



# SIERRA MADRE GENERAL PLAN UPDATE FINAL SEIR

**September 2021 | Final Environmental Impact  
Report State Clearing House No. 2021040369**



# TABLE OF CONTENTS

---

I.	INTRODUCTION.....	I-1
II.	RESPONSES TO COMMENTS .....	II-1
III.	REVISIONS, CLARIFICATIONS, AND CORRECTIONS TO THE DRAFT SEIR .....	III-1
IV.	MITIGATION MONITORING PROGRAM.....	IV-1

This page intentionally left blank

# I. INTRODUCTION

---

## 1. SUMMARY OF THE PROPOSED PROJECT

The project is the adoption of the 2021-2029 Housing Element, related updates to the Land Use, Safety, and Circulation Elements. The Housing Element requires amending General Plan designations on some of the proposed Housing Element opportunity sites, which requires revisions to the Land Use Element and Land Use Map of the City of Sierra Madre General Plan. The Housing Element also necessitates rezoning of some proposed opportunity sites; therefore, the project includes changes to the City's Zoning Code and Zoning Map.

In addition to the Housing and Land Use Element updates, the City is required to make other changes to the General Plan in response to recent State legislation. To comply with Senate Bill (SB) 379, Assembly Bill (AB) 2140, and SB 1241, the project updates the Safety Element. The City recently adopted Transportation Study Guidelines for Vehicle Miles Traveled in July 2020. These Guidelines are incorporated into the General Plan Circulation Element.

## 2. ENVIRONMENTAL REVIEW PROCESS

As defined by Section 21087 of the California Environmental Quality Act (CEQA), the City of Sierra Madre is the Lead Agency for the project. The project was reviewed by the City of Sierra Madre Planning and Community Preservation Department, which determined that the project required the preparation of a Subsequent Environmental Impact Report (SEIR).

Comments from identified responsible and trustee agencies, as well as interested parties, on the scope of the SEIR were solicited through a Notice of Preparation (NOP) process. The City circulated the NOP for this project for 30 days from April 15, 2021 to May 14, 2021. A scoping meeting for the project was held on July 28, 2021. The Draft SEIR was released for public comment on August 3, 2021. The comment period ended on September 21, 2021 (49 days), meeting the minimum 45-day review period required by the CEQA. During that time, the Planning and Community Preservation Department, received comments on the Draft SEIR from one agency and 15 individuals.

Before approving a project, CEQA requires the Lead Agency to prepare and certify a Final Subsequent Environmental Impact Report (Final SEIR). The Draft SEIR, and this Final SEIR will be submitted to Planning Commission and City Council for certification in connection with action on the Project.

The Final SEIR is available for public review at the following locations:

1. Sierra Madre City Hall, (232 W. Sierra Madre Boulevard, Sierra Madre, CA 91204)
2. Sierra Madre Public Library (440 W. Sierra Madre Boulevard, Sierra Mare, CA 92104)
3. City of Sierra Madre website at: <https://www.cityofsierramadre.com/housingelement>

Additionally, CEQA requires that the lead agency provide each agency that commented on the Draft SEIR with a copy of the lead agency's proposed response at least 10 days before certifying the Final SEIR.

## 3. ORGANIZATION OF THE FINAL EIR

This document, together with the Draft SEIR and the Draft SEIR Technical Appendices, constitute the "Final SEIR" for the project.

This Final EIR is organized in the following sections:

### **I. Introduction**

This Section is intended to provide a summary of the project description and CEQA requirements.

### **II. Responses to Comments**

This Section includes a list of public agencies, organizations, and individuals who submitted comments on the Draft SEIR, and detailed responses to the comment letters submitted to the City in response to the Draft SEIR.

### **III. Revisions, Clarifications, and Corrections**

This Section provides a complete overview of the changes to the Draft SEIR that have been incorporated into the Final SEIR in response to the comments submitted during the public review period. These changes are minor and do not add significant new information that would affect the analysis or conclusions presented in the Draft SEIR. More specifically, CEQA requires recirculation of a Draft SEIR only when “significant new information” is added to a Draft SEIR after public notice of the availability of the Draft SEIR has occurred (refer to California Public Resources Code Section 21092.1 and CEQA Guidelines Section 15088.5), but before the SEIR is certified. Section 15088.5 of the CEQA Guidelines specifically states: “New information added to an EIR is not ‘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. ‘Significant new information’ requiring recirculation includes, for example, a disclosure showing that:

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

CEQA Guidelines Section 15088.5 also provides that “[r]ecirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR... A decision not to recirculate an EIR must be supported by substantial evidence in the administrative record.”

As demonstrated in this Final SEIR, neither the comments submitted on the Draft SEIR, the responses to these comments, nor the corrections and additions presented in Chapter III of this Final SEIR, constitute new significant information warranting recirculation of the Draft SEIR as set forth in CEQA Guidelines Section 15088.5. Rather, the Draft SEIR is comprehensive and has been prepared in accordance with CEQA.

#### **IV. Mitigation Monitoring Program**

This Section includes a list of the required project mitigation measures and includes detailed information with respect to the City's policies and procedures for implementation of the recommended project design features and mitigation measures. This Mitigation Monitoring Program (MMP) identifies the monitoring phase, the enforcement phase, and the applicable department or agency responsible for ensuring that each recommended feature or measure is implemented.

## II. RESPONSES TO COMMENTS

---

The CEQA review process provides opportunities for public participation, including periods for public review and comment on the adequacy of the Draft SEIR prior to certification. Section 15088(a) of the State CEQA Guidelines requires that the lead agency evaluate comments on environmental issues received from persons who reviewed the Draft SEIR and prepare a written response to comments received during the notice comment period. Section 15204(a) of the State CEQA Guidelines clarifies that the lead agency is not obligated to undertake every suggestion it is given, provided that the lead agency responds to significant environmental issues and makes a good faith effort at disclosure. Reviewers of the Draft SEIR are encouraged to examine the sufficiency of the environmental document, particularly regarding significant effects, and to suggest specific mitigation measures and project alternatives. Furthermore, Section 15204(c) of the State CEQA Guidelines advises reviewers that comments should be accompanied by factual support.

The City of Sierra Madre Planning and Community Preservation Department received a total of 16 comment letters on the Draft SEIR during the designated public review period (49 days between August 3, 2021 and September 21, 2021). Each comment letter has been assigned a corresponding number, and comments within each comment letter are also numbered. The agencies/organizations/persons that provided written comments on the Draft SEIR to the City of Sierra Madre Planning and Community Preservation Department are listed in Table II-1, below. The letters and responses are provided following.

**Table II-1**  
**SEIR Comment Letter Submissions**

<b>Letter Number</b>	<b>Agency/Organization/Name</b>	<b>Letter Number</b>	<b>Agency/Organization/Name</b>
1	State of California, Department of Transportation (Caltrans), District 7 – Office of Regional Planning	9	Barbara Vellturo
2	Tricia Searcy	10	Barbara Vellturo
3	Matt Bryant	11	Preserve Sierra Madre
4	John Clarke	12	Lynne Collmann
5	Barbara Vellturo	13	Phillip Yao
6	Barbara Vellturo	14	Deb Sheridan
7	Barbara Vellturo	15	Pat Alorn
8	Barbara Vellturo	16	Alex Arrieta

Written comments made during the public review period for the Draft SEIR included comments relevant to the adequacy of the environmental review, as well as comments and opinions not related to the project's environmental issues, but relevant to the project's approval/disapproval. Responses to comments provided in this section of the Final SEIR provide detailed responses to all comments related to the environmental review and acknowledge the comments and opinions relating to the project's approval/disapproval.

DEPARTMENT OF TRANSPORTATION

DISTRICT 7 – Office of Regional Planning

100 S. MAIN STREET, MS 16

LOS ANGELES, CA 90012

PHONE (213) 266-3562

FAX (213) 897-1337

TTY 711

www.dot.ca.gov



Making Conservation  
a California Way of Life.

September 16, 2021

Clare Lin  
City of Sierra Madre  
232 West Sierra Madre Boulevard  
Sierra Madre, CA 91024

RE: Sierra Madre General Plan Housing, Land  
Use, Safety, and Circulation Element  
Update – Draft Subsequent Environmental  
Impact Report (DSEIR)  
SCH # 2021040369  
GTS # 07-LA-2021-03673

Dear Clare Lin:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced DSEIR. The project consists of a comprehensive update to the Housing Element as well as related updates to the Land Use Element and Land Use Map of the City of Sierra Madre General Plan. It also includes updates to the City's Zoning Code, Zoning Map, Safety Element, and Circulation Element. The 2021-2029 Housing Element, which is the bulk of the project, serves as a policy guide to address the comprehensive housing needs of Sierra Madre. The primary focus of the Housing Element is to ensure decent, safe, sanitary, and affordable housing for residents of the City, including those with special needs. The City is required to ensure the availability of residential sites at appropriate densities and development standards. It is also required to adopt land use plans and regulatory systems that facilitate housing production in the City. By meeting these requirements the City will accommodate its fair share of the regional housing need, also known as the Regional Housing Needs Assessment (RHNA) allocation. The City's total RHNA for the 2021-2029 planning period is 204 units. The City of Sierra Madre is the Lead Agency under the California Environmental Quality Act (CEQA).

1

The citywide project is located near Interstate 210. From reviewing the DSEIR, Caltrans has the following comments.

We support the proposed Circulation Element policy L57.1, which states, "Each new project must be evaluated against the "Vehicle Miles Traveled" Baselines and Thresholds of Significance adopted June 9<sup>th</sup>, 2020 by the City Council." We also support the implementation of mitigation measure TRANS-1, which is a Transportation Demand Management (TDM) program, as well as Project Design Features (PDFs), to reduce Vehicle Miles Traveled (VMT). Reducing VMT aligns with Caltrans' mission to provide a safe and reliable transportation network that serves all people and respects the environment.

2

As each housing site develops, Caltrans suggests referring to the following resources for potential TDM strategies to include in onsite VMT reduction programs:

- The 2010 Quantifying Greenhouse Gas Mitigation Measures report by the California Air Pollution Control Officers Association (CAPCOA), available at <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>, or

Clare Lin  
September 16, 2021  
Page 2 of 2

- Integrating Demand Management into the Transportation Planning Process: A Desk Reference (Chapter 8) by the Federal Highway Administration (FHWA), available at <https://ops.fhwa.dot.gov/publications/fhwahop12035/index.htm>.

2 cont.

If you have any questions about these comments, please contact Emily Gibson, the project coordinator, at [Emily.Gibson@dot.ca.gov](mailto:Emily.Gibson@dot.ca.gov), and refer to GTS # 07-LA-2021-03673.

Sincerely,

*Miya Edmonson*

MIYA EDMONSON  
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

**Comment Letter No. 1**

State of California  
Department of Transportation (Caltrans)  
District 7 – Office of Regional Planning  
100 S. Main Street, MS 16  
Los Angeles, CA 90012

Response to Comment 1-1

The comment is a standard response from Caltrans describing the project as described in the Draft SEIR. No further response is necessary.

Response to Comment 1-2

The comment states that Caltrans supports the proposed Circulation Element policy L57.1 related to vehicle miles traveled (VMT) and implementation of mitigation measure TRANS-1. The comment refers the City to resources for strategies for onsite VMT reductions. No further response is necessary.

September 20, 2021

To: Clare Lin, Senior Planner  
232 W. Sierra Madre Boulevard, Sierra Madre, CA 91024  
housingelement2021@cityofsierramadre.com.

From: Tricia Searcy  
734 Fairview Avenue  
Sierra Madre, CA 91024  
tricia\_searcy@yahoo.com

Thank you for the opportunity to comment on the SEIR for the Housing Element of the City of Sierra Madre General Plan for the 2021-2029 planning period (Housing Element Update).

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.

1

Comments to the SEIR for the Housing Element of the City of Sierra Madre General Plan for the 2021-2029 planning period (Housing Element Update)

I. Project Description, p. III-5

There are three standards that a project description must meet; it must be clear, stable, and finite.

*The project description is not clear.* On page III-5, the report identifies two residential projects in the city, Stonegate and The Meadows at Bailey Canyon, as approved/pending before stating that they are included “for informational purposes only” and stating that, “[f]or the environmental analyses, these projects will be considered as part of the future environmental baseline and not as part of the project for the non-technical analyses. For the analysis of air quality, energy, greenhouse gases, noise, and transportation, these projects are included to present a worst case scenario.”

2

Questions: Are the projects included or not? What does it mean that they are part of the “future environmental baseline?” What does it mean that they are not part of the project for the non-technical analyses? What technical analysis are they part of? Why are they part of the analysis of certain environmental factors and not others such as biological resources? How is the “worst case scenario” calculated? The description chooses

some elements to be evaluated (air quality) to the exclusion of others (biological resources) making it impossible to meaningfully evaluate.

*The project description is unstable.* Major Changes to the Zoning Code, General Plan, and Land Use Map are contemplated by the Meadows at Bailey Canyon project making the project description unstable. In addition, the nature of the Meadows project is currently in flux. For example, the description of 45 acres of donated land to the city is a feature that is currently under discussion.

*The project description is not complete or finite.* It seeks to simultaneously include and exclude the Stonegate and Meadows at Bailey Canyon projects. If they are excluded, the project description would not be complete because the Meadows project is scheduled for completion by 2025 within the 2021-2029 time frame of this document and for Stonegate, 7 of 24 applications for development have already been approved. If the projects are to be included, the environmental impacts of each should be comprehensively evaluated in this report.

2 cont.

## II. Environmental Impact Analysis G at p. V.G-1 Land Use Planning

This section of the SEIR analyzes the potential environmental effects related to land use and planning from implementation of the proposed project. There is no reference to the fact that the Meadows at Bailey Canyon would create a Specific Plan that changes our Zoning Code and General Plan. Please address this significant fact and present an analysis of the consequences. In addition, the entire section omits discussion and analysis of the Stonegate and Meadows Projects. Please provide discussion and analysis of the potential environmental effects related to land use planning for these two projects for each of the subsections in this section.

3

Impact G-2 on p. V.G-13: *Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purposes of avoiding or mitigating an environmental effect?*

On p. V.G-16, the report states that new residential development would be required to comply with all applicable plans and regulations including the General Plan and the City's Municipal Code. Based on this assertion, the report concludes on p. V.G-17 that impacts related to conflicts with land use plans, policies, and regulations would be less than significant and thus no mitigation is required. Similarly, it is inaccurately asserted on p. IV.A-14 that future development activities accommodated by the General Plan Update would also be subject to the design standards and guidelines outlined in Title 17 (Zoning) of the City's Municipal Code.

4

The Meadows at Bailey Canyon project, however, would be a new residential development that is *not* required to comply with applicable plans and regulations, the General Plan or the City's Municipal Code.

The Meadows project would be governed instead by a Specific Plan that changes the City's Zoning Code and General Plan and conflicts with other local policies and ordinances with regard to, but not limited to the following found in this report:

Policy R3.2 at p. IV.C-14: the Meadows Project conflicts with this policy to 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 at p. IV.C-14: the Meadows Project conflicts with this policy to 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 at p. IV.C-15: the Meadows Project conflicts with the policy to 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 R4.1 at p. IV.C-15: The Meadows Project conflicts with the policy to raise awareness of Sierra Madre as an urban/wildlife interface where, as such, it is necessary for the residents to respect the wildlife, share space with wildlife, and to acknowledge the right of wildlife to pass within City limits undisturbed.

