4.15 PUBLIC SERVICES & 4.16 RECREATION: DEDICATED PARK:**

- **Sierra Madre Community Exclusive Park Use:** Sierra Madreans should have Exclusive Use with non-visible secured perimeters and surveillance to avoid all the direct and indirect impacts resulting from non-community users. In fact, the DEIR references the Park as a “Dedicated Neighborhood Park” and alsofor “Project Residents and Nearby Residents.” Whereas parks are neighborhood and community benefits, they also can become places of destination resulting in overuse, poor maintenance, homeless encampments, etc. in detriment to the community and planned intentions.

195-9

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- **Mature Landscaping at Installation:** The park requires a 20Ft matured landscaped buffer (as if the park had been there for 20 years, and as depicted in the City Council Update March 2021 and throughout the Development Documents); and should not include park physical uses (to mitigate privacy, noise, and light trespass) adjacent to existing residential.
- **Geometrical Barrier Design Issue:** The park presents itself as an amenity for the first row of houses, development mitigation buffer benefit and Quimby fee mitigation / enticement, rather than a community accessible park, because of its: 1) limited access on the East and West edges of a longitudinal land locked pocket park; 2) the leveraging of the existing Bailey Park – parking, toilet facility, etc.
- **Park Dedicated ADA / Toilet Facility:** Toilet Access and Toilet ADA compliance is not apparent in the DEIR documents and should not leverage / overburden existing Bailey Canyon’s unisex toilet; without DEIR collaboration and that Responsible Agency.
- **Inadequate Parking:** The 7 stalls depicted appear inadequate, with intentions to comeingle the existing parking at Bailey Canyon Park, with continuing overburden to North Grove Street.
- **Grading:** The Park should not have a vertical grade separation abutting the existing residential, to avoid vista down slope privacy issues into existing residential.
- **Site Elements:** The Park requires a solid 8 ft high fence, positive drainage to not trespass over adjacent private property, including landscaping and irrigation restoration to the existing residential side of the adjacency.

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Cont.

***I# 4.17 TRANSPORTATION:**

- **No Project Gates:** There should be no gates or if gates are acquiesced in benefit to the Developer, no manipulative design to present the park as if the Sierra Madre Community is not welcome.
- **No Vehicular Use of Existing Crestvale Drive:** Whereas the existing grades might accommodate road access to Existing Crestvale Drive, negating the intended use of West Carter Ave., that should be clearly stipulated upfront to avoid any deviation in the process. Images are an inadequate record and the narratives are not absolute.
- **No Vehicular Use of North Grove Street:** There should be “T” intersection public improvements (curb, gutter, physical barrier – not just “no right turn signage”) to prevent vehicular use of existing North Grove Street using a right turn from existing West Carter Ave. Inevitably, the intended “secondary ingress/egress” will result in a right turn by-pass short cut using North Grove Street to Grandview. North Grove Street Parking is already burdened by existing Bailey Park users, with a narrow vehicular free board. And, clearly residents on North Grove would not welcome “No Parking” because of the proposed projects overburden today or in the future. The Meadows Specific plan: 1) page 21 diagram: depicts exclusive tie-in and use of West Carter Ave., not North Grove Street, however certainty in public works improvements to preclude use and over burden to North Grove Street should be a mitigation in the EIR, and not simply deferred into the future to the Subdivision Process and City Engineer, because of its relevance. This should be enacted by way of narrative and detailed design throughout.
- **Certainty of Improvements to West Carter Ave.:** The Section 4.15.5 Impact Analysis is DEIR conceptual as to the proposed scope of West Carter Improvements and appears to be in conflict with Page 23 of the Specific Plan wherein narrated that the existing West Carter Ave. tie-in will remain as is (inferring no intentions to improve). West Carter Ave.: 1) appears to be less than 20Ft, is not a functioning street with failing pavement, has non-compliant lighting, no curbs – gutters – sidewalks, defective drainage and the linkage to Lima Street appears equally questionable. West Carter Ave. is designated as a secondary ingress and egress access throughout the Development documents, however that functionality will not exist unless improved and the Responsible Agencies – LA County Public Works, Flood Control, Parks, etc.

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DEIR Meadows Bailey Canyon Specific Plan Hickman Comments 10.04.21ver1.1.docx

engaged early. West Carter Ave is narrated in the DEIR to be secondary ingress and egress and appears to be somewhat disingenuous given the realities of use and impacts. Just because the DEIR states secondary utilization, that is not certainty to mitigate the impacts to North Grove Ave and North Lima Street. The City Engineer and Public Works should provide input in the DEIR and not wait to parlay a solution in definitive design using the Subdivision process and Plan Check. West Carter Ave. improvements from the Development to Lima should be specifically identified as a cost of the Development not Sierra Madre taxpayers. Pages 57 and 109 in the Specific Plan conveniently does not address the West Carter Ave. tie-in Scope and should. Storm drainage conceptual design narrated in Section 4.19 Storm Drainage and depicted in Figure 3-7 in the DEIR, appears to use West Carter for surface water transport (see DEIR Section 4.19)

- **Vehicular Access tie-in at Carter and along Carter adjacent to the existing park:** A sound and headlights wall should be constructed along the existing residential. Any street lighting be designed to minimize / mitigate impact to residential property.
- **Provide Vehicular Traffic Flow PTV VISSIM Software Modeling Results:** to demonstrate vehicular impacts to N. Grove Street, FairView Ave, GrandView Ave, West Carter Ave, N. Lima Street, North Sunnyside Ave, etc.

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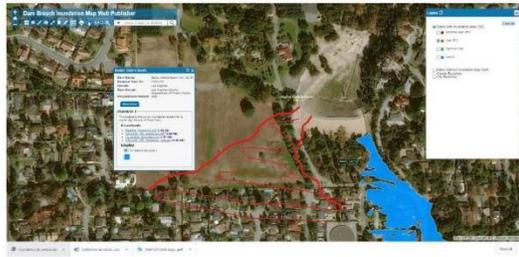
I95-12

***I# 4.19 UTILITIES AND SERVICE SYSTEMS – STORMWATER DRAINAGE:**

- **Proposed Underground Storm Water Retention Storage Gallery Under Park Risks and Ownership:** (Reference DEIR Figure 3-7 Proposed Drainage Plan): The 63,500 cu.ft., 2400 lineal feet long, 63500 cu.ft., 5ft diameter, underground storm water retention storage “infiltration” gallery should be identified upfront as a cost and risk obligation to both the Developer, in the Final Map and HOA CC&R’s / Bylaws. It should be, in perpetuity, insured for performance, anomalous miscalculated filtration and infiltration, instantaneous failure impacts, and have a cost strategy / accountability for ongoing maintenance / inspections and replacement. The seismic location imposes a higher degree of hazard and impact to such a structure, proposed at a higher elevation (be it underground) to lower elevation existing residential properties and downstream drainage infrastructure. Additionally, a sustainability storm drain structure with good intentions to not impact and overburden the existing infrastructure may in fact be more detrimental to the existing infrastructure and water quality treatment as proposed with negative impacts to the aquifer. Sierra Madre has anecdotal history of contaminated wells and aquifer.
- **Stormwater New 24-inch Surface Culvert at Crestvale Drive Drainage Pathway Problem and Eyesore:** Referencing Page 4.19-14 of the DEIR, the proposed stormwater assumed overflow (if not retained) out of the proposed retention storage structure (gallery, percolation tank or otherwise is unclear) under the park..... thru a new 24-inch surface culvert, will more than likely inundate the surface flow capacity of Crestvale and basin structures in Fairview Ave. with addition inundation of the downslope properties along Fairview, addresses 480, 470, 460, 450. A positive design with underground pipe in Crestvale Drive should be implemented with connection to the existing stormwater structures in Fairview.
- **Bailey Canyon Debris Basin Bread and Inundation Risks to Project: BASIN Failure:** The DEIR does not reference adjacent risks of relevance and mitigations resulting from a possible Bailey Canyon Debris Basin failure or inundation (see enhanced referenced image found below). If the perfect one-hundred-year storm were to occur, compromising both the Storm Water Retention Storage Gallery under the Park and also a breach to the Debris Basin there would be a neighborhood catastrophe. Absent of the Storm Water Retention Storage Gallery compromise there would be impact as well. The DEIR should address this and include mitigation measures.

I95-13

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9. REFERENCES: SECTION 4.7: GEOLOGY AND SOILS: APPEARS MYOPIC

- **Omission of Plain and Obvious Public Records:** The DEIR, including its References appear to be myopic regarding site-specific seismic on-site faults hazards and history, noting that this project would not have come before the Community and City Legislators had there not been a catastrophic impact to the site and prior structures due to the Sierra Madre Earthquake Epicenter (at the project site?).
- **Sierra Madre Historical Preservation Society: Southern California Story: Seeking the Better Life in Sierra Madre, Michele Zack: Page 251: regarding the Sierra Madre 1991 Earthquake and the 3 Story Monastery Building which was demolished (an image of the structure to be demolished is included in that citation).**
 - <https://smhps.org/archives.html>

195-14

END Page 7 of 7

DEIR Meadows Bailey Canyon Specific Plan Hickman Comments 10.04.21ver1.1.docx

Response to Comment Letter I95

Individual
Glenn Hickman
October 4, 2021

- I95-1** The comment is an introduction to comments that follow. This comment requests the following comments (Comments I95-2 through I95-14) be included in the responses to comments of the Final EIR. As shown, the commenter's request has been recorded as part of this Final EIR.
- I95-2** The comment expresses concern about the project not being completed leading to community blight. The comment does not raise any issue concerning the adequacy of the Draft EIR. As discussed in Section 3.3.13, construction of the proposed project is anticipated to be completed in February 2025.
- I95-3** The comment expresses concern about certain responsible agencies not being identified in the application. Responsible Agencies are agencies that hold discretionary approval as part of the project implementation. Discretionary actions for this project are listed in Draft EIR Section 3.4 and responsible agencies are listed in Draft EIR Section 3.5. The Los Angeles County Flood Control District and Los Angeles Department of Public Works received the NOA for the Draft EIR. The California Department of Parks and Recreation and the California Department of Water Resources Division of Safety of Dams do not have any discretionary approvals required for this project and are not considered a responsible agency under CEQA.
- I95-4** The comment suggests that a bond alternative to purchase the property for a conservation park should have been included amongst the alternatives. Please refer to Response to Comment I26-10. The City appreciates the commenter's recommendation. However, the bond alternative would not meet most of the project objectives and given that the project does not result in any significant and unavoidable impacts, the bond alternative would not reduce or eliminate any significant and unavoidable impacts associated with the project. Per CEQA Guidelines Section 15126.6, an EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason. Draft EIR Chapter 8, Alternatives, considers four feasible alternatives, including the no project alternatives, that were considered by the City. In addition, the City notes that this comment includes economic issues associated with the suggested bond alternative that do not appear to relate to any physical effect on the environment.
- The comment also suggests that Alternative 2, considered in Draft EIR Chapter 8, Alternatives, would not be feasible given the faults near the property. It should be noted that the proposed project would take place on the same side as Alternative 2. Impacts related to geology and soils, including potential impacts associated with faults have been addressed in Draft EIR Section 4.7, Geology and Soils. A comparison of these impacts with Alternative 2 was included in Draft EIR Chapter 8.
- I95-5** The comment expresses concern about the geologic hazards on the project site. The comment states that Appendix E only appears to be a preliminary soils report. It should be noted that Appendix E of the

Draft EIR is a geotechnical report that includes analysis of the geologic conditions and constraints on the site. It should be noted that the excerpt from 4.7.2 that was provided in the comment states the definitions of Late Quaternary and Quaternary faults as defined by the Alquist-Priolo Earthquake Fault Zoning Act, it does not state that there are Late Quaternary faults on the site. Please refer to Response to Comment I36-7.

I95-6 The comment states that the geological history of the site was not complete and suggests that a detailed exploration be performed to rule out an on-site fault hazard. Information about the local geologic setting can be found in Appendix E of the Draft EIR. Please refer to Response to Comment I42-19 and I50-7.

I95-7 The comment states that the developer should be forced to secure earthquake insurance. As stated in Draft EIR Section 4.7, the impacts of seismic hazards have been reduced to less than significant levels, and no additional mitigation would be required. Requirement to obtain insurance is not within the scope of the required environmental analysis under CEQA. As such, no response is required.

I95-8 The comment suggests that there should be no accessory dwelling units permitted on the project site and states that additional ADUs should be specifically addressed through the CEQA process. Please see Response to Comment I28-5.

I95-9 The comment provides the following suggestions for the proposed neighborhood park: exclusive use for the City's residents; a mature landscaping installation; an-ADA compliant toilet facility; vertical grade separation above existing residential development; an incorporation of an 8-foot high fence. Additionally, the comment states that the park is not a community accessible park and has inadequate parking. The comment does not raise any issue concerning the adequacy of the Draft EIR. Final EIR Section 3.3.2 provides details regarding the proposed neighborhood park.

I95-10 The comment provides the following suggestions related to transportation: no gates; no access through Crestvale Drive; and no use of North Grove Street. It should be noted that access through Crestvale Drive will not occur as a result of the project. The comment does not raise any issue concerning the adequacy of the Draft EIR; therefore, no further response is required or provided.

I95-11 The comment expresses concern about Carter Avenue being used as a secondary ingress and egress to the project site and notes that the current state of West Carter Avenue needs improvement if it will be used as an ingress and egress before the implementation of the project and should be a cost paid by the development. Please refer to Global Response GR-5.

The comment also brings up issues not related to the adequacy of the Draft EIR, such as who would pay for development of Lima Street. The comment also provides a brief summary of the project's proposed stormwater plan. However, this comment does not raise any issue concerning the adequacy of the Draft EIR.

I95-12 The comment requests traffic flow modeling results that show project impacts on streets such as Grove Street, Fairview Avenue, Grandview Avenue, Carter Avenue, Lima Street, and Sunnyside Avenue. Appendix K, Traffic Conditions Analysis, of this Final EIR has been provided in response to public comments on surrounding street segments. It should be noted that Appendix K has been provided for informational purposes only and does not constitute new information under CEQA, nor does it change

or modify the findings of the Draft EIR. Please refer to Appendix K of this Final EIR for additional information on surrounding roadway segments and intersections analyzed and taken into consideration as part of the proposed project. Please refer to Global Response GR-6.

I95-13 The comment expresses concern about the performance of the stormwater retention storage gallery and how it would impact existing infrastructure connected to it. Additionally, the comment expresses concern about debris basin failure. As stated in Draft EIR Section 4.19, Utilities and Service Systems, through the implementation of the drainage plans, impacts to drainage facilities would be less than significant levels. In addition, the northeastern portion of the Mater Dolorosa Retreat Center, located north of the site, flows to the Bailey Canyon Debris Basin to the east and discharges into Arcadia Wash. The project site does not flow towards the Bailey Canyon Debris Basin.

The comment raises economic issues related to the proposed storm drain system that do not appear to relate to any physical effect on the environment. In addition, the comment misquotes the information presented on Draft EIR page 4.19-14 and states that the new 24-inch surface culvert would result in inundation. As discussed on page 4.19-14 of the Draft EIR, a 24-inch RCP would be located in the southeastern portion of the project site and would run in the east to west direction into the proposed retention gallery, within the proposed park. The proposed retention storage gallery would be approximately 24 inches below ground and will promote water quality treatment through infiltration. Stormwater that is not retained in the underground storage gallery retention system or infiltrated into the ground would be routed to the southeast corner of the proposed park and exit to Crestvale Drive via a 24-inch surface culvert to the MS4 downstream to Arcadia Wash. Flows would then be conveyed via the MS4 to the receiving waters of Arcadia Wash, an open concrete lined channel located approximately 1 mile southeast of the project site. Therefore, this proposed feature would not result in inundation.

Regarding impacts on the project associated with Bailey Canyon Debris Basin failure or inundation, it should be noted that this would be considered an impact on the project from the environment and not vice versa. Therefore, this would not be considered a CEQA issue.

I95-14 The comment states that the references section for Draft EIR Section 4.7 does not include references about site-specific geological hazards. Please refer to Appendix E of the Draft EIR for references for geotechnical report and Chapter 9 for additional references used to prepare Draft EIR Section 4.7.

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Comment Letter I96

Comment Letter I96

I have reviewed the draft EIR, Zoning Amendment, Appendices and Specific Plan for the Monastery Project and make the following comments for inclusion into the public record.

I 196-1

Project Impacts – It is the role of the PC and CC to ‘determine if the potential significant impacts of the project have been fully mitigated below a level of significance and if any alternative meets the key objectives of the Project while reducing environmental impact’. While the Draft EIR overwhelmingly claims that most project impacts are insignificant and the 6 that are potentially significant can be reduced through mitigation to insignificant, we will present detailed information that disproves this. We begin with a discussion of the Project Impacts.

I 196-2

There are eight objectives of the proposed project. The Project does not meet five of them as outlined below:

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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.

I 196-3

Objective 4: The objective of a ‘high quality community sensitively sited within the sites existing natural topography’ and ‘minimizes traffic impacts to adjacent sites’ fails on both counts. The project will destroy all existing natural topography and replace it with three levels of grading for three rows of concrete pads; the widening of two roads and the addition of three; and will remove over 100 mature trees and all vegetation and wildlife habitat from the site. Critically, the Project provides no information, no traffic studies, no plans, no recommendations, nothing to minimize traffic impacts to adjacent streets. In a glaring omission, the Project fails to mention impacts on neighbouring streets.

I 196-4

Objective 5: This objective purports to ‘dedicate approximately 30 acres of hillside open space directly behind the Retreat Center in order to preserve Colby Canyon.’ This objective fails on two points: a) Portions of the land to be donated do not belong to the Monastery property, but to Pasadena and Sierra Madre. And b) Colby Canyon is located in the Angeles National Forest approximately 24 miles north of the property and has no discernible relationship to the Monastery.

I 196-5

Objective 6: The Project fails to provide ‘street improvements for safe efficient access from North Sunnyside Avenue’. North Sunnyside Ave begins at Sierra Madre Blvd and runs for 6 blocks north before entering private Monastery property. Per the Project Plan, street improvements are only made to North Sunnyside after it enters the private Monastery property, ignoring the 6 blocks south of the Project that will be used as the primary access to the property. The Project seeks only ‘safe, efficient access’ at the property line – not before, where it is needed the most.

I 196-6

Objective 7: This objective claims a ‘net zero impact on local water supplies to minimize burdens on existing City, infrastructure and environmental impact’. The project provides no details other than pre-purchasing 50 years of water at today’s price and storing it for future use. The Project provides no details on how it will meet real ‘net zero’ impact guidelines established by the US Department of Energy. <https://www.energy.gov/eere/femp/net-zero-water-building-strategies>. The Project fails

I 196-7
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to provide details on how it 'minimizes burdens on City's infrastructure' and 'minimizes impact on the environment'.

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It is recommended that the Planning Commission and City Council request the missing supporting details and information from the developer before discussing the Discretionary Actions that are required as the Project does not realistically and honestly assess the projects impacts on the community.

196-8

The Project discusses the following potentially significant impacts and purports to address them to less than significant thru mitigation. Attempts to do so fail in the following areas.

Aesthetics

Would the project have a substantial adverse effect on a scenic vista?

Yes, the Project would block current views of the San Gabriel Mountains from the neighbouring homes on the west and south side of the development. The Project is comprised of a majority of two story homes that would compromise the views that the homeowners now enjoy. The vista from the park area would be minimal as it is the lowest point of the project. When the park trees are mature, they would block visibility to the mountains.

196-9

Biological Resources:

Would the Project have a 'substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive or special status species in local or regional plans, policies or regulation, or by the Ca Dept of Fish and Game or US Fish and Wildlife Service'?

To answer this, a Dudek biologist conducted one field survey on May 29, 2020. Time unknown. The survey methodology is flawed as it only occurred on one day, time and duration both unknown. It is likely, however, that it was conducted during normal business hours 9 to 5. Many animals are visible in early morning, evening hours and at night. It is highly unlikely that a quick snapshot of any meadow area during our working hours will result in animal/bird sightings. For example, bats are off in the evening 20 minutes before dusk and the biologist would have to have bat detection devices that record the sonar pitch - which is different for each species. Townsend's Big Eared Bat is listed by the State of California. All bats need insects and water. If their survey was not done during the bat flight, it needs to be stated. Bats are not present if there are no insects to feed on. As noted below, the California Department of Fish and Wildlife (CDFW) recommends a 'project-level biological resources survey provide a thorough discussion and adequate disclosure of potential impacts to bats and roosts from project construction and activities including (but not limited to) ground-disturbing activities (e.g., mobilizing, staging, drilling, and excavating) and vegetation removal'.

196-10

In addition, in December 2019, the project area was heavily sprayed with chemicals by the Monastery ostensibly to kill tumbleweeds. The result transformed a once beautiful green meadow occupied by ground squirrels, rabbits, snakes, gophers, deer, birds and coyote into a barren

196-11
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uninhabitable wasteland. The pictures below show before and after the devastating impacts of destroying the food source and habitat of local wildlife.



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Cont.

It is not surprising that no wildlife or plant materials were found five months after the application of chemicals.

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| Cont.

Further, the survey did not address seed bank or lasting roots of native plants that are found at this elevation all across the foothills.

| 196-12

Appendix C1 lists 43 special-status wildlife species with recorded occurrences in the project site, with 37 listed under federal and/or California endangered species acts, noting that there is a low potential for occurrence due to lack of suitable habitat as illustrated above. Concerns about project impact on wildlife corridors, such as along the foothills of the San Gabriel Mountains were not addressed. CDFW notes that development occurring adjacent to natural habitat areas such as wildlife corridors could have direct or indirect impacts on wildlife. Impacts result from increased human presence, traffic, noise, and artificial lighting. Increased human-wildlife interactions could lead to injury or mortality of wildlife. For instance, as human population and communities expand into wildland areas, there has been a commensurate increase in direct and indirect interaction between mountain lions/bears and people. As a result, the need to relocate or humanely euthanize mountain lions and bears may increase for public safety. CDFW recommends that the developer thoroughly analyze whether the project may impact wildlife corridors. Impacts include habitat loss and fragmentation, narrowing of a wildlife corridor, and introduction of barriers to wildlife movement. Additional analysis is needed of the projects direct and indirect impacts on wildlife resulting from increased human presence, traffic, noise, and artificial lighting.

| 196-13

Eleven bat species were noted with low occurrence due to lack of habitat and noted that the pallid bat which roosts in trees 'would be expected to leave if the tree is disturbed'. No doubt, removing over 100 trees would result in loss of habitat and nesting for many birds and give them no other option but leaving. CDFW advises that numerous bat species are known to roost in trees and structures throughout Los Angeles County (Remington and Cooper 2014). In urbanized areas, bats use trees and man-made structures for daytime and night-time roosts. Accordingly, CDFW recommends the project provide measures to avoid potential impacts to bats. Bats are considered non-game mammals and are afforded protection by state law from take and/or harassment (Fish & G. Code, § 4150; Cal. Code of Regs., § 251.1). Project construction and activities, including (but not limited to) ground disturbance, vegetation removal, and any activities leading to increased noise levels may have direct and/or indirect impacts on bats and roosts. CDFW recommends a project-level biological resources survey provide a thorough discussion and adequate disclosure of potential impacts to bats and roosts from project construction and activities including (but not limited to) ground-disturbing activities (e.g., mobilizing, staging, drilling, and excavating) and vegetation removal. If necessary, to reduce impacts to less than significant, a project-level environmental document should provide bat-specific avoidance and/or mitigation measures [CEQA Guidelines, § 15126.4(a)(1)].

| 196-14

The impacts to Nesting Birds was labelled a 'potentially significant impact' and could occur 'if vegetation clearing and tree removal is undertaken during the breeding season from February 1 through August 31'. In addition, 'these activities would also affect herbaceous vegetation that could support and conceal ground-nesting species' 'Project activities that result in the loss of bird nests, eggs and young would be in violation of one or more of California Fish and Game codes and be potentially significant'.

The California Department of Fish and Wildlife recommends that the project 'avoid potential impacts to nesting birds. Project activities occurring during the bird and raptor breeding and nesting season could result in the incidental loss of fertile eggs or nestlings, or otherwise lead to nest abandonment'. They also recommend that 'measures be taken to fully avoid impacts to nesting birds and raptors. Ground-disturbing activities (e.g., mobilizing, staging, drilling, and excavating) and vegetation removal should occur outside of the avian breeding season which generally runs from February 15 through August 31 (as early as January 1 for some raptors) to avoid take of birds, raptors, or their eggs'.

There are no plans to follow these recommendations in the Draft EIR.