Policy R10.2 at p. IV.C-15: The Meadows Project conflicts with the policy to continue to develop tree preservation and protection measures.

Impact C-5 at p. IV.C-23: The Meadows project would conflict with local policies and ordinances protecting biological resources, including tree preservation as it envisions the removal of trees as well as policies requiring that all access to hillside areas be designed for minimum disturbance to the natural features, and that consideration be given to the impact on wildlife. The impact analysis for this policy specifically identifies sites 1-4 and A-D and states that, "future development and/or redevelopment activities under the project on these sites would be required to comply with Chapter 12.20 (Tree Preservation) of the City's Municipal Code." There is no reference at all to the impact of either Stonegate or The Meadows project.

Similarly, the report states that, "[t]he update to the Safety Element includes policies related to limiting risk from wildfire, including avoiding development in Very High Fire Severity Zones, updating maps related to fire hazards, and developing a Vegetation Management Program" while omitting any discussion of the impact of the Stonegate and Meadows at Bailey Canyon projects despite the fact that the Meadows project is in a Very High Fire Severity Zone. Please provide discussion and analysis to support the conclusion that impact would be less than significant given these facts.

**4 cont.**

**5**

Objective Hz7: The Meadows project conflicts with this policy to avoid expanding development into undeveloped areas in Very High Severity Fire Zones.

Impact K-4: The Meadows project would result in inadequate emergency access for firefighting as well as search and rescue operations in contravention of this policy.

Impact L-2: The Meadows project would result in insufficient water supplies to serve the project because it is based on the assumption that currently unavailable water will become available.

Impact A-1 at p. IV.A-12: The Meadows project would have a substantial impact on scenic vistas as it would destroy the meadows and hillside currently occupied by trees, plants, deer, birds, bears, bobcats, coyotes and other wildlife, significantly changing the existing visual quality and character of wildlife interface.

Impact A-3 at p. IV. A-13: The Meadows project would substantially degrade the existing visual character and quality of public views of the site and its surroundings and would conflict with applicable zoning and other regulations governing scenic quality.

Impact A-4 at p. IV.A-14: The Meadows project would create many new sources of substantial light and glare which would adversely affect day and nighttime views of the area.

5 cont.

III. Environmental Impact Analysis A at p.IV.A-1 Aesthetics

This section of the EIR analyzes the potential environmental effects on aesthetic and visual impacts from implementation of the proposed project. The entire section omits discussion and analysis of the Stonegate and Meadows Projects. Please provide discussion and analysis of the potential environmental effects related to aesthetics for these two projects for each of the subsections in this section.

IV. Environmental Impact Analysis C at p. IV.C-1 Biological Resources

This section of the EIR analyzes the potential environmental effects on biological resources from implementation of the proposed project. The entire section omits discussion and analysis of the Stonegate and Meadows Projects. Please provide discussion and analysis of the potential environmental effects related to biological resources for these two projects for each of the subsections in this section.

V. Environmental Impact Analysis at p. IV.E-1 Geology and Soils

This section of the SEIR analyzes the potential environmental effects related to geology and soils, including paleontological resources, from implementation of the proposed project. The entire section omits discussion and analysis of the Stonegate and Meadows Projects. Please provide discussion and analysis of the potential

environmental effects related to geology and soils for these two projects for each of the subsections in this section.

5 cont.

VI. Environmental Impact Analysis B at p. IV.B-1 Air Quality

This section of the Draft SEIR evaluates the potential for the Sierra Madre General Plan Update with the Housing Element 2021-2029 (Housing Element) to impact air quality in a local and regional context.

Impact B-1 at p. IV.B-20: Would the Project conflict with or obstruct implementation of the applicable air quality plan?

6

The report specifically identifies Stonegate and The Meadows at Bailey Canyon as projects when identifying “sensitive receptors,” but does not engage in substantive analysis of these two projects prior to concluding that “the future development associated with the Housing Element will not result in an inconsistency with the SCAQMD AQMP. Therefore, a less than significant impact will occur.” p. IV.B-20. Please provide factual support, discussion and analysis for this conclusion.

VII. Environmental Impact p. IV.J.1-1 Public Services –Fire.

This section of the SEIR analyzes the potential environmental effects related to fire protection and emergency services from implementation of the proposed project. The entire section omits discussion and analysis of the Stonegate and Meadows Projects. Please provide discussion and analysis of the potential environmental effects related to fire protection and emergency services for these two projects for each of the subsections in this section.

VIII. Environmental Impact Analysis J.2 at p. IV.J.2-1 Public Services—Police Protection.

This section of the SEIR analyzes the potential environmental effects related to police protection services from implementation of the proposed project. The entire section omits discussion and analysis of the Stonegate and Meadows Projects. Please provide discussion and analysis of the potential environmental effects related to police protection services for these two projects for each of the subsections in this section.

7

IX. Environmental Impact Analysis J.3 at p.IV.J.3-1 Public Services-Schools

This section of the SEIR analyzes the potential environmental effects related to school services from implementation of the proposed project. The entire section omits discussion and analysis of the Stonegate and Meadows Projects. Please provide discussion and analysis of the potential environmental effects related to public services-schools for these two projects for each of the subsections in this section.

X. Environmental Impact Analysis L.1 at p. L.1-1 Utilities-Water

This section of the SEIR analyzes the potential environmental effects related to water supply and infrastructure from implementation of the proposed project. The entire section omits discussion and analysis of the Stonegate and Meadows Projects. Please provide discussion and analysis of the potential environmental effects related to Utilities-Water for these two projects for each of the subsections in this section.

XI. Environmental Impact Analysis L.2 at p. IV.L.2-1Utilities-Wastewater

This section of the SEIR analyzes the potential environmental effects related to utilities-wastewater services from implementation of the proposed project. The entire section omits discussion and analysis of the Stonegate and Meadows Projects. Please provide discussion and analysis of the potential environmental effects related to Utilities-Wastewater for these two projects for each of the subsections in this section.

7 cont.

XII. Environmental Impact Analysis L.3 at p. IV.L3-1Utilities-Stormwater

This section of the SEIR analyzes the potential environmental effects related to stormwater infrastructure from implementation of the proposed project. The entire section omits discussion and analysis of the Stonegate and Meadows Projects. Please provide discussion and analysis of the potential environmental effects related to Utilities-Wastewater for these two projects for each of the subsections in this section.

XIII. Environmental Impact Analysis L.5 at p. IV.L5-1Utilities-Energy

This section of the SEIR analyzes the potential environmental effects related to relocation, reconstruction, or expansion of energy (electricity and natural gas) infrastructure from implementation of the proposed project. The entire section omits discussion and analysis of the Stonegate and Meadows Projects. Please provide discussion and analysis of the potential environmental effects related to Utilities-Energy for these two projects for each of the subsections in this section.

**Comment Letter No. 2**

Tricia Searcy  
734 Fairview Avenue  
Sierra Madre, CA 91024  
tricia\_searcy@yahoo.com

Response to Comment 2-1

The comment requests that the author be included on a notification list.

Response to Comment 2-2

The comment states that the project description is unclear, unstable, and not complete or finite. See Master Response 1—Scope of Environmental Analysis.

Response to Comment 2-3

The comment states that there is no reference to the fact that The Meadows at Bailey Canyon would create a Specific Plan that changes the Zoning Code and General Plan and that the SEIR states that all new residential development would be required to comply with all applicable plans and regulations including the General Plan and the City's Municipal Code. The comment further requests that the Section G, Land Use include analysis of the Stonegate and The Meadows projects.

See Master Response 1—Scope of Environmental Analysis. Additionally, see the 1 Carter Avenue Project Environmental Impact Report and The Meadows at Bailey Canyon Specific Plan Environmental Impact Report for analysis of environmental impacts, including land use, for the 1 Carter Avenue and The Meadows at Bailey Canyon Specific Plan projects.

Response to Comment 2-4

The comment states that The Meadows project would conflict with General Plan policies listed by the author. See The Meadows at Bailey Canyon Specific Plan Environmental Impact Report for analysis of these policies.

Response to Comment 2-5

The comment states that The Meadows project would create an impact through conflict with General Plan policies listed by the author, including General Plan policies related to biological resources, wildfire, water supply, aesthetics, and geology and soils. See The Meadows at Bailey Canyon Specific Plan Environmental Impact Report for analysis of these policies.

Response to Comment 2-6

The comment states that the SEIR does not include factual support related to the Stonegate and The Meadows projects related to air quality analysis. For the analysis of air quality, energy, greenhouse gases, noise, and transportation, these projects were included to present a worst-case scenario. Factual support is provided in Section IV.B. Air Quality and Appendix B, Air Quality and Greenhouse Gas Emissions Report.

Response to Comment 2-7

The comment states that the SEIR does not analyze impacts to public services and utilities for the Stonegate and The Meadows projects. See Master Response 1—Scope of Environmental Analysis.

September 20, 2021

To: Clare Lin, Senior Planner  
232 W. Sierra Madre Boulevard, Sierra Madre, CA 91024  
[housingelement2021@cityofsierramadre.com](mailto:housingelement2021@cityofsierramadre.com).

From: Matt Bryant  
635 Edgeview Drive  
Sierra Madre, CA 91024  
[mvnbryant@aol.com](mailto:mvnbryant@aol.com)

Thank you for the opportunity to comment on the SEIR for the Housing Element of the City of Sierra Madre General Plan for the 2021-2029 planning period (Housing Element Update).

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.

1

Comments to the SEIR for the Housing Element of the City of Sierra Madre General Plan for the 2021-2029 planning period (Housing Element Update)

I. Environmental Impact Analysis G at p. V.G-1 Land Use Planning

This section of the SEIR analyzes the potential environmental effects related to land use and planning from implementation of the proposed project. There is no reference to the fact that the Meadows at Bailey Canyon would create a Specific Plan that changes our Zoning Code and General Plan. Please address this significant fact and present an analysis of the consequences.

2

Impact G-2 on p. V.G-13: *Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purposes of avoiding or mitigating an environmental effect?*

3

On p. V.G-16, the report states that new residential development would be required to comply with all applicable plans and regulations including the General Plan and the City's Municipal Code. Based on this assertion, the report concludes on p. V.G-17 that

impacts related to conflicts with land use plans, policies, and regulations would be less than significant and thus no mitigation is required. Similarly, it is inaccurately asserted on p. IV.A-14 that future development activities accommodated by the General Plan Update would also be subject to the design standards and guidelines outlined in Title 17 (Zoning) of the City's Municipal Code.

The Meadows at Bailey Canyon project, however, would be a new residential development that is *not* required to comply with applicable plans and regulations, the General Plan or the City's Municipal Code.

The Meadows project would be governed instead by a Specific Plan that changes the City's Zoning Code and General Plan and conflicts with other local policies and ordinances with regard to, but not limited to the following found in this report:

Policy R4.1 at p. IV.C-15: The Meadows Project conflicts with the policy to raise awareness of Sierra Madre as an urban/wildlife interface where, as such, it is necessary for the residents to respect the wildlife, share space with wildlife, and to acknowledge the right of wildlife to pass within City limits undisturbed. The area proposed for development is home to deer, mountain lions, bear, bobcats, owls, hawks among other species. The proposed project would destroy that habitat.

Policy R10.2 at p. IV.C-15: The Meadows Project conflicts with the policy to continue to develop tree preservation and protection measures. Every mature tree from where the entrance to Mater Dolorosa begins at the top of Sunnyside all the way up to the top will be destroyed.

Impact C-5 at p. IV.C-23: The Meadows project would conflict with local policies and ordinances protecting biological resources, including tree preservation as it envisions the removal of trees as well as policies requiring that all access to hillside areas be designed for minimum disturbance to the natural features, and that consideration be given to the impact on wildlife. The impact analysis for this policy specifically identifies sites 1-4 and A-D and states that, "future development and/or redevelopment activities under the project on these sites would be required to comply with Chapter 12.20 (Tree Preservation) of the City's Municipal Code." There is no reference at all to the impact of The Meadows project.

Similarly, the report states that, "[t]he update to the Safety Element includes policies related to limiting risk from wildfire, including avoiding development in Very High Fire Severity Zones, updating maps related to fire hazards, and developing a Vegetation Management Program" while omitting any discussion of the impact of the Meadows at Bailey Canyon project despite the fact that the Meadows project is in a Very High Fire Severity Zone. Please provide discussion and analysis to support the conclusion that impact would be less than significant given these facts. The governmental Natural Hazard Zone Disclosure reveals that the Meadows project is within a high fire hazard area.

3 cont.

4

ObjectiveHz7: The Meadows project conflicts with this policy to avoid expanding development into undeveloped areas in Very High Severity Fire Zones.

Impact K-4: The Meadows project would result in inadequate emergency access for firefighting as well as search and rescue operations in contravention of this policy. Because of the magnitude of the Meadows project, it requires an additional ingress/egress at Carter. That will become a huge chock point in the event of an emergency. There is insufficient parking at Bailey Park particularly on weekends which forces overflow cars to park on both sides of Grove as far down as Fairview and beyond. Pedestrians walking up to Bailey Park are forced to walk in the street because there are no sidewalks on Grove. If someone is driving up Grove towards Bailey Park and another car is coming south on Grove away from the Park, one of the cars has to find a place to pull over because there is not room for both cars to pass simultaneously. Cars have to dodge pedestrians and pedestrians have to dodge cars. It is already a chaotic choke point and a dangerous condition. If you add the additional traffic from 42 homes, deliveries and a new public park, you have an accident waiting to happen.

Impact L-2: The Meadows project would result in insufficient water supplies to serve the project because it is based on the assumption that currently unavailable water will become available. We are currently in one of the worst droughts in history, even worse than the drought that caused the City Council to enact a water meter moratorium in 2014. California and other Southwestern states have been particularly hard hit. If the drought continues, the only solution will be higher water rates and rationing for existing users. It is irresponsible to bring 42 additional users on line under the current conditions which will only exacerbate an already dire drought forecast.

Impact A-1 at p. IV.A-12: The Meadows project would have a substantial impact on scenic vistas as it would destroy the meadows and hillside currently occupied by trees, plants, deer, birds, bears, bobcats, coyotes and other wildlife, significantly changing the existing visual quality and character of wildlife interface.

Impact A-3 at p. IV. A-13: The Meadows project would substantially degrade the existing visual character and quality of public views of the site and its surroundings and would conflict with applicable zoning and other regulations governing scenic quality. The westside neighbors in particular will have their views destroyed, privacy destroyed and the values of their property significantly diminished.

Impact A-4 at p. IV.A-14: The Meadows project would create many new sources of substantial light and glare which would adversely affect day and nighttime views of the area.

4 cont.

**Comment Letter No. 3**

Matt Bryant  
635 Edgeview Drive  
Sierra Madre, CA 91024  
mvnbryant@aol.com

Response to Comment 3-1

The comment requests that the author be included on a notification list.

Response to Comment 3-2

The comment states that there is no reference to the fact that the Meadows at Bailey Canyon would create a Specific Plan that changes the Zoning Code and General Plan and that the SEIR states that all new residential development would be required to comply with all applicable plans and regulations including the General Plan and the City's Municipal Code. The comment further requests that the Section G, Land Use include analysis of the Stonegate and Meadows projects.

See Master Response 1—Scope of Environmental Analysis. Additionally, see the 1 Carter Avenue Project Environmental Impact Report and The Meadows at Bailey Canyon Specific Plan Environmental Impact Report for analysis of environmental impacts, including land use, for the 1 Carter Avenue and The Meadows at Bailey Canyon Specific Plan projects.

Response to Comment 3-3

The comment states that The Meadows project would conflict with General Plan policies listed by the author. See The Meadows at Bailey Canyon Specific Plan Environmental Impact Report for analysis of these policies.

Response to Comment 3-4

The comment states that The Meadows project would create an impact through conflict with General Plan policies listed by the author, including General Plan policies related to biological resources, wildfire, water supply, and aesthetics. See The Meadows at Bailey Canyon Specific Plan Environmental Impact Report for analysis of these policies.

September 21, 2021

Ms Clare Lin  
Senior Planner  
232 Sierra Madre Blvd.  
Sierra Madre, CA 91024

Dear Ms. Lin:

I am writing to comment on the Draft SEIR issued at the same time (August 3rd) as the Draft EIR for the Monastery development (August 4<sup>th</sup>). There is a 49 day review overlap that makes it all but impossible for most of Sierra Madre residents to review and comment thoughtfully on both very important EIRs. As the Draft EIR for the Monastery was long anticipated and released with more public notice, my efforts have been spent on this document of over 50 pages and its multiple Appendices. Fortunately, the City extended the review period to 60 days from 45. Why didn't the City take similar action for the SEIR, extend the review period and provide for a separate review period?

Due to Covid restrictions, many of us have not attended City Council or Planning Commission meetings for the past year and a half. Many of us have found Zoom meetings to be less than satisfactory. As the City attempts to return to the 'new normal', some of us are starting to come back and attend meetings at City Hall. Many decisions have been made in our absence with very little public comment and input and this seems to be acceptable to City leaders.

It would be expected that, at any time, our leaders would reach out and seek public support and consensus in order to continue to build on the theme of 'transparency' so frequently mentioned by the City. Hamstringing us in our efforts to review both documents at the same time circumvents these efforts.

I would request that the City disregard any pressure from the State to rush this process after the State's years of inaction and failure to promote and provide adequate housing – and support the efforts of its citizens to have a say in the future of our community.

Accordingly, I would request that the City revisit the review timeline for the Draft SEIR and allow for additional 30 days for residents to read and comment.

Thank you,

John Clarke

**Comment Letter No. 4**

John Clark

Response to Comment 4-1

The comment requests that the public review period be extended. See Master Response 2—Public Review Period.

September 20, 2021

To Clare Lin, Senior Planner  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

housingelement2021@cityofsierramadre.com

From  
Barbara Velluro  
380 W. Carter Avenue  
Sierra Madre, California 91024  
[barbaravelluro@gmail.com](mailto:barbaravelluro@gmail.com)

Thank you for the opportunity to Comment on the SEIR to Amend the General Plan, (Housing Element Update) Please retain a copy of these comments for the Administrative record.

1

Please respond to the Comments and Questions below in the Final EIR and please put me on the list of people to notify when the final EIR is completed.

Comments to the SEIR for the Sierra Madre General Plan Update

The Project Description of "The Meadows at Bailey Canyon is Inaccurate

The SEIR on Page III-6 includes this description

2

- **The Meadows at Bailey Canyon.** The lower 20 acres of the 88-acre Mater Dolorosa Passionist Retreat Center is being proposed for development with 42 detached single-family dwellings and a 3 to 3.5 acre dedicated neighborhood park. An additional 45 acres of hillside open space north of the Retreat Center is to be dedicated to the City of Sierra Madre. The property is currently identified as an institutional land use in the General Plan, and is being proposed to be amended to include Open Space, Civic/City Park, Institutional, and One Family Residential (7,500 sq. ft. minimum) land use designations. The project is projected to go before City Council in August 2021, and is not part of the rezone program proposed under the Housing Element.

However The Specific Plan for the Project and its DEIR now circulating for public comments describe the project as follows:

The Specific Plan allows for the development of approximately 17 acres of undeveloped land that is referred to as "the Meadows" by the Retreat Center. The Meadows at Bailey Canyon development includes 42 detached single-family dwellings on approximately nine acres of the site; public roadways; open space, including an approximately three-acre dedicated neighborhood public park at the southernmost portion of the Plan area; and an approximately one-acre grading and landscape buffer along the northern Plan area boundary between the Meadows at Bailey Canyon development and the Retreat

3

Center. In addition, the Specific Plan includes the dedication to the City or other perpetual conservation of approximately 35 acres of open space hillside land to the north of the Mater Dolorosa Retreat Center. Additional community benefits will include a net zero water impact, street improvements, underground utilities, and a dedicated funding source for park maintenance.

This chart was also included in that Specific Plan

Zone <sup>1</sup>	Use Type	Other Land Uses	Acres (gross)	Dwelling Units
RL	Detached, Single-Family Dwellings	Private Drives, Landscape Areas, Parking	919	42
OS	Public Park, and Landscape Buffer and Open Space	Pedestrian Paths, Natural Features, Landscaping, Play Equipment, Picnic Area and Seating, Restroom Building, Parking	3.39	-
-	Grading and Landscape Buffer	Walls, Gates, and Landscaping	1.04	-
-	Project Roadways	North Sunnyside Avenue, Carter Avenue, and Streets A, B, and C	3.68	-
<b>TOTAL</b>			<b>17.30</b>	<b>42</b>

Notes:  
<sup>1</sup> RL = Residential Low Density, OS = Open Space.

Table 3-1: Specific Plan Summary

3 cont.

The Project Description in the SEIR also includes the Statement that "The project is projected to go before City Council in August 2021."

The comment period for responses to the DEIR for the Meadows project is October 4, 2021. There will be many comments submitted and it is expected that the Final EIR for the project will not be released until the end of 2021 or sometime in 2022. After release it will be examined by the Planning Commission before being presented to the City Council.

Please correct these errors in the SEIR

**Comment Letter No. 5-**

Barbara Vellturo  
380 W. Carter Avenue  
Sierra Madre, CA 91024  
barbaravellturo@gmail.com

Response to Comment 5-1

The comment requests that the author be included on a notification list.

Response to Comment 5-2

The comment is an excerpt of text from Page III-6 of the SEIR.

Response to Comment 5-3

The comment states that the description of The Meadows project is incorrect. Since the preparation of the Housing Element, The Meadows project has been refined to residential development of 17.30 acres and a 3.04 acre neighborhood park as stated in the Draft Meadow EIR.

The comment states that The Meadows project will not go before City Council until the end of 2021 or sometime in 2022.

Page III-6, paragraph 1 of the SEIR is amended as follows:

- The Meadows at Bailey Canyon. The lower ~~20~~ 17.30 acres of the 88-acre Mater Dolorosa Passionist Retreat Center is being proposed for development with 42 detached single-family dwellings and a ~~3 to 3.5~~ 3.04 acres dedicated neighborhood park. ~~An additional 45 acres of hillside open space north of the Retreat Center is to be dedicated to the City of Sierra Madre.~~ The property is currently identified as an institutional land use in the General Plan, and is being proposed to be amended to include Open Space, Civic/City Park, Institutional, and One Family Residential (7,500 sq. ft. minimum) land use designations. The project is projected to go before City Council ~~in August 2021,~~ until the end of 2021 or sometime in 2022 and is not part of the rezone program proposed under the Housing Element.

September 20, 2021

To Clare Lin, Senior Planner  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

housingelement2021@cityofsierramadre.com

From  
Barbara Vellturo  
380 W. Carter Avenue  
Sierra Madre, California 91024  
[barbaravellturo@gmail.com](mailto:barbaravellturo@gmail.com)

Thank you for the opportunity to Comment on the SEIR to Amend the General Plan, (Housing Element Update) Please retain a copy of these comments for the Administrative record.

1

Please respond to the Comments and Questions below in the Final EIR and please put me on the list of people to notify when the final EIR is completed.

Comments to the SEIR for the Sierra Madre General Plan Update

**The MAPS labeled EXISTING GENERAL PLAN DESIGNATIONS and EXISTING ZONING DESIGNATIONS ARE INACCURATE**

Both the “existing General Plan designation” and the “existing zoning designation” maps, inaccurately, DO NOT show either the “Meadows” parcel or the “Stonegate” parcels as they currently exist in the Sierra Madre General Plan and Zoning.

The “Meadows” parcel is currently a single property, and it’s “Existing General Plan Designation” and its “Existing Zoning Designation” are Institutional zone.

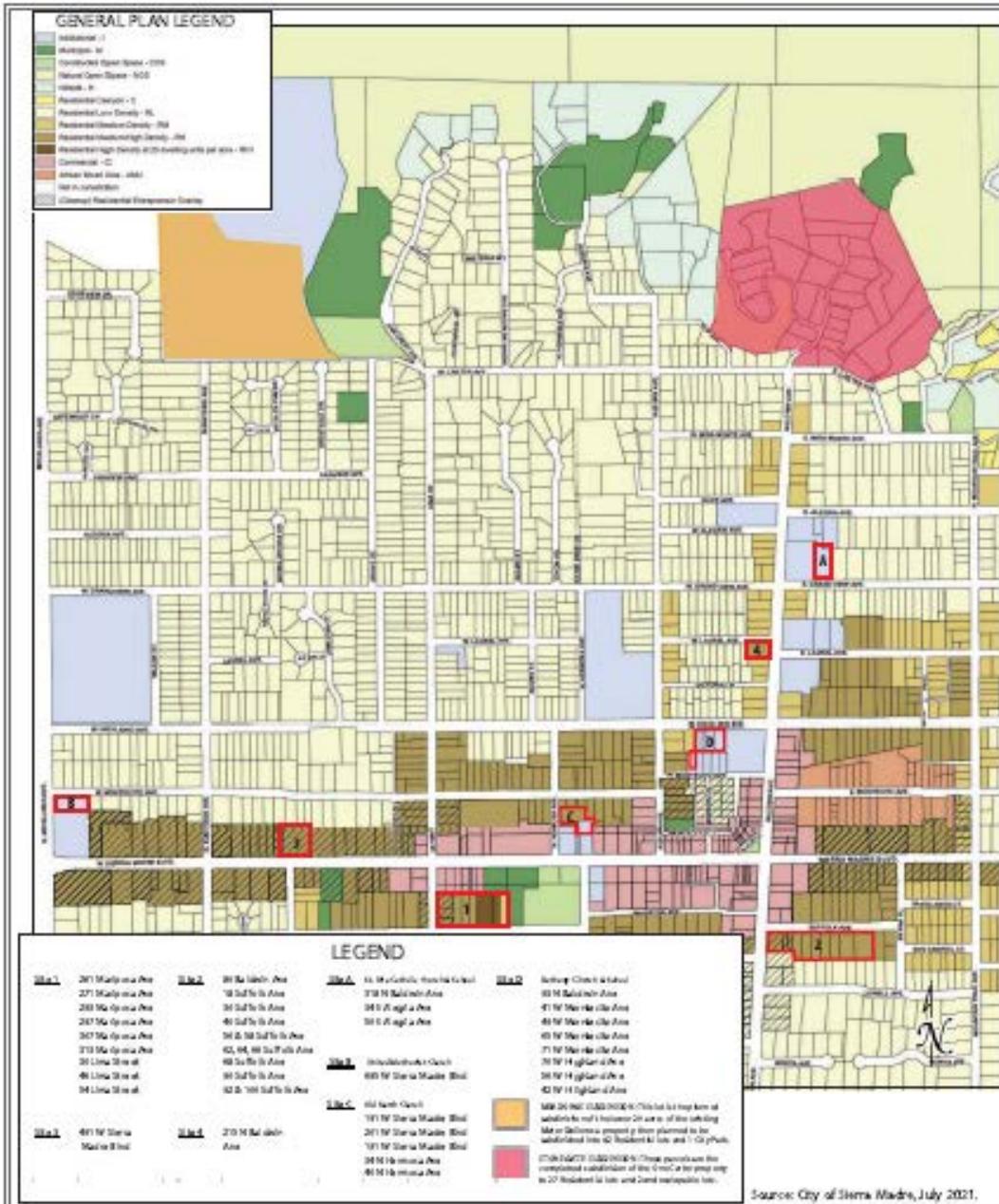
2

The “Existing General Plan Designation” and “Existing Zoning Designation” of the “Stonegate” parcels is Hillside Management Zone.

If both of these parcels are presented incorrectly on the “Existing” Maps, it is suggested that the entirety of those maps be examined for accuracy.

All references to these inaccuracies in any part of the SEIR or the Housing Element must also be corrected.

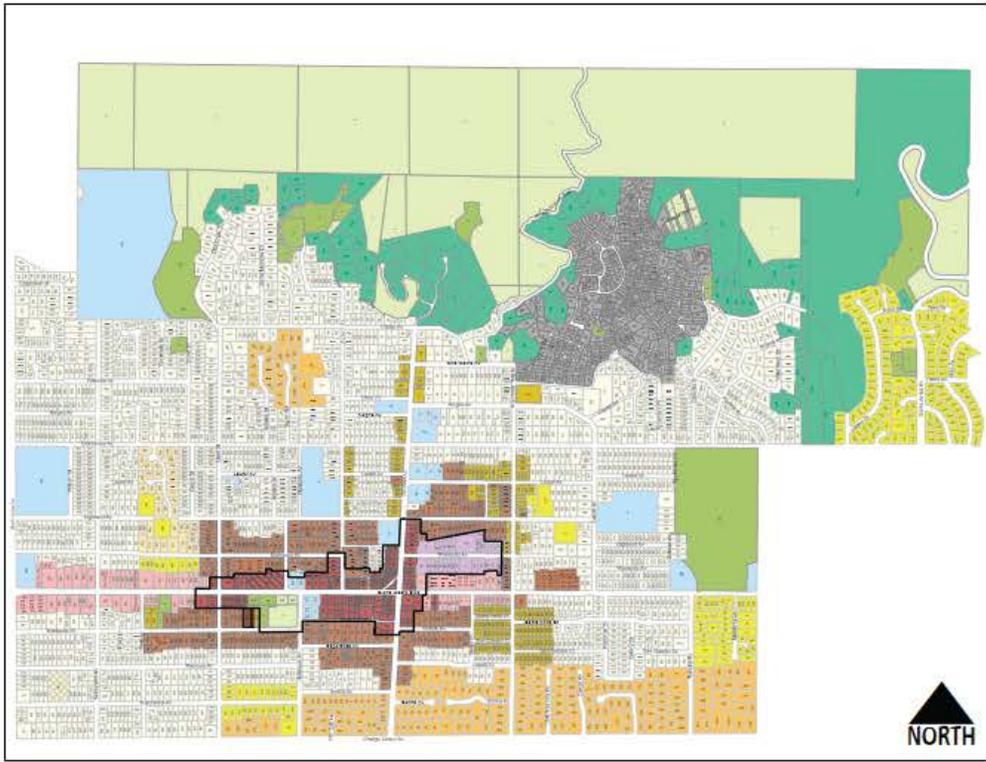
Maps from the SEIR and our current zoning map are presented below.