The CDFW states 'the biggest threat to birds is habitat loss and conversion of natural vegetation into another land use such as development (e.g., commercial, residential, industrial). In the greater Los Angeles region, urban forests and street trees, both native and some non-native species, provide habitat for a high diversity of 13 birds (Wood and Esaian 2020). Some species of raptors have adapted to and exploited urban areas for breeding and nesting (Cooper et al. 2020). For example, raptors (Accipitridae, Falconidae) such as red-tailed hawks (*Buteo jamaicensis*) and Cooper's hawks (*Accipiter cooperii*) can nest successfully in urban sites. Red-tailed hawks commonly nest in ornamental vegetation such as eucalyptus (Cooper et al. 2020).

The CDFW recommends surveys by a qualified biologist with experience conducting breeding bird and raptor surveys. Surveys are needed to detect protected native birds and raptors occurring in suitable nesting habitat that may be disturbed and any other such habitat within 300 feet of the project disturbance area, to the extent allowable and accessible. For raptors, this radius should be expanded to 500 feet and 0.5 mile for special status species, if feasible. Project personnel, including all contractors working on site, should be instructed on the sensitivity of the area. Reductions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.

The developer proposed the implementation of **MM-BIO-1** to reduce the impacts to nesting birds during construction as follows:

MM-BIO-1: Nesting Bird Avoidance. Initiation of construction activities (i.e., initial vegetation clearing) should avoid the migratory bird nesting season (February 1 through August 31), to reduce any potential significant impact to birds that may be nesting on the project site. If construction activities must be initiated during the migratory bird-nesting season, an avian nesting survey of the project site and contiguous habitat within 500 feet of all impact areas must be conducted for protected migratory birds and active nests. The avian nesting survey shall be performed by a qualified wildlife biologist within 72 hours prior to the start of construction in accordance with the MBTA and California Fish and Game Code. If an active bird nest is found, the nest shall be flagged and

196-15

mapped on the construction plans along with an appropriate no disturbance buffer, which shall be determined by the biologist based on the species' sensitivity to disturbance (typically 50 feet for common, urban-adapted species, 300 feet for other passerine species, and 500 feet for raptors and special-status species). The nest area shall be avoided until the nest is vacated and the juveniles have fledged. The nest area shall be demarcated in the field with flagging and stakes or construction fencing. A qualified biologist (with the ability to stop work) shall serve as a construction monitor during those periods when construction activities will occur near active nest areas to ensure that no inadvertent impacts on these nests occur.

I96-15
Cont.

We would argue that this is another example of a mitigation measure that does not conform to CEQA Guidelines that is feasible, effective, manageable and fully enforceable in order to be effective and successfully implemented to achieve the desired result.

In conclusion, the Biological Resources Report failed to provide a thorough discussion of direct, indirect, and cumulative impacts affecting project biological resources. There was no discussion regarding Project-related indirect impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats or riparian ecosystem. Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas were not discussed or evaluated. There was no discussion of the potential adverse impacts from lighting, noise, use of chemicals or temporary and permanent human activity.

I96-16

Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

The Project response is that the removal of 10 protected trees onsite would result in 'potentially significant impacts'. However, after mitigation, it is reduced to 'less than significant'.

Removing over 100 trees is a significant environmental impact, not only to the Monastery property, but to the neighbouring community as well. Four goals and objectives of the City's General Plan relative to trees support this position:

Goal 1: Continued preservation and protection of existing trees.

Goal 2: Increase of the City's community forest.

Objective R10: Maintaining and enhancing the City's significant tree resources.

Policy R10.2. Continue to develop tree preservation and protection measures.

I96-17

The project fails to meet these critical goals and responds with the same sentence: "The Specific Plan includes a Tree and Planting Plan which includes the planting of new trees and will adhere to the City's Tree Preservation and Protection Ordinance," which includes replacing only 10 trees as they are protected. The Project does not value the contribution that the remaining 90+ trees have for the environment and the community. This does not mean they do not have unique qualities or declining numbers and are very likely important to our environment. Mature trees have deeper roots established over decades and deeper roots are more resistant to drought and to other effects of climate change. As this Project is in a very high fire zone, it is important to note that mature trees

of any kind are much more resistant to fire given their thick bark and elevated crowns. Young coast live oaks cannot survive fire, but old mature ones can.

196-17
Cont.

The project disregards Goal 1 completely by removing over 100 mature trees, making it impossible to preserve and protect them. It appears that 100% of the trees on the project will be removed. No attempts to preserve and integrate them into the project have been made. All of the 101 trees are part of an ecosystem developed over decades. Removing them will have a negative effect on other plants and animals that has not been thoroughly studied in this DraftEIR.

Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

196-18

Yes, the Project conflicts with the LA County Sustainability Plan as it fails to ensure a climate-appropriate, healthy urban tree canopy that is equitably distributed. The urban forest is an essential part of a healthy community, made up of trees on both public and private lands. Spread equitably and supported by other urban greening measures, a well-managed urban forest throughout LA County can deliver healthier soils, biodiversity, habitats, shading from heat, and greater community health and well-being. The Plan prioritizes resilient, climate-appropriate trees, understory vegetation, and native biodiversity. The plan conserves mature trees and properly manages resources to ensure that trees thrive in our urban environment. Removing over 100 trees conflicts with this plan.

Would the project have a cumulative effect on biological resources?

196-19

The Project has a cumulative effect on biological resources. This property is the largest undeveloped parcel of land left in Sierra Madre. With the approval of the Stonegate Project to build 29 homes at the base of the foothills to the east, the value of this parcel in its present state has increased significantly.

If it is developed, this parcel will destroy the natural habitats of the native plants and animals that have depended on this area for almost 100 years. If approved, this development will be situated on the very last large parcel of land in the Eastern San Gabriel foothills, a significant loss for all of us. The Water Conservation Authority ranked the Monastery property very in high in conservation value in their Foothills Open Space Acquisition Study due to its watershed value, adjacency to protected lands, and potential for habitat restoration.

Cultural Resources

Would the Project have a cumulative effect on cultural resources?

196-20

As the Project area is at the base of the foothills on sloping land, there is a distinct possibility that indigenous people lived in this area and have left behind evidence of their presence that will give us

greater insights into them. Historical maps show the existence of springs. The area hasn't been surveyed. The age of the soil, gentle slope and access to water make it likely the area was inhabited. Sensitivity mapping of local foothill areas show high sensitivity in the Monastery area and the site is a high priority for a cultural resource study. Bulldozing the area and building 42 homes, roads, driveways and sidewalks would destroy the opportunity to learn more about the cultural resources this area may offer.

196-20
Cont.

Energy

Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Yes, the Project fails to incorporate high performance building standards for new County buildings beyond the current LEED Gold standard, such as Passive House, Zero Net Energy, Net Zero Water, Net Zero Waste, the Living Building Challenge and the WELL Building Standard. The Project incorporates the minimum standards required by current building codes and does not work to elevate the Project.

196-21

Greenhouse Gas Emissions

Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Yes, the project conflicts with the LA County Sustainability Plan. The 2015 LA County Greenhouse Gas Emissions Inventory, a component of the LA County Sustainability Plan, states that Greenhouse Gas Emissions from Transportation total 42% of all emissions. The project does not address the reduction of these emissions in its project as its occupants would be totally dependent on vehicles for transportation, as the project runs counter to current state wide efforts to construct housing with ½ mile of public transportation.

196-22

Hydrology and Water Quality

Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

The Watershed Conservation Authority (WCA), states that imported water is not as sustainable as ground water. Building structures will compromise the ability to sustain the water. Reducing the amount of land and increasing the amount of storm water if this water has to be imported; will have to be cleaned, which is expensive for the taxpayers.

196-23

Create an integrated and resilient water system Water management in LA County today reflects a historically siloed view that failed to recognize the interconnectedness of all water, including groundwater, surface water, rainwater, and wastewater. This approach has led to a complex, disjointed system that is not well-suited to adapting to the needs of a rapidly growing region and changing climate. Building on the successful passage of the Safe Clean Water Program (Measure W), which promises to support an integrated and holistic approach to storm water management, the region must invest in a 21st-century water system that prioritizes multi-benefit management strategies that restore and mimic natural processes and cycles.

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Cont.

Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

The Watershed Conservation Authority (WCA) advises that this development is situated on *the very last large parcel of land in the Eastern San Gabriel foothills which retains a connection between the canyons and the alluvial fan*. Alluvial fans have particularly high rates of infiltration as water can sink deep into the ground and recharge aquifers. Protecting the remaining recharge areas such as the Monastery undeveloped is a critical part of protecting our region's watersheds. This land was ranked very in high in conservation value in the agency's Foothills Open Space Acquisition Study due to its watershed value, adjacency to protected lands, potential for habitat restoration, and for public access. The Project will cover the existing 20 acre parcel with 42 building pads, driveways, sidewalks and roads that will substantially impact the percolation of rainfall levels into the ground. Collecting water in two 36 inch drains and discharging it into a water gallery at the southernmost end of the property interferes with groundwater recharge. Any excess will be sent into the city's storm water system.

196-24

Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on or off site;

Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

No, at this time the city cannot buy any additional water for this project under the NetZero Impact Plan. The entire State of California is in a drought, reservoirs are at an all time low and mandatory water conservation is in effect in many cities at this time. It is expected that more cities will be making conservation demands of their communities with no extra water available for purchase in the foreseeable future. Even if water were available, the Net Zero Plan is misleading as it gives the impression that there is no water use and the impact on the City will be zero. This is not true. As the Project argues the value of its 'net zero' water usage, the project will have double the impact on water usage as it plans to now buy all the water it needs for the next 50 years and store it for future use, while homeowners will still use and pay for municipal water going forward. At the present time there is no water available for purchase. Given the present drought conditions, there is no guarantee

196-25

that this is a viable option going forward. California is in a drought, reservoirs are at an all time low and mandatory water conservation is in effect currently in many cities. It is just a matter of time before the Governor implements restrictions in southern California. The Project fails to provide a convincing argument that storing water today results in net zero water usage, as homeowners will still use and pay for municipal water going forward.

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I96-25
Cont.

Land Use and Planning

Would the project physically divide an established community?

Despite its efforts to be Sierra Madre compatible and seamlessly integrate the Project into the community, the Project fails to do so in its attempts. Its design creates four physical 'buffers' on all sides of the property that create artificial barriers distancing the Project from its neighbours. Despite frequent use of the word connectivity, the Project fails to show discernible linkages for pedestrians and bicyclists. Even the park has no pedestrian linkage to the Sunnyside neighbourhood to the south or the Bailey Canyon Park to the east. The Project sidewalks end at the Project resulting in pedestrians walking a narrow street with no sidewalks to access the park. The Project result is a Project that sets itself apart from the established community and gives the impression of a gated community without the gate. The Project failed to accept the challenge of creating a cohesive, complementary development with a vision that is truly 'Sierra Madre quality'.

I96-26

Transportation

Would the project result in inadequate emergency access? The project results in inadequate emergency access from Carter Avenue. The road has no sidewalks and is not wide enough to accommodate the confluence of cars leaving the area during an emergency and the emergency vehicles trying to enter.

I96-27

Wildfire

Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

Due to slope, prevailing winds, and other factors, would the project exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

One of the goals of the LA County Sustainability Plan is to 'Limit development in high climate-hazard areas'. Development locations should be carefully scrutinized with consideration for climate hazards such as wildfire, flooding, extreme heat, and sea level rise. Climate science allows us to identify the areas that are most at risk, including floodplains and the urban-wildland interface at the edge of developed areas. Wildfire is an integral component of ecological processes in LA County, but it is also on the rise due to hotter temperatures and changing precipitation patterns, posing a risk to

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lives. LA County is already seeing longer droughts punctuated by intense rain events, which not only increases fire risk, but leads to flood vulnerability. In planning for these climate-related hazards, it is important to ensure large-scale development avoids areas prone to these risks.

As personally witnessed by residents, the western portion of the Monastery field is recognized as an emergency landing site by both Search and Rescue and responding fire departments. The Search and Rescue statistician estimates that they use this important staging area for their vehicles and attendant air rescue helicopters once every two years.

Objective Hz7 – “Avoid expanding development into undeveloped areas in a Very High Fire Severity Zone.” The Project is inconsistent with this objective of the General Plan and precludes the development of this parcel below the Monastery. This objective is crystal clear and no development should be considered in this location for the safety of all Sierra Madre residents.

196-28
Cont.

Would the project expose people or structures to significant risks, including down slope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Yes, it is highly likely that the Project area would be the victim of flooding or landslides following heavy rain after a fire has destroyed the hillsides.

196-29

Would the project have a cumulative effect on wildfire?

The Project would have a cumulative effect on wildfire as it provides a new fuel source for a hungry fire that would endanger the rest of the community. To try and reduce the fuel for future fire events, the California Conservation Corp has spent weeks clearing brush and trees from the Bailey Canyon area adjacent to the property. As of the morning of October 4th, crews from LA County were working the debris basin removing brush and trimming trees in Bailey Canyon. It seems counter intuitive to spend thousands of man hours removing fuel from the area and then approve a 42 unit fuel-intensive project that would replace an open meadow that has little to no fuel. The Project would provide a ‘gateway’ for a fire to flow south down the mountain by prevailing winds, ignite homes and because of the large amount of fuel, and endanger all homes on nearby streets.

196-30

Project’s Consistency with City of Sierra Madre’s General Plan Goals and Policies

The Draft EIR responded to selected General Plan Goals, Policies and Objectives and responded that the Specific Plan is consistent with the majority of them as noted in Section 4.11.1 Projects **Consistency with City of Sierra Madre’s General Plan Goal and Policies**. The Project believes it is Consistent with all but three of the City’s General Plan Goals. These include importing water from SGVMWD, no bicycle facilities and removing over 100 mature trees on the property. The following review and comments show that there are a number of inconsistencies between the General Plan and the Project Specific Plan.

196-31

Chapter One: Land Use

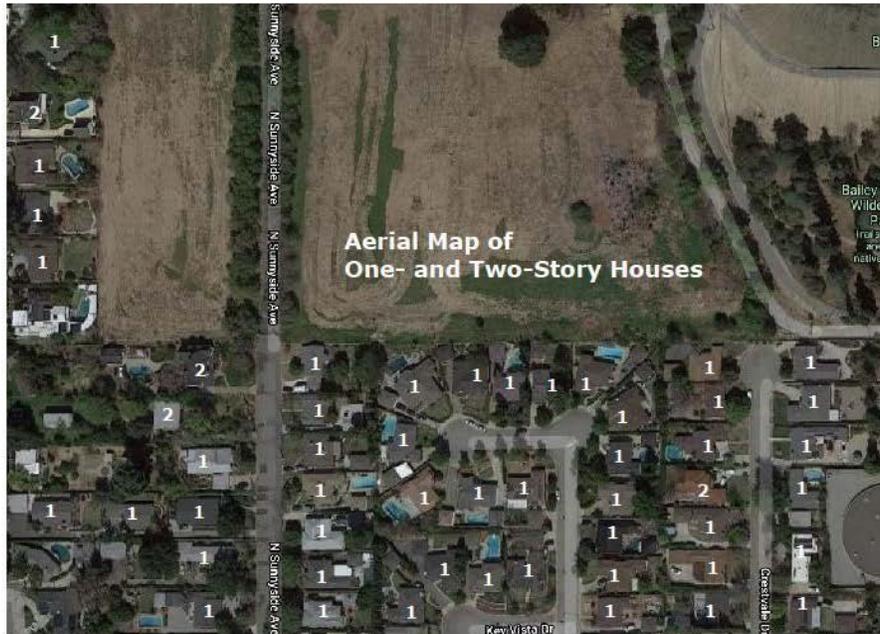
The Zoning Map Amendment which is required to change the zoning from institutional to residential states that 'The subject property is currently surrounded by single family residential land uses to the west and south. As such, the proposed project is consistent with existing adjacent land uses'. The Project is not consistent with existing adjacent land uses as the subject property is bordered by an institutional facility and open space to the north on 71 acres as well as a Wilderness Park, debris basin and open space to the East.

Goal 2: 'Preserve and enhance the diversity in the character of residential neighbourhoods ensuring that new development is compatible in its design and scale with older established development in the surrounding neighbourhood without attempting to replicate or mass produce a style of development'.

DraftEIR Response: 'The Specific Plan would assist in the implementation of this Goal through the provision of development regulations and design guidelines, which would be compatible with existing surrounding neighbourhoods'.

My Response: The majority of lot sizes and square footage of the houses do not enhance or preserve the diversity of the adjacent residential community as it is not compatible in design or scale with established nearby homes. There are 51 one story and only 4 two story houses in the neighbourhood. The opposite is currently planned for the Project, with the majority being two story and the rest one story as shown in the picture below. Neighbouring homes have larger setbacks, no sidewalks or parkways, mature trees and many design styles, not four. The resulting look and feel of the project will be 'cookie cutter' and stand out noticeably on the hillside.

196-32



Goal 3: 'Ensure that development is done in harmony with its neighbourhood, and preserves and protects privacy and mountain views of neighbouring properties'.

Draft EIR Response: 'Consistent. The Specific Plan includes development regulations and design guidelines for the project site created to be compatible with the surrounding neighbourhood. The development will be designed in a manner that is sensitive to scenic viewpoints and/or view sheds through building design, site layout and building heights'.

The project is not harmonious or compatible with the nearby neighbourhoods in lot and home sizes and is deliberately isolated on all four sides with 'buffer zones' that create physical barriers from the community. The Project is very similar to a gated community but without the gate. There is little to no integration with the neighbourhood. The project claims it is 'sensitive' to scenic viewpoints but fails to provide any supporting details. 'Sensitive' is not the same as 'consistent.' The Project is not consistent with this goal without convincing detail.

196-33

Goal 4: 'Ensure that development is done to maximize water conservation practices to reduce and minimize the impact on the City's local water supply and the ability to serve its water customers'.

196-34

Draft EIR Response: 'Consistent. The development would comply with City requirements by having net zero water usage for the first 50 years after construction. Additionally, the project would include the incorporation of green infrastructure into the design to promote water conservation'.

As the project argues the value of its 'net zero' water usage, the project will have double the impact on water usage as it plans to now buy all the water it needs for the next 50 years and store it for future use, while homeowners will still use and pay for municipal water going forward. At the present time there is no water available for purchase. Given the present drought conditions, there is no guarantee that this is a viable option going forward. California is in a drought, reservoirs are at an all time low and mandatory water conservation is in effect currently in many cities. It is just a matter of time before the Governor implements restrictions in southern California. The Project fails to provide a convincing argument that storing water today results in net zero water usage, as homeowners will still use and pay for municipal water going forward.

More to the point, the Project fails to implement the strategies established by the Department of Energy in their Net Zero Water Requirements as follows: A net zero water building is designed to:

- Minimize total water consumption
- Maximize alternative water sources
- Minimize wastewater discharge from the building and return water to the original water source.

Net zero water creates a water-neutral building where the amount of alternative water used and water returned to the original water source is equal to the building's total water consumption.

However, if the building is not located within the watershed or aquifer of the original water source, then returning water to the original water source will be unlikely. In those cases, a net zero water strategy would depend on alternative water use. Alternative water is a sustainable water source not derived from fresh-, surface-, or groundwater sources. Alternative water includes:

- Harvested rainwater, storm water, sump-pump (foundation) water
- Gray water
- Air-cooling condensate
- Rejected water from water purification systems
- Reclaimed wastewater
- Water derived from other water reuse strategies.

A net zero water building uses alternative water sources to offset the use of freshwater.

A net zero water building closes the loop on the water system by returning water to the original water source. Wastewater can be treated and recharged. Storm water can also recharge the original water source.

'Net zero water usage' is a moving target that seeks a solution that will stick. First, it was encouraging all city residents to use 'low flow' devices to reduce their water consumption, but the City Manager advised that it would be too difficult and time consuming to implement and manage. Then, it was defined that the project would buy (at today's prices) all the water needed for the next 50 years based on today's consumption. As clarified later in this document, the Project fails to

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196-35

incorporate the Department of Energy’s guidelines on Net Zero Water into the development. As of today, net zero water usage still seeks a valid, practical solution that can be implemented to meet this goal.

Goal 5: ‘Institute conservation measures so that the demand for water matches the City’s local supply’.

The Project repeatedly uses the following sentence: “The project would achieve a net-zero impact on local water supplies to offset the demand placed on existing supplies and provides supplemental water to the City, available to serve the public”.

That sentence is used to answer all the following Policies and was discussed in detail above:

Policy L1.1.6 “...new residential development... .. reduces and minimize the impact on the City’s water supply and its ability to serve its water customers”

Policy L4.3: “Ensure new development... .. incorporate water conservation measure that reduce and minimize the impact on the city’s water supply and its ability to serve its customers”

Policy L8.3: “Consider a water impact fee to apply to new residential dwelling units... .. to fund water fixture retrofits of existing homes and other water conservation measures”

In addition to answering using the above sentence, no water impact fee is being assessed.

Goal 8: ‘Preserve existing and provide additional constructed and natural open space’.

DraftEIR Response: Consistent. The project would comply with the City’s Goal of providing additional open space. The Specific Plan establishes open spaces zones on the project site, including the incorporation of a public park at the southern area of the Plan area, and includes the dedication to the City or other perpetual conservation of approximately 45 acres of open space hillside land.

The Project is not consistent because it reduces the amount of open space by destroying the 17 acres of meadow open space in order to construct 42 homes, streets, parkways, driveways and sidewalks. The project further misleads by defining open space as individual balconies. An over-developed ‘park’ of less than 3 acres sandwiched between two residential areas as a ‘buffer zone’ is on the low end of meeting criteria for ‘open space’. Further, it is known that portions of the 45 acre donation of open space are already owned by the city of Sierra Madre and another section is within the boundary of the city of Pasadena.

Goal 9: ‘Preserve the hillside areas in order to protect the environment and mountain views, obtain a balance between developed areas and the hillside wilderness, and establish the role of the hillside as an entry point into wildland areas’.

DraftEIR Response: Consistent. The Specific Plan includes the dedication to the City or other perpetual conservation of approximately 45 acres of open space hillside land to the north of the Mater Dolorosa Retreat Center.

The Project is not consistent because the hillside areas are unbuildable and not pertinent to the developer’s response. The dedication of 45 acres does not meet this goal as there is no ‘balance’

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I96-36

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.

196-36
Cont.

Objective L1: 'Continuing the existing pattern of residential housing development'.

DraftEIR 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.

196-37

Policy L4.2 – The project is inconsistent with both the General Plan and current zoning, in that it requires substantial amendments to both. So much so, that it necessitates creation of a Specific Plan that overrides the General Plan that was created by over 100 Sierra Madre citizens over a 5 year period.

Policy L5 and Policy L5.1– The Project is inconsistent with existing grid patterns as it establishes an inverted 'U' pattern criss-crossed by 3 horizontal, same size roads A, B and C. This pattern does not exist at the northern part of the city.

Policy L6 and L6.2 – The Project is not consistent, 'harmonious or compatible with the nearby neighbourhoods' in both lot and home sizes. Being 'sensitive' to scenic viewpoints is not the same as protecting privacy and mountain views of neighbours. What does this mean? Sensitive is not the same as consistent. The EIR states that the Project would 'appear to be consistent' with the visual environment. It does not as neighbourhoods have mature trees throughout and the Project puts more homes in the same amount of space. it seeks to cram twice as many homes into space as neighbouring streets. 'Appears to be' is not the same as 'is consistent'.

Policy L7 – Development is not consistent with neighbouring homes which are mostly one story. .
The project shows only pictures of 2 story homes and does not provide location of any possible one story homes.

Policy L7.2 Project is inconsistent with General Plan as it disregards the General Plan and substitutes its own Specific Plan.

Policy L7.4 – Project is not consistent with General Plan as it ignores established setbacks and creates its own. ‘Complement’ is not the same as ‘consistent’. Landscaping is not consistent and does not reflect Sierra Madre vegetation patterns as the project removes all mature trees that would help facilitate the integration of this project into the surrounding neighbourhood.

Policy L8.3 - Project is not consistent as it fails to ‘implement a water impact fee to fund retrofits of existing homes.’ As the project argues the value of its ‘net zero’ water usage, the project will have double the impact on water usage as it plans to now buy all the water it needs for the next 50 years and store it for future use. At the present time there is no water available for purchase. Given the present drought conditions, there is no guarantee that this is a viable option going forward. Homeowners will still use and pay for municipal water going forward. The Project fails to provide a convincing argument that storing water today results in net zero water usage.

Policy L17 – The project is inconsistent as it fails to protect existing views and uses the word ‘sensitive’ to describe its attention to the hillside without describing in concrete terms what this means; but appears to be a work around ‘consistent’

Policy 17.2 – The project is not consistent with this policy as it requires the use of detached garages and all of the home designs show the garage attached to the home.

Policy L 20 – The project is not consistent as it does not maintain ‘mass and scale with existing Sierra Madre homes’ on the south and west as project homes are larger and lots smaller.