2 cont.

Figure 3-3  
Existing General Plan Designations





### City of Sierra Madre Zoning Map 2017

- Legend**
- Measure V Line
- Zoning**
- One Family Residential (7,500 sqft min.) - O-1
  - Single Home Specific Plan Overlay - SHSPSO
  - One Family Residential (9,000 sqft min.) - O-1A
  - One Family Residential (11,000 sqft min.) - O-1B
  - One Family Residential (14,000 sqft min.) - O-1C
  - Two Family Residential - R-2
  - Multiple Family Residential - R-3
  - Multiple Family Residential High Density - R-3H
  - Residential Professional - R-P
  - Open Space - OS
  - Alliada Management - H
  - Residential Canyon - RC
  - Commercial - C
  - Kennelton Specific Plan Overlay - KSPSO
  - Institutional - I
  - Manufacture - M
  - Civic and City Park - CDP



2 cont.

**Comment Letter No. 6**

Barbara Vellturo  
380 W. Carter Avenue  
Sierra Madre, CA 91024  
barbaravellturo@gmail.com

Response to Comment 6-1

The comment requests that the author be included on a notification list.

Response to Comment 6-2

The comment states that the maps labeled as existing General Plan and existing Zoning designations are inaccurate, including the land use and zoning designations for The Meadows project area. The letter includes maps from the SEIR and the 2017 City Zoning Map.

The 2017 City Zoning Map provided does not include any of the updates that have occurred in the City since that time. The SEIR maps reflect the current General Plan and Zoning in the City at the time of the Notice of Preparation, which is consistent with CEQA requirements related to environmental baseline as outlined in CEQA Guidelines 15125(a)(1).

September 20, 2021

To Clare Lin, Senior Planner  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

housingelement2021@cityofsierramadre.com

From  
Barbara Vellturo  
380 W. Carter Avenue  
Sierra Madre, California 91024  
[barbaravellturo@gmail.com](mailto:barbaravellturo@gmail.com)

Thank you for the opportunity to Comment on the SEIR to Amend the General Plan, (Housing Element Update) Please retain a copy of these comments for the Administrative record.

Please respond to the Comments and Questions below in the Final EIR and please put me on the list of people to notify when the final EIR is completed.

Comments to the SEIR for the Sierra Madre General Plan Update

**The MAPS labeled PROPOSED GENERAL PLAN DESIGNATIONS and PROPOSED ZONING DESIGNATIONS ARE INACCURATE**

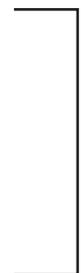
Both the "Proposed General Plan designation" and the "Proposed Zoning designation" maps, inaccurately, DO NOT show either the "Meadows" parcel or the "Stonegate" parcels as they will exist in the Sierra Madre General Plan and Zoning after adoption of the General Plan and the Housing Element.

In the Project Description of the Meadows at Bailey Canyon, it is specifically stated that "THIS PARCEL IS NOT PART OF THE REZONE PROGRAM PROPOSED UNDER THE HOUSING ELEMENT"

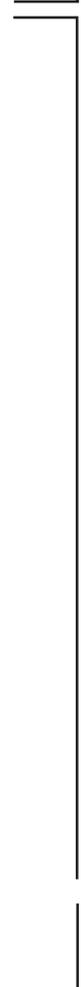
The "Meadows" parcel is currently a single property, and it's "Proposed General Plan Designation" and its "Proposed Zoning Designation" will remain as they are now, Institutional zone and an undivided parcel. The rezoning of the parcels in the Housing Element will have no effect on its current zoning of Institutional and Its current configuration as a single parcel.

The General Plan Designation and Zoning Designation" of the "Stonegate" parcels will likewise remain as it presently is, Hillside Management Zone.

If both of these parcels are presented incorrectly on the "Proposed" Maps, it is suggested that the entirety of those maps be examined for accuracy.



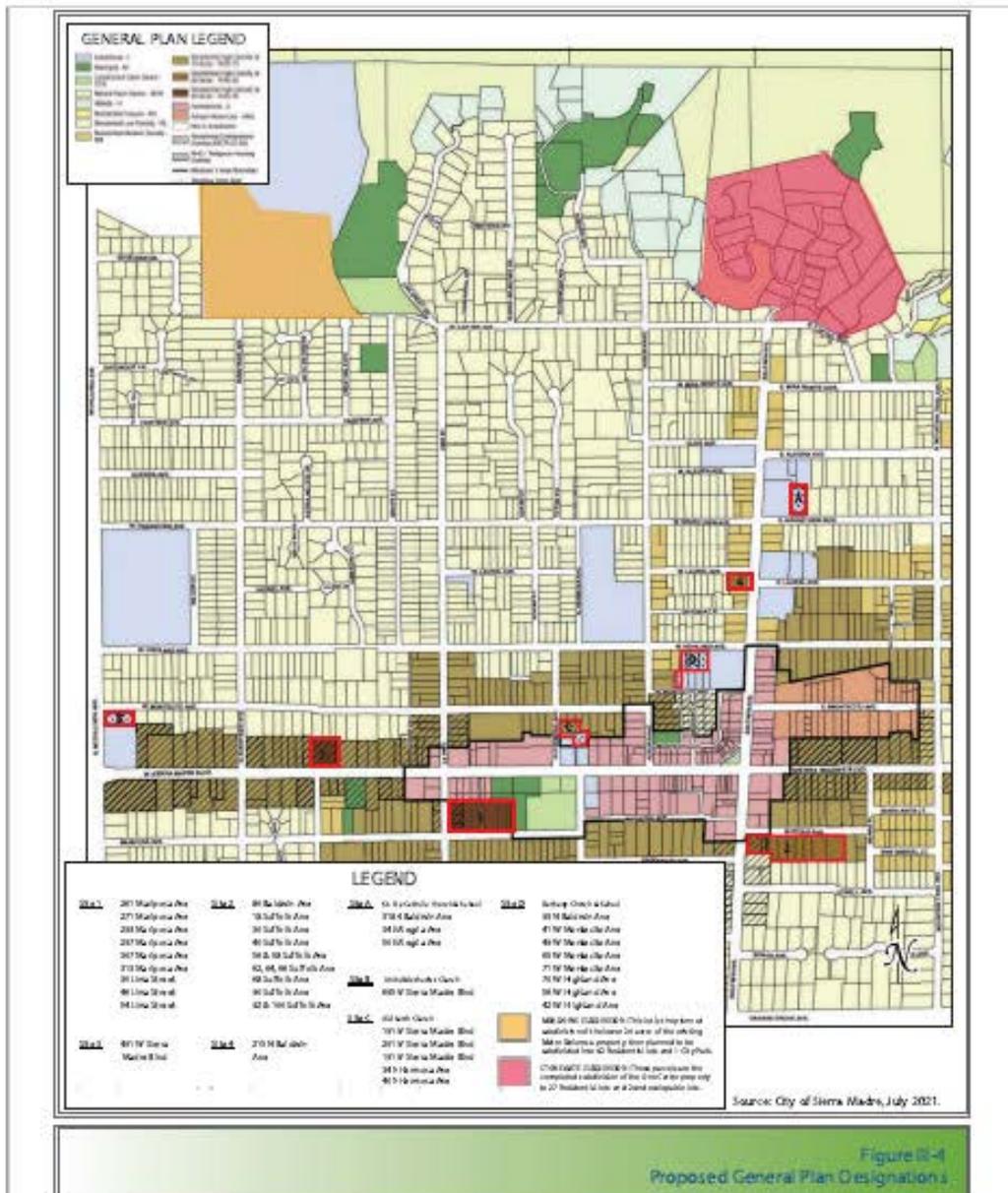
1



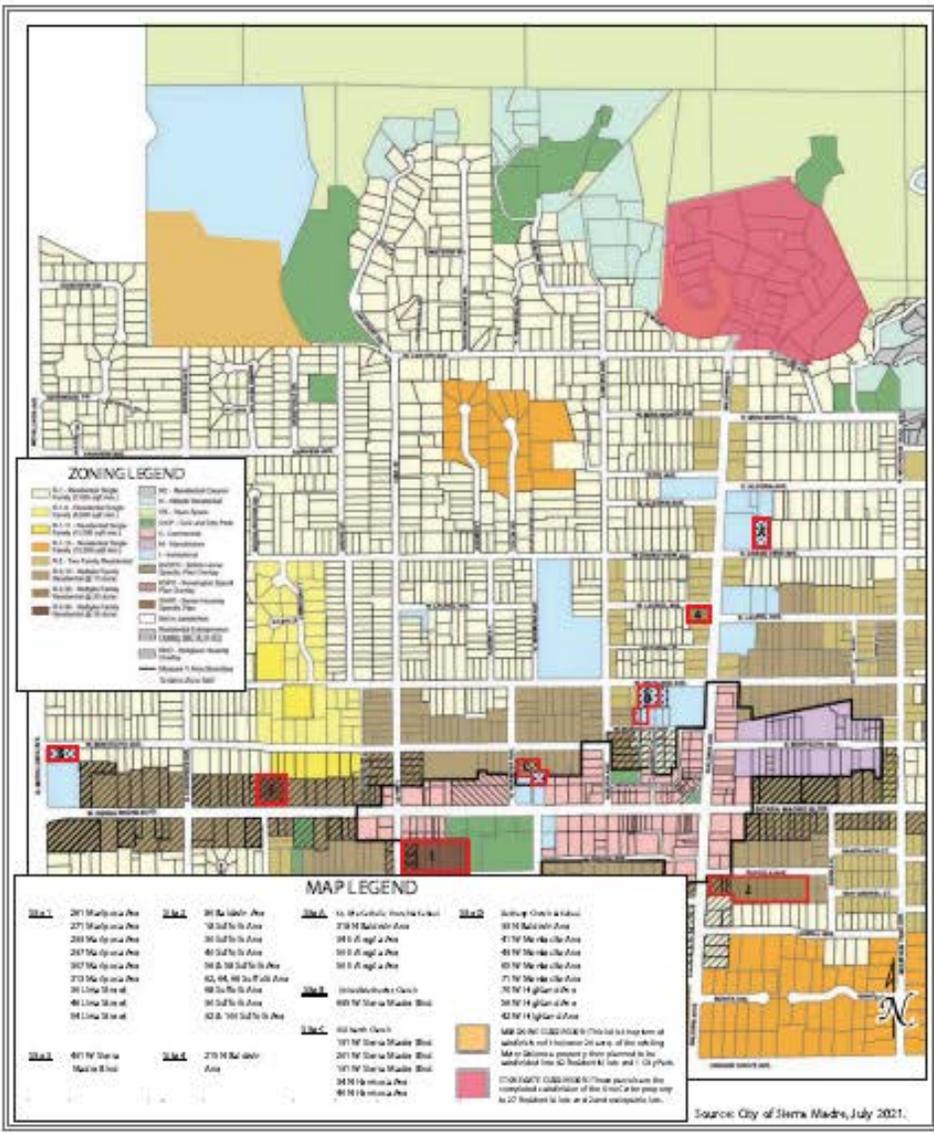
2

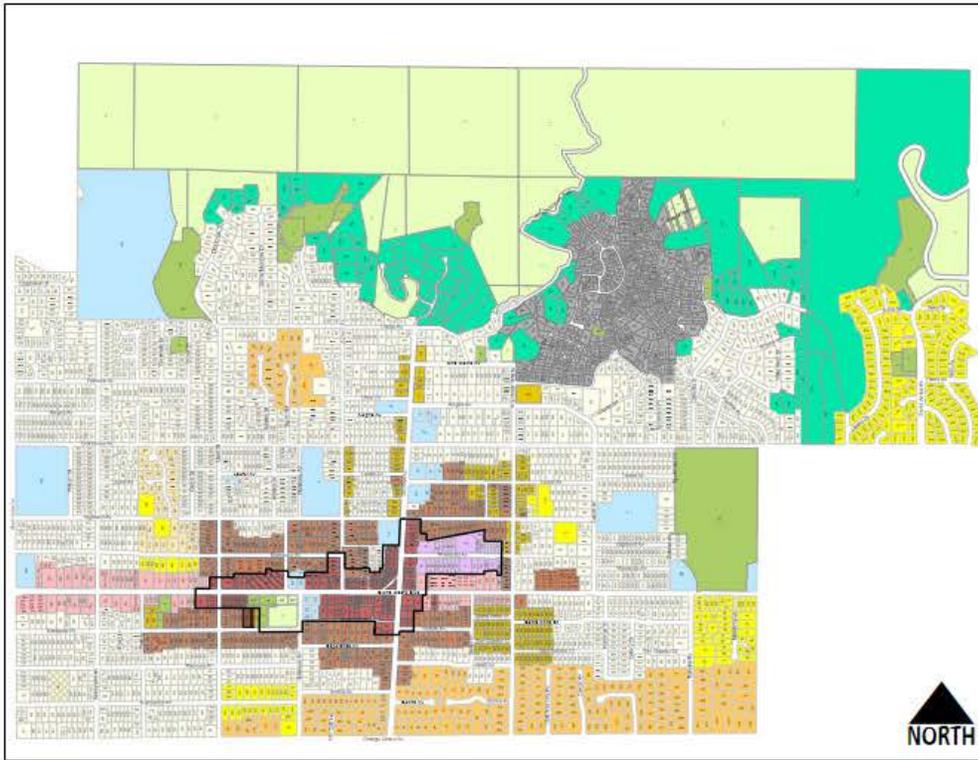
All references to these inaccuracies in any part of the SEIR or the Housing Element must be corrected.

Maps from the SEIR and Sierra Madre's current zoning map are presented below.



2 cont.





### City of Sierra Madre Zoning Map 2017

- Legend**
- Measure V Line
- Zoning**
- One Family Residential (7,000 sq ft min.) - R-1
  - British Home Specific Plan Overlay - BHPO
  - One Family Residential (8,000 sq ft min.) - R-1.5
  - One Family Residential (11,000 sq ft min.) - R-1.5-1
  - One Family Residential (15,000 sq ft min.) - R-1.5-2
  - Two Family Residential - R-2
  - Multiple Family Residential - R-3
  - Multiple Family Residential (High Density) - R-3H
  - Residential Professional - R-P
  - Open Space - OS
  - Hillside Management - H
  - Residential General - R-G
  - Commercial - C
  - Kearlwood Specific Plan Overlay - KSPO
  - Institutional - I
  - Manufacture - M
  - Civic and City Park - CDP



2 cont.

**Comment Letter No. 7**

Barbara Vellturo  
380 W. Carter Avenue  
Sierra Madre, CA 91024  
barbaravellturo@gmail.com

Response to Comment 7-1

The comment requests that the author be included on a notification list.