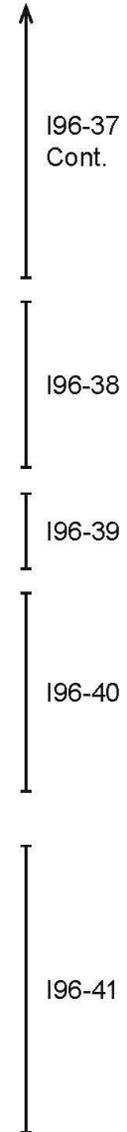
Policy L 20.1 – The project is not consistent with surrounding development, as it does not ‘maintain existing front yard setbacks’ and creates smaller, alternate ones in the Specific Plan.

Historic Preservation

Objective L44 – The project is not consistent with ‘preserving natural open space areas’ because it proposes to destroy 17 acres of meadow open space in order to construct 42 homes, streets, driveways and sidewalks. An over-developed ‘park’ of less than 3 acres sandwiched between two residential areas as a ‘buffer zone’ is on the low end of meeting criteria for ‘open space’. Further, it is known that portions of the 45 acre donation of open space are already owned by the city of Sierra Madre and another section is within the boundary of the city of Pasadena.

Policy 44.1 – Project is not consistent with ‘support the purchase of hillside property’ and so states.

Objective 45 - The Project is not consistent as it does not ‘acquire additional natural open space area’. It, in fact, destroys 20 acres of current open space.



Housing:

Goal 1.0: The Project is not consistent as it does not ‘maintain and enhance the quality of existing housing and ensure that new residential development is consistent with Sierra Madre’s small town character’ or Goal 2.0: ‘Facilitate the provision of a range of housing types to meet community needs’. The Project will look oddly out of place as it is designed with buffers on all four sides that will isolate it from the community at large. The Project repetitively repeats four housing styles in a cookie cutter pattern that is not representative of existing housing. The Project puts larger homes on smaller lots and creates density that exceeds local housing standards.

Policy 1.1: Maintain sustainable neighbourhoods with quality housing, infrastructure and open space that fosters neighbourhood character and the health of residents.

Policy 2.1: The Project is not consistent with ‘encouraging diversity in the type, size, price and tenure of residential development in Sierra Madre, while maintaining quality of life goals’ as the Project provides only similar sizes and similar pricing in the range of \$3 to \$5 million. The Project does nothing to assist the City in meeting its regional housing numbers as it only addresses housing in the above moderate range and ignores 75% of the housing required. The Project proposes development that is now considered to be outdated and inconsistent with current housing goals.

Policy 2.2: The Project does not provide ‘adequate housing sites through appropriate zoning and land use designations, consistent with Sierra Madre’s regional housing growth needs’. The Project is not consistent with the intent of this state wide mandate as it only addresses one of the four housing needs - above moderate. It does nothing to address very low, low or moderate housing growth needs, so desperately needed in California.

Policy 2.5: The Project is not consistent with this Policy to ‘encourage the construction of new, well designed second units in residential zones’ as a means of addressing a portion of Sierra Madre’s regional housing needs. The Project does not address the impact that second units would have on the Project.

Policy 5.3: The Project is not consistent as the proposed plan states that it is possible for any of the homes to use solar panels, however it is not the plan that they all have them or that any of them have them. So the proposed plan does not promote the use of such alternatives, and so is inconsistent with the General Plan policy.

Policy 5.4: The Project is inconsistent with this policy as it does not incorporate ‘transit and other transportation alternative such as walking and bicycling’ into the design. The project has a “mobility plan” which is simply roads and sidewalks within the new project. There is no plan for alternatives and no continuity with the neighbours.

Circulation:

Goal 1: The project is not consistent, as the ‘balanced transportation system’ only addresses vehicular and pedestrian travel with roads and sidewalks and on-street parking. There are no plans

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for bicycle lanes. The word 'system' implies connectivity with the surrounding neighbourhoods, but there is no pedestrian linkage as the surrounding streets do not have sidewalks and there is no practical access to transit systems.

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Goal 2: The project is not consistent as it does not 'promote safe and well-maintained streets' and addresses only the streets within the project and does not address the many safety issues this project will cause for streets surrounding the project. It says nothing about the impact of safe and maintenance as the result of 3-400+ car trips on neighbouring streets and the residents of Carter, Lima, Grove and Sunnyside. A thorough analysis of these impacts needs to be completed to fully understand the projects safety issues on the neighbouring community. Two areas need to be addressed:

How the project would implement street sections that slow traffic.
How users would differentiate between the main Sunnyside entrance and the ingress/egress secondary access road, Carter Avenue.

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Goal 3: The project is not consistent as it does not 'preserve quiet neighbourhoods with limited thru traffic'. It repeats the same cut and paste responses for the above two goals. In reality, the project does nothing to preserve quiet surrounding neighbourhoods to the west and south. It does, in fact, increase thru traffic by a minimum of 300-400+ car trips a day, an increase of over 300%. To get to the project, the cars will have to travel local streets including Sunnyside, Lima, Carter and Grove. There is no mention of the impact of traffic on these streets. A study needs to be conducted to study the impacts of the development on adjacent streets.

Once again, the response only addresses traffic within the project itself and not its impact on the community.

Objective L51: The project is not consistent as it does nothing to 'address cyclists or pedestrians in their 'balanced circulation system' and there is no connectivity for pedestrians or bicyclists from the project into the community at large. The Project is inconsistent as it fails to develop a multi-modal transportation system for pedestrians and cyclists.

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The project is so far out of range of public transportation that it is not a viable option. Owners that are able to afford to live in his neighbourhood are not likely to use mass transit, preferring to use their cars necessitating increased usage of surrounding.

Policy L51.2: The Project is not consistent with the policy to 'limit the development of new roadways or the expansion of existing roadways', as it fails both objectives. It creates two new roadways and expands 100 % of the existing roads in the project.

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Policy L51.5: The project is inconsistent with this policy to 'encourage and support the use of non-automotive travel throughout the City'. In reality, it is not addressing this in any way other than a limited myopic view of a 'circular system using non-vehicular modes of transportation in a system of pedestrian pathways within the project site'. Again, looking from the inside-out with no discernible impact on non-automotive travel throughout the City.

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Policy L51.6: The project is inconsistent as it does nothing to address non-vehicular travel. EIR needs to provide details how a buffer along existing adjacent homes encourages residents to walk and bicycle through the area.

Policy L51.8: The Project is inconsistent with this policy to 'prioritize improvements for nonvehicular modes like bicycles, pedestrians, and transit to eliminate the need for new or expanded roadways and intersection improvements like traffic signals'. There are no bicycle paths through the Project, no pedestrian connectivity with surrounding neighbourhood and the increased traffic on local roads will like require intersection improvements.

Objective L52: The project is inconsistent for its failure to 'improve streets to maintain levels of safety to vehicles, cyclists and pedestrians'. The proposed project is likely to result in transportation related hazards to both cyclists and pedestrians. The surrounding neighbourhood streets that feed into the project were not designed to handle an increase in traffic of 300-400+ additional car trips a day and the project does nothing to improve the safety of any of the existing residents of local streets nor does it address maintenance costs for those streets due to increased traffic. Per the LA County Sustainability Plan, total vehicle miles travelled is one indicator of an area's dependence on single-occupant vehicle travel. This mode of travel, while traditionally the most convenient option, is carbon- and resource-intensive. Average daily VMT has been trending upwards. In 2017 it was at nearly 21.9 miles per person per day.

Traffic fatalities and severe injuries are serious public health threats: on average, one person is killed every four days as a result of a traffic collision on unincorporated County roadways. Further, people walking and biking are the most vulnerable road users. In fact, traffic collisions are the leading cause of death for children in LA County and also place older residents at heightened risk. In 2015, there were 1,091 severe injuries or fatalities across LA County. (LA County Sustainability Plan)

It is also stated that the project would not result in impacts to existing levels of service at any nearby intersection. That is incorrect. It is highly likely that multiple stop signs will be required at the intersection of Carter and Grove to control traffic volume to prevent accidents.

Policy L52.8: The project is inconsistent as it fails to 'incorporate bicycle facilities into the design of land use'. The Project states that 'due to the small size and scope of this project, bicycle facilities would not be implemented. Although no bicycle facilities and improvements are proposed under the project, the project would not impact existing bicycle facilities in the vicinity of the project, including the existing bicycle lanes within Sierra Madre Boulevard. Nonetheless, because bicycle facilities would not be required, the project would be inconsistent with these policies'.

Policy L52.9: The project is inconsistent as it does nothing to implement 'sidewalk continuity with existing neighbourhoods'. There is no linkage from the project into the community. The lack of sidewalk continuity increases the isolation of the project from the rest of Sierra Madre and makes it inconsistent with the city's general plan.

Objective L53: The project is inconsistent, as it fails to 'protect local neighbourhoods from through traffic'. It does protect its future residents from through traffic - as the project is a stand-alone U-shaped community, but it ignores the tremendous impact on its residential neighbours. Interestingly, 'Carter Avenue would become an egress and ingress lane and would still allow access

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to the Mater Dolorosa Retreat Center'. This is a 100% change from its existing use as a small, 20 foot wide dead end road. 'unbelievably, there is no discussion of the increased traffic (300-400+ vehicle trips daily) caused by project residents on the surrounding residential neighbourhoods and how they will be protected from this intrusion of through traffic on Lima, Sunnyside, Carter and Grove. This is an unacceptable analysis of Objective L53.

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Chapter Two: Resource Management

Hillside Preservation

Goal 3: The Project is not consistent because it does not 'provide public access to the San Gabriel Mountains via parks, trails and roads.' The project creates the illusion of connectivity from the project park to Bailey Canyon Park. In reality, because the project is next to the Park, connectivity is achieved by walking or driving down Carter Avenue and entering the park. There is no special pathway; in fact, the Project sidewalk ends at Project boundary, forcing walkers on Carter, a 20 foot street with no sidewalks.

196-53

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.

196-54

Tree Preservation:

- Goal 1 - Continued preservation and protection of existing trees.
- Goal 2 - Increase of the City's community forest.
- Objective R10 - Maintaining and enhancing the City's significant tree resources.
- Policy R10.2 - Continue to develop tree preservation and protection measures.

The project is not consistent with these four simple, easy-to-understand goals in the General Plan. Removing over 100 trees is a significant environmental impact, not only to the Monastery property, but to the neighbouring community as well.

The project fails to meet these critical goals and responds with the same 'cut and paste' sentence: 'The Specific Plan includes a Tree and Planting Plan which includes the planting of new trees and will adhere to the City's Tree Preservation and Protection Ordinance', which includes replacing only 10 trees as they are 'protected'.

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The project disregards Goal 1 completely by removing over 100 mature trees, making it impossible to preserve and protect them. It appears that 100% of the trees on the project will be removed. No attempts to preserve and integrate them into the project them have been made.

Goal 2, increasing the community forest - has been ignored by removing 100% of mature trees. Replacing fully grown trees that are food and habitat sources, with young, immature trees will not compensate for the loss of this irreplaceable community forest.

Objective R10.1 is disregarded by the project. Instead of maintaining and enhancing these valuable and priceless City resources, the developer has chosen to remove them. Instead of trimming and

shaping these mature trees for future generations to enjoy, they will be cut down and destroyed, a whole-hearted, irreplaceable loss for a recognized 'Tree City USA'.

The California Department of Fish and Wildlife (CDFW) recommends that the project 'avoid removal of any native trees, large and dense-canopied native and non-native trees, and trees occurring in high density and recommends avoiding impacts to trees protected by the City's Tree Ordinance. CDFW also recommends avoiding impacts to understory vegetation (e.g., ground cover, sub shrubs, shrubs, and trees).

The developer's plan to replace 'at least ten trees on site' for the 100 removed and planting new young trees falls woefully short of increasing the community's forest. In both cases, it will be decades before the baby trees grow into the mature trees that now gracefully adorn the Monastery property. Notably around the Monastery buildings to the north.

The developer states that the 10 trees would be subject to a 5 year monitoring effort by an independent 3rd party arborist. And that this 'may' result in recommendations of remedial actions for poor or declining health. This is vague as there are no details regarding the recipient of this report, the party required to take actions and fund the recommendations/replacements if needed or whether the findings are required as well as party responsible for overseeing the monitoring. As such, it falls short of meeting the following criteria:

As noted by the CDFW, mitigation measures must be feasible, effective, implemented, and fully enforceable/imposed by the lead agency through permit conditions, agreements, or other legally binding instruments (Pub. Resources Code, § 21081.6(b); CEQA Guidelines, §§ 15126.4, 15041). A public agency shall provide the measures that are fully enforceable through permit conditions, agreements, or other measures (Pub. Resources Code, § 21081.6). CDFW recommends that the City prepare mitigation measures that are specific, detailed (i.e., responsible party, timing, specific actions, location), and clear in order for a measure to be fully enforceable and implemented successfully via a mitigation monitoring and/or reporting program (CEQA Guidelines, § 15097; Pub. Resources Code, § 21081.6).

Policy R10.8: The Project is not consistent with the need to 'continue to monitor construction projects with regard to grading and construction effects on trees, tree removal and replacement' as all trees on the development site will be removed to facilitate construction.

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Cont.

Water Resources:

Goal 1: The Project is not consistent with 'conservation of the City's water resources'.

Consistent: The proposed project states it would 'incorporate water conservation measures guided by the development regulations and design guidelines of the Specific Plan'. These measures are insufficient to conserve our water resources. The Project again refers to the net zero impact plan which is unachievable in today's drought conditions. Their water conservation measures are those implemented by the bulk of Sierra Madre residents years ago and were inadequate to address needed conservation.

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Goal 3: The Project is inconsistent with the goal to 'link growth to the availability of water'. The Project proposes to buy water now to achieve a net zero impact on local water supplies but fails to provide convincing details that support this as a viable response. Their proposal to buy water now is unattainable as water is not available to purchase and they have failed to provide an alternative that is workable and consistent with this Goal. There is no available water for purchase; therefore there should be no development growth.

Objective R14: The Project is inconsistent as that it provides no details on 'Ensuring adequate water availability for future growth in the City.' Their proposed plan to purchase water now fails because water is not available and proposed measures only partially address water conservation.

Goal 4: The Project is not consistent with the goal to 'use local sources of groundwater rather than imported water' for development needs. It again provides the unattainable goal of net zero by purchasing 50 years worth of water now (that is not available). The Project fails to meet the sustainability goals of Los Angeles County by using ground water and not water sourced from outside the region. The Metropolitan Water District advises that in '2017, approximately 59% of water used in LA County was sourced from outside the region. Only 9% came from local recycled water sources and 32% was sourced from local groundwater resources'. One of the goals of the LA County Sustainability Plan is to increase the use of groundwater and rely less on water from outside the region. The Project notes that because it would use imported water from SGVMWD, the project would be inconsistent with this goal.

Objective R12: The Project is not consistent with the objective to 'optimize the use of water resources' as it fails to provide water efficiency measures to reduce indoor and outdoor water use above current CALGreen standards.

Objective R15: The Project is not consistent with the objective to 'conserve water during times of drought' and provides the same disproved net-zero impact response and basic water conservation measures that not proven to be effective during a drought.

Air Quality:

Objective R23: The Project is inconsistent with this objective to 'reduce the amount of vehicular emissions in Sierra Madre'. The 2015 LA County Greenhouse Gas Emissions Inventory, a component of the LA County Sustainability Plan, states that Greenhouse Gas Emissions from Transportation total 42% of all emissions. The project does not address the reduction of these emissions in its project as its occupants would be totally dependent on vehicles for transportation, as the project runs counter to current state wide efforts to construct housing within a ½ mile of public transportation.

Policy 22.2: The Project is not consistent with the policy to 'Prohibit the development of land uses and land use practices which would contribute significantly to poor air quality'. The LA County Sustainability Plan advises that single family housing developments are a building practice of the past as they are not environmentally friendly, contribute to greenhouse gas emissions and fail to address current housing needs.

Chapter Three: Hazard Prevention

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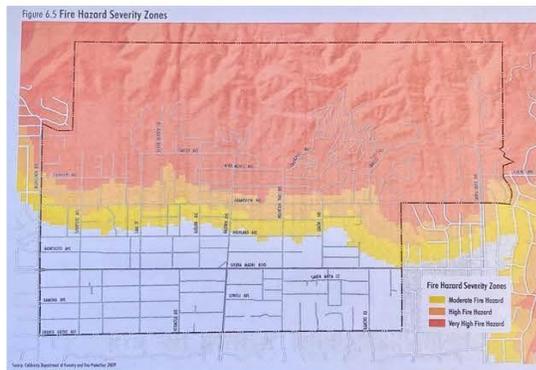
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Fire Safety/WILDFIRES

Objective Hz7 – “Avoid expanding development into undeveloped areas in a Very High Fire Severity Zone.”

Policy Hz2.5 Assess the impacts of incremental increases in development density and related traffic congestion on fire hazards and emergency response time, and ensure through the development review process that new development will not result in a reduction of fire protection services below acceptable levels.

The project site is located in a very high fire hazard severity zone as shown below, according to the Cal Dept of Forestry and Fire Protection and the Sierra Madre Fire Department. It is inconsistent with the General Plan that states not to build in a high fire zone. Parts of Sierra Madre have been evacuated three times in the last 35 years, and the incidence and intensity of wildfires has been increasing. Putting homes and people in danger in the event of a fire is foolhardy and stretches already limited fire response. In the event of a fire, responders are forced to protect structures and are not able to fight fires and create breaks. This development would necessitate Carter Avenue being identified as a red flag street in the event of a fire emergency as it is not wide enough to accommodate emergency vehicles.



The LA County Sustainability Plan states that ‘development should be limited in high climate-hazard areas, such as wildfire, flooding, extreme heat, and sea level rise. Climate science allows us to identify the areas that are most at risk, including urban-wildland interface at the edge of developed areas. Wildfire is an integral component of ecological processes in LA County, but it is also on the rise due to hotter temperatures and changing precipitation patterns, posing a risk to lives. LA County is already seeing longer droughts punctuated by intense rain events, which not only increases fire risk, but leads to flood vulnerability. In planning for these climate-related hazards, it is important to ensure development avoids areas prone to these risks’.

Flood/Landslide:

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Law Enforcement:

Policy C1.2: The Project provides the same 'cut and paste' response to all four General Plan Objectives and Policies that states that paying an impact fee will satisfactorily address all four General Plan goals. The Project is inconsistent as it fails to provide the required assessment or analysis of the impact of the Project on police response times and service calls. The SMPD states that the Project would affect response times and service ratios. The Project argues that the payment of a one-time development fee in the amount of approximately \$2,000 per home (total of \$84,000) would offset the increased personnel or equipment required to maintain acceptable service ratios, but fails to provide details on how this amount over 50 years would do so.

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Policy C4.3: The Project is inconsistent with this General Plan policy as it fails to provide any passive prevention measures being addressed by this development as required.

Recreation Services:

Objective C6: The Project is inconsistent with this objective to provide 'quality recreation, leisure and social programs and facilities for the various segments of the Sierra Madre community'. The proposed project struggles to convince us that the small 3 acre park that serves as a buffer between the project and homes on the south end of the project and also serves as a cover for the 63,500 cubic foot water retention storage gallery underneath meets this objective. There are no provisions for leisure and social programs for the community.

Policy C8.1: Continue a park maintenance program to secure the existing nature and beauty of the City Parks and open space areas.

The project is labelled as 'Consistent'. However, the proposed project has nothing to do with a future maintenance program for either the park or open space.

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Policy C8.3: Install and replace existing landscape with native and drought resistant plants in City parks where deterioration has occurred.

The project is labelled as 'Consistent'. However, it will only install in the small 3 acre park.

Policy C11.2: The Project is inconsistent with this policy to 'maintain and update a maintenance and repair plan for existing and future City facilities' as it would neither maintain or update a maintenance and repair plan for the small park.

Transit Services:

Objective C30: The Project provides again provides a 'cut and paste' response to all three General Plan Objectives and Policies addressing public safety by stating improvements to Sunnyside and Carter and the creation of three new roads. The Project is inconsistent as it adds 3-400+ new car trips a day on the neighbouring streets of Sunnyside, Grove, Carter and Lima street and claims the proposed project "would not result in new traffic hazards..." and provides no analysis to support this statement. The Project would "implement street sections that slow traffic and create a safe and

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pleasant small neighbourhood environment”. However, they are addressing only the roads within the Project boundaries, not the surrounding neighbourhoods. They have repeatedly failed to address the Project’s many impacts on the city streets that will be utilized to access this project. A traffic and impact study of these streets as a result of this Project needs to be undertaken to evaluate the impact of over 400+ additional car trips on small local roads that were not designed or built to become access routes to a housing development. Two are dead end: Grove providing access to Bailey Canyon parking lot and Carter providing access to the debris basin. The Project has further failed to do a safety analysis of the increased traffic on the pedestrians and bicyclists who use neighbouring streets daily as these streets do not have sidewalks.

Policy C30.2: The EIR and Project say they are consistent with this, using the same sentence describing the new roads and connections in the new project and profess to “implement street sections that slow traffic and create a safe and pleasant small neighbourhood environment”. Again, only referring to streets within the Project boundaries, not the surrounding neighbourhoods which will bear the brunt of traffic and suffer the negative consequences.

Policy C30.3: The Project is inconsistent with ‘maintaining safety and efficient circulation’; again, using the same cut and paste response. The Project has failed to initiate a Traffic Study incorporating the neighbouring streets that would be utilized to access this development. The village atmosphere that residents in the area now enjoy would be destroyed forever with no compensating value.

Public Services:

Policy C31.5: The Project is not consistent with this policy that ‘requires new development capture for percolation on site the maximum practical amount of storm water’. The Project states that it would ‘introduce more impervious area that would result in more surface runoff.’ It provides an inadequate response that ‘a new storm water drainage system would assist in reducing runoff velocities’ without providing a supportive analysis. It is obvious that the Project significantly alters the existing open meadow area by adding 42 non-permeable concrete pads, sidewalks, walkways, driveways, road and curbs which do not allow the natural percolation of water into the soil. The Project artificially forces water into two north/south storm drains that direct water to the southernmost portion of the property where it is expected to percolate into an area that is less than 20% of the previous open meadow. The Project is inconsistent with this policy.

Tree Preservation

Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

It is obvious that removing over 100 trees is a significant environmental impact, not only to the Monastery property, but to the neighboring community as well. It is clear that the Project conflicts with the City’s tree ordinance as it fails to comply with the following goals:

Goal 1: Continued preservation and protection of existing trees.

Goal 2: Increase of the City’s community forest.

Objective R10: Maintaining and enhancing the City’s significant tree resources.

Policy R10.2. Continue to develop tree preservation and protection measures.

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The project fails to meet these critical goals and responds with the same sentence: “The Specific Plan includes a Tree and Planting Plan which includes the planting of new trees and will adhere to the City’s Tree Preservation and Protection Ordinance,” which includes replacing only 10 trees as they are protected.

The project disregards Goal 1 completely by removing over 100 mature trees, making it impossible to preserve and protect them. It appears that 100% of the trees on the project will be removed. No attempts to preserve and integrate them into the project have been made.

Goal 2, increasing the community forest – has been ignored by removing 100% of mature trees. Replacing fully grown trees, that are food and habitat sources, with young, immature trees with not compensate for the loss of this irreplaceable community forest.

Objective R10.1 is disregarded by the project. Instead of maintaining and enhancing these valuable and priceless City resources, the developer has chosen to remove them. Instead of trimming and shaping these mature trees for future generations to enjoy, they will be cut down and destroyed, a whole-hearted loss for a recognize “Tree City USA.”

Cumulative effects

If this Project is developed, it will destroy the last large parcel of land in Sierra Madre. With the development of Stonegate, there will be no more open parcels of this size in our community.

The cumulative impacts of losing both to development affects biodiversity and groundwater.

The Projects’ Biological Resources Report failed to provide a thorough discussion of direct, indirect, and cumulative impacts affecting project biological resources. There was no discussion regarding Project-related indirect impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats or riparian ecosystem. Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas were not discussed or evaluated. There was no discussion of the potential adverse impacts from lighting, noise, use of chemicals or temporary and permanent human activity.

The Project failed to discuss the property’s connection with the eastern San Gabriel foothills and investigate its roll in recharging the Raymond Basin. A noted earlier, this development is situated on *the very last large parcel of land in the Eastern San Gabriel foothills which retains a connection between the canyons and the alluvial fan*. Alluvial fans have particularly high rates of infiltration. There, water can sink deep into the ground and recharge aquifers. Keeping remaining recharge areas as undeveloped as possible is a critical part of protecting our region’s watersheds and creates an integrated and resilient water system. This Project fails to recognize the interconnectedness of all water, including groundwater, surface water, rainwater, and wastewater. It exacerbates a disjointed system that is not well-suited to adapting to the needs of a rapidly growing region and changing climate. Building on the successful passage of the Safe Clean Water Program (Measure W), which promises to support an integrated and holistic approach to storm water management, the region must invest in a 21st-century water system that prioritizes multi-benefit management strategies that restore and mimic natural processes and cycles.