Response to Comment 7-2

The comment states that the maps labeled as existing General Plan and existing Zoning designations are inaccurate, including the land use and zoning designations for the Stonegate project area. The letter includes maps from the SEIR and the 2017 City Zoning Map and states that The Meadows and Stonegate parcels are not shown as they will be after adoption of the General Plan and Housing Element.

The 2017 City Zoning Map provided does not include any of the updates that have occurred in the City since that time. The SEIR maps reflect the current General Plan and Zoning in the City at the time of the Notice of Preparation, which is consistent with CEQA requirements related to environmental baseline as outlined in CEQA Guidelines 15125(a)(1).

September 20, 2021

To Clare Lin, Senior Planner  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

housingelement2021@cityofsierramadre.com

From  
Barbara Vellturo  
380 W. Carter Avenue  
Sierra Madre, California 91024  
[barbaravellturo@gmail.com](mailto:barbaravellturo@gmail.com)

Thank you for the opportunity to Comment on the SEIR to Amend the General Plan, (Housing Element Update) Please retain a copy of these comments for the Administrative record.

1

Please respond to the Comments and Questions below in the Final EIR and please put me on the list of people to notify

Comments to the SEIR for the Sierra Madre General Plan Update

The below letter was received by the City of Sierra Madre in response to a NOP sent to impacted Agencies to review the currently circulating DEIR for the “Meadows Project, which is also a site included for its environmental impact in the Current SEIR.

The LA County Flood Control District has easements on the section of Carter Avenue which has been identified as one of two ingress and egress points for the project, and one of two evacuation routes. In addition, they have drainage easements on the “Meadows Parcel” development. Their letter also addresses concerns over possible debris flows that may require flood and debris control facilities and states “Project components affecting the LACFCD’s facilities or right of way will require a flood permit, storm drain plans approval, and hydrology study approval from the LACFCD through EPIC-LA at [epicla.lacounty.gov](http://epicla.lacounty.gov). The LACFCD should be disclosed and included as a responsible permitting agency in the DEIR”

2

It does not appear that this agency, which will have significant input into the planned “Meadows project” and has significant concerns about the effect of the development on their easements and rights was given notice either in a Notice of Preparation or a Notice of the Release of either the SEIR or the Housing Element, both of which included consideration of the Meadows project, as it is expected to be developed within the 8 year period of the housing element.

The input of a County Agency with easement rights both within the parcel and in a necessary access road should have been a critical component of this SEIR in studying the impacts of ALL parcels included to be analyzed.

2 cont.

Please advise if this agency was given notice of the NOP and release of this SEIR and the NOP and release of the Draft Housing Element and their responses, if any.

3

Please include their interests and concerns in all studies of potential impacts of all parcels for the final EIR.

To: Vincent Gonzalez <[vgonzalez@cityofsierramadre.com](mailto:vgonzalez@cityofsierramadre.com)>Cc: Jose Suarez <[JSUAREZ@dpw.lacounty.gov](mailto:JSUAREZ@dpw.lacounty.gov)>, Jose Cruz <[JoCruz@dpw.lacounty.gov](mailto:JoCruz@dpw.lacounty.gov)>, Long Thang <[LTHANG@dpw.lacounty.gov](mailto:LTHANG@dpw.lacounty.gov)>, Jason Rietze <[JRietze@dpw.lacounty.gov](mailto:JRietze@dpw.lacounty.gov)>

Bcc:

Date:

Subject:

**sunnyside terrace subdivision**

**Notice of Preparation (NOP) of a**

**Draft Environmental Impact REport (DEIR)**

**city of SIERRA MADRE**

**Environmental PLan (RPPL2020003918)**

Thank you for the opportunity to review the NOP of a DEIR for the subject project. The project proposes to subdivide approximately 20 acres of property into 42 detached single-family dwellings, 3.5 acres neighborhood Park, and 45 acres of open space in the City of Sierra Madre.

The Los Angeles County Flood Control District (LACFCD) has reviewed the NOP and offers the following comments for your consideration:

1. Project components affecting the LACFCD's facilities or right of way will require a flood permit, storm drain plans approval, and hydrology study approval from the LACFCD through EPIC-LA at [epicla.lacounty.gov](http://epicla.lacounty.gov). The LACFCD should be disclosed and included as a responsible permitting agency in the DEIR.
2. The hillsides above the proposed housing project are highly erosive and subject to severe burn from wildfires. Debris flows can result afterwards due to

storm water run-off. Flood and debris control facilities may be required to protect the proposed housing project.

3. If the City of Sierra Madre intends to transfer any of the proposed flood and debris control facilities to the LACFCD for operation and maintenance, the facilities shall be designed and built to meet the Los Angeles County Public Works Department's design standards in addition to any other city's requirements.

4. A portion of the proposed housing development appears to be on top of existing LACFCD's storm drains. The LACFCD does not normally allow housing to be constructed over existing LACFCD's facilities. It is suggested that conceptual plans be submitted through EPIC-LA as soon as possible for consultation.

5. All environmental impacts and mitigations for the construction and long term maintenance of the flood and debris control facilities required by local, state and federal entities should be included in the DEIR. All mitigations shall be met prior to the LACFCD's acceptance of any proposed facilities to be transferred.

6 The DEIR should address the project impacts to the operation and maintenance of Bailey Debris Basin and include all required mitigations including, but not limited to the following:

6.1. Potential complaints from current and future residents about the impact from work at the basin such as cleanout activities and trucking.

6.2. Increases in traffic affecting operation efficiency during basin cleanout.

We request the opportunity to review the DEIR and future environmental documents when they are available. For questions regarding the above comments, please contact Jason Rietze of Public Works, Stormwater Planning Division at (626) 300-3248 or [jrietze@pw.lacounty.gov](mailto:jrietze@pw.lacounty.gov).

If you have any other questions or require additional information, please contact the undersigned.

Sincerely,

Toan Duong

Civil Engineer

Los Angeles County Public Works

Office: (626) 458-4921

**Comment Letter No. 8**

Barbara Vellturo  
380 W. Carter Avenue  
Sierra Madre, CA 91024  
barbaravellturo@gmail.com

Response to Comment 8-1

The comment requests that the author be included on a notification list.

Response to Comment 8-2

This comment states that the City received a letter from the Los Angeles Flood Control District related to The Meadows project. This comment is not relevant to the SEIR as The Meadows project analysis is presented in another EIR. See Master Response 1—Scope of Environmental Analysis.

Response to Comment 8-3

This comment asks whether the City distributed the Notice of Preparation to the Los Angeles Flood Control District. The Notice of Preparation was distributed to the State Clearinghouse, which distributes notices to applicable state agencies, including California Department of Fish and Wildlife and the Native American Heritage Commission. The Notice of Preparation was distributed to the following organizations and local agencies.

- Sierra Madre Conservancy
- Los Angeles County Clerk Recorder
- City of Pasadena
- City of Arcadia
- Pasadena Unified School District
- Los Angeles County Flood Control District
- Los Angeles County Public Works (Street Division)
- San Gabriel Valley Municipal Water District

Future projects that may be proposed under the Housing Element would be required to undergo environmental review and would notify the Los Angeles Flood Control District if a project is proposed in an area that requires input or approvals from the Los Angeles Flood Control District.

September 21, 2021

To Clare Lin, Senior Planner  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024

housingelement2021@cityofsierramadre.com

From  
Barbara Vellturo  
380 W. Carter Avenue  
Sierra Madre, California 91024  
[barbaravellturo@gmail.com](mailto:barbaravellturo@gmail.com)

Thank you for the opportunity to Comment on the SEIR to Amend the General Plan, (Housing Element Update) Please retain a copy of these comments for the Administrative record.

1

Please respond to the Comments and Questions below in the Final EIR and please put me on the list of people to notify

Comments to the SEIR for the Sierra Madre General Plan Update

THE SEIR MUST CONDUCT A FULL ENVIRONMENTAL ANALYSIS ON THE PROPERTIES IDENTIFIED AS "THE MEADOWS AT BAILEY CANYON" AND "STONEGATE, BOTH EXPECTED TO BE DEVELOPED WITHIN 8 YEARS, IN ORDER TO ESTABLISH THE "WORST CASE SCENERIO" IN THE EVENT OF DEVELOPMENT

The SEIR on page III-5, identifies two residential projects in the city, Stonegate and The Meadows at Bailey Canyon, as approved/pending and states that they are included "for informational purposes only" and that, "[f]or the environmental analyses, these projects will be considered as part of the future environmental baseline and not as part of the project for the non-technical analyses. For the analysis of air quality, energy, greenhouse gases, noise, and transportation, these projects are included to present a worst case scenario."

2

The WORST CASE SCENARIO for the residents of Sierra Madre are those in ALL the areas of potential environmental impact considered in the SEIR and MUST be evaluated according to the documents available to the City by which they are deemed "Pending"

At the time of the NOP the Developer of the "Meadows" project had not yet submitted an application for development to the City. The project was labeled "Pending" on the basis of a 2020 MOU (Memorandum of Understanding) which, among other items, required the developer to widen Carter Avenue, one of two areas of ingress/egress, as

well as one of two evacuation routes for the 42 homes. The developer's Specific Plan says that the road will remain at its present approximate 20 ft width.

An earlier traffic report, sent to the developer, showed that the Project would result in 740 vehicle trips in 2025 when the Project was expected to be completed and occupied. (section of Traffic Study below) That number did not include Monastery traffic, gardeners and other workers, delivery people, trash pickup, visitors to the home and the Park, and people from all over the Area taking a "Short Cut" to adjacent Bailey Canyon park.

A "Worst Case Scenario" would also have to evaluate the expected inclusion of a number of ADUs with added traffic, and two roads for ingress and egress, both on the South end of the project.

The Carter Avenue section of road, currently less than 24 feet wide, is a particularly dangerous road from the Parcel. Vehicles would be travelling at a higher rate of speed down the 40-50 foot sloped roads in the project to make a left turn onto Carter Avenue, less than a block to the intersection of Grove Avenue, where much of the regular overflow parking is, for Bailey Canyon Park, across Carter Avenue. Families park on Grove Avenue, walk in the street as there are no sidewalks, and cross against two way traffic going into and coming out of the housing project a short distance away.

The Specific plan and DEIR indicate that they will provide pedestrian access to Bailey Canyon Park, however what they show is a pedestrian walkway alongside their two way traffic in the development, to cross from the west side of the street inside the development (where parking will be), exit onto the same dangerous section of Carter Avenue and walk the block to the Bailey Canyon exit. On weekends cars are also parked all the way to Oak Crest and Lima Avenue, with people walking along Carter, from the west to get to the park (there are no sidewalks on that part of Carter either)

**2 cont.**

The two way traffic will have to watch for pedestrians coming from both directions.

The situation with the MANY pedestrians in the area of that entrance to and exit from the development IS a worst case scenario and has not been considered at all in this even IF the road were widened.

The large number of vehicles once the Parcel is developed, and the Construction vehicles before that time, also create a concern by interfering with the Right of Way of LA County Flood Control District. The entrance to their road, which they use to service the Debris Basin, and which Rescue equipment uses to reach injured hikers on the Bailey Canyon trails or in the event of fire in the hills would be impacted

That clearly dangerous, potentially disastrous, "PENDING" project should have been extensively examined in the SEIR for its WORST CASE SCENARIO as to Traffic, Circulation and Pedestrians.

The two projects “included to present a worst case scenario” MUST be extensively evaluated for ALL possible environmental impacts, as they are likely to be developed within the 8 years until the next Housing Element. Both are located in sensitive slope areas that pose more danger to residents than the properties to be rezoned.

Both projects are located in the “Very High Fire Severity Zone”, are just below the mountain slopes and are part of the “Wildland Urban Interface”. They are just below earthquake landslide zones on a Seismic Hazard map. A large building, just above the the location of the proposed “Meadows” project, was damaged in the 1991 earthquake.

The City Website references that earthquake “**Sierra Madre Earthquake of 1991** The damage to City of Sierra Madre businesses, residences, and infrastructure was estimated at about \$12.5 million. The City estimates that the earthquake event directly or indirectly affected 80% of the City’s 10,650 residents.”

Clearly, extensive studies of the potential for disastrous earthquakes in the Parcels must be conducted to establish a “Worst Case Scenario” and determine whether or not those critical impacts can be abated.

In the past, fires have come perilously close to the properties now “Pending” for development. The changes in fire behaviour (and the droughts) in recent years have made them increasingly deadly. The New Policies proposed by Sierra Madre in its Safety Element include,

2 cont.

**Objective Hz7: Avoid expanding development into undeveloped areas in Very High Fire Severity Zones.**

Although it is hoped that this most reasonable restriction will eliminate the fire concern in developing the “Meadows” parcel, until that is a fact, it is a **WORST CASE SCENARIO** that MUST be extensively studied. Our Sierra Madre Fire Department is not yet at full strength and will be stretched trying to cover all the “Hillside” areas in town.

These important (critical) potential Environmental Impacts MUST be part of the studies for a document which will change our GENERAL PLAN for many years to come. As the “Constitution” that is meant to guide all future development in the City, this EIR must be complete and allow only those conditions that consider the health and safety of its residents.

**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 Michilinda Avenue and Sunnyside Avenue	6,970	7,310	5%
Michilinda Avenue between Fairview Avenue and Sierra Madre Boulevard	7,390	7,390	0%
Michilinda Avenue between Sierra Madre Boulevard and Foothill Boulevard	9,550	9,680	1%

2 cont.

**Comment Letter No. 9**

Barbara Vellturo  
380 W. Carter Avenue  
Sierra Madre, CA 91024  
barbaravellturo@gmail.com

Response to Comment 9-1

The comment requests that the author be included on a notification list.

Response to Comment 9-2

Several public workshops to gather community input were held on The Meadows project in August 2020. A formal application was filed with the City for The Meadows on March 18, 2021. Therefore, The Meadows project was a known project at the time of the Notice of Preparation and per CEQA Guidelines 15125(a)(1) was included in the environmental baseline as part of the existing conditions at the time of the Notice of Preparation.

See Master Response 1—Scope of Environmental Analysis. Additionally, see the 1 Carter Avenue Project Environmental Impact Report and The Meadows at Bailey Canyon Specific Plan Environmental Impact Report for analysis of environmental impacts, including land use, for the 1 Carter Avenue and The Meadows at Bailey Canyon Specific Plan projects.

September 21, 2021

To Clare Lin, Senior Planner  
232 W. Sierra Madre Blvd  
Sierra Madre, CA 91024  
housingelement2021@cityofsierramadre.com

From  
Barbara Vellturo  
380 W. Carter Avenue  
Sierra Madre, California 91024  
[barbaravellturo@gmail.com](mailto:barbaravellturo@gmail.com)

Thank you for the opportunity to Comment on the SEIR to Amend the General Plan, (Housing Element Update) Please retain a copy of these comments for the Administrative record.

1

Please respond to the Comments and Questions below in the Final EIR and please put me on the list of people to notify when the final EIR is completed.

Comments to the SEIR for the Sierra Madre General Plan Update

THE CITY HAS REFUSED TO EXTEND THE TIME FOR CITIZENS' RESPONSE TO THE SEIR, WHILE ALSO FAILING TO PROVIDE INFORMATION AND A PUBLIC OPPORTUNITY TO UNDERSTAND THESE VOLUMINOUS, IMPORTANT DOCUMENTS.

We have asked the City to extend the time for Citizens' comments on both the SEIR to Amend the General Plan and the DEIR for the "Meadows Project". They have refused.

There was no reason given for failing to extend our time to review the SEIR, a 850 page document (Just because we are simultaneously trying to read and understand and comment on the 514 Page DEIR AND the 140 Page SPECIFIC PLAN?) (Just because there has been NO informational meeting to explain and answer questions - either to the Citizens or to the Planning Commission, the only group that even had that review on their agenda?) (Just because an extension wouldn't matter as the Housing Element is still being worked on by the City and the State, so it is inaccurate as part of the SEIR at this time?) Apparently not.

2

The reason we were given for not extending the time to review the DEIR was that the law said it can only be extended past 60 days for undefined "unusual circumstances" Possibly the fact that we had to read and try to understand the implications of 1,504 pages of unfamiliar facts and information at the same time is an unusual circumstance? Possibly the fact that the City Council promised, at their March 10th meeting in the Park, that there would be a public informational

meeting on the DEIR before the comment period ended, and have failed to hold that is an unusual circumstance? Since there is no definition of unusual circumstances, it is unlikely that CEQA would object to either. I have seen documents online where cities extended the comment period several times, during the comment period. It is unlikely an additional 30 day extension to provide PUBLIC INFORMATION, in either deadline, would be questioned.

2 cont.

850 PAGE SEIR to Amend the General Plan, 514 PAGE DEIR - MEADOWS PROJECT, 140 PAGE SPECIFIC PLAN MEADOWS PROJECT = 1,504 PAGES, NO INFORMATION FROM THE CITY ON ANY DOCUMENT

## 1. INTRODUCTION

This document is a Subsequent Environmental Impact Report (SEIR) for the proposed City of Sierra Madre 2021-2029 Housing, Land Use, Safety, and Circulation Element General Plan Update (hereafter referred to as the proposed project or the project) in the City of Sierra Madre, California.

The project consists of a comprehensive update to the Housing Element and related updates to the Land Use Element and Land Use Map of the City of Sierra Madre General Plan. The project also includes updates to the City's Zoning Code, Zoning Map, and updates to the Safety Element and Circulation Element in compliance with new State rules. The proposed project is described in more detail in Section II, Project Description.

In other words, this is an extensive and IMPORTANT DOCUMENT that will impact many parts of our lives for many years to come.

NOP - There was NO scoping meeting or any chance for the public to submit comments during the 30 day comment period for the SEIR as is common for projects of this size and has typically been done in Sierra Madre in the past.

3

NOP - for the Housing Element was incorporated in this document. Many citizens submitted comments during the 30 day period, though they only learned of the opportunity (not noticed by the city) a few days before the deadline. NONE of those comments were included.

There was NO opportunity for public information concerning this CRITICALLY IMPORTANT 850 PAGE DOCUMENT DURING THE COMMENT PERIOD. The SEIR was to be discussed at a Planning Commission meeting shortly before the deadline and many Citizens attended to learn about the SEIR and to have questions answered during the few days they had left to answer. All their concerns and questions, raised at the meeting and sent to the planning commission by email centered around the analyses of the SEIR and the Safety Element. NEITHER OF THOSE SUBJECTS WERE DISCUSSED!!

Although a representative of the group that prepared the SEIR was present and apparently was there to provide information and answer questions by the Planning Commission and Citizens, no one got a chance! Staff had prepared and presented a

presentation on the Housing Element for more than 90% of the time, and the entire meeting ONLY discussed that Housing Element. NO information was given on the SEIR and the Safety Element.

THIS IS AN 850 PAGE DOCUMENT, with many studies and information unfamiliar to the public. It is meant to be a critical City document, a "Constitution" that will direct the direction of development in our City for many years to come.

The Citizens were expected to read, understand, and make knowledgeable comments on this important document, while simultaneously trying to read and understand the ramifications of the 514 page DEIR - MEADOWS PROJECT and the 140 PAGE SPECIFIC PLAN

While ALSO trying to fit in jobs, family, LIVES! Amid fears of the still circulating pandemic.

All "Unusual Circumstances" that would have justified extensions of both deadlines to submit comments. And, MAYBE given the City the opportunity to provide INFORMATION and ASSISTANCE to ITS CITIZENS! Which it HASN'T provided on either of these documents.

The City has unfairly refused to make simple extensions to those due dates. Once again, limiting the opportunity for Citizens to Participate in the governing of THEIR City.

The City will tell you that you will have a chance to comment on the FINAL documents. You will. But it will mean nothing. I do not know of a single instance when a Final Eir was NOT adopted by the city. Regardless of Comments.

**3 cont.**

**Comment Letter No. 10**

Barbara Vellturo  
380 W. Carter Avenue  
Sierra Madre, CA 91024  
barbaravellturo@gmail.com

Response to Comment 10-1

The comment requests that the author be included on a notification list.

Response to Comment 10-2

The comment requests that the public review period be extended. See Master Response 2—Public Review Period.

Response to Comment 10-3

The comment excerpts the SEIR text related to the type of project and a summary of the project description.

The comment states that the City did not have a public informational discussion. The City held a Scoping Meeting on July 28, 2021 and held a public hearing on the project before the Planning Commission on September 16, 2021 with an additional hearing scheduled for October 7, 2021. Additionally, the City Council will meet to discuss this project on October 26, 2021.

See Master Response 2—Public Review Period.

September 20, 2021

Ms. Clare Lin  
Senior Planner  
232 W. Sierra Madre Boulevard  
Sierra Madre, CA 91024

Dear Ms. Lin:

Re: Comments on Draft SEIR

After a cursory review of the 425 page SEIR and its 481 page Appendices, it is respectfully requested that the City continue the review period for an additional 30 days for the following reasons:

The draft SEIR was issued only a few days after the draft EIR for the Monastery project was issued. The Monastery EIR along with its Appendices totals 3,425 pages. The draft SEIR had a 49 day review period; the draft Monastery EIR had a 60 day review period that was extended by the City in response to requests for additional time due to the Covid shutdown.

The review periods overlap for 49 days. They should never have been issued at the same time, regardless of whatever pressure the state may be imposing for their failure to plan and implement reasonable housing plans over the years. It is unrealistic for a City to expect its citizens to simultaneously review two draft EIRs of 4,331 pages and provide meaningful comments for consideration on both.

The companies hired to prepare these reports have multiple departments, staffing and expert resources. The citizens rely on volunteer time and effort to prepare responses. As challenging as it is to respond to one document; two is beyond the capabilities of most residents.

The City relies heavily on the efforts of its citizen volunteers in too many capacities to mention. Overburdening them with the expectation that they can review two EIRs at the same time is terribly unfair and discouraging to those who do care about and wish to participate in City matters. Unfortunately, due to the Covid shutdowns, we have been largely out of sight and occupied with life threatening matters of safety and health for our families. But, as a reminder, we are still here; not 'out of sight, out of mind' and willing to participate in the on-going issues of concern in our Sierra Madre community. And we want to be fairly given every opportunity to do so and that is not happening. We hope that our City officials recognize this and acknowledge the unnecessary burden this has placed on the engaged members of Sierra Madre and feel, as we do, that this needs to be addressed.

We respectfully request additional time to review the draft SEIR with appropriate notices sent out to re-involve the community in this important document for the future of our community.

Sincerely,

Preserve Sierra Madre on behalf of its 320 followers

**Comment Letter No. 11**

Preserve Sierra Madre

Response to Comment 11-1

The comment requests that the public review period be extended. See Master Response 2—Public Review Period.

# Comment Letter No. 12

September 20, 2021

Ms. Clare Lin  
Senior Planner  
232 W. Sierra Madre Boulevard  
Sierra Madre, CA 91024

Dear Ms. Lin:

Re: Comments on Draft SEIR

After briefly reviewing the Draft SEIR and skimming its many Appendices, it appears that many sections are now outdated and will require revisions due to the passage of SB 9 and 10 as they seek to destroy single family housing in our town and others across the State. They will make many of our zoning laws obsolete and require updating our General Plan.

1

As state officials scramble to review Housing Element drafts from throughout the state before year end, it appears that they will not be able to meet the deadlines they have imposed on us. This should allow us additional time to review this important document and under these circumstances, it is respectfully requested that the City continue the review period for an additional 30 days.

As a resident who does try to stay informed and be involved in Sierra Madre issues, I have spent my time reviewing the Draft EIR for the Monastery and haven't been able to spend the time on another EIR issued at the same time. I can't image that the City expects residents to do both at the same time. Especially given the huge number of pages and technical reports involved!!

2

City officials talk about the importance of public meetings and input from residents, without providing us with the time to comment adequately on two Draft EIRs in the same period.

It is my sincere hope that our City officials now recognize this and will correct this unfortunate oversight by extending the review period for an additional 30 days so we can be diligent in our review and our comments can be helpful.

Sincerely,

Lynne Collmann

**Comment Letter No. 12**

Lynn Collmann

Response to Comment 12-1

The comment states that with the passage of SB 9 and 10 the SEIR will be outdated. The SEIR examines the impacts of residential development on specific parcels at specific maximum densities; therefore, the passage of SB 9 and 10 would only have effect on future Housing Elements. Additionally, this comment is not relevant to the analysis in the SEIR.

Response to Comment 12-2

The comment requests that the public review period be extended. See Master Response 2—Public Review Period.

# Comment Letter No. 13

**From:** Philip Yao philip.b.yao@gmail.com

**Subject:** P. Yao's Comment to Draft SEIR (Reference Draft Environmental Impact Report State Clearing House No. 2021040369, August 2021)

**Date:** September 21, 2021 at 3:41 PM

**To:** Housing Element housingelement2021@cityofsierramadre.com, Clare Lin clin@cityofsierramadre.com

---

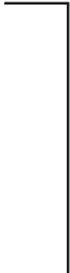


**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Dear Ms. Lin,

Following are my comments to the Draft SEIR:

The subject Draft SEIR has abandoned quality for quantity. Too much boilerplate, useless information, along with very poorly written Introduction and Executive Summary Sections lend credence to my claim. Its low quality and jargons obfuscate what it is supposed to present. It is nowhere close to a cogent document that would be useful for the citizens of Sierra Madre, let alone the City of Sierra Madre.



**1**

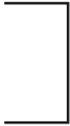
The Draft SEIR is suppose to address the Housing Element and Regional Housing Needs Allocation (RHNA); therefore, it should never have included the proposed Meadows development, as including it advances and implies compliance to a whole host of environmental impacts that have not been vetted and/or adjudicated.

Furthermore, the Draft SEIR did nothing to address Section 2, Environmental Setting, City of Sierra Madre Municipal Code, Chapters 17.20 and 17.52(ref. page IV-A-7). The impact to infrastructure and resources are nothing more than rehashed talking points.



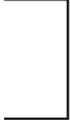
**2**

Drilling down, the impact to sensitive receptors from the Meadows is make-believe. The use of VMT for noise and emissions is ludicrous. The statement that the "Meadows and Stonegate incorporate similar design features that would reduce VMT of the existing site including ....." is patently false as the Meadows will certainly increase VMT.



**3**

If it is not obvious, I am not a fan of this Draft SEIR. Good money has been paid to generate this and the work product is unacceptable. The City of Sierra Madre has a fiduciary responsibility and obligation to inform the preparers that their work product is unacceptable. This Draft SEIR must be rejected and the preparers must be held accountable until they deliver an acceptable Subsequent Environmental Impact Report!



**4**

Please confirm receipt of this e-mail.

Regards,

Philip Yao  
513 Sierra Keys Drive  
Sierra Madre, CA 91024

**Comment Letter No. 13**

Philip Yao  
513 Sierra Keys Drive  
Sierra Madre, CA 91024  
philip.b.yao@gmail.com

Response to Comment 13-1

The comment states that the SEIR should not have addressed The Meadows project. See Master Response 1—Scope of Environmental Analysis.

Response to Comment 13-2

The comment states that the SEIR does not address City of Sierra Madre Municipal Code, Chapters 17.20 and 17.52 as related to infrastructure. These chapters of the Municipal Code address aesthetics, which were discussed in Section IV.A, Aesthetics of the SEIR.

Response to Comment 13-3

The comment states that the use of VMT for noise and emissions is ludicrous. The air quality analysis was prepared using CalEEMod (Version 2020.4.0). This modeling software is used to model air quality impacts from mobile and stationary sources and is the accepted model as required by the South Coast Air Quality Management District. CalEEMod (Version 2020.4.0).

Traffic information from the General Plan Traffic Impact Study Draft Report was utilized for traffic noise modeling purposes. Existing, Existing Plus Project, and Future traffic noise from vehicular traffic was projected using a computer program that replicates the FHWA Traffic Noise Prediction Model (FHWA-RD-77-108). Inputs for the model including road classification, speed, land distance, and vehicle mix were taken from the noise modeling for the General Plan Draft EIR Noise Background and Technical Analysis appendix. The analysis was prepared using information and software that is consistent with technical studies prepared for environmental impact reports.

Response to Comment 13-4

The comment states that The Meadows project will increase VMT. See The Meadows at Bailey Canyon Specific Plan Environmental Impact Report for analysis of environmental impacts, including traffic.

From: Clare Lin <clin@cityofsierramadre.com>  
Subject: RE: SEIR for the Housing Element  
Date: September 21, 2021 at 5:09:08 PM PDT  
To: 'deb sheridan' <debsheridan2000@yahoo.com>  
Cc: Housing Element <housingelement2021@cityofsierramadre.com>

Hi Ms. Sheridan,

Thank you for your comments and email regarding the Draft SEIR for the City of Sierra Madre 2021-2029 Housing Element Update. Comments received will be included in the Final SEIR for certification by the City Council.

Best Regards,

**Clare Lin**  
Senior Planner  
Planning & Community Preservation  
[www.CityofSierraMadre.com](http://www.CityofSierraMadre.com)  
(626) 355-1536 | [clin@cityofsierramadre.com](mailto:clin@cityofsierramadre.com)



**From:** deb sheridan [mailto:debsheridan2000@yahoo.com]  
**Sent:** Tuesday, September 21, 2021 4:18 PM  
**To:** Clare Lin <clin@cityofsierramadre.com>  
**Subject:** SEIR for the Housing Element

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

I am writing to let you know that I strongly object to the deadline of today for the SEIR. The residents are thoroughly confused by two different Environmental Impact Reports coming out days apart. Both have overlapped by 49 days. Now two events have made it imperative that the comment period for the SEIR (changing the housing element portion of the General Plan):

1  
2

1. The consultants came up with a plan to add three church parking lots to come up with the 208 Housing Unit numbers that are needed, and, more importantly,

2. SB 9 and SB 10 have been signed into law. That means that *anyone* who owns property in Sierra Madre can build Additional Dwelling Units, and Junior Additional Dwelling Units.

2 cont.

Please reconsider and reopen the deadline.

Thanks  
Deb Sheridan  
635 Valle Vista Drive

**Comment Letter No. 14**

Deb Sheridan  
635 Valle Vista Drive  
Sierra Madre, CA 91024  
debsheridan2000@yahoo.com

Response to Comment 14-1

The comment requests that the public review period be extended. See Master Response 2—Public Review Period.