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It is important to note that *The Water Conservation Authority* ranked the Monastery property very in high in conservation value in their Foothills Open Space Acquisition Study due to its watershed value, adjacency to protected lands, and potential for habitat restoration.

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In striving to meet the Paris Climate Agreement, we have an opportunity and urgency to design buildings that are more energy and water efficient, carbon conscious, and healthy and supportive to their residents. LA County's new buildings should have a minimal impact on countywide emissions and the environment. This Project hasn't proven that its impact is minimal.

LA County's landscapes and ecosystems span islands, mountains, deserts, beaches, and coastlines. The region is home to the largest set of threatened and endangered plants and animals in the continental United States, and it is the most urbanized area to be designated one of Conservation International's global Biodiversity Hotspots. In addition to providing habitats for flora and fauna to thrive, the diverse landscapes throughout LA County offer residents and communities areas to be active and exercise or relax, greatly improving health and emotional well-being. The region's ecosystems, habitats, and biodiversity are under stress from development projects like this. If it is developed, this parcel will destroy the natural habitats of the native plants and animals that have depended on this area for almost 100 years.

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Conclusion

The DraftEIR makes statements without supporting facts, analyses or documentation .

In order to provide a repetitious response of 'consistent', it provides responses for only a portion of the goal, objective or policy and ignores the rest.

When the Project struggles to be 'consistent', it substitutes words of other meaning, such as sensitive' or 'compliment.

The Project does not realistically and honestly assess the projects impacts on the community.

It makes a number of errors that should have been caught and corrected.

It provides repetitive 'cut and paste' responses that, in many cases, did not address the issue.

The Project fails to meet the objectives it set at the beginning of the Draft EIR.

The Project is not consistent with the General Plan goals and objectives and replaces it with its own 'Specific Plan' that is not in the community's best interests. It would be a mistake for the City to override the General Plan in favour of this Specific Plan for all the reasons previously noted in this review of the DraftEIR. It would be a 'defining' moment in Sierra Madre history to allow a Project of this poor design that is so contrary to 'Sierra Madre quality' in our community and allow the Specific Plan to set development design standards for future housing.

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Response to Comment Letter I96

Individual
Lynne Collman
October 4, 2021

- I96-1** This comment requests the following comments (Comments I96-2 through I95-71) be included in the responses to comments of the Final EIR. As shown, the commenter's request has been recorded as part of this Final EIR.
- I96-2** The comment is introductory in nature and expresses the commenter's opinion that the project will result in significant impacts.
- I96-3** The comment states that the project does meet Project Objective 1 because the development would be one phase, the project is not compatible with the current zoning and design standards, and the project is not compatible with the existing community character. Please refer to Global Response GR- 7. In addition, as concluded in Draft EIR Section 4.11 the project would work in harmony with neighborhood character through regulations and design guidelines which would be compatible with existing neighborhoods. In addition, as discussed in Section 4.1.5, Impact Analysis, of Section 4.1, Aesthetics, the project's impacts to aesthetics would be less than significant.
- I96-4** The comment states that the project does meet Project Objective 4 because it adds development to the site and does not provide information regarding traffic impacts to adjacent streets. Please refer to Global Response GR-6.
- I96-5** The comment states that the project does meet Project Objective 5 because portions of the land do not belong to the Monastery Property and Colby Canyon is not located near the property. Please refer to Response to Comments I42-15 and I42-26.
- I96-6** The comment states that the project does meet Project Objective 6 because it does not provide safe and efficient access at North Sunnyside Avenue, south of the project. This objective is met because the project will construct roads that comply with SMMC standards. As discussed in Draft EIR Section 3.3.6.1, the proposed project would include reconfiguration of North Sunnyside Avenue, located within the western portion of the site, which would be moved farther to the west. North Sunnyside Avenue would transition from a width of 40 feet at its existing terminus to a varying 54- to 56.5-foot right-of-way within the project site, with curbs and gutters, parking and planting areas on both sides, a landscaped parkway and sidewalk on the west side, and tree plantings on the east side of the street. There is no evidence that these improvements would result in a safety impact. Final EIR Section 4.17 details consistency with existing General Plan policies and objectives highlighting the need for safety. Impacts associated with transportation, including roadway safety, were found to be less than significant.
- I96-7** The comment states that the project does meet Project Objective 7. Please refer to Global Response GR-1.
- I96-8** The comment requests that the Planning Commission and City Council request missing supporting details and information before making a decision. The City acknowledges this comment, and notes that it is not related to the adequacy of the Draft EIR. Additional information has been provided throughout Responses to Comments I96-1 through I96-71.

- I96-9** The comment states that the project would have impacts on scenic vistas because it would impact views from neighboring homes. Please refer to Response to Comment I77-7.
- I96-10** The comment expresses concern about the timing of biological surveys for the project, specifically as it relates to impacts to bats. Please refer to Response to Comment A1-7. The commenter is correct that the filed visit occurred on May 29, 2020.
- I96-11** The comment states that chemical spraying occurred on the site in 2019 and impacted wildlife and plants on the site. However, the City is unaware of any record of such spraying or evidence that such spraying changed the baseline conditions on the project site. Regardless, surveys for biological resources were conducted May 29, 2020 (as described in Appendix C1 of the Draft EIR) and determined the project site does not contain suitable habitat or connections to other large undeveloped areas to support wildlife corridors. Additionally, as described in Appendix C1 to the Draft EIR, the United States Fish and Wildlife Service does not designate the site as a critical habitat nor is the project site not located within any habitat conservation plan or natural community conservation plan. As discussed in CEQA Guidelines Section 15125(a)(a), generally, the lead agency should describe the physical conditions as they exist at the time the notice of preparation (NOP) is published. The NOP for the proposed project was published June 24, 2020. Therefore, the baseline conditions and environmental setting for biological resources were accurately described.
- I96-12** The comment states that the survey did not address seed banks or lasting roots of native plants. The project site has been historically removed of native vegetation and depleted the native seed bank. The current seed bank is expected to be composed of the current vegetation, which consists of non-native vegetation.
- I96-13** The comment expresses concern about impacts to wildlife corridors, general biological resources concerns, and human interactions with mountain lions/bears. Please refer to Response to Comment I67- 1 for a discussion related to wildlife corridors and Response to Comment A1-17 for discussion related to human interactions with mountain lions/bears. In addition, as discussed in Draft EIR Section 4.4, Biological Resources, impacts to biological resources would be less than significant with mitigation.
- I96-14** The comment expresses concern related to impacts to bat habitat and suggests implementation of bat-specific mitigation measures. Please refer to Response to Comment A1-7 and A1-9. A project-level biological resources survey, mentioned by the commenter, has been prepared and included as Draft EIR Appendix C1.
- I96-15** The comment expresses concern related to impacts to nesting bird species and states that MM-BIO-1 would not be sufficient. Please refer to Response to Comments A1-20 and A1-22.
- I96-16** The comment provides conclusionary remarks about how impacts to biological resources were not adequately evaluated. Please refer to Response to Comment A1-22.
- I96-17** The comment expresses concern about the removal of trees with project implementation. Please refer to Global Response GR-2.

- I96-18** The comment states that the project is inconsistent with the Los Angeles County Sustainability Plan. The LA County Sustainability Plan¹² applies only to unincorporated areas of Los Angeles County, and does not apply within the incorporated City of Sierra Madre.
- I96-19** The comment states that the project would have a cumulative impact on biological resources due as the project site is the largest parcel of land left in the City. as discussed in Draft EIR Section 4.4, impacts to biological resources would be less than significant with mitigation. Please refer to Draft EIR Chapter 5, Cumulative Effects, which states that no cumulatively-considerable impacts related to biological resources would occur.
- I96-20** The comment states that there is potential for cultural resources to be found on the project because of the site characteristics and that cumulative impacts would occur. Please refer to Draft EIR Section 5.4.5, Cultural Resources, which determined that impacts to cultural resources would be less than significant with mitigation. In addition, please refer to Draft EIR Chapter 5, Cumulative Effects, which states that no cumulatively-considerable impacts related to cultural resources would occur.
- I96-21** The comment states that the project fails to incorporate high performance building standards beyond the current LEED Gold Standard and meets the minimum standards. The project would comply with building code standards which include energy efficiency requirements. As stated in Draft EIR Section 4.6, Energy, the project would result in less than significant impacts related to inefficient, wasteful, or unnecessary consumption of energy resources.
- I96-22** The comment states that the project would conflict with the Los Angeles County Sustainability Plan's greenhouse gas requirements. Please refer to Response to Comment I96-18.
- I96-23** The comment states that the region must invest in an up-to-date water system that can meet water requirements and mimic the natural water cycle. The City acknowledges this comment, and it does not pertain to the adequacy of the Draft EIR.
- I96-24** The comment expresses concern related to the project's impacts on groundwater recharge, given that the site is located in an alluvial fan. Please refer to Response to Comment I32-2.
- I96-25** The comment expresses concern about impacts to erosion as they relate to the alteration of the drainage pattern and the project's net-zero water impact. As discussed in Draft EIR Section 4.10, with implementation of project design features, impacts associated with substantial erosion or siltation on or off site would be less than significant. Regarding the project's net-zero water impact, please refer to Global Response GR-1.
- I96-26** The comment states that the project would physically divide the community due to creation of buffers, and lack of pedestrian and bicyclist linkages to the project site. The concerns mentioned by the commenter would not result in division of the community. As concluded in Draft EIR Section 4.11, Land Use and Planning, the project would not physically divide a community. It should also be noted that, the project applicant is proposing off-site widening to Carter Avenue, between the southeastern portion of the project site boundary and Lima Street, which would include a 6-foot sidewalk along the northern portion of Carter Avenue (see Final EIR Section 3.3.12 and Global Response GR-5 for details).

¹² County of Los Angeles. 2019. Los Angeles Countywide Sustainability Plan. <https://ourcountyla.lacounty.gov/plan>

- I96-27** The comment expresses concern about emergency access from Carter Avenue. Please refer to Global Response GR-4 and Global Response GR-5.
- I96-28** The comment provides background information related to wildfire, flood, extreme heat, and sea level rise that do not pertain to the adequacy of the Draft EIR. The comment also states that the project is inconsistent with Objective Hz7 and the LA County Sustainability Plan. Please refer to Global Response GR-3 and I96-18. Lastly, the comment expresses concern related to the use of the site as an emergency landing site. Please refer to Response to Comment I10-1.
- I96-29** The comment states that the project is likely to be a victim of flooding or landslides after a fire has destroyed the hillsides. As concluded in Draft EIR Section 4.20, Wildfire, impacts associated with downslope and downstream flooding post- fire would be less than significant.
- I96-30** The comment states that the project would have a cumulative impact on wildfire risks because the project would provide a gateway for fire to flow into the neighborhood. As stated in Chapter 5, the project would not result in cumulatively considerable impacts to wildfire. Please refer to Global Response GR-3.
- I96-31** The comment states that the project has more inconsistencies than what is stated in Draft EIR Section 4.11. The City acknowledges this comment, and notes that it is an introduction to the comments that follow. Please see Responses to Comments I96-32 through I96-70.
- I96-32** The comment states that the project is inconsistent with Goal 2 of the General Plan as it is inconsistent with adjacent land uses and design of nearby residences; because of the limited two-story homes in the area; and neighborhood characteristics such as larger setbacks, no sidewalks, and mature trees. See Global Response GR-7. In addition, as concluded in Draft EIR Section 4.11 the project would work in harmony with neighborhood character through regulations and design guidelines which would be compatible with existing neighborhoods. In addition, as discussed in Section 4.1.5, Impact Analysis, of Section 4.1, Aesthetics, the project's impacts to aesthetics would be less than significant. It should be noted that, once the project is complete, the proposed landscape plan would result in an increase in trees on site, as compared to existing conditions. Lastly, related to the size of the proposed residences and their compatibility with nearby uses, please refer to Response to Comment I76-9.
- I96-33** The comment states the project is not compatible with Goal 3 because the project would not preserve scenic views and states that the project is isolated using buffer zones. Please refer to Global Response GR-7. In addition, as discussed in Final EIR Section 4.11.5, the proposed project includes development regulations and design guidelines for the project site created to be compatible with the surrounding neighborhood. The proposed project is designed in a manner that is sensitive to scenic viewpoints and/or viewsheds through building design, site layout and building heights. Therefore, the project would be consistent with Goal 3 of the General Plan.
- I96-34** The comment states that the project is inconsistent with Goal 4 of the of the General Plan and expresses concern that there is no water available for purchase. Please refer to Global Response GR- 1 and Global Response GR-7. In addition, as discussed in Final EIR Section 4.11.5, the proposed project would comply with City regulations per Goal 4 and would incorporate green infrastructure into the project design to promote water conservation; thus, the proposed project would be consistent with this goal.

196-35 The comment provides background information related to net-zero water use and states that the project's net-zero water impact fails to implement the strategies for Net Zero Water Requirement and is not consistent with General Plan Policies L1.6, L4.3, and L8.3. See Global Response GR-1, and Global Response GR-7. As discussed in Final EIR Section 4.11.5, the proposed project would incorporate water conservation strategies and water conservation measures guided by the development regulations and design guidelines of the Specific Plan into the project design to reduce and minimize the proposed project's impact on the City's water supply. As such, the proposed project would be consistent with General Plan Policies L1.6, L4.3, and L8.3.

196-36 The comment states that the project is not consistent with General Plan Goal 8 and Goal 9. See Global Response GR-7.

More specifically, regarding Goal 8 of the General Plan, the comment expresses concern that open space is being defined as individual balconies. The project's proposed open space can be found in Draft EIR Chapter 3, Project Description. Open space on private balconies is not included in the total acres of designated open space. The proposed project would include the incorporation of a neighborhood park and the conservation of approximately 35 acres of protected open space to the City. Therefore, As concluded in Draft EIR Section 4.11, Table 4.11-1, the proposed project would comply with the City's goal of providing additional constructed open space and would be consistent with Goal 8 of the General Plan. The comment also expresses concern that the proposed open space is owned by the City of Sierra Madre and within the boundary of Pasadena. Please refer to Response to Comment I42-15.

Regarding Goal 9, the comment expresses concern about the designated open space being on a property that is not buildable being used to create balance. As concluded in Draft EIR Section 4.11, the conservation of this area in perpetuity would be consistent with this goal. In addition, it should be noted that the project is not located in a hillside area, as outlined by the City's General Plan.¹³ Therefore, consistency with this goal was not provided in Draft EIR Section 4.11.5. Nonetheless, the project would preserve the 35-acre open space hillside area through a conservation easement. No development would occur within this area. In addition, this goal calls for a balance between developed areas and hillside wilderness. The proposed project would be surrounded by similar development and therefore would not conflict with the existing balance between developed areas and hillside wilderness.

The comment further expresses concern about the preservation of Colby Canyon when there is no relation of Colby Canyon and the project site. Please refer to Response to Comment I42-26.

196-37 The comment states that the project is inconsistent with Objective L1, L4, Policy L4.2, L5, L5.1, L6, L6.2, L7. As discussed in Draft EIR Section 4.1, the proposed project's potential to substantially degrade the existing visual character or quality of public views of the site and its surroundings would be less than significant. The proposed project would include project design that is sensitive to the scenic viewsheds and/or viewpoints of the City and would result in the development of low-density residential and open space land uses similar to those surrounding the project site. The proposed project would also result in the creation of through streets A, B, and C. Furthermore, the project would incorporate mitigation measures to reduce all potentially significant impacts to less than significant

¹³ City of Sierra Madre. 2015. *City of Sierra Madre General Plan*. https://www.cityofsierramadre.com/cityhall/strategic_planning/general_plan.

Thus, as concluded in Draft EIR Section 4.11, Table 4.11-1, the proposed project would be consistent with Objectives L1 and L4, and Policies L4.2, L5, L5.1, L6, L6.2, and L7. Please refer to Global Response GR-7.

I96-38 The comment states that the project fails to implement a water impact fee (Policy L8.3) for the project. Please refer to Response to Comment I74-3 and Global Response GR-1.

I96-39 The comment states that the project does not protect existing views as required by Policy L17. Please refer to Response to Comment I89-30 and Global Response GR-7.

I96-40 The comment states that the project is not consistent with Policy 17.2, L20, and L 20.1, which all are policies that have to do with compatibility with current property characteristics. As concluded in Draft EIR Section 4.11, Table 4.11-1, the project would be consistent with these policies through compliance with the design guidelines and the creation of tiered building pads to blend in with the existing landform. See Global Response GR-7.

I96-41 The comment states that the project is inconsistent with General Plan policies regarding the preservation of open spaces. Please refer to Response to Comment I96-36.

I96-42 The comment states that the project is not consistent with housing policies from the General Plan. The comment states that the project does not fit the neighborhood character, creates higher density housing that exceeds local standards, and only meets the above moderate range of housing needs. As concluded in Draft EIR Section 4.11 the project would work in harmony with neighborhood character through regulations and design guidelines which would be compatible with existing neighborhoods. Furthermore, the project would comply with all local and state building standards and would not exceed density standards. Please refer to Response to Comment I65-3.

Additionally, the comment expresses concern about analysis for additional units in residential zones. Please refer to Response to Comment I28-5.

I96-43 The comment states that the project does not promote the use of solar panels and is therefore inconsistent with General Plan Policy 5.3. Please refer to Response to Comment I87-3.

I96-44 The comment states that the project is inconsistent with general plan policy 5.4 from the Housing element and Goal 1 of the Circulation Element of the General Plan because there are no bike lanes proposed and there are no pedestrian linkages because there are no sidewalks on surrounding streets. Please refer to Response to Comment I47-5 regarding bike lanes. The project would include sidewalks along the proposed streets to promote pedestrian safety and mobility within the project site and local vicinity as well as a 6-foot sidewalk between the southeastern portion of the project site boundary and Lima Street, which includes a 6-foot sidewalk on the north side of Carter Avenue (see Final EIR Section 3.3.12). See Global Response GR-7.

I96-45 The comment states that the project is not consistent with Circulation Goal 2 and 3 of the General Plan and expresses concern about traffic and the Carter Avenue ingress/egress. As concluded in Final EIR Section 4.11, Table 4.11-1, the proposed project would be consistent with these goals through providing improvements to the City's circulation system by extending public access along North Sunnyside Avenue, the construction of Streets A, B, and C, and improvements to Carter Avenue. In addition, please refer to Global Response GR-4, Global Response GR-5, and Global Response GR-7 .

- I96-46** This comment states that the project is not consistent with Objective L51 because the project fails to address a transportation system for pedestrians and cyclists. As concluded in Final EIR Section 4.11, Table 4.11-1, the proposed project would be consistent with Objective L51 through the incorporation of the proposed sidewalks along the northern side of Carter Avenue, which would promote the use of non-automobile travel and provide access to existing transit facilities. Please refer to Responses to Comments I47-5 and I46-8 and Global Response GR-7.
- I96-47** This comment states that the project is inconsistent with Policy L51.2 because it builds new roadways. As concluded in Draft EIR Section 4.11, the project would be consistent with this policy because the project would not build any new roadways beyond the project site and would only include the reconfiguration of North Sunnyside Avenue and improvements to Carter Avenue.
- I96-48** This comment states that the project is inconsistent with Policy L51.5, L51.6, and L51.8 because the project does not support pedestrian and bike connectivity. Due to the scope of the proposed project, bike facilities would not be included. As discussed in Final EIR Section 4.11.5, the proposed project would be consistent with Policies L51.5, L51.6. The proposed project would be inconsistent with Policy L51.8. However, not constructing bicycle facilities, as required to be consistent with Policy L51.8, would not result in significant environmental impacts. See Global Response GR-7. Please refer to Response to Comment I96-46.
- I96-49** The comment states that the project is inconsistent with Objective L52 of the General Plan and further expresses concern about increased traffic, traffic safety, and sites standards and data from the LA County Sustainability Plan. It should be noted that it was concluded in Draft EIR Section 4.11, Table 4.11-1, that the project was consistent with this policy through the proposed improvements to North Sunnyside Avenue and Carter Avenue, and the development of Streets A, B, and C. Please refer to Global Response GR-6 and Responses to Comments I85-14 and I96-18.
- I96-50** The comment states that the project is inconsistent with Policy L52.8. As concluded in Draft EIR Section 4.11, Table 4.11-1, due to the size and scope of the proposed project, bike facilities would not be required. Please refer to Response to Comment I47-5 and Global Response GR-7.
- I96-51** The comment states that the project is inconsistent with Policy L52.9. It should be noted that it was concluded in Draft EIR Section 4.11, Table 4.11-1, that the project was consistent with this policy by providing sidewalks throughout the proposed project site and along the northern side of Carter Avenue. Please refer to Response to Comment I46-8.
- I96-52** The comment states that the project is inconsistent with Policy L53. Please refer to Response to Comment I85-45.
- I96-53** The comment stated that the project is inconsistent with Goal 3 of the Resource Management Goals of the general plan because it does not provide access to the San Gabriel Mountains. As concluded in Draft EIR Section 4.11 that the project is consistent with this policy because it does not hinder public access to the San Gabriel Mountains, and it connects to Bailey Canyon Wilderness Park.
- I96-54** The comment stated that the project is inconsistent with Goal 3 of the Resource Management Goals of the general plan because it does not comply with more stringent LEED building standards. See Global Response GR-7 and Response to Comment I96-21. It should be noted that Goal 3 of the Resource Management Chapter of the General Plan relates to public access to the San Gabriel Mountains. As discussed in Final EIR Section 4.11.5, the project would be consistent with this goal.

- I96-55** The comment states that the project is inconsistent with General Plan policies that involve tree preservation. Please refer to Global Response GR-2 and Draft EIR Section 4.11.5, Impact Analysis, of section 4.11, Land Use and Planning, regarding the project’s consistency with the goals, objectives, and policies listed by the commenter
- I96-56** The comment states that the project is inconsistent with General Plan policies that involve water resources, specifically Goal 1, 3, and 4, and Objectives R12, R14, and R15. The comment specifically expresses concern about water supply, the viability of the Net Zero Water Impact, the ability to purchase water, and water conservation. As concluded in Final EIR Section 4.11.5, the proposed project would be consistent with these goals and objectives aside from Goal 4. Please refer to Global Response GR- 1, and Global Response GR-7.
- I96-57** The comment states that the project is inconsistent with General Plan Policy 22.2 and Objective R23 and sites the LA County Sustainability Plan standards as the reason why these are inconsistent with the General Plan. The proposed project’s vehicular emissions are addressed in Draft EIR Section 4.3, Air Quality and 4.8, Greenhouse Gas Emissions, in addition to Final EIR Section 4.17, Transportation. Please refer to Global Response GR-7 and Response to Comment I96-18.
- I96-58** The comment states that the project is inconsistent with General Plan Policy Hz2.5 and Draft Safety Element Update (now the adopted Hazard Prevention Element) Objective Hz7. Please refer to Response to Comment I45-3 regarding Objective Hz7. The comment further expresses concern about impacts to fire protection services, the project being located in a VHFHSZ, and that Carter Avenue would not be able to accommodate emergency vehicles. It should be noted that it was concluded in Draft EIR Section 4.11, Table 4.11-1, that the project is consistent with this General Plan policy as the Sierra Madre Fire Department (SMFD) has reviewed the proposed project and determined no significant impacts to service demands would occur.. Please refer to Response to Comment I4-26, I10-9, and I12- 4, and Global Responses GR-3 and GR-4.
- The comment further cites the Los Angeles County Sustainability Plan as stating that development should be limited in high climate-hazard areas. Please refer to Response to Comment I96-18.
- I96-59** The comment states that the project is inconsistent with General Plan Policy Hz6.2 and expresses concern about the increase in impervious surfaces to the project site. As discussed in Draft EIR Section 4.11, Table 4.11-1, although the proposed project would result in an increase in impervious surfaces, the proposed project would also include a new stormwater drainage system to reduce runoff velocities as well as a proposed neighborhood park and landscaping which would allow percolation of water into underlying soils; thus, the proposed project would not be inconsistent with this policy. Please refer to Global Response GR-7 and Response to Comment I32-2.
- I96-60** The comment states that the project lies within the Sierra Madre earthquake fault zone. Please refer to Response to Comment I36-7.
- I96-61** The comment states that the project is inconsistent with General Plan Policy Hz 14.2 because the Draft EIR does not address the additional noise generated from increased traffic levels in the area. Please refer to Response to Comment I5-2.

- I96-62** The comment states that the project is inconsistent with General Plan Policies C1.2 and C4.3 because the project does not provide analysis of response times and service ratios and does not provide any passive prevention measures. As concluded in Draft EIR Section 4.11, the project applicant would be required to provide payment for development fees that would be used to offset any costs required to maintain emergency services. Thus, the proposed project would not be inconsistent with these policies. Please refer to Global Response GR-7 and Response to Comment I74-4.
- I96-63** The comment states that the project is inconsistent with General Plan policies about recreation services, specifically Objective C6 and Policies C8.1, C8.3, and C11.2. The comment expresses concern about the size of the park, the lack of leisure and social programs provided, and the future maintenance of parks. As stated in Draft EIR Section 4.16.5, Impacts Analysis, in Section 4.16, Recreation, the project is required to provide 0.5 acres of parkland on site to be compliant with the State’s Quimby Act and the SMMC. The project contributes 3.04 acres of parkland and exceeds the minimum standard. The project would create recreation through the dedication of the park, specific leisure and social programs are not required to comply with Objective C6. Please refer to Response to Comment I4-18 about park maintenance and Global Response GR-7.
- I96-64** The comment states that the project is inconsistent with General Plan transit service policies, specifically Objective C30, and Policies C30.2 and C30.3. The comment expresses concern about traffic hazards around the project site and specifically near the project entrances. As concluded in Final EIR Section 4.11, Table 4.11-1, the proposed project would be consistent with these policies by including circulation improvements along Carter Avenue and implementing street sections to slow traffic and create a safe environment within the neighborhood. Please refer to Response to Comment I85-14 through I85-16 and Global Response GR-7.
- I96-65** The comment states that the project is not consistent with Policy C31.5 regarding capturing stormwater. As discussed in Chapter 3, Project Description of the Draft EIR, off-site flows would be directed to the two proposed catch basins located northeast of the project site. In addition, the project would include two storm drain networks located at the eastern and western portion of the project site for on-site runoff. In addition, as discussed in Draft EIR Section 4.11.5, the project would be consistent with this policy.
- I96-66** The comment states that the project is inconsistent with General Plan policies that involve tree preservation. Specifically, Goal 1 and 2, and Policies R10 and R10.2. Please refer to Global Response GR-2 and Response to Comment I96-55.
- I96-67** The comment states that the Draft EIR failed to address impacts related to biological resources. This information can be found in Draft EIR Section 4.4, Biological Resources, and Chapter 5, Cumulative Effects.
- I96-68** The comment states that the project failed to address the property’s connection to the alluvial fan. Please refer to Response to Comment I32-2.
- I96-69** The comment states that the Water Conservation Authority identifies the site as high in conservation value. The comment and notes that it does not raise new or additional environmental issues concerning the adequacy of the Draft EIR.

196-70 The comment states that the project should be in light with the Paris Climate Agreement. The project is not required to comply with this requirement. The comment and notes that it does not raise new or additional environmental issues concerning the adequacy of the Draft EIR.

196-71 The comment and notes that it provides concluding remarks and general opposition to the project that do not raise new or additional environmental issues concerning the adequacy of the Draft EIR.

Comment Letter I97

From: macgone@aol.com
Sent: Monday, October 4, 2021 5:15 PM
To: Vincent Gonzalez
Subject: Monastery Project.

CAUTION: This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Dear Mr. Gonzalez,

Every issue that has been addressed by citizen groups and individual citizens regarding this project are valid, well thought out and comprehensive. In all areas, trees, water, fire, wild life, traffic , the goals of the General Plan are not being met and since the General Plan, by definition, is the peoples plan, it cannot be changed without the consent of the owners of it – the people of Sierra Madre, not staff or developers. The people are very much against it.

I 197-1
I 197-2

There is a very practical issue that has not been addressed and that is the potential to sell these houses. The insurance market in California is very difficult. Homeowners are receiving non-renewal notices and premiums are skyrocketing. In the area proposed, the cost and availability of insurance will be determined by 2 factors : fire protection score and brush score. The fire protection score will be adversely affected by the inadequate ingress and egress and staging area. the brush score will make homeowner insurance unaffordable.

I 197-3

The only option may be the California Fair Plan and it will also be costly. Then the owner will have to obtain additional coverage for theft etc. All lenders will want assurance of complete and adequate insurance coverage in order to close a loan.

With the cost of the home and the astronomical cost of insurance, these homes will likely not be purchased by "our neighbors" as advertised by the developer.

With all of the information you have received to date, it must be evident that this project is a "no win" for the city. Any monies derived from property tax will be eaten by sustaining costs.

The property should be zoned Institutional. Another development like the Kensington is more appropriate, less obtrusive and very much needed. There is no obligation to the developer or the Passionist community to rezone. The obligation is to the citizens of Sierra Madre.

I 197-4

MaryAnn MacGillivray
Former Mayor and Councilwoman

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Response to Comment Letter I97

Individual
MaryAnn MacGillivray
October 4, 2021

- I97-1** The comment states that the project is not meeting the goals of the General Plan. Please refer to Global Response GR-7.
- I97-2** The comment expresses general opposition to the project. The comment does not raise any issue concerning the adequacy of the Draft EIR.
- I97-3** The comment expresses concern about insurance cost and coverage for homes in the area. According to the State CEQA Guidelines, Section 15064(e) “economic and social changes resulting from a project shall not be treated as significant effects on the environment.” Therefore, the comment does not contain specific concerns related to the adequacy of the environmental analysis in the Draft EIR.
- I97-4** The comment expresses general opposition to the proposed land use designation change for the project site. The comment does not raise any specific issue concerning the adequacy of the Draft EIR.

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Comment Letter I98

From: Connor Murphy-Boyd <cmurphyboyd@gmail.com>
Sent: Monday, October 4, 2021 4:48 PM
To: Vincent Gonzalez
Subject: DEIR Response for Meadows at Bailey Canyon

CAUTION: This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Good Evening Vincent,

This is in regards to my staunch opposition to the massive housing project being proposed for the Bailey Canyon/Monastery lot.

I have emailed about these concerns previously, but would like to once more consolidate all of them in one email.

Having grown up in Sierra Madre, it was always a town of uniqueness and pride in it being the last semblance of a "small town america." Not having a traffic light, individual characters of houses, taking care of our neighbors, these are all things which I see being lost across the country, and I was always happy to come home to Sierra Madre, a beacon to other small towns to remember their roots. This housing development goes against all of that through the cookie-cutter designs, drastic increase to traffic, reduction in our already depleted water supply, dangerous addition to an already high fire zone, all for prioritization of profit over city wellbeing.

I98-2

I98-3

This whole process has felt rushed, hidden, and pushed through to make sure our comments were not heard. I do believe this lot can be developed for something greater than quickly built/sold houses, something that contributes to the strong history of Sierra Madre, not one that takes away from it.

Thank you,
Connor Murphy-Boyd
Designer, B.Architecture
(626) 615-2662

I98-1
I98-4
I98-5

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Response to Comment Letter I98

Individual
Connor Murphy-Boyd
October 4, 2021

- I98-1** The comment expresses general opposition to the project. The comment does not raise any specific issue concerning the adequacy of the Draft EIR.
- I98-2** The comment expresses general concern about an increase in traffic. Please refer to Global Response GR-6.
- I98-3** The comment expresses general concern about impacts to the water supply as a result of project implementation. As concluded in Draft EIR Section 4.11.5, Impacts Analysis, in Section 4.11, Land Use and Planning, impacts to groundwater supply would be less than significant.
- I98-4** The comment expresses concern about the project being located in a VHFHSZ. Please refer to Global Response GR-3.
- I98-5** The comment expresses concern that the process has felt rushed and that there was not an opportunity for comments to be heard. Please refer to Response to Comment I74-2 regarding public meetings held.

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Comment Letter I99

From: Ally Arrieta <allyarrieta@gmail.com>
Sent: Monday, October 4, 2021 3:53 PM
To: Vincent Gonzalez
Subject: DEIR Comments for The Meadows at Bailey Canyon

CAUTION: This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Dear Mr. Gonzalez:

Below are my comments/concerns with the DEIR for the proposed housing project known as The Meadows at Bailey Canyon. I ask that you retain a copy for the administrative record and respond to these comments in the final EIR. I would also like to be put on the list of people to notify when the final EIR is complete.

I99-1

In general, I strongly object to this development project as it is not at all suitable for the City of Sierra Madre, nor for the area in which it is located. The proposed project is also significantly inconsistent with our General Plan and Municipal Code and opposed by the vast majority of residents in Sierra Madre.

My specific comments/concerns are as follows:

1. WATER: Regardless of what the developer promises to do, water is becoming an increasingly scarce resource. Lakes, rivers and reservoirs are drying up all over the Southwestern United States. There is no water source that can ever guarantee the delivery of water in the future under these conditions. Until the drought conditions improve, it would be the height of irresponsibility to bring additional users on line, such as what would occur with the additional of 42 homes. Our General Plan, Goal 4, states that use of local sources of groundwater rather than imported water (such as what is being proposed under the 'Net Zero Water Impact' proposal from NUW) must be used for new developments. The only solution if the drought continues is going to be rationing and higher water rates for existing users. The Meadows project would an already dire water supply situation into a catastrophe. The developer has promised this project will be a 'net zero impact' on our water supply. However, our own City Manager, Jose Reynoso, stated in a Planning Commission meeting several weeks ago that purchasing 50 years of water for the 42 homes is not possible, because the water is not available and he's not sure when it will be. Therefore 'net zero impact' is not factual. As a result there will be a huge impact to our existing water supply. Even if the developer offers to retrofit areas in Sierra Madre to offset the water use by the Meadows, that will only be a short-term fix. If the drought gets worse as many experts project will occur, and the developer has already done these retrofits, it means the City has no further options except rationing and higher water rates. This is the height of irresponsibility to approve this project with the significant water issues at play.

I99-2

2. FIRE: The proposed project site is within 5 miles of where 74 wildfires have burned since the beginning of the historical fire data record. Additionally, the proposed project site is designated as a Local Responsibility Area Very High Fire Hazard Severity Zone by the California Department of Forestry and Fire Protection (CAL FIRE). Our own City Policy Hz7 of the Safety Element of the General Plan states 'to avoid expanding development into undeveloped areas in Very High Severity Fire Zones. Additionally, City Policy R3.2 states 'to ensure that wildland open space, including the areas of the city designated as High Fire Hazard Severity Zone remains undeveloped so as to mitigate the flood cycles that follow wild land fires in the natural open space. Both of these Sierra Madre policies both

I99-3

emphatically state development must not occur in the very high fire severity zones, such as where the proposed project is. The CALDOR fire in central California started in August 2021 and is still not fully contained. To date it has burned 221,774 acres and burned 782 homes, many of which were built of the same 'fire resistant' materials, the developer is saying these homes would be composed of. In 2020, there were 9,639 fires in California with 10,488 homes lost to wild fire, again, many of these homes were also composed of 'fire retardant' materials, and 31 lives lost. Last August, helicopters were using the fields at the Monastery for staging for fire-fighting efforts for the Bobcat fire. It is unconscionable that the City leadership would even consider a housing proposal in such a fire prone area that would endanger lives and property.

199-3
Cont.

3. **TRAFFIC:** The November 10, 2020 Fehr and Peers traffic study indicated there would be a 118% increase in traffic on weekdays and 129% increase in traffic on weekends. With this data, there is no doubt the project will create extremely significant intrusion and increase of thru traffic. The DEIR indicated just from construction alone there would be close to 70,000 trips. The increased traffic from the project will result in a significant decrease in air quality. Also, the additional ingress/egress required for a project of this magnitude located at Carter creates a very dangerous area affecting car and pedestrian traffic, especially where Carter intersects with Grove and Lima. This area is already significantly congested with residents walking and driving. Either a car is going to hit head-on with another car or a pedestrian is going to get hurt or killed. Then if the traffic of another 42 homes is layered on top of this, it could become catastrophic. A critical purpose of having an additional ingress/egress is so that people can evacuate safely in the event of an emergency and so that emergency vehicles can quickly access the property. For the reasons outlined above, it would not be feasible under the conditions I describe now as well as what they would be should this project get approved. The traffic on Sunnyside will destroy the character of that street and the quality of life for the residents. I can remember attending a City Council meeting a few years ago where residents on Sunnyside were concerned about the traffic only coming from the Mater Dolorosa Retreat Center. If you now add to that the traffic coming from 42 additional homes, deliveries, guests, and a public park, Sunnyside will be ruined. Sunnyside also does not have sidewalks and simply cannot support the increase in traffic resulting from a project of this magnitude.

199-4

4. **TREES:** Chapter 2 - Tree Preservation: Goal 1: Continued preservation and enhancing the City's significant tree resources. The proposed project would remove over 100 trees, including protected oak trees. Additionally, every mature tree along the beautiful drive from the entry gates of the Monastery at the top of Sunnyside up to the Retreat Center will be destroyed. These are mature trees that have been there for many years and are irreplaceable.

199-5

5. **SEISMIC IMPACT:** The proposed project is within a few hundred feet of the significant Sierra Madre Earthquake Fault. The DEIR also states the soil on the proposed project site is weak and not currently suitable. A large monastery building was destroyed during a significant earthquake some years ago. It is not safe to build at this site so close to an active earthquake fault.

199-6

6. **AESTHETICS:** Contrary to the precepts in the General Plan and Municipal Code, neighbors immediately adjacent and to the west of the project will have their views, privacy and value of their properties significantly affected by this project. Despite commitments made by Mater Dolorosa over the years about mitigating the impact of their project on the neighbors, that is not the case. Policy L6.2 of the City's General Plan states that any new or expanded structures in residential neighborhoods do not unreasonably obstruct significant mountain or basin views. This project would not achieve that.

199-7

7. **LAST REMAINING OPEN SPACE:** The last large special open space in Sierra Madre will be destroyed with this project. As a result, wildlife such as deer, coyote, bobcats, falcons, bears and other wildlife will be displaced.

199-8

8. **LACK OF VIABLE ALTERNATIVES:** There have no viable alternatives presented to this proposed housing development. The DEIR does not show any environmental or other impacts from any alternative projects. From the beginning, only huge institutional projects have been shared or rather used to 'scare' residents into supporting this project. However, a reasonably sized and well designed institutional development has not been even explored. Many residents would be supportive of such a project because the lot coverage, traffic, water use and overall impact would be significantly less.

199-9

In conclusion, the City of Sierra Madre has no obligation to support, much less approve this poorly conceived and planned project and waive required compliance by the developer to existing zoning and General Plan requirements. For the reasons outlined above, I don't believe any of the outlined concerns and other serious concerns can be effectively mitigated without declining this project and seriously exploring other viable development alternatives.

199-10

Thank you.

Ally Arrieta

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Response to Comment Letter I99

Individual
Ally Arrieta
October 4, 2021

- I99-1 Please refer to Response to Comment I77-1.
- I99-2 Please refer to Response to Comment I77-2.
- I99-3 Please refer to Response to Comment I77-3.
- I99-4 Please refer to Response to Comment I77-4.
- I99-5 Please refer to Response to Comment I77-5.
- I99-6 Please refer to Response to Comment I77-6.
- I99-7 Please refer to Response to Comment I77-7.
- I99-8 Please refer to Response to Comment I77-8.
- I99-9 Please refer to Response to Comment I77-9.
- I99-10 Please refer to Response to Comment I77-10.

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Comment Letter I100

From: Susan Neuhausen <neuhausen.susan@gmail.com>
Sent: Monday, October 4, 2021 10:44 AM
To: Vincent Gonzalez
Cc: Barbara Velturo; Alexander Arrieta
Subject: DEIR for the "Meadows at Bailey Canyon."
Attachments: DEIR alternatives SLN.docx

CAUTION: This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

October 4, 2021

Dear Vincent:

Thank you for the opportunity to comment on the DEIR for the "Meadows at Bailey Canyon." Below are my comments and questions on environmental impact. Please retain a copy for the administrative record.

Please respond to these comments in the Final EIR, and put me on the list of people to notify when the Final EIR is complete.

Please see the attached document on my concern related to lack of information on alternatives.

Sincerely,

Susan Neuhausen

491 Grove St

neuhausen.susan@gmail.com

I100-1

Date: October 4, 2021

To: Vincent Gonzalez

From: Susan Neuhausen
 491 Grove St
 Neuhausen.susan@gmail.com

Re: DEIR for the “Meadows at Bailey Canyon”
 Traffic and safety

Thank you for the opportunity to comment on the DEIR for the “Meadows at Bailey Canyon.” Below are my comments and questions on Section II-5 New alternatives are not considered. Please retain a copy for the administrative record.

Please respond to these comments in the Final EIR, and put me on the list of people to notify when the Final EIR is complete.

I object to the proposed housing development. It is inconsistent with the Policies and Values of our General Plan. I am concerned that alternatives are not being considered. As stated in the Draft Subsequent EIR, there are no analyses of any new alternatives to the project, and those are required.

Here is the paragraph from the Draft EIR:

“The 2015 General Plan EIR analyzed two alternatives: the No Project/Current General Plan Alternative and the Reduced Development Alternative. The Draft Subsequent EIR does not include analyses of any new alternatives to the project. New alternatives are required in a subsequent EIR when new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete” shows that one or more alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, or alternatives that are considerably different from those analyzed in the 2015 program EIR would substantially reduce one or more significant effects on the environment (CEQA Guidelines Section 15162). There is no new information meeting the definition of Section 15162. The conditions within the City and its SOI are largely the same as when the 2015 DEIR was certified and the General Plan update approved.”

Clearly, there are alternatives to the proposed subdivision. Based on comments that I heard when the developer presented in the park over the summer, residents are more in favor of keeping the site zoned institutional and building a modest assisted-living facility that would benefit the aging priests and others in our community. The footprint and disruption to the environment and neighbors would be much less than the proposed subdivision.

I did back-of-the-envelope calculations as follows: If one makes an assumption of average house size of 3700 square feet (approximately the mean of 2700 and 4250 square foot of the range of house sizes plus 200 square feet for garage = 3700 square feet) x 42 houses = 155,400 square feet of building. The size of the Kensington is 58,000 square feet (<https://www.lpiarchitecture.com/the-kensington-sierra-madre/>). In the scenario of building a Catholic school, the California allowance for schools is 73, 80, and 95 square feet per student for elementary, middle school, and high school respectively (<https://www.cde.ca.gov/ls/fa/sf/completesch.asp>). Even if they built a middle school for 500 students, that would be 40,000 square feet, still much smaller than their threat of a massive institution of unknown function.

The developer is using scare tactics that they will build a large institution, possibly a Catholic school, if they cannot build the proposed subdivision. They presented an alternative of a large institution at their presentation

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 I100-4

in the park in the summer, in the material they sent out, and in a recent telephone survey. People in our community have been receiving calls to complete an online survey on the monastery development. The telemarketers conducting the survey state they do not know who hired their company. The survey is skewed and will provide biased answers. For example, one question asks the interviewee to choose between the housing project or a huge institutional project. This survey is inappropriate given that the identity of the provider is not given and the questions are skewed without the ability to comment on the answers or questions.

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I100-4
Cont.

For an institutional project similar in type and size to the Kensington, the environmental impact would be much smaller as it would take up less acreage, fewer roads and infrastructure would need to be constructed, and the construction time, noise, dirt, etc. would be much shorter and smaller respectively. In addition, there would be less traffic once completed than 42 houses will require. It is incumbent upon the city to consider other options.

I100-5

Please ensure that Section II.5 of the EIR is appropriately completed. What are all the alternatives to the Meadows at Bailey Canyon project? A range of options needs to be presented, e.g., leaving it as it is and selling to a Conservancy, building a modest assisted living facility, or building a new retreat center.

I100-6

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Response to Comment Letter I100

Individual
Susan Neuhausen
October 4, 2021

- I100-1** This comment requests the following comments (Comments I100-2 through I100-6) be included in the responses to comments of the Final EIR. As shown, the commenter's request has been recorded as part of this Final EIR.
- I100-2** The comment expresses general opposition to the project and expresses concern regarding the project's inconsistency with the General Plan and lack of alternatives. Please refer to Global Response GR-7. Draft EIR Chapter 8, Alternatives, provides a discussion of four proposed alternatives, including the No Project Alternative.
- I100-3** The comment expresses concern about a lack in alternatives provided in the Draft EIR and suggests that keeping the site institutional would be more appropriate. The comment also includes an excerpt from the 2015 General Plan Draft Subsequent EIR. It should be noted that the excerpt is from the 2015 General Plan EIR and not from the Draft EIR prepared for the proposed project. The alternatives provided for the project are provided in Draft EIR Chapter 8, Alternatives, not the Subsequent EIR. Per CEQA Guidelines Section 15126.6, an EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason. Draft EIR Chapter 8, Alternatives, considers four feasible alternatives, including the no project alternatives, that were considered by the City. The comment also provides calculations related to home sizes as related to potential school sizes. An Existing Zoning and Land Use Designation: Private School Alternative (Alternative 3) was analyzed as an alternative to the proposed project (see Draft EIR Section 8.6.2).
- I100-4** The comment states that community surveying was not done appropriately for the project and the presentations about development of the project site gave limited alternatives. Any project-specific information, including maps of the proposed project site, were provided for during the scoping meeting for informational purposes only to provide the public with general intent and scope of the project. The information, materials, map, and analysis provided in the public review Draft EIR dated July 2021 contains the project specific information associated with the project details being proposed and will be included as part of the design package for consideration by the City of Sierra Madre as part of any discretionary action and decision-making process. Please refer to Response to Comment I100-3, above, regarding the concern related to limited alternatives.
- I100-5** The comment states that an institutional project that is smaller in scale would be more appropriate and would have less of an environmental impact. As stated in Draft EIR Chapter 8, a reduced intensity institutional alternative (Alternative 3) was considered but ultimately rejected because it would not have substantially lessened one or more of the significant effects of the projects as compared to the alternatives that were included.

I100-6 The comment states that there needs to be a completed alternatives analysis performed. The completed alternatives analysis of the Draft EIR can be found in Chapter 8. Please refer to Response to Comment I100-3, above.

Comment Letter 1101

ELLEN L. MUNOZ
340 N. LIMA STREET
SIERRA MADRE, CA 91024

October 3, 2021

Victor Gonzales
Director of Planning & Community Preservation
City of Sierra Madre
232 W. Sierra Madre Blvd
City of Sierra Madre, CA

RE: The Meadows at Bailey Canyon

I am very concerned about the above-referenced proposed plan.

I 1101-1

We have lived in Sierra Madre since April 1958. While living on the south side of East Laurel (near Baldwin) from 1958 – September 1964, I witnessed the entire mountainside aflame several times. In September of 1964, we moved to North Lima (above Grand View) where we still reside. During the years on North Lima, we have been notified to prepare for evacuation three times, notified to evacuate in 2008. Our friends living on Oak Crest were evacuated many times because of fires in the mountains. Our last prepare for evacuation notice was the Bobcat Fire last year. The smoke from this fire was particularly harmful to Sierra Madre residents.

In the 980's, we stood at the trail just inside the monastery property and watched a fire burn down to the statue of Jesus on the cross with St. John and Mary kneeling beside the cross. Later an artist painted the scene and entitled it "He Still Watches Over Us". Fortunately for Sierra Madre, the wind changed direction and the fire moved north. Sierra Madre was saved.

1101-2

Haven't the builders in California learned not to build in high-fire areas, near earthquake faults, mud slide areas, wildlife habitats???

Remember when it used to rain in Southern California? In the 1980s it was necessary to clean out the debris basin above Bailey Canyon to prepare for the next heavy rain. For 24 hours a day, for over two months, large dump trucks hauled out the dirt that had been washed into the basin. The route they used – Lima Street. All day and all night, it felt like the aftershocks from an earthquake. Fortunately our house is well build, so the foundation was not damaged from the constant shaking.

The traffic going in and coming out of the project will impact Sunnyside, Carter, Grove, Lima and Baldwin. Grove is so narrow that when Baily Canyon hikers park their cars on both sides of the street (which happens often), it becomes a one-way street. It's even difficult to walk one's dog on those days because it's necessary to walk in the middle of the street! On many of these streets there are no sidewalks therefore pedestrians must walk in the street.

I1101-3

Imagine the traffic when heavy cement trucks, large diesel trucks hauling building supplies, utility trucks for electricity and gas, all necessary for work on the projects, are driving our narrow streets at the same time? Would a fire engine, an ambulance or police car even be able to get through in case of a tragedy or life emergency? The additional traffic will create more air pollution.

I1101-4

In 1991, Sierra Madre had its own earthquake! The epicenter was in the mountains behind the Monastery. The Monastery Chapel was destroyed. Many houses in Sierra Madre were damaged. We lost two chimneys, extensive roof damage, plus many household items broken. At that time the deductible on the Earthquake Policy was \$10,000. Today the deductible is \$100,000.

I1101-5

The Monastery grounds are a wildlife habitat. When we could walk the grounds, we would see deer, coyotes, rabbits, skunks, owls, bear and even a mountain lion was sighted. Where are these animals going?? The trees on the property are important to the air quality in our community. The destruction of these irreplaceable mature trees would be a sacrilege!

I1101-6

Then there is the water shortage in California. How much longer will the drought last? With drought comes fires. If we have heavy rains again there will be mud and mud slides. In 1969 there were mud slides on Chaparral, a street off W. Carter. The sister of one of my daughter's friends was seriously injured when a hillside of mud plunged into the family room of their home.