Response to Comment 14-2

The comment stating that the Housing Element includes three church parking lots to create 208 housing units and that SB 9 and 10 have been signed into law. These comments are not related to the analysis in the SEIR and no further response is required.

From: Clare Lin <clin@cityofsierramadre.com>  
Subject: RE: SEIR  
Date: September 21, 2021 at 5:09:42 PM PDT  
To: 'Pat Alcorn' <lacabriole@aol.com>  
Cc: Housing Element <housingelement2021@cityofsierramadre.com>

Hi Mr. Alcorn,

Thank you for your comments and email regarding the Draft SEIR for the City of Sierra Madre 2021-2029 Housing Element Update. Comments received will be included in the Final SEIR for certification by the City Council.

Best Regards,

**Clare Lin**  
Senior Planner  
Planning & Community Preservation  
[www.CityofSierraMadre.com](http://www.CityofSierraMadre.com)  
(626) 355-1536 | [clin@cityofsierramadre.com](mailto:clin@cityofsierramadre.com)



**From:** Pat Alcorn [mailto:lacabriole@aol.com]  
**Sent:** Tuesday, September 21, 2021 4:23 PM  
**To:** Clare Lin <clin@cityofsierramadre.com>  
**Subject:** SEIR

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

I learned this afternoon that the deadline for sending in comments for the Housing section EIR cannot be extended through today unless there is a compelling reason. It makes sense that the fact the State Legislature has passed two egregious bills (SB9 & 10) and is working on another makes this a compelling reason to delay the comment period. The impact of the two bills already passed will make our Housing element all the more important. Thank you, Pat Alcorn

**Comment Letter No. 15**

Pat Alorn  
lacabriole@aol.com

Response to Comment 15-1

The comment requests that the public review period be extended. See Master Response 2—Public Review Period.

September 20, 2021

To: Clare Lin, Senior Planner  
232 W. Sierra Madre Boulevard, Sierra Madre, CA 91024  
**housingelement2021@cityofsierramadre.com.**

From: Alex Arrieta  
645 Edgeview Drive  
Sierra Madre, CA 91024  
Alexanderander23@gmail.com

Comments to the SEIR for the Housing Element of the City of Sierra Madre General Plan for the 2021-2029 planning period (Housing Element Update)

Thank you for the opportunity to Comment on the SEIR to Amend the General Plan, (Housing Element Update). Please retain a copy of these comments for the Administrative record. Please respond to the Comments and Questions below in the Final EIR and please put me on the list of people to notify.

First of all, I'm very concerned that the City has refused to extend the review period despite the fact that Citizens were attempting to read this important document to change our General Plan, (which is a critical city document) while simultaneously reviewing and responding to over 500+ pages of the Meadows DEIR, in addition to the Specific Plan.

1

Additionally, it is really unacceptable that the City has had NO Public Informational Discussion meetings on EITHER the SEIR or the DEIR to help our citizens better understand the content and formulate their comments. The City promised at the March 10<sup>th</sup> meeting that they would take these actions.

2

**Comments to the SEIR for the Sierra Madre General Plan Update**

I. Analysis of the Specific Plan for the Meadows Project: why was there no analysis of this proposed project, when it is the most significant development project in the history of Sierra Madre? Also, especially in light of the fact the Specific Plan says it can be amended.

II. Project Description, p. III-5

3

On page III-5, the report identifies two residential projects in the city, Stonegate and The Meadows at Bailey Canyon, as approved/pending before stating that they are included "for informational purposes only" and stating that, "[f]or the environmental analyses, these projects will be considered as part of the future environmental baseline and not as part of the project for the non-technical analyses. For the analysis of air

quality, energy, greenhouse gases, noise, and transportation, these projects are included to present a worst case scenario.”

Questions: Are the Stonegate and Meadows at Bailey Canyon projects included in the SEIR or not?

- What does it mean that they are part of the “future environmental baseline?”
- What does it mean that they are not part of the project for the non-technical analyses?
- What technical analysis are they part of?
- Why are they part of the analysis of certain environmental factors and not others such as biological resources?
- How is the “worst case scenario” calculated? The description chooses some elements to be evaluated (air quality) while others are excluded (biological resources) so this makes it very difficult to meaningfully and effectively evaluate.

The SEIR is seeking to simultaneously include and exclude the Stonegate and Meadows at Bailey Canyon projects. If they are excluded, the project description would not be complete because the Meadows project is scheduled for completion by 2025 within the 2021-2029 time frame of this document and for Stonegate, 7 of 24 applications for development have already been approved. If the projects are to be included, which they should be due to their scope and size, the environmental impacts of each must be comprehensively evaluated and assessed in this report.

### III. Environmental Impact Analysis G at p. V.G-1 Land Use Planning

This section of the SEIR analyzes the potential environmental effects related to land use and planning from implementation of the proposed project. There is no reference to the fact that the Meadows at Bailey Canyon would create a Specific Plan that changes our Zoning Code and General Plan. Please address this significant fact and present a comprehensive analysis of the consequences. In addition, the entire section discussion and analysis of the Stonegate and Meadows Projects. Please provide discussion and analysis of the potential environmental effects related to land use planning for these two very significant projects for each of the subsections following.

Impact G-2 on p. V.G-13: Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purposes of avoiding or mitigating an environmental effect?

On p. V.G-16, the report states that new residential development would be required to comply with all applicable plans and regulations including the General Plan and the City’s Municipal Code. Based on this assertion, the report concludes on p. V.G-17 that impacts related to conflicts with land use plans, policies, and regulations would be less than significant and thus no mitigation is required. Similarly, it is inaccurately asserted on p. IV.A-14 that future development activities accommodated by the General Plan

**3 cont.**

Update would also be subject to the design standards and guidelines outlined in Title 17 (Zoning) of the City's Municipal Code.

The Meadows at Bailey Canyon project, however, would be a new residential development that is *not* required to comply with applicable plans and regulations, the General Plan or the City's Municipal Code.

The Meadows project would be governed instead by a Specific Plan that changes the City's Zoning Code and General Plan and conflicts with other local policies and ordinances with regard to, but not limited to the following found in this report:

Policy R3.2 at p. IV.C-14: the Meadows Project conflicts with this policy to 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 at p. IV.C-14: the Meadows Project conflicts with this policy to 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 at p. IV.C-15: the Meadows Project conflicts with the policy to 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 R4.1 at p. IV.C-15: The Meadows Project conflicts with the policy to raise awareness of Sierra Madre as an urban/wildlife interface where, as such, it is necessary for the residents to respect the wildlife, share space with wildlife, and to acknowledge the right of wildlife to pass within City limits undisturbed.

Policy R10.2 at p. IV.C-15: The Meadows Project conflicts with the policy to continue to develop tree preservation and protection measures. The Monastery project has over 100 mature trees that are on the road on Sunnyside that you see as you enter the Monastery grounds.

Impact C-5 at p. IV.C-23: The Meadows project would conflict with local policies and ordinances protecting biological resources, including tree preservation as it envisions the removal of trees as well as policies requiring that all access to hillside areas be designed for minimum disturbance to the natural features, and that consideration be given to the impact on wildlife. The impact analysis for this policy specifically identifies sites 1-4 and A-D and states that, "future development and/or redevelopment activities under the project on these sites would be required to comply with Chapter 12.20 (Tree Preservation) of the City's Municipal Code." There is no reference at all to the impact of The Meadows project.

**3 cont.**

Similarly, the report states that, “[t]he update to the Safety Element includes policies related to limiting risk from wildfire, including avoiding development in Very High Fire Severity Zones, updating maps related to fire hazards, and developing a Vegetation Management Program” while omitting any discussion of the impact of the Stonegate and Meadows at Bailey Canyon projects despite the fact that the Meadows project is in a Very High Fire Severity Zone. Please provide discussion and analysis to support the conclusion that impact would be less than significant given these facts.

**Objective Hz7: The Meadows project conflicts with this policy to avoid expanding development into undeveloped areas in Very High Severity Fire Zones. We know from the Meadows DEIR that there have been 75 fires within 5 miles of the proposed project land. Objective Hz7 must be adhered to in order to avoid seriously endangering public safety and existing home structures.**

Impact K-4: The Meadows project would result in inadequate emergency access for firefighting as well as search and rescue operations in contravention of this policy. Due to the significant size of the Meadows project it requires an additional ingress/egress at Carter Street. Failure to do so will result in a huge, catastrophic traffic block in the event of a fire, earthquake or other emergency.

Impact L-2: The Meadows project would result in insufficient water supplies to serve the project because it is based on the assumption that currently unavailable water will become available. As was recently disclosed in a planning commission meeting by the interim City Manager, purchasing water for 42 homes for 50 years is not an option, nor is it expected to become available anytime soon. Additionally, we are in the middle of the worst drought in California history, so why would the City want to exacerbate the dire water supply situation.

Impact A-1 at p. IV.A-12: The Meadows project would have a substantial impact on scenic vistas as it would destroy the meadows and hillside currently occupied by trees, plants, deer, birds, bears, bobcats, coyotes and other wildlife, significantly changing the existing visual quality and character of wildlife interface.

Impact A-3 at p. IV. A-13: The Meadows project would substantially degrade the existing visual character and quality of public views of the site and its surroundings and would conflict with applicable zoning and other regulations governing scenic quality.

Impact A-4 at p. IV.A-14: The Meadows project would create many new sources of substantial light and glare which would adversely affect day and nighttime views of the area.

**3 cont.**

IV. Environmental Impact Analysis A at p.IV.A-1 Aesthetics

This section of the EIR analyzes the potential environmental effects on aesthetic and visual impacts from implementation of the proposed project. The entire section omits discussion and analysis of the Stonegate and Meadows Projects. Please provide discussion and analysis of the potential environmental effects related to aesthetics for these two projects for each of the subsections listed herein.

V. Environmental Impact Analysis C at p. IV.C-1 Biological Resources

This section of the EIR analyzes the potential environmental effects on biological resources from implementation of the proposed project. The entire section omits discussion and analysis of the Stonegate and Meadows Projects. Please provide discussion and analysis of the potential environmental effects related to biological resources for these projects for each of the subsections below.

VI. Environmental Impact Analysis at p. IV.E-1 Geology and Soils

This section of the SEIR analyzes the potential environmental effects related to geology and soils, including paleontological resources, from implementation of the proposed project. The entire section omits discussion and analysis of the Meadows and Stonegate Projects. Please provide discussion and analysis of the potential environmental effects related to geology and soils for these projects for each of the subsections listed herein.

3 cont.

VII. Environmental Impact Analysis B at p. IV.B-1 Air Quality

This section of the Draft SEIR evaluates the potential for the Sierra Madre General Plan Update with the Housing Element 2021-2029 (Housing Element) to impact air quality in a local and regional context.

**Impact B-1 at p. IV.B-20: *Would the Project conflict with or obstruct implementation of the applicable air quality plan?***

**The report specifically identifies Stonegate and The Meadows at Bailey Canyon as projects when identifying “sensitive receptors,” but does not engage in substantive analysis of these two projects prior to concluding that “the future development associated with the Housing Element will not result in an inconsistency with the SCAQMD AQMP. Therefore, a less than significant impact will occur.” p. IV.B-20. *Please provide factual support, discussion and analysis for this conclusion.***

VIII. Environmental Impact p. IV.J.1-1 Public Services –Fire.

This section of the SEIR analyzes the potential environmental effects related to fire protection and emergency services from implementation of the proposed project. The

entire section omits discussion and analysis of the Stonegate and Meadows Projects. Please provide discussion and analysis of the potential environmental effects related to fire protection and emergency services for these two projects for each of the subsections listed herein. We know, according to the Meadows DEIR, that there have 75 fires within five miles of the proposed land for the Meadows project. Adding 42 additional homes adds to this severe fire risk.

IX. Environmental Impact Analysis J.2 at p. IV.J.2-1 Public Services—Police Protection.

This section of the SEIR analyzes the potential environmental effects related to police protection services from implementation of the proposed project. The entire section omits discussion and analysis of the Stonegate and Meadows Projects. Please provide discussion and analysis of the potential environmental effects related to police protection services for these two projects for each of the subsections listed herein.

IX. Environmental Impact Analysis J.3 at p.IV.J.3-1 Public Services-Schools

This section of the SEIR analyzes the potential environmental effects related to school services from implementation of the proposed project. The entire section omits discussion and analysis of the Stonegate and Meadows Projects. Please provide discussion and analysis of the potential environmental effects related to public services-schools for these two projects for each of the subsections listed herein.

X. Environmental Impact Analysis L.1 at p. L.1-1 Utilities-Water

This section of the SEIR analyzes the potential environmental effects related to water supply and infrastructure from implementation of the proposed project. The entire section omits discussion and analysis of the Stonegate and Meadows Projects. Please provide discussion and analysis of the potential environmental effects related to Utilities-Water for these two projects for each of the subsections listed herein.

XI. Environmental Impact Analysis L.2 at p. IV.L.2-1Utilities-Wastewater

This section of the SEIR analyzes the potential environmental effects related to utilities-wastewater services from implementation of the proposed project. The entire section omits discussion and analysis of the Stonegate and Meadows Projects. Please provide discussion and analysis of the potential environmental effects related to Utilities-Wastewater for these two projects for each of the subsections listed herein.

XII. Environmental Impact Analysis L.3 at p. IV.L3-1Utilities-Stormwater

**3 cont.**

This section of the SEIR analyzes the potential environmental effects related to stormwater infrastructure from implementation of the proposed project. The entire section omits discussion and analysis of the Stonegate and Meadows Projects. Please provide discussion and analysis of the potential environmental effects related to Utilities-Wastewater for these two projects for each of the subsections listed herein.

XIII. Environmental Impact Analysis L.5 at p. IV.L5-1Utilities-Energy

This section of the SEIR analyzes the potential environmental effects related to relocation, reconstruction, or expansion of energy (electricity and natural gas) infrastructure from implementation of the proposed project. The entire section omits discussion and analysis of the Stonegate and Meadows Projects. Please provide discussion and analysis of the potential environmental effects related to Utilities-Energy for these two projects for each of the subsections listed herein.

**3 cont.**

**Comment Letter No. 16**

Alex Arrieta  
645 Edgeview Drive  
Sierra Madre, CA 91024  
Alexanderander23@gmail.com

Response to Comment 16-1

The comment requests that the author be included on a notification list.

The comment requests that the public review period be extended. See Master Response 2—Public Review Period.

Response to Comment 16-2

The comment states that the City did not have a public informational discussion. The City held a Scoping Meeting on July 28, 2021 and held a public hearing on the project before the Planning Commission on September 16, 2021 with an additional hearing scheduled for October 7, 2021. Additionally, the City Council will meet to discuss this project on October 26, 2021.

Response to Comment 16-3

The comment states that there is no analysis of The Meadows project in the SEIR, including for land use, biological resources, public services, utilities, geology and soils, and aesthetics.

The comment states that the SEIR does not include factual support related to the Stonegate and The Meadows projects related to air quality analysis. For the analysis of air quality, energy, greenhouse gases, noise, and transportation, these projects were included to present a worst-case scenario. Factual support is provided in Section IV.B. Air Quality and Appendix B, Air Quality and Greenhouse Gas Emissions Report.