I1101-8

An additional 42 houses will only add to a need for more water. What about police and fire protection?

I1101-10

This project will not help the housing crises in California. Low-income home buyers and many middle-class home buyers will not be able to afford to purchase and maintain these houses (mortgages, taxes, fire insurance, earthquake insurance, utilities, landscaping, gardeners, etc.) This development will not improve the housing problem in California.

I1101-11

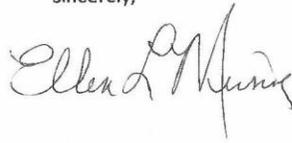
Sierra Madre must not allow outside contractors/builders/developers to destroy our beloved Foothill Community! Remember what happened at One Carter? Years of negotiations, endless meetings, investigations into the contractor's past, destruction of the hill side, wildlife habitat destroyed, costly lawsuits, (and if I remember correctly, Sierra Madre never received the settlement that was awarded) and for what??? Empty lots.

I1101-12

Sierra Madre does not need a large housing project that will cause tremendous problems and destruction in the lives of Sierra Madre residents and will negatively impact life for years in our community. Please keep our little community one of the best places to live in Southern California.

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1101-12
Cont.

Sincerely,



P.S During the years 1965-1975, my children had several friends who owned horses – yes, horses could be owned by Sierra Madre residents! Their friends would bring their horses to our yard, pick up my children to ride with them on the monastery grounds. And these horses were ridden in the Sierra Madre Fourth of July Parade. Of course, that ended many years ago, but the memories are a Sierra Madre treasure.

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1101-13

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Response to Comment Letter I101

Individual
Ellen Munoz
October 3, 2021

- I101-1** The comment expresses general opposition to the project. The comment does not raise any issue concerning the adequacy of the Draft EIR; therefore, no further response is required.
- I101-2** The comment provides information about previous fires and debris removal that has occurred in the City. The comment does not raise any issue concerning the adequacy of the Draft EIR. Please see Global Response GR-4 for a discussion related to wildfire.
- I101-3** The comment expresses concern related to traffic on Sunnyside, Carter, Grove, Lima, and Baldwin. Please refer to Global Response GR-6.
- Additionally, the comment expresses concern about the narrow portion of Carter before the entrance to the project site. Please refer to Global Response GR-5. It should be noted that the project applicant is proposing off-site widening to Carter Avenue, between the southeastern portion of the project site boundary and Lima Street, which includes a 6-foot sidewalk along the northern portion of Carter Avenue (see Final EIR Section 3.3.12 and Global Response GR-5 for details).
- Lastly, the comment expresses concern related to emergency evacuation. Please refer to Global Response GR-4.
- I101-4** The comment states that additional traffic would create more air pollution. Impacts to air quality were analyzed in Draft EIR Section 4.3, Air Quality. As discussed in this section, impacts to air quality would be less than significant with mitigation.
- I101-5** The comment provides information about previous earthquakes that has damaged the Monastery building and expresses economic concerns related to earthquake damage that do not pertain to the adequacy of the Draft EIR. It should be noted that, due to the age of the Mater Dolorosa Retreat Center, this existing building was not constructed to current building code standards. The proposed project would be required to adhere to the most current CBC standards to minimize the effects of earthquakes and other geotechnical hazards.
- I101-6** The comment expresses concern about the destruction of habitat and loss of trees as a result of the project. Please refer to Response to Comment I65-17 and Global Response GR-2.
- I101-7** The comment states that there is a water shortage in California and with drought can increase risk to fires. As concluded in Draft EIR Section 4.20, Wildfire, impacts related to wildfire would be less than significant. The comment does not raise any issue concerning the adequacy of the Draft EIR; therefore, no further response is required.
- I101-8** The comment expresses concern about landslides, as they relate to wildfire. Please refer to Response to Comment I45-7. In addition, as discussed in Section 4.20.5, Impact Analysis, of Section 4.20, Wildfire, through implementation of measures outlined in the FPP (see Draft EIR Appendix F2), impacts associated with slope, prevailing winds, and other factors, that would cause the project to exacerbate wildfire risks would be less than significant.

- I101-9** The comment expresses concern about additional need for water for the 42 homes. Please refer to Global Response GR-1.
- I101-10** The comment expresses concern regarding police and fire protection being impacted by the project. As discussed in Draft EIR Section 4.15.5, Impacts Analysis, in Section 4.15, Public Services, with payment of development fees, impacts to fire and police protection services would be less than significant.
- I101-11** The comment expresses that the project will not improve the housing crisis. The comment expresses the opinions of the commenter and does not raise any issue concerning the adequacy of the Draft EIR.
- I101-12** The comment expresses general opposition to the project and notes that it raises political issues that do not appear to relate to any physical effect on the environment. The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR.
- I101-13** The comment does not raise any issue concerning the adequacy of the Draft EIR; therefore, no further response is required.

Comment Letter 1102

From: deb sheridan <debsheridan2000@yahoo.com>
Sent: Monday, October 4, 2021 12:27 PM
To: Vincent Gonzalez
Subject: Draft EIR The Meadows at Bailey Canyon (Monastery Property)

CAUTION: This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Dear Director Gonzalez and All Concerned,

When the proposal for 42 luxury homes on the Monastery property was first proposed, I thought it might be a tolerable project. Once the 500 page draft EIR report was published, and I had an opportunity to study it, I am greatly disturbed by it. Here are my main objections:

I102-1

1. **This is a designated high fire hazard severity zone, per the California Department of Forestry and Fire Protection.** That in itself should make this property unbuildable. This goes against two Objectives of our General Plan of 2015. Objective Hz5.a - "Limit risk of wildfire through public education and **development planning.**" Development planning would stay out of a high fire zone, especially one that has come so close to burning three times in the 35 years I've lived here.

Objective Hz7 - "Avoid expanding development into undeveloped areas in a **Very High Fire Severity Zone.**" The town of Paradise, also in a Very High Fire Severity Zone, nearly burned entirely to the ground (90%).

I102-2

Global warming is real, wildfires worldwide are increasing in frequency and intensity, and especially in California. I live north of Grand View, and was on voluntary evacuation just a year ago during the Bobcat fire, which came within 1 1/2 miles of Sierra Madre. In 2008, the call for mandatory evacuation came at Midnight. That was the Sierra Madre fire, and many residents north of Grand View had their homeowner's insurance rates increased greatly, or were cancelled altogether.

2. **This is also in close proximity to an earthquake fault.** The Sierra Madre earthquake of 1991 destroyed one of the buildings on the Monastery property. Rather than rebuild it for an estimated \$5 million, the Mater Dolorosa priests chose to tear it down. Twenty-two homes were condemned along Sunnyside and Lima, and there was damage to 403 structures, resulting in \$12.5 million in damages. This in itself should make the property unbuildable.

I102-3

3. **Water.** Once again we are in a drought - two years into the drought - the Colorado River as well as most lakes and rivers are at unprecedented low levels. Our City Council in 2014 put a moratorium on building, which halted this project. The developer has assured the City of "net zero" water usage, meaning they will purchase water up front for the next 50 years and store it for future use. There is no water to be purchased, and for 50 years? According to Jane Tsong, Project Manager for the Watershed Conservation Authority (WCA), it would be impossible to predict what net zero will be for the next 50 years. Especially given our current drought situation, and climate change, which seems to be here to stay. This also violates the General Plan - Objective R12 - "Optimizing the use of water and water resources," and Policy L4.3 - "Ensure that the new development and the expansion of existing uses incorporate water conservation measures that reduce and minimize the impact on the

I102-4

City's water supply and its ability to serve its customers." This in itself should make the property unbuildable.

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I102-4
Cont.

This property is part of an alluvial plain, the only one of its kind along the foothills between Sierra Madre and Claremont. Building 42 large homes, with the needed infrastructure will make storm water recapture that much more difficult.

4. **Traffic.** Traffic is expected to increase by 300-400 (and possibly more) vehicles per day along the side street of Sunnyside. Additionally, Carter is expected to carry some of the burden, with travelers going down Lima and Grove. No mention is made of the many delivery and service trucks that are typical of a neighborhood such as this one. There are no plans for a bicycle lane. Sidewalks may be put in on Carter and Sunnyside, but I am puzzled as to how this is to take place on residents' property.

I102-5

5. **Housing** - 42 houses of 2700-4000 square footage are much larger than those of the surrounding neighborhood. There will be "some" one story houses, yet, we have asked several times and the answer from the New Urban West representatives are "Don't know yet." If one looks at the map of the surrounding neighborhood, those homes consist of much smaller homes - only 4 are two story and 51 are one story. These homes will be walled off from the neighborhood. This violates Vision and Guiding Principal #5 - "Ensure development is done in harmony with its neighborhood, while maintaining the character of the town and without unduly burdening existing city services and infrastructure or impacting the environment."

I102-6

6. **Trees** - The developer's Specific Plan calls for the removal of 100 mature trees. The plan is to replace them, but it takes about 20 years for a tree to reach maturity. They need water to grow and thrive, and our drought may never end. Meanwhile, the needed canopy that helps reduce global warming is gone. There is no plan to build the houses around the mature trees, even the 10 protected coastal oaks in order to save them.

I102-7

I was on the General Plan Update Steering Committee, which took five years to implement with countless meetings, workshops, with many residents. This is "the Constitution of the City - the residents." There are three main issues that cannot be mitigated, and the other three areas of concern add to it.

I102-8

Deb Sheridan
635 Valle Vista Drive
Sierra Madre

Response to Comment Letter I102

Individual
Deb Sheridan
October 4, 2021

- I102-1** The comment is an introduction to comments that follow and notes that it expresses general opposition for the proposed project and does not raise any issue concerning the adequacy of the Draft EIR. No further response is required.
- I102-2** The comment raises concern regarding the project site's location within a VHFHSZ. Additionally, the comment states that the project would be inconsistent with objectives of the General Plan associated with fire safety. Please refer to Global Response GR-3 and Global Response GR-7.
- I102-3** The comment includes information regarding the Sierra Madre Earthquake of 1991 and expresses concerns related to the proximity of an earthquake fault. It should be noted that, due to the age of the Mater Dolorosa Retreat Center, this existing building was not constructed to current building code standards. The proposed project would be required to adhere to the most current CBC standards to minimize the effects of earthquakes and other geotechnical hazards. No further response is required.
- I102-4** The comment expresses concern associated with the net-zero impact on the water supply and inconsistencies with General Plan Objective R12 and Policy L1.6 (incorrectly cited as policy L4.3). For information regarding the proposed project's net-zero water impact, please refer to Global Response GR-1. For information regarding General Plan consistency, please refer to Global Response GR-7. As discussed in Final EIR Section 4.11, the project would be consistent with Policy L1.6 and R12.
- The comment states that implementation of the proposed project would make stormwater capture more difficult. As discussed in Chapter 3, Project Description of the Draft EIR, off-site flows would be directed to the two proposed catch basins located northeast of the project site. In addition, the project would include two storm drain networks located at the eastern and western portion of the project site for on-site runoff. As discussed in Draft EIR Section 4.19, Utilities and Service Systems, the project would not result in impacts to stormwater drainage.
- I102-5** The comment expresses concern regarding traffic impacts to Carter Avenue and Sunnyside Avenue. Sidewalks would not be placed on residents' properties. Please refer to Global Response GR-6.
- I102-6** The comment expresses concern regarding the exact size and height of the proposed residences and states that the project would be inconsistent with Guiding Principle #5, regarding ensuring development is done in harmony with its neighborhood.

Guiding Principle #5 of the City's General Plan states: "Ensure that development is done in harmony with its neighborhood, while maintaining the character of the town and within unduly burdening existing city services and infrastructure or impacting the environment. The Specific Plan includes design details of the proposed project to ensure that the proposed project would not degrade the visual character of the community. As discussed throughout Chapter 4 of the Draft EIR, with implementation of mitigation, the project's impacts on the environment would be less than significant. As concluded in Draft EIR

Section 4.11 the project would work in harmony with neighborhood character through regulations and design guidelines which would be compatible with existing neighborhoods. Please refer to Response to Comments I4-7 through I4-9, regarding lot sizes and number of stories. In addition, please refer to Global Response GR-7 for additional discussion related to consistency with the General Plan.

- I102-7** The comment expresses concern that proposed project would result in the removal of 100 trees and replacing them with trees that are have not yet reached maturity. Please refer to Global Response GR-2.
- I102-8** The comment provides concluding remarks on issues that have been addressed above that do not raise an issue related to the adequacy of the Draft EIR.

Comment Letter 1103

From: Philip Yao <philip.b.yao@gmail.com>
Sent: Monday, October 4, 2021 4:47 PM
To: Vincent Gonzalez
Cc: Alicia Yao; Daniel Yao; Marites
Subject: Comments on DEIR for the Meadows at Bailey Canyon (Yao, Family 513 Sierra Keys Drive, Sierra Madre, CA 91024)

CAUTION: This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Mr. Vincent Gonzalez,

We object to the proposed Meadows at Bailey Canyon. This proposed development is inconsistent with Sierra Madre’s General Plan; and, if approved, it would result in irreparable damage to our unique Sierra Madre community and endanger the health and wellbeing of all Sierra Madre residents.

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1103-1
I

A few of my concerns are as follows:

1. The proposed development of 2,500 to 3,800 square feet homes does not reflect the predominantly smaller single family homes bordering and nearby the Mater Dolorosa Passionist Retreat Center. This is in direct violation of our General Plan’s Summary Of Land Use Goals 1 through 3. Personally, the proposed development will result in a wall of houses that will obscure all of my view of Mater Dolorosa and the mountains. It will increase the noise level to my property. Lastly, the higher elevation proposed park will destroy my privacy.

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1103-2
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1103-3
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2. Mater Dolorosa Passionist Retreat Center is zoned Institutional and there are many Sierra Madre community activities that appear in our General Plan. One that is not listed is that the open field serves as a natural firebreak for the community adjacent to it, even though Mater Dolorosa is in a High Fire Hazard Zone. If 42 new homes are allowed to be built, the firebreak will be gone and those 42 homes will be classified as High Fire Hazard Zone for insurance. It will likely cause the surrounding homes to be similarly classified, increasing insurance costs and deductibles.

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1103-4
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3. The EIR traffic assessment is wrong. The proposed development will increase traffic and will endanger those who live by Sunnyside and Carter. My family has lived on Sierra Keys adjacent to Mater Dolorosa for close to 40 years; so, I know firsthand how dangerous the cross traffic at Fairview and Sunnyside is. Adding additional automobiles from 42 families will only increase the likelihood of accidents! Citing correspondence from Miya Edmonson (IGR/CEQA Branch Chief) to Vincent Gonzalez - Currently the project is designed in a way that induces a high number of trips per household due to being exclusively large-lot, single-family residential. In addition, automobile emission from these families will further stress respiratory health of the residents adjacent to this proposed development, as starting an automobile emits the most pollution.

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1103-5
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1103-6
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4. The water usage assessment is wrong. It is not net-zero and it is grossly underestimated. It is not 55 gallons per person per day as even the USGS estimates that on average, each person uses about 80-100 gallons of water per day, for indoor home uses. In addition, water for landscape, pools, etc must be included.

I
1103-7

Regards,

Philip, Alicia, Daniel, and Marites Yao

513 Sierra Keys Drive

Sierra Madre, CA 91024

Response to Comment Letter I103

Individual

Phillip, Alicia, Daniel, and Marites

October 4, 2021

- I103-1** The comment expresses concern that the project would be inconsistent with the City' General Plan and would result in irreparable damage. Please refer to Global Response GR-7.
- I103-2** The comment expresses concern that the project would be inconsistent with nearby development and therefore in violation of Land Use Goals 1 and 3. The City's General Plan Land Use Element Goal 1 is to "Preserve the existing street and block patterns currently established throughout the City and provide additional non-vehicular connectivity where it is currently lacking in the downtown commercial area." This policy, as well as a discussion on the project's consistency with this policy has been added to Table 4.11- 1 in Final EIR Section 4.11, Land Use and Planning. As discussed in this section, the proposed project would include configurations and improvements of existing North Sunnyside Avenue and Carter Avenue as well as development of Streets A, B, and C, which are proposed as through streets, to connect to North Sunnyside Avenue and Carter Avenue. Therefore, the proposed project would maintain the general pattern of the existing streets and improve circulation within the project site. Regarding non-vehicular connectivity, this portion of the policy is related to the downtown commercial area. However, the proposed project would include a Mobility Plan, which provides for a circulation system using private vehicular and non-vehicular modes of transportation in a system of public roadways and pedestrian pathways within the project site. In addition, as stated in Table 4.11-1, the project would be consistent with Land Use Element Goal 3 as the proposed project includes development regulations and design guidelines for the project site created to be compatible with the surrounding neighborhood and is designed in a manner that is sensitive to scenic viewpoints and/or viewsheds through building design, site layout and building heights. Please refer to Global Response GR- 7.
- I103-3** The comment expresses concern about private views, privacy, and noise levels on the commenter's property. Draft EIR Section 4.13, Noise, identified potentially significant temporary noise impacts during construction activities and mitigation was incorporated to reduce impacts to a less than significant level. A significant impact would occur when construction takes place near the project boundaries, specifically impacting sensitive receptors such as the single-family residences to the west and south of the project site (See Table 4.13-5, Construction Noise Levels at Noise-Sensitive Uses, of the Draft EIR). However, with the incorporation of mitigation measure MM-NOI-1, the City and/or the Construction Contractor would be required to implement noise reduction measures during all construction activities which would ensure compliance with the applicable noise limits and reduce impacts to a less than significant level. Noise reduction measures would include administrative controls, engineering controls, and noise barriers. Given this, the project does address concerns related to noise impacts. For information about impacts to private views and privacy it should be noted that, although private views are not protected by CEQA, the design guidelines of the Specific Plan outline site planning and design, architectural design, and landscape design standards that would be implemented as a design of the project to ensure that visual character and quality of public and private views are not degraded.
- I103-4** The comment states that the project would remove the current natural fire break for the community and would likely increase fire insurance costs for the surrounding area. It should be noted that fire insurance raises economic issues that do not appear to relate to any physical effect on the environment. Nonetheless, please refer to Global Response GR-3.

- I103-5** The comment expresses concern about traffic and traffic safety. Please refer to Global Response GR-6 and Response to Comment I85-14.
- I103-6** The comment expresses concern about respiratory health associated with air pollution from the increase in vehicles in the area. As discussed in Draft EIR Section 4.3, Air Quality, with implementation of MM-AQ-1, impacts to air quality would be less than significant. In addition, construction and operation of the project would not contribute to exceedances of the NAAQS and CAAQS for NO₂. Health effects that result from NO₂ and NO_x include respiratory irritation, which could be experienced by nearby receptors during the periods of heaviest use of off-road construction equipment. However, project construction would be relatively short term, and off-road construction equipment would be operating at various portions of the site and would not be concentrated in one portion of the site at any one time. Construction and operation of the project would exceed localized thresholds for PM₁₀ or PM_{2.5} and may contribute to exceedances of the NAAQS and CAAQS for particulate matter or may obstruct the SCAB from coming into attainment for these pollutants. However, the project would not result in substantial DPM emissions during construction and operation, and therefore, would not result in significant health effects related to DPM exposure. Additionally, the project would implement dust control strategies and be required to comply with SCAQMD Rule 403, which limits the amount of fugitive dust generated during construction and MM-AQ-1, which requires use of California Air Resources Board (CARB)-certified Tier 4 Interim engines or equipment outfitted with CARB verified diesel particulate filters during construction. As shown in Draft EIR Section 4.3.7, Level of Significance After Mitigation, with implementation of MM-AQ_1, localized construction impacts and potential health effects associated with these impacts during construction of the project would be less than significant with mitigation.
- I103-7** The comment states that the water usage assessment is wrong because of the uses of 55 gallons of water per person per day and the exclusion of outdoor water usage such as landscaping and pools. SB 606 and AB 1668 has identified 55 gallons per person per day as a target objective for urban water agencies to meet.¹⁴ Please refer to Global Response GR-1. In addition, please see Final EIR Section 4.19.5, Impacts Analysis, in Section 4.19, Utilities and Service Systems, for information on how outdoor water use was calculated and included in the water usage estimation. Although no swimming pools are proposed, future homeowners can potentially install swimming pools. However, any future installation would comply with city code requirements related to pool installation.

¹⁴ California Water Boards. 2018. Water Efficiency Bill Fact Sheet. June 7, 2018. https://www.waterboards.ca.gov/publications_forms/publications/factsheets/docs/water_efficiency_bill_factsheet.pdf

Comment Letter I104

From: Karen Rowinsky <karen@karenrowinsky.com>
Sent: Monday, October 4, 2021 4:56 PM
To: Vincent Gonzalez
Subject: Draft EIR

CAUTION: This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

When the proposal for 42 luxury homes on the Monastery property was first proposed, I thought it might be a tolerable project. Once the 500 page draft EIR report was published, and I had an opportunity to study it, I am greatly disturbed by it. Here are my main objections:

I104-1

1. **This is a designated high fire hazard severity zone, per the California Department of Forestry and Fire Protection.** That in itself should make this property unbuildable. This goes against two Objectives of our General Plan of 2015. Objective Hz5.a - "Limit risk of wildfire through public education and **development planning.**" Development planning would stay out of a high fire zone, especially one that has come so close to burning three times in the 35 years I've lived here.

I104-2

Objective Hz7 - "Avoid expanding development into undeveloped areas in a **Very High Fire Severity Zone.**" The town of Paradise, also in a Very High Fire Severity Zone, nearly burned entirely to the ground (90%).

Global warming is real, wildfires worldwide are increasing in frequency and intensity, and especially in California. I live north of Grand View, and was on voluntary evacuation just a year ago during the Bobcat fire, which came within 1 1/2 miles of Sierra Madre. In 2008, the call for mandatory evacuation came at Midnight. That was the Sierra Madre fire, and many residents north of Grand View had their homeowner's insurance rates increased greatly, or were cancelled altogether.

I104-3

2. **This is also in close proximity to an earthquake fault.** The Sierra Madre earthquake of 1991 destroyed one of the buildings on the Monastery property. Rather than rebuild it for an estimated \$5 million, the Mater Dolorosa priests chose to tear it down. Twenty-two homes were condemned along Sunnyside and Lima, and there was damage to 403 structures, resulting in \$12.5 million in damages. This in itself should make the property unbuildable.

I104-4

3. **Water.** Once again we are in a drought - two years into the drought - the Colorado River as well as most lakes and rivers are at unprecedented low levels. Our City Council in 2014 put a moratorium on building, which halted this project. The developer has assured the City of "net zero" water usage, meaning they will purchase water up front for the next 50 years and store it for future use. There is no water to be purchased, and for 50 years? According to Jane Tsong, Project Manager for the Watershed Conservation Authority (WCA), it would be impossible to predict what net zero will be for the next 50 years. Especially given our current drought situation, and climate change, which seems to be here to stay. This also violates the General Plan - Objective R12 - "Optimizing the use of water and water resources," and Policy L4.3 - "Ensure that the new development and the expansion of existing uses incorporate water conservation measures that reduce and minimize the impact on the City's water supply and its ability to serve its customers." This in itself should make the property unbuildable.

I104-5
I104-6

This property is part of an alluvial plain, the only one of its kind along the foothills between Sierra Madre and Claremont. Building 42 large homes, with the needed infrastructure will make storm water recapture that much more difficult.

I 1104-7

4. **Traffic.** Traffic is expected to increase by 300-400 (and possibly more) vehicles per day along the side street of Sunnyside. Additionally, Carter is expected to carry some of the burden, with travelers going down Lima and Grove. No mention is made of the many delivery and service trucks that are typical of a neighborhood such as this one. There are no plans for a bicycle lane. Sidewalks may be put in on Carter and Sunnyside, but I am puzzled as to how this is to take place on residents' property.

I 1104-8

5. **Housing** - 42 houses of 2700-4000 square footage are much larger than those of the surrounding neighborhood. There will be "some" one story houses, yet, we have asked several times and the answer from the New Urban West representatives are "Don't know yet." If one looks at the map of the surrounding neighborhood, those homes consist of much smaller homes - only 4 are two story and 51 are one story. These homes will be walled off from the neighborhood. This violates Vision and Guiding Principal #5 - "Ensure development is done in harmony with its neighborhood, while maintaining the character of the town and without unduly burdening existing city services and infrastructure or impacting the environment."

I 1104-9

6. **Trees** - The developer's Specific Plan calls for the removal of 100 mature trees. The plan is to replace them, but it takes about 20 years for a tree to reach maturity. They need water to grow and thrive, and our drought may never end. Meanwhile, the needed canopy that helps reduce global warming is gone. There is no plan to build the houses around the mature trees, even the 10 protected coastal oaks in order to save them.

I 1104-10

Thank you for your time and attention to this very concerning matter.

Karen Rowinsky
Sierra Madre Resident

Karen Rowinsky, LCSW
Pronouns: she, her, hers
626-483-1135
<http://www.karenrowinsky.com>

Response to Comment Letter I104

Individual
Karen Rowinsky
October 4, 2021

- I104-1** The comment expresses general opposition for the proposed project but does not raise any issue concerning the adequacy of the Draft EIR. No further response is required.
- I104-2** The comment expresses concern about the consistency with the General Plan Draft Safety Element and the project's location in a Very High Fire Hazard Severity Zone (VHFHSZ). Please refer to Global Response GR-3.
- I104-3** The comment expresses concern about fire history in the area and the increased insurance rates as a result of the fires. As concluded in Draft EIR Section 4.20, Wildfire, impacts related to wildfire would be less than significant. Please refer to Global Response GR-3. In addition, insurance is not within the scope of the required environmental analysis under CEQA. As such, no response is required.
- I104-4** The comment expresses concern about the project's proximity to an earthquake fault. Please refer to Response to Comment I36-7.
- I104-5** The comment expressed concern about the water usage of the project. Please refer to Global Response GR-1.
- I104-6** The comment states that the project is not consistent with the water resource policies in the General Plan, particularly Objective R12 Policy L1.6 (incorrectly cited as policy L4.3). Please refer to Response to Comment I02-4.
- I104-7** The comment states that the project site is part of an alluvial fan and expresses concern about losing the ability for the site to capture water. Please refer to Response to Comment I32-2.
- I104-8** The comment expresses concern about the increase in traffic, lack of sidewalks in the surrounding area, no plans for bicycle lanes, and the addition of delivery and service trucks. Please refer to Response to Comment I47-5 regarding bike lanes. Please refer to Global Response GR-6, regarding increases in traffic in the surrounding neighborhood; delivery and service trucks are included in the traffic analysis. Sidewalks will not be placed on residents' properties.
- I104-9** The comment expresses concern about neighborhood consistency, specifically about the size of the proposed homes. Please refer to Response to Comment I90-2 and I85-12.
- I104-10** The comment expresses concern regarding the removal of trees on the project site, specifically the ability for the trees to reach maturity. Please refer to Global Response GR-2.

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Comment Letter 1105

Monday, October 4, 2021

Dear Mr. Gonzalez, Mayor Arizmendi, Mayor Pro Tem Goss, Council Member Garcia, Council Member Kriebs, Council Member Parkhurst,

First, I appreciate all of the work you all do on behalf of our very special small town. I have served on 2 commissions here in town and on a previous ad hoc general plan committee during the tenure of Mayor Rob Stockley. I mention this because I know the amount of time, energy and study that is necessary when serving on a commission and the City Council requires ever so much more of the above. And you get a lot of very emotional letters and speeches from people like me. So, I preface this letter by acknowledging your hard and caring work and to thank you for your service, dedication and your commitment to preserving our dear Sierra Madre.

I am writing regarding the DEIR for the proposed zone change and proposed large housing development at the Mater Delarosa Monastery. I want to start by saying how disturbing it was that this project was trotted out in the middle of an unprecedented deadly pandemic, (not to mention unprecedented social and political upheaval) where people weren't supposed to leave their homes or were afraid to leave their homes. They no longer were able to congregare and talk to each and be apprised of what was going on in the city. It felt devious and immediately put a lot of people in a place of distrust of the process and the entities involved.

Anytime I read something that says, "No significant impact", or "less that significant impact" by someone who neither lives in the place they are studying, nor will have to live there once whatever is being proposed actually happens, I tend to find it has little to no credibility to the people directly affected. Anyone who lives here, especially in the affected area, knows in their soul that this project is going to have a tremendous adverse, negative affect on their daily lives, for example: just 2 cars making one trip away from 42 homes and one return trip a day, just one, which is an extremely conservative number, means 168 cars zipping down our street(s) and back again. 168 cars compared to the current number. Do you leave your and return just once a day? Or do you come

1105-1

1105-2

and go several times? HUGE impact. Just because a document say there's no "significant" impact doesn't mean a thing to those of us living in the immediate area. Citywide we are already experiencing near gridlock conditions whenever one of the 8 schools in our tiny city begins their day and ends their day. One of those schools is located right in the neighborhood that is in the development zone and has recently gone from a high school to a K-12. It is almost impossible to even move through the area now. Adding hundreds, that's right, hundreds of more daily car trips; residents, delivery vehicles, gardeners, garbage trucks, etc. through this small area is going to deeply impact the people who live here, some who have worked their entire adult lives to be able to live here, only to suddenly find their peace, safety, quality of life and likely their property values take a HUGE hit. Our downtown is already very difficult to move through. I see people making U-turns every trip I make downtown and there is rarely if ever a police officer around. I've been someone who has almost been hit by one of these people making illegal U-turns. There is nobody enforcing that U-turn law. Rarely enforcing it. It happens all the time **because of the traffic**. We can't handle any more traffic in our downtown! People avoiding town are racing through the residential areas. This is an insane proposition. I don't know where the pressure is coming from or if there is pressure, but you have the power to say NO to 42 houses, NO to a zoning change. I would be interested in knowing what an institutional use would look like, but the developer wants to get the most money they can out of our town and big expensive houses is the only way to get it. Even "mitigating" with fewer (even larger homes) is a non-starter for a good many of us, whether you hear from those people or not. This DEIR is a cumbersome, dense document that not everyone has the time or even the comprehension to get through it, understand it, or comment on it. I hope you take that into consideration during your deliberations. I am not being hyperbolic when I tell you that this proposed development is a mistake on a grand scale. I would feel somewhat better about it if there were fewer homes, single story, not packed together and affordable so young families could buy a home here. But that is not what this is. It feels like a money grab and a greedy one at that.

It's offensive to have someone say that cutting down 100 mature trees, some of them hundreds of years old, is not significant. Replanting trees

1105-2
Cont.

1105-3

1105-4

is not anywhere near retaining mature trees. Every time you cut down a mature tree, you're releasing climate warming carbon dioxide and losing something irreplaceable. You're disturbing wildlife habitats that have been in place for decades.

I105-4
Cont.

Putting 42 houses in highly dangerous fire areas that the General Plan asks we not do, is offensive and quite frankly, stupid. Those proposed homeowners will likely be unable to insure their homes against fire (people who live on Sunnyside voiced that they already are having difficulty getting insurance) and yet they will be in the highest hazardous fire zone there is. A California moratorium guaranteeing insurance in wildfire-threatened areas lapsed on September 26, 2021, putting hundreds of thousands of homes at the mercy of the market. As many as 2.4 million homes are at risk of losing protection in 2021 as grace periods expire.

I105-5

Sitting in a Planning Commission meeting (for hours) that is supposed to be addressing water, as in where will the water come from for this enormous project and having a commissioner, several commissioners, blather on about the condition of our pipes and where the pipes are and how many pipes there are rather than addressing WHERE THE WATER WILL COME FROM is offensive. Clearly, one particular commissioner had already made up his mind that he wants the development and was trying to keep the discussion away from where the water will come from when we are presently in a water emergency. It is offensive and highly hypocritical for the City to ask us, the community, to conserve water and then imply that we have plenty of water! Enough water for 42 additional houses! Why should we conserve, spend thousands of dollars to rip out our lawns and re-landscape our yards only so some developer can build his 42 mansions? Why? This drought is worse than the one where we had a moratorium on new water meters and yet, the same commissioner doesn't talk about that, he talks about the size of our pipes. He used up so much time talking away from the actual subject. People; working people, old people, people with children who desperately try to get to these meetings to hear something of substance only to have one man wasting their precious time, my precious time, talking about nothing. Deeply offensive, deeply disappointing and deeply arrogant.

I105-6

It seems like the decision has already been made and the onus has been put on US, the citizenry of our most precious Sierra Madre, who have made their wishes known by giving their time to participate in the crafting of the general plan, to have to defend our town from the very people we voted in who promised to preserve this irreplaceable treasure of Sierra Madre. From what I was able to get through in the EIR water is mentioned as net-zero. It's not going to have any affect on us existing folks and our water future. That is simply NOT true. It is a deceitful term. Have a BIG meeting, a real meeting. Tell the truth about the water. Where is 50 years worth going to come from when, according to the scientists and water specialists and the Metropolitan Water District say we maybe have two years worth of water security. Why won't anyone use the word water? It's because you all know there is no water and things look dire for all the western states including ours. Many farmers have already been stripped of their water this year. Next year could be worse. An unprecedented water emergency has been declared on the Colorado River, which has NEVER happened before in its history, due to dwindling water and where a good portion of our water supply comes from. The Hyatt Power plant at Lake Oroville in California, which generates some of our electricity has been taken offline due to falling lake levels in an effort to preserve critical water supplies. You have been alerted. Before you make any decision, I sincerely hope you will stop with the magical thinking where water is concerned, where environment is concerned, where traffic is concerned, where noise is concerned, where quality of life is concerned. We don't deserve this. And just so you know, there are many people who are afraid to speak out against this project because they are Catholic and don't want to publicly speak against the Catholic Church.

1105-6
Cont.

I don't envy the position you're in, but I hope you will look at this in a clear-eyed manner. If it sounds like a dangerous proposal to you, knowing this town intimately as you do, vowing to preserve our dear town as you all did, knowing that we are in a dangerous water emergency, which is guaranteed to get much worse in the coming years, please think very carefully about this. Listen to your gut. I trust you are looking out for my and the rest of your constituencies best interest, not a developer's. We want to preserve our vulnerable little town. If this re-zoning and proposed development go through...

1105-7

this will be your legacy. Yours, Rachelle Arizmendi, Gene Goss, Edward Garcia, Kelly Kriebs, Robert Parkhurst, Bob Spears, Tom Denison, John Hutt, William Pevsner and Peggy Dallas.

↑ 1105-7
Cont.

Respectfully yours,

Karin Delman
540 W. Laurel Avenue
Sierra Madre, CA 91024

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Response to Comment Letter I105

Individual
Karin Delman
October 4, 2021

- I105-1** The comment is an introduction to comments that follow and does not raise any specific issue related to the adequacy of the Draft EIR.
- I105-2** The comment expresses general concern regarding traffic congestion associated with the proposed project. Please refer to Global Response GR-6.
- I105-3** The comment expresses general opposition to the proposed project. However, the comment does not raise any specific issue related to the adequacy of the Draft EIR.
- I105-4** The comment expresses concern regarding the tree removal within the project site and general wildlife habitat concerns. Please refer to Global Response GR-2 and Final EIR Section 4.4, Biological Resources.
- I105-5** The comment expresses general concerns regarding the project site being located within a VHFHSZ. Please refer to Global Response GR-3.
- I105-6** The comment expresses concern regarding water supply. Please refer to Global Response GR-1.
- I105-7** The comment provides general concluding remarks and opposition to the project that do not raise new or additional environmental issues concerning the adequacy of the Draft EIR.

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Comment Letter 1106

From: Helena Karafilis <helenakarafilis@gmail.com>
Sent: Monday, October 4, 2021 2:10 PM
To: Vincent Gonzalez
Subject: Housing development

CAUTION: This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Helena Karafilis-Spensley
642 Fairview Ave, Sierra Madre, CA 91024

Thank you for the opportunity to comment on the DEIR for the "Meadows at Bailey Canyon"
Please retain a copy for the administrative record.
Please respond to these comments in the Final EIR and please put me on the list of people to
notify when the Final EIR is complete.

1106-1

I strongly object to the proposed housing development. It is inconsistent with the Policies and
Values of our General Plan. I am especially concerned with:

1106-2

1) 101 mature trees will be removed, including 10 protected Oaks. The Oaks will be replaced with
smaller Oaks and other small trees (requiring a great deal of water to become established) SM has
a Forest Management Plan with a mission to preserve "Canopies" for their environmental and
aesthetic benefit. 101 large canopied trees will be destroyed. Why are you flouting the SM Forest
Management Plan and denuding the area? How will you prevent rock and landslides and impact on
wildlife when these mature trees are destroyed?

1106-3
1106-4

2) I strongly oppose a change in zoning, a change in our General Plan and a change in the
regulations that other residents have to follow.

1106-5

3) In the Alternatives section presented in the Draft EIR, why did you choose to feature only a
maximum-sized institution building as opposed to one we could have such as an assisted-living
facility such as the Kensington, which is under 60,000 sq feet, as would be a high school? Why are
you not presenting all options to citizens? Please present another institutional option.

1106-6

4) How, specifically, will the project ensure there will be no increased fire risk and address
successfully two crucial elements in the proposed safety element given the area is an extremely high
fire severity zone? The two safety elements below are particularly relevant—please address
specifically in the EIR:

1106-7

Hz 2.12 All new residential developments in hazard areas shall have at least two emergency evacuation routes (i.e., points of ingress and egress)

Objective Hz7: Avoid expanding development into undeveloped areas in Very High Fire Severity Zone

Please address these concerns.

Sincerely,

Helena Karafilis-Spensley



↑
1105-7
Cont.

Response to Comment Letter I106

Individual
Helena Karafilis Spensley
October 4, 2021

- I106-1** This comment requests the following comments (Comments I106-2 through I106-7) be included in the responses to comments of the Final EIR. As shown, the commenter's request has been recorded as part of this Final EIR.
- I106-2** This comment is the same as comment from I92-2. Please refer to Response to Comment I92-2.
- I106-3** This comment is the same as comment from I92-3. Please refer to Response to Comment I92-3.
- I106-4** This comment is the same as comment from I92-4. Please refer to Response to Comment I92-4.
- I106-5** This comment is the same as comment from I92-5. Please refer to Response to Comment I92-5.
- I106-6** This comment is the same as comment from I92-6. Please refer to Response to Comment I92-6.
- I106-7** This comment is the same as comment from I92-7. Please refer to Response to Comment I92-7.

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Comment Letter 1107

From: Matthew Bryant <mvnbryant@aol.com>
Sent: Monday, October 4, 2021 11:57 AM
To: Vincent Gonzalez
Subject: from Matt Bryant re; DEIR Comments for The Meadows at Bailey Canyon

CAUTION: This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

To: Vincent Gonzalez

From: Matt Bryant
635 Edgeview Drive
Sierra Madre, CA 91024

Re: DEIR for the Meadows at Bailey Canyso

Dear Mr. Gonzalez:

Below are my comments/concerns with the DEIR for the proposed housing project known as The Meadows at Bailey Canyon. I ask that you retain a copy for the administrative record and respond to these comments in the final EIR. I would also like to be put on the list of people to notify when the final EIR is complete.

1107-1

In general, I strongly object to this project as not suitable for the area in which it is located, inconsistent with our General Plan and Municipal Code and opposed by the vast majority of residents in Sierra Madre. My specific comments/concerns are as follows:

1. The additional ingress/egress required for a project of this magnitude located at Carter creates a dangerous choke point affecting vehicular traffic and pedestrian traffic particularly where Carter intersects with Grove and Lima. My wife and I recently decided to go for a walk at Bailey Park. As we drove up Grove from Fairview towards Bailey Park there were cars parked on both sides of the street on Grove. This is caused because the parking at Bailey Park is inadequate to meet the demand which causes overflow parking onto Grove. As we drove north on Grove towards the park, other cars were coming down Grove in the opposite direction. Because there was not room to pass simultaneously, one of the cars had to find a place to pull to the side to let the other car pass. That had to be done while dodging pedestrians who had parked on Grove and were walking toward the park on a street without sidewalks. This is already a congested mess and an accident waiting to happen. Either a car is going to hit head-on with another car or a pedestrian is going to get hurt or killed. One or the other is bound to happen. And the conditions that I'm describing exist right now. If you add to this, the additional traffic from 42 homes, deliveries, guests and a public park, it becomes an accident waiting to happen. It simply doesn't work. Please consider my statement as putting the City of Sierra Madre on notice of a dangerous condition that will be made exponentially worse with the approval of this project. The City of Sierra Madre does not need the kind of legal exposure that would result from this project.

1107-2

2. The whole purpose of having an additional ingress/egress is so that people can evacuate safely in the event of an emergency and so that emergency vehicles can quickly access the property. For the reasons outlined above, it would not be feasible under the conditions I describe now as well as what they would be should this project gets approved.

1107-3

3. Regardless of what the developer promises to do, water is becoming an increasingly scarce resource. Lakes, rivers and reservoirs are drying up all over the Southwestern United States. There is no water source that can ever guarantee the delivery of water in the future under these conditions. Until the drought conditions improve, it would be the height of irresponsibility to bring additional users on line. The only solution if the drought continues is going to be rationing and higher water rates for existing users. The Meadows project could turn a disaster into a catastrophe. The developer promises "net zero" water use. That simply can't be achieved. Even if they offer to retrofit areas in Sierra Madre to offset the water use by the Meadows, that will only be a short-term fix. If the drought gets worse as many experts project will occur, and the developer has already done these retrofits, it means the City has no where to go. The retrofitting will have already been done to bring this project on line and now the City will have nowhere to go except rationing and higher water rates.

1107-4

- 4. The traffic on Sunnyside will destroy the character of that street and the quality of life for the residents. I can remember attending a City Council meeting a few years ago where residents on Sunnyside were concerned about the traffic only coming from the Mater Dolorosa Retreat Center. If you now add to that the traffic coming from 42 additional homes, deliveries, guests, and a public park, Sunnyside will be ruined. Sunnyside also does not have sidewalks and simply cannot support the increase in traffic resulting from a project of this magnitude.

1107-5
- 5. Every mature tree along the beautiful drive from the entry gates of the Monastery at the top of Sunnyside up to the Retreat Center will be destroyed. These are mature trees that have been there for years. They are irreplaceable. The project could have worked around this but instead chose to maximize profit at the expense of a well-designed project.

1107-6
- 6. With the passage of SB-9 and SB-10, the City of Sierra Madre has lost control over its zoning regulations. If this project were to be approved, there is no telling what owners of the newly-built homes could do if they were so inclined to do so. They could each put an ADU unit in or add more dwellings and the City of Sierra Madre would be powerless to stop them. None of that is being taken into account in the DEIR. It would further aggravate every concern I have mentioned whether it's traffic, water or in emergencies.

1107-7
- 7. According to the Natural Hazard Zone Disclosure Report for this property, it is located in the highest fire hazard zone. Owners would not be able to obtain normal insurance and instead would have to buy an expensive policy using the California Fair Plan. No other insurance company would touch a property in this kind of high fire hazard zone. The property also has an active earthquake fault either underneath or very close by. As is common knowledge, a large Monastery building was destroyed some years back after an earthquake. It is also located in a dangerous landslide zone. The property is also located in a protected species zone including potential or existing habitat for the California Spotted Owl and Hoary Bat among other species.

1107-8
1107-9
1107-10
1107-11
- 8. In preparation for the project, Mater Dolorosa sprayed a chemical over the entire 22 acres that destroyed almost all plant life and vegetation. There has been no efforts at dust mitigation whatsoever. When the wind blows, dust rolls off the barren land into the air and onto neighboring properties causing allergies and more severe respiratory and other health issues. Construction of a housing project will only make the conditions worse.

1107-12
- 9. Contrary to the precepts in the General Plan and Municipal Code, neighbors immediately adjacent and to the west of the project will have their views, privacy and value of their properties significantly affected by this project. Despite promises by Mater Dolorosa over the years about mitigating the impact of their project on the neighbors, that is not the case. We still do not know if the homes are going to be 1-story or 2-story. But when we see a pattern of conduct that puts profit over people, we can guess what story homes they intend to put in.

1107-13
- 10. The last large parcel of open space in Sierra Madre will be obliterated. The wildlife including deer, coyote, bobcats, falcons, bears and other wildlife will be displaced.

1107-14
- 11. The area to be donated above the Monastery has been deemed to be a generous gift to the community. That land is not buildable, valuable land. Mater Dolorosa and their Developer have cleverly offered that up as a "concession" when in reality, all it does is shift the responsibility and liability for maintaining the land from Mater Dolorosa over to the City of Sierra Madre and its taxpayers. This is hardly a benefit to the community.

1107-15
- 12. The Meadows has been a staging area in the event of fires as well as for mountain rescues. By developing this land with a large housing project, not only do we remove it as a valuable staging area, we also further stress our police and fire departments with additional people that may need evacuation and their homes protected. Add to that the difficulty of getting emergency vehicles into the project as a result of the road conditions along Sunnyside and Carter and, once again, this project only makes difficult conditions even worse.

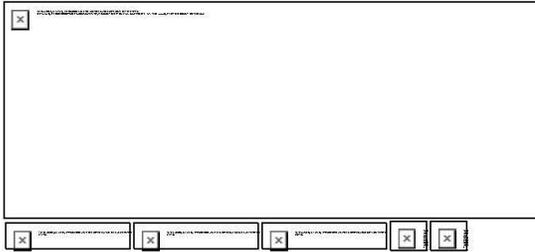
1107-16
- 13. A well-designed institutional development has not been fairly or adequately explored. From the get go, only very scary institutional projects have been offered as an alternative to this residential project when that is simply not the case. The lot coverage, setbacks, traffic, water use and impact on the neighbors appear to be a lot less with an institutional project. I also believe the vast majority of residents would be in favor of such a project.

1107-17
- In conclusion, the City of Sierra Madre has no obligation to support this horrible project just because Mater Dolorosa and their developer, New Urban West want to maximize their profit at our expense. I don't believe that the concerns outlined above can be mitigated without a drastic change to this project or an alternative use.

1107-18

Thank you.
Matt Bryant

635 Edgeview Drive
Sierra Madre, CA 91024
626-695-7807



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Response to Comment Letter I107

Individual
Matthew Bryant
October 4, 2021

- I107-1** The comment expresses general opposition to the project and requests the following comments be included in the responses to comments of the Final EIR. As shown, the commenter's request has been recorded as part of this Final EIR. Regarding consistency with the General Plan, please refer to Global Response GR-7.
- I107-2** The comment raises concerns regarding the design of the Carter Avenue and potential safety hazards to motorists and pedestrians. Please refer to Global Response GR-5.
- I107-3** The comment expresses concern regarding emergency evacuation relative to the ingress/egress design proposed for Carter Avenue. Please refer to Global Response GR-4 and Global Response GR-5.
- I107-4** The comment expresses concern regarding water availability during drought conditions and potential exacerbation of water supply issues with implementation of the proposed project. Please refer to Global Response GR-1.
- I107-5** The comment expresses concern regarding future traffic volumes on Sunnyside Avenue and potential degradation to the character of the street. Sunnyside Avenue is currently the primary entrance to the Mater Dolorosa Retreat Center and will serve as a two-way access for the proposed project. The comment states that Sunnyside Avenue does not have sidewalks above Algeria Avenue. Please note that Sunnyside has sidewalks on both sides of the street between West Algeria Avenue and Fairview Avenue. However, no sidewalks are present north of Fairview Avenue. The proposed project would be consistent with Objective L51 of the City's Land Use Element, which states "developing a balanced and multi-modal transportation system to serve the needs of all roadway users, including motorists, public transit patrons, pedestrians and cyclists," because the proposed project would include a landscaped parkway and sidewalk on the west side of North Sunnyside Avenue, and a sidewalk between proposed A, B, and C Streets, enhancing pedestrian safety and mobility (Draft EIR Section 4.17.4, Project Design Features, in Section 4.17, Transportation). Therefore, the proposed project has a less than significant impact to the City's circulation system. Please refer to Global Response GR-6 for information about traffic impacts.
- I107-6** The comment expresses concern regarding tree removal that would occur as part of project implementation. Please refer to Global Response GR-2.
- I107-7** The comment expresses concern regarding the passage of Senate Bill (SB) 9 and SB 10 and associated indirect effects of potential future development allowed under these senate bills. Please see Response to Comment I28-5 for discussion regarding SB 9. Regarding the comment's concern for SB 10, this bill was recently passed and signed by the Governor and will take effect in January 2022. The new law provides that local agencies (e.g., City of Sierra Madre) may adopt an ordinance to allow up to 10 dwelling units on any parcel, at a height specified in the ordinance, if the parcel is located within a transit-rich area or urban infill site. Pursuant to SB 10, adoption of such an ordinance would not be

subject to CEQA.¹⁵ The proposed project does not request or benefit from the provisions of SB 10. As previously discussed above, the project as proposed requests the approval of a Specific Plan, which is subject to CEQA as shown in these Responses to Comments. As such, no change or addition to the Draft EIR is required.