See Master Response 1—Scope of Environmental Analysis.

**Master Response 1—Scope of Environmental Analysis**

Sierra Madre has two residential subdivisions in various stages of development entitlement that will contribute towards addressing its future RHNA needs. The City choose to include the Stonegate and The Meadows projects in the Housing Element as the Stonegate project is an approved project for which the City is anticipating development in the next planning period and The Meadows is a pending project with a current in-progress application and an EIR out for public review. The proposed Meadows project is one of the largest projects ever proposed in the City's history, and if approved will contribute 42 new homes to the City's housing stock. While not relied upon to address the City's RHNA, the project, if approved, will assist in providing housing for above moderate-income households, and to the extent any homes add an accessory dwelling unit, may also provide housing for lower and moderate income households. To not include discussion of such a major project within the City's 8-year housing plan would be an omission. Therefore, these two projects were included in the Housing Element for full disclosure to the State HCD in their review of the Housing Element.

Even though these sites are not required to fulfill the City's RHNA, they were included in the EIR for informational purposes only. As approved and pending projects, these projects are considered as part of the future environmental baseline and not as part of the project for the non-technical analyses. For the analysis of air quality, energy, greenhouse gases, noise, and transportation, these projects are included to present a worst-case scenario.

See the 1 Carter Avenue Project Environmental Impact Report and The Meadows at Bailey Canyon Specific Plan Environmental Impact Report for analysis of these impacts.

**Master Response 2—Public Review Period**

Per Public Resources Code 1091, when a Draft SEIR is sent to the State Clearinghouse for review, the public review period must be 45 days unless the State Clearinghouse approves a shorter period no less than 30 days. The City provided a 49-day public review period for the Draft SEIR, which began on Monday, August 3, 2021 and ended on Tuesday, September 21, 2021. This public review period is in excess of what is required. Therefore, the City exceeded the CEQA requirements for public review.

### III. REVISIONS, CLARIFICATIONS, AND CORRECTIONS TO THE SEIR

---

This Section provides a complete overview of the changes to the Draft SEIR that have been incorporated into the Final SEIR in response to the comments submitted during the public review period. These changes are minor and do not add significant new information that would affect the analysis or conclusions presented in the Draft SEIR. More specifically, CEQA requires recirculation of a Draft SEIR only when “significant new information” is added to a Draft SEIR after public notice of the availability of the Draft SEIR has occurred (refer to California Public Resources Code Section 21092.1 and CEQA Guidelines Section 15088.5), but before the SEIR is certified. Section 15088.5 of the CEQA Guidelines specifically states: “New information added to an EIR is not ‘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. ‘Significant new information’ requiring recirculation includes, for example, a disclosure showing that:

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

CEQA Guidelines Section 15088.5 also provides that “[r]ecirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR... A decision not to recirculate an EIR must be supported by substantial evidence in the administrative record.”

As demonstrated in this Final SEIR, neither the comments submitted on the Draft SEIR, the responses to these comments, nor the corrections and additions presented in Chapter III of this Final SEIR, constitute new significant information warranting recirculation of the Draft SEIR as set forth in CEQA Guidelines Section 15088.5. Rather, the Draft SEIR is comprehensive and has been prepared in accordance with CEQA.

Page III-6, paragraph 1 of the SEIR is amended as follows:

- The Meadows at Bailey Canyon. The lower ~~20~~ 17.30 acres of the 88-acre Mater Dolorosa Passionist Retreat Center is being proposed for development with 42 detached single-family dwellings and a ~~3 to 3.5~~ 0.4 acres dedicated neighborhood park. ~~An additional 45 acres of hillside open space north of the Retreat Center is to be dedicated to the City of Sierra Madre.~~ The property is currently identified as an institutional land use in the General Plan, and is being proposed to be amended to include Open Space, Civic/City Park, Institutional, and One Family Residential (7,500 sq. ft. minimum) land use designations. The project is projected to go before

City Council ~~in August 2021~~, until the end of 2021 or sometime in 2022 and is not part of the rezone program proposed under the Housing Element.

# IV. MITIGATION MONITORING PROGRAM

---

## 1. INTRODUCTION

This Mitigation Monitoring Program (“MMP”) has been prepared pursuant to Public Resources Code Section 21081.6, which requires a Lead Agency to adopt a “reporting or monitoring program for changes to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment.” In addition, Section 15097(a) of the State CEQA Guidelines requires that a public agency adopt a program for monitoring or reporting mitigation measures and project revisions, which it has required to mitigate or avoid significant environmental effects. This MMP has been prepared in compliance with the requirements of CEQA, Public Resources Code Section 21081.6 and Section 15097 of the CEQA Guidelines.

The City of Sierra Madre is the Lead Agency for the project and therefore is responsible for administering and implementing the MMP. A public agency may delegate reporting or monitoring responsibilities to another public agency or to a private entity that accepts the delegation; however, until mitigation measures have been completed, the lead agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the program.

A SEIR has been prepared to address the potential environmental impacts of the project. The evaluation of the project’s impacts takes into consideration project design features and identifies mitigation measures to avoid or reduce potentially significant environmental impacts. This MMP is designed to monitor implementation of the project design features and mitigation measures identified for the project.

## 2. ORGANIZATION

As shown on the following pages, each required project design feature and mitigation measure for the proposed project is listed and categorized by impact area, with an accompanying identification of the following:

- **Monitoring Phase:** The phase of the proposed project during which the project design feature or mitigation measure shall be monitored;
- **Enforcement Agency:** The agency with the power to enforce the project design feature or mitigation measure;
- **Monitoring Agency:** The agency to which reports involving feasibility, compliance, implementation and development are made;
- **Monitoring Frequency:** The frequency at which the project design feature or mitigation measure shall be monitored; and
- **Action Indicating Compliance:** The action of which the Enforcement or Monitoring Agency indicates that compliance with the required project design feature or mitigation measure has been implemented.

## 3. MITIGATION MONITORING PROGRAM

Listed below are the required project mitigation measures and policies and procedures for implementation of the recommended project design features and mitigation measures. This Mitigation Monitoring Program (MMP) identifies the monitoring phase, the enforcement phase, and the applicable

department or agency responsible for ensuring that each recommended feature or measure is implemented.



**Table IV-1  
2021 Sierra Madre General Plan SEIR Mitigation Monitoring Program**

Environmental Impact	Mitigation Measures	Time Frame/Monitoring Milestone	Implementing/Responsible Party
	<p>Reclaimed water should be used whenever possible.</p> <ul style="list-style-type: none"> <li>• Cover all trucks hauling soil, sand, and other loose materials or require all trucks to maintain at least two feet of freeboard (i.e., the minimum required spaced between the top of the load and the top of the trailer).</li> <li>• Pave, apply water three times daily or as often as necessary to control dust, or apply (non-toxic) soil stabilizer on all unpaved access roads, parking areas, and staging areas at construction sites.</li> <li>• Sweep daily (with water sweepers using reclaimed water if possible), or as often as needed, all paved access roads, parking areas, and staging areas at the construction site to control dust.</li> <li>• Sweep public streets daily (with water sweepers using reclaimed water if possible) in the vicinity of the project site, or as often as needed, to keep streets free of visible soil material.</li> <li>• Hydroseed or apply non-toxic soil stabilizers to inactive construction areas.</li> <li>• Enclose, cover, water three times daily, or apply non-toxic soil binders to exposed stockpiles (dirt, sand, etc.)</li> </ul>		
<p><i>Impact B-3: Would the project expose sensitive receptors to substantial pollutant concentrations?</i></p>	<p><b>AQ-1: GP EIR MM 2-1.</b> If, during subsequent project-level environmental review conducted for individual development projects, construction-related criteria air pollutants are determined to have the potential to exceed the South Coast Air Quality Management District (SCAQMD) adopted thresholds of significance, the City of Sierra Madre Planning</p>	<p>Prior to issuance of grading and building permits</p>	<p>City of Sierra Madre Planning and Community Preservation Department, Public Works Department</p>

**Table IV-1  
2021 Sierra Madre General Plan SEIR Mitigation Monitoring Program**

Environmental Impact	Mitigation Measures	Time Frame/Monitoring Milestone	Implementing/Responsible Party
	<p>and Community Preservation Department shall require that applicants for new development projects incorporate mitigation measures as identified in the CEQA document prepared for the project to reduce air pollutant emissions during construction activities. Mitigation measures that may be identified during the environmental review include but are not limited to:</p>		
	<ul style="list-style-type: none"> <li>• Using construction equipment rated by the United States Environmental Protection Agency as having Tier 3 (model year 2006 or newer) or Tier 4 (model year 2008 or newer) emission limits, applicable to engines between 50 and 750 horsepower.</li> <li>• Ensuring construction equipment is properly serviced and maintained to the manufacturer’s standards.</li> <li>• Limiting nonessential idling of construction equipment to no more than five consecutive minutes.</li> <li>• 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. Reclaimed water should be used whenever possible.</li> <li>• Cover all trucks hauling soil, sand, and other loose materials or require all trucks to maintain at least two feet of freeboard (i.e., the minimum required spaced between the top of the load and the top of the trailer).</li> <li>• Pave, apply water three times daily or as often as necessary to control dust, or apply (non-toxic) soil stabilizer on all</li> </ul>	<p>During construction</p>	<p>Construction contractors, City of Sierra Madre Planning and Community Preservation Department, Public Works Department</p>

**Table IV-1  
2021 Sierra Madre General Plan SEIR Mitigation Monitoring Program**

Environmental Impact	Mitigation Measures	Time Frame/Monitoring Milestone	Implementing/Responsible Party
	<p>unpaved access roads, parking areas, and staging areas at construction sites.</p> <ul style="list-style-type: none"> <li>• Sweep daily (with water sweepers using reclaimed water if possible), or as often as needed, all paved access roads, parking areas, and staging areas at the construction site to control dust.</li> <li>• Sweep public streets daily (with water sweepers using reclaimed water if possible) in the vicinity of the project site, or as often as needed, to keep streets free of visible soil material.</li> <li>• Hydroseed or apply non-toxic soil stabilizers to inactive construction areas.</li> <li>• Enclose, cover, water three times daily, or apply non-toxic soil binders to exposed stockpiles (dirt, sand, etc.)</li> </ul>		
<b>Biological Resources</b>			
<p><i>Impact C-1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?</i></p>	<p><b>BIO-1: Focused Bat Surveys.</b> Prior to any demolition activities, a bat survey shall be conducted by a qualified biologist. Where project-related implementation, construction, and activities would occur near potential roosting habitat for bats, such as buildings or tall trees, a qualified bat specialist shall conduct bat surveys within these areas (plus a 100-foot buffer as access allows) to identify potential habitat that could provide daytime and/or nighttime roost sites, and any maternity roosts. Surveys should be conducted using acoustic recognition technology to maximize detection of bats. A discussion of survey results, including negative findings should be provided to the City. Depending on the survey results, a qualified bat specialist</p>	<p>Prior to issuance of demolition permits</p>	<p>City of Sierra Madre Planning and Community Preservation Department, Public Works Department</p>

**Table IV-1  
2021 Sierra Madre General Plan SEIR Mitigation Monitoring Program**

Environmental Impact	Mitigation Measures	Time Frame/Monitoring Milestone	Implementing/Responsible Party
	<p>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. 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 demolition, ground-disturbing activities, or vegetation removal at or near locations of roosting habitat for bats.</p> <p>If bats are not detected, but the bat specialist determines that roosting bats may be present at any time of year and could roost at a given location, species specific mitigation measures shall be required to reduce impacts to below a level of significance. If maternity roosts are found, to the extent feasible, 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).</p> <p>If maternity roosts are found and the City determines that impacts are unavoidable, a qualified bat specialist should conduct a preconstruction survey. Acoustic recognition technology should be used to maximize the detection of bats. Each tree identified as potentially supporting an active maternity roost should be closely inspected by the bat specialist no more than 7 days prior to tree disturbance to determine the presence or absence of roost bats more precisely. If maternity roosts are detected, trees/structures determined to be maternity roosts should be left in place until the end of the maternity season. Work should not occur within 100 feet of or directly under or adjacent to an active roost. Work should also not occur between 30 minutes</p>		

**Table IV-1  
2021 Sierra Madre General Plan SEIR Mitigation Monitoring Program**

Environmental Impact	Mitigation Measures	Time Frame/Monitoring Milestone	Implementing/Responsible Party
	before subset and 30 minutes after sunrise.		
<p><i>Impact C-1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?</i></p>	<p><b>BIO-2: Nesting Bird and Raptor Surveys.</b> Ground-disturbing activities (e.g., mobilizing, staging, drilling, and excavating) and vegetation removal shall 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.</p> <p>Surveys shall be conducted 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 shall be expanded to 500 feet and 0.5 mile for special status species, if feasible. Project personnel, including all contractors working on site, shall 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.</p>	<p>During application process and prior to issuance of grading and building permits</p>	<p>Applicant/contractor, City of Sierra Madre Planning and Community Preservation Department, Public Works Department</p>
<b>Cultural Resources</b>			
<p><i>Impact D-1: Would the project create a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?</i></p>	<p><b>CUL-1: GP EIR MM 5.4-1.</b> Prior to any construction activities of individual projects that may affect historic resources, a historic resources technical assessment/study shall be performed by an architectural historian or historian who meets the Secretary of the Interior’s Professional Qualifications Standards requirements in architectural history or history; the technical assessment/study shall be submitted to the City of Sierra Madre for review and approval. The technical assessment/study shall include a records search at the South Central Coastal Information Center to determine if</p>	<p>During application process and prior to issuance of grading and building permits</p>	<p>City of Sierra Madre Planning and Community Preservation Department, Public Works Department</p>

**Table IV-1  
2021 Sierra Madre General Plan SEIR Mitigation Monitoring Program**

Environmental Impact	Mitigation Measures	Time Frame/Monitoring Milestone	Implementing/Responsible Party
	<p>any resources that may potentially be affected by the project have been previously recorded, evaluated, and/or designated on the National Register of Historic Places or California Register of Historic Resources, or any other state or local historic resources registry/database. Following the records search, the qualified architectural historian or historian shall conduct a reconnaissance-level and/or intensive-level survey in accordance with the California Office of Historic Preservation guidelines to identify any previously unrecorded potential historic resources that may potentially be affected by the proposed project. If the resource meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code Section 5024.1, Title 14 CCR, Section 4852), mitigation shall be identified within the technical study that ensures the value of the historic resource is maintained.</p> <p>To ensure that individual projects requiring the relocation, rehabilitation, or alteration of a historic resource do not impair its significance, the Secretary of the Interior’s Standards for the Treatments of Historic Properties (Standards) shall be used. The application of the standards shall be overseen by a qualified architectural historian or historic architect meeting the Secretary of the Interior’s Professional Qualifications Standards. Prior to any construction activities that may affect the historic resource, a report identifying and specifying the treatment of character-defining features and construction activities shall be provided to the City of Sierra Madre.</p> <p>If an individual project would result in the demolition or significant alteration of a historic resource, it