- I107-8** The comment expresses concern regarding the project location within a high fire hazard severity zone. Please refer to Global Response GR-3.
- I107-9** The comment expresses concern regarding earthquake hazards and the project proximity to fault zones. Please refer to Response to Comment I36-7 and Response to Comment I36-7. Regarding the commenter’s concern about damage to the Mater Dolorosa Retreat Center, it should be noted that, due to the age of the Mater Dolorosa Retreat Center, this existing building was not constructed to current building code standards. The proposed project would be required to adhere to the most current CBC standards to minimize the effects of earthquakes and other geotechnical hazards.
- I107-10** The comment expresses concern regarding landslide hazards. As concluded in Draft EIR Section 4.7, Geology and Soils, the project site is located outside of any potential landslide zone and is not located within a seismic hazard zone, therefore, impacts associated with landslides would be less than significant.
- I107-11** The comment expresses concern regarding potential impacts to the California Spotted Owl and Hoary Bat, as well as general impacts to on-site habitat. Regarding the spotted owl, the CDFW Spotted Owl Viewer (CDFW 2021) does not have recent records of California spotted owl (*Strix occidentalis occidentalis*) in the local vicinity, with the nearest being a 1974 record from almost two miles to the northeast and there are several ridges between the project and the record location. As such, the potential for occurrence of the species was not assessed due to the lack of recent local records and the distance to the nearest record. The species is typically found in old-growth mixed conifer forest, often with an understory of oaks and other deciduous hardwoods. The potential habitat is most often found in deep-shaded canyons (canopy closure greater than 40%), on north-facing slopes, and within 300 meters of water. The project site lacks suitable habitat for the species, so the species is not expected breed in the area. As with most birds, there is potential for the species to be a transient in the area during foraging, but project activities would not be expected to impact the species. Regarding hoary bat, the Biological Resources Report provided as Appendix C1 of the Draft EIR, specifically Appendix C of the report, Special-Status Wildlife Species Potential to Occur on the Project Site, determined the hoary bat is not expected to occur on site due to lack of suitable habitat. Draft EIR Section 4.4, Biological Resources, analyzes potential impacts to habitat and provides mitigation measures MM-BIO-1 through MM-BIO-3 which would reduce impacts to biological resources to a level that is less than significant.
- I107-12** The comment expresses concern regarding chemical spraying at the site by the Mater Dolorosa Retreat Center. The comment does not raise any issue concerning the adequacy of the Draft EIR. Activities undertaken by the Mater Dolorosa Retreat Center are outside the control of the project Applicant and serve as baseline conditions at the project site.

¹⁵ Holland and Knight. 2021. SB 10 to Facilitate Upzonings, But Does Not Include CEQA Exemption for Corresponding Projects. September 10, 2021. <https://www.hklaw.com/en/insights/publications/2021/09/sb-10-to-facilitate-upzonings>.

- I107-13** The comment expresses concern regarding private residential views being impacts by implementation of the proposed project. Protection of private views is not within the purview of CEQA; therefore, impacts to private views are not considered an environmental impact under CEQA. Impacts to public viewpoints or other sensitive views within the project area that would result following implementation of the project are analyzed in Draft EIR Section 4.1, Aesthetics.
- I107-14** The comment expresses concern regarding impacts to wildlife, including deer, coyote, bobcats, falcons, bears and other wildlife. All potential impacts to sensitive wildlife species are analyzed in Draft EIR Section 4.4. Mitigation measures MM-BIO-1 through MM-BIO-3 would reduce impacts to biological resources, including wildlife, to a level that is less than significant. Additional impact analysis is provided in the Biological Resources Report provided as Appendix C1 of the Draft EIR.
- I107-15** The comment expresses concern regarding the land donation north of the Retreat Center. As discussed in Final EIR Section 3.2, Project Objectives, one of the objectives of the proposed project is to preserve the hillside open space area by conserving approximately 35 acres north of the Mater Dolorosa Retreat Center to the City in order to preserve a portion of Bailey Canyon and the Bailey Canyon Trail, which would be used by wildlife movement up and down slope; preserve native vegetation communities and drainages; and preserve land adjacent to the Bailey Canyon stream. It should be noted that no development is proposed within this 35-acre open space hillside conservation area. The comment does not raise any issue concerning the adequacy of the Draft EIR; therefore, no further response is provided. Conservation
- I107-16** The comment states that the project site currently serves as a fire protection staging area and expresses concern regarding emergency evacuation. Please refer to Global Response GR-4 for general concerns related to wildfire. Regarding the loss of the site as a fire response/helicopter landing area, see Response to Comment I10-1.
- I107-17** The comment expresses concern regarding the potential alternatives analyzed in lieu of the proposed project. Potential alternatives analyzed for the proposed project are provided in Draft EIR Chapter 8, Alternatives. Refer to Response to Comment I26-10.
- I107-18** The comment provides concluding remarks that do not raise new or additional environmental issues concerning the adequacy of the Draft EIR.

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Comment Letter 1108

Heather Allen
431 Grove Street
Sierra Madre, Ca.

Dear Mr. Gonzalez,

My name is Heather Allen. I have been a resident at 431 Grove Street since 1973.

Thank you for the opportunity to comment on the DEIR for the "Meadows at Bailey Canyon".

Please respond to my comments in the final EIR, and retain a copy of this letter for the administrative record.

I object to the proposed housing development. The following are my concerns:

The land is zoned institutional, yet the developer wants to build many homes. This is not allowed in an institutional zone. Even if the city council grants the applicant a residential zone change, many large houses on small lots is not keeping within Sierra Madre's character or the surrounding neighborhood.

There are two late quaternary earthquake faults on the site. This was not even mentioned in the DEIR. It is imprudent to build any homes on earthquake fault lines.

Over the years, I have noticed an increase of traffic and parking on Grove Street, particularly on the weekends when people come to Bailey Canyon. The addition of a park is only going to intensify these problems. I feel that a park is a benefit to the developer and the people who move into the Meadows, but it is a disadvantage to the current residents.

I have also noticed an increase in noise over the years. In the 1980's, Grove Street was very quiet. But now, at times, the noise is unbearable. (It seems like an endless cacophony of mowers, blowers, and noise from various nearby home construction/repair projects.) I cannot imagine the misery that may be added to this by the construction and maintenance of 42 additional homes!

Carter is too narrow to be used as an ingress/egress for the project, particularly if there is a fire. I have lived through three mountain fires while residing on Grove. I know first hand the intense stress of having to hurriedly pack and evacuate under smoky, windy conditions. (Once you evacuate, the authorities may close the street and not allow you back into your home.) I can only imagine the chaos and safety concerns that would arise when many panicked residents try to evacuate on Carter only to run into more traffic jams on Grove and Lima because the current residents are trying to leave at the same time. This is certainly a recipe for disaster.

For all the above reasons, I object to this proposed development. I feel that the Monastery and the developer have little or no consideration for the residents who already live here. I understand the concept of private property rights, but no one has a "right" to build if the project infringes on someone else's rights. If approved, this proposed development will lessen our property values, pose serious safety concerns, and ultimately undermine our quality of life.

Sincerely,
Heather Allen
hla@webtv.net

1108-1

1108-2

1108-3

1108-4

1108-5

1108-6

1108-7

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Response to Comment Letter I108

Individual
Heather Allen
October 4, 2021

- I108-1** The comment expresses general opposition for the proposed project and requests the following comments (Comments I108-2 through I108-7) be included in the responses to comments of the Final EIR. As shown, the commenter's request has been recorded as part of this Final EIR.
- I108-2** This comment states that this project is not allowed in the current institutional zoning of the project and states that the project would not be consistent with the surrounding neighborhood characteristics. Please refer to Global Response GR-7.
- I108-3** The comment states that there are two late quaternary faults on site that were not identified in the Draft EIR. Please refer to Response to Comments I36-7 and I95-5.
- I108-4** The comment states that Bailey Canyon experiences parking problems around the park and suggests that the addition of a new park would exacerbate the parking issues. The proposed park would include a small parking lot. Additionally, the topic of parking is not an environmental issue required for evaluation under CEQA. Further, please refer to Response to Comment I10-17.
- I108-5** The comment expresses concern about the addition of construction and operational noise resulting from the project. Please refer to Response to Comments I36-6 and I65-14.
- I108-6** The comment expresses concern regarding Carter Avenue being used as an emergency ingress/egress for the project. Please refer to Global Response GR-4.
- I108-7** The comment expresses general opposition for the proposed project but does not raise any issue concerning the adequacy of the Draft EIR. No further response is required.

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Comment Letter I109

From: Brian Stieler <brian.stieler@gmail.com>
Sent: Monday, October 4, 2021 11:58 AM
To: Vincent Gonzalez
Subject: Opposed to Meadows at Bailey canyon

CAUTION: This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Hello Mr. Gonzalez,

I am a Sierra Madre resident, and I strongly oppose the new development. We moved to Sierra Madre because of the small quaint atmosphere. I really don't want to see more homes built here and ruining the beautiful landscape.

I 1109-1

Thank you
Brian Stieler

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Response to Comment Letter I109

Individual
Brian Stieler
October 4, 2021

- I109-1** The comment expresses general opposition to the proposed project but does not raise any issue concerning the adequacy of the Draft EIR.

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Comment Letter I110

From: Steve Haegelin <shaegelin@gmail.com>
Sent: Monday, October 4, 2021 12:18 PM
To: Vincent Gonzalez
Subject: Comments on the Draft EIR for The Meadows at Bailey Canyon

CAUTION: This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

To: Vincent Gonzalez

From: Teng Hik Khoe, Kiok Gwat Khoe

Re: Comments on the Draft EIR for The Meadows at Bailey Canyon

We live at 523 Sierra Keys Drive and our backyard abuts the southern end of the Monastery grounds. We object to the project and have the following concerns about the EIR

I 1110-1

1) The proposed development goes against the City's own Safety Element Hz 2.12 and Hz 7 requiring two points of escape (Carter is not a "real" road to serve so many homes and easily blocked) and avoiding expansion into undeveloped, high fire risk areas, respectively. In addition, removing the natural fire break provided by the Monastery grounds will put existing homes, like ours, at risk.

I 1110-2

2) The proposed development plan for Carter ignores the Sierra Madre requirement for 30ft wide streets and is not suitable for the large number of trips from so many homes.

I 1110-3

3) The proposed development goes against the City's Forest Plan of maintaining mature trees to preserve the existing canopy by removing 101 mature trees and 10 Protected Oaks.

I 1110-4

4) The proposed development's two story homes will destroy the views from the backyard of our home which we have enjoyed for 45 years. Our lot is substantially below the southern border of the Monastery, and two story homes will prevent us from seeing much of the view we currently enjoy. They are also not in keeping with the architecture of our neighborhood.

I 1110-5

Sincerely,

Teng Hik Khoe &
Kiok Gwat Khoe

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Response to Comment Letter I110

Individual

Teng Hik Khoe and Kiok Gwat Khoe

October 4, 2021

- I110-1** The comment expresses opposition for the proposed project but does not raise any specific issues concerning the adequacy of the Draft EIR.
- I110-2** The comment expresses concern regarding impacts to evacuation routes, specifically within Carter Avenue, and the project's consistency with the Draft Safety Element Update. Please refer to Global Response GR-3, Global Response GR-4, and Global Response GR-5.
- I110-3** The comment states that the design of Carter Avenue ignores the City's 30-foot roadway width requirement. Please refer to Global Response GR-5.
- I110-4** The comment raises concerns regarding the removal of trees on the project site. Please refer to Global Response GR-2.
- I110-5** The comment raises concerns regarding the proposed project's impact to private views. Please refer to Response to Comment I77-7.

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Comment Letter I111

From: robertg [mailto:robertg@sgds.com]
Sent: Tuesday, October 5, 2021 10:03 AM
To: Vincent Gonzalez <vgonzalez@cityofsierramadre.com>
Subject: Meadows dEIR - Specific Plan inconsistency

CAUTION: This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

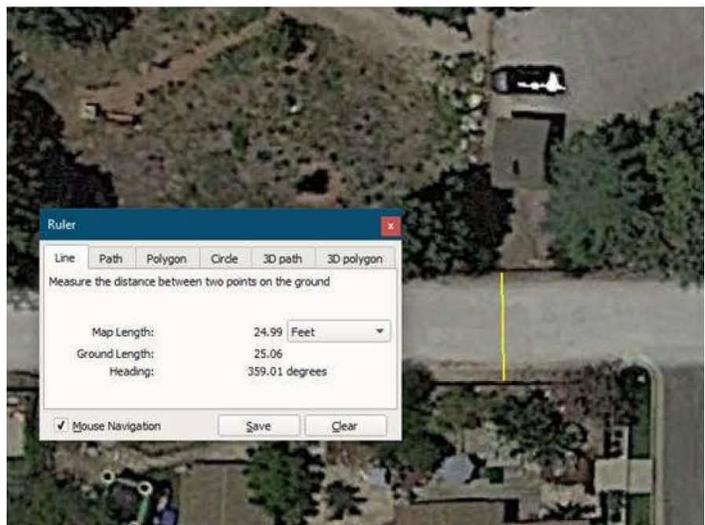
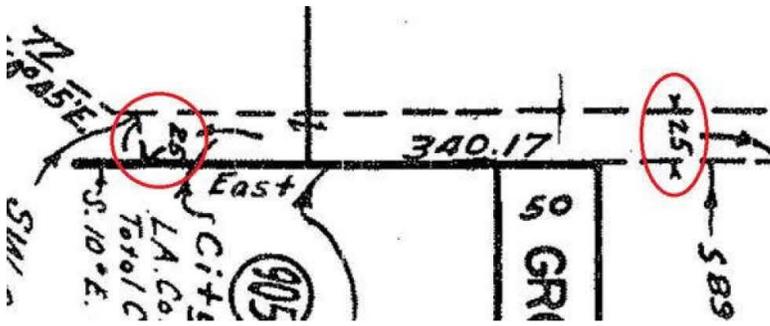
Vincent, there is an inconsistency between the Meadows draft EIR and the Specific Plan.

The right-of-way section of Carter that the city owns south of Bailey Canyon Park is listed as being 20' wide in the Specific Plan (page 20) and 25' wide in the dEIR.

According to the Assessor's map and measuring on Google Earth the right-of-way is 25' wide. Maybe the paved street itself is physically 20'.

Robert Gjerde

I111-1



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Response to Comment Letter I111

Individual
Robert Gjerde
October 5, 2021

- I111-1** The comment states that there is an inconsistency between the Specific Plan and the Draft EIR regarding the right-of-way of Carter Avenue. The Specific Plan has been revised to reflect this change. Please refer to Global Response GR-5.

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Comment Letter 1112

5 October 2021

To whom it may concern

I oppose the Meadows project.

First, this whole project swept upon us in the cloud of COVID. I did not hear anything until this EIR situation came up. How can that be for something so profound? Perhaps all was done technically legally. But for something this large, the residents should have been much more in the conversation.

So we are left responding to a very confusing EIR. Not being a lawyer I found it confounding.

I did try to read the EIR through, however. Here are my concerns in MY language, the language of an average citizen who feels as though the situation was never clearly presented.

1112-1

1. All the zoning rules, setbacks, values of the General Plan, etc. that need to be changed to make this happen. Why? Is changing everything to make this happen for the good of the city or the people around this massive development? To make all these changes, allow all these exceptions seems very selective and unfair. I doubt that any other resident would be allowed even one or two of these changes let alone that multitude that are being proposed. As someone who was required to follow quite draconian rules for a building project, I protest. However I followed the rules because underneath it all I respected that the rules, zones, codes etc. were there by common consent of the residents and meant to maintain the qualities we value.
2. There is no water to buy. So the net zero argument is ridiculous. We are in an unprecedented drought/climate change situation and creating 42 more homes using water that the city will have to provide when the rest of the residents are looking at undoubtedly mandatory cutbacks in water is foolish. I guess we are getting sort of bribed with money for this non available water, but money, although it may fix pipes cannot create water.
3. Fire. This area was zoned as high danger because it is. This is another example of sweeping away recommendations in our code and general plan to please this project with no real reasoning why that should be allowed. The type of fires today, although slowed by our better fire protection in buildings, clearly does not stop the destruction. Forty-two more (million+)\$ homes to protect also appears foolish.
4. Nature. Again, protections for oaks and other plants are being swept away for this project. Why? In this case the oaks will take generations to grow back, the root system under the ground etc. also will take generations. Five years of taking care of some saplings does not replace the PROTECTED oaks that will not be protected.
5. Traffic. It is ludicrous to imagine that 42 houses with at least 2 cars per house and all the support systems associated with them will not affect our traffic. Already that area is stressed by Alverno and its now TWO schools, LaSalle, and Bailey Canyon. None of the roads were built for this situation and none of the fixes address that. North Sunnyside even now is very busy in the morning with every heading out to the schools and work. This would just get even worse!
6. Other options. There must be and are other options, but because there are no plans or EIR for those we can not clearly say that an institution or fewer homes or multi family homes would not work better for the good of our town.

1112-2

1112-3

1112-4

1112-5

1112-6

1112-7

All in all, I do not see how changing everything to make this happen benefits the town, its values, the rules and guidelines the town has in place or the trust we put in those we put in positions of authority to protect those rules and vales. Yes, it brings in money. But the money, as stated, does not buy way of life, safety, full grown and supported nature, water or protection from climate change. At the end of the day, I ask the city council and city planning commissions to do their job, maintain the plans, codes and zoning that are in place. Although the monastery of course has a right to sell, whomever owns does NOT have the right to do whatever THEY feel is best for them and their bottom line.

1112-8

Sincerely,



Beth Kerns

196 N. Sunnyside

Response to Comment Letter I112

Individual
Beth Kerns
October 5, 2021

- I112-1** The comment expresses general opposition for the proposed project and includes an introduction for comments to follow.
- I112-2** The comment expresses general opposition to the project, particularly related to changes to the proposed zone and land use designation. Please refer to Global Response GR-7.
- I112-3** The comment expresses concern related to drought and the project's water supply and net-zero impact. Please refer to Global Response GR-1.
- I112-4** The comment expresses concern associated with wildfires. Please refer to Global Response GR-3.
- I112-5** The comment expresses concern regarding the tree removal and tree replacement of the protected coast live oak located on the project site. Please refer to Global Response GR-2.
- I112-6** The comment expresses general concerns relating to traffic. Please refer to Global Response GR-6.
- I112-7** The comment states that the Draft EIR does not include other options. Project alternatives were analyzed in Chapter 8 of the Draft EIR. Pursuant to CEQA Guidelines, all EIRs must include a "range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives" (14 CCR 15126.6[a]). Four project alternatives are included in the Draft EIR. Further details of the project alternatives for the proposed project are discussed in Draft EIR Chapter 8, Alternatives.
- I112-8** The comment provides concluding remarks and general opposition to the project that do not raise new or additional environmental issues concerning the adequacy of the Draft EIR.

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Comment Letter I113

DEIR for the "Meadows Project"

My name is Elsa A. Saldaña. I live with my husband, Nasrat A. Raouf. We have lived 475 Gatewood Lane since 1996. Our home is just East of the Mater Dolorosa Passionist Retreat Center.

I113-1

I respectfully and strongly object to the proposed Mater Dolorosa Passionist Retreat Center property rezoning and the building of the housing project named "The Meadows at Baily Canyon".

There are many environment issues that are of concern to me and other citizens: removal of 100 irreplaceable mature trees, increased traffic on city streets, optimization of water resources, increased building in designated high fire zone, disruption of wildlife habitat and many more.

I113-2

Below are my comments. Please retain a copy for the City Administrative Record.

I wish to have my comments in the Final EIR and to be given notification when the Final EIR is complete.

I113-3

I appreciate your work and thank you for the opportunity to comment on the DEIR for the housing project named "The Meadows at Baily Canyon".

I, **Elsa A. Saldaña**, am especially concerned with the safety of pedestrian foot traffic as a result of increased car traffic from the housing project named "The Meadows at Baily Canyon".

More specifically, the foot traffic near the West Carter Street entrance for "The Meadows at Baily Canyon" and that of the Baily Canyon Park entrance.

This West Carter Street entrance for "The Meadows at Baily Canyon" is planned to be both an egress and ingress.

This section of Carter Street is measured as a twenty-five-foot-wide road which is without curbs and sidewalks. Twenty feet of the road is paved. At this time, there is no known expansion for this section of Carter Street.

I113-4

With the increase of car traffic, there is a greater potential for injury to pedestrians. Pedestrians currently walk to Baily Canyon Park from the over flow street parking. With the proposed City Park at "The Meadows at Baily Canyon" there comes a predicted increase of pedestrian traffic and the over flow parking.

Although I am not able to currently site the City General Plan as to sidewalks and pedestrian safety, the impact of congestion from the "The Meadows at Baily Canyon" housing project on area streets and citizen safety will be extraordinary.

My questions are how will the above concerns be addressed and also mitigated?

Elsa A. Saldaña
475 Gatewood Lane
Sierra Madre 91024
mediaease@verizon.net

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Response to Comment Letter I113

Individual
Elsa A. Saldana
October 3, 2021

- I113-1** The comment expresses general opposition for the proposed project and includes an introduction for comments to follow.
- I113-2** The comment expresses concern about the removal of mature trees, increases in traffic, optimization of water resources, building in a high fire hazard zone, and disruption of wildlife habitat. Each of these issues were considered and addressed in the project EIR. Per Final EIR Section 4.4.5, Impact Analysis, in Section 4.4, Biological Resources, with the implementation of mitigation measures MM-BIO-1, MM- BIO-2, and MM-BIO-3, impacts to biological resources would be less than significant. Please refer to Global Response GR-2 for information regarding tree removal; Global Response GR-6 for information regarding the traffic comment; Global Response GR-1 for information regarding the project's water impact; and Global Response GR-3 for information regarding the project site being located within an area designated in the City General Plan as a VHFHSZ.
- I113-3** The comment includes an introduction for comments to follow. As requested, the commenter will be notified when the Final EIR is complete and available to the public.
- I113-4** The comment expresses concern about pedestrian safety from the increased traffic from the project site and specifically mentions concern about Carter Avenue being used as a point of ingress/egress. The comment further asks how these issues would be mitigated. As concluded in Final EIR Section 4.17, Transportation, the project would not result in significant impacts related to inadequate emergency access or create hazardous conditions and therefore no mitigation would be required. Please refer to Global Response GR-5 and Global Response GR-6, regarding traffic and safety.

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Comment Letter I114

From: Amy Wasson [mailto:awasson810@hotmail.com]
Sent: Thursday, September 02, 2021 3:43 PM
To: Public Comment <publiccomment@cityofsierramadre.com>
Subject: Planning Commission Meeting September 2, 2021

CAUTION: This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

As a Sierra Madre resident of almost 30 years, I have concerns regarding "The Meadows" project. My residence is in close proximity to the corner of Sierra Madre Blvd and Sunnyside. The additional 700+ vehicle trips that this development would add to Sunnyside would be a huge impact on traffic and safety. This amount of daily traffic will overburden Sunnyside and the intersection. I am also concerned with building in a high fire zone with limited access routes for emergency vehicles and potential evacuations. For these, and other reasons, I think the request to approve this project, should be denied.

I114-1
I114-2
I114-3

Thank you,

Amy Wasson
Sierra Madre Blvd

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Response to Comment Letter I114

Individual
Amy Wasson
September 2, 2021

- I114-1** The comment expresses concern about traffic and safety surrounding the project site. The comment specifically mentions the impact the project would have on Sunnyside Avenue. Please refer to Global Response GR-6.
- I114-2** The comment expresses concern about development in a VHFHSZ with limited access routes. Please refer to Global Response GR-3 and Global Response GR-4.
- I114-3** The comment expresses opposition for the proposed project but does not raise any specific issues concerning the adequacy of the Draft EIR.

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Comment Letter 1115

From: bgh [mailto:bobbieh7@verizon.net]
Sent: Wednesday, September 15, 2021 3:00 PM
To: Public Comment <publiccomment@cityofsierramadre.com>
Subject: Deny Meadows at Baily Canyon Project

CAUTION: This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

HAVE BEEN A RESIDENT AND HOME OWNER OF SIERRA MADRE FOR 39 YEARS. I FEEL THE PROPOSAL TO BUILD 42 NEW HOMES IS A BAD IDEA. OUR CITY KNOWN AND LOVED FOR ITS GREEN SPACES IS AGAIN COMING UNDER ATTACK BY FOLKS NOT THAT CONCERNED ABOUT US OR THE LAND OR THE ANIMALS. THAT LAND IS DESIGNATED FOR INSTITUTIONAL IT SHOULD NOT BE CHANGED. THE NEARBY RESIDENTS WILL BE NEGATIVELY IMPACTED FOR YEARS IF APPROVED. AND OUR CITY AS A WHOLE, WHO KNOWS THE NEGATIVE IMPACT. A NEW PARK IS HARDLY A REASON. THAT IS A SPECTACULAR PIECE OF EARTH WHICH UNFORTUNATELY COULDN'T BE BOUGHT BY THE CITY AS OTHER COMMUNITIES SAVE THEIR DWINDLING OPEN SPACES. MORE HOMES, WHAT FOR! HOPEFULLY, THE PRIESTS CAN SELL OTHER VALUABLE LAND THEY OWN TO SUPPORT THEIR NEEDS. DO NOT APPROVE THIS PROJECT.

1115-1

RESPECTFULLY,
BOBBIE HOOKER

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Response to Comment Letter I115

Individual
Bobbie Hooker
September 15, 2021

- I115-1** The comment expresses opposition for the proposed project but does not raise any specific issues concerning the adequacy of the Draft EIR.

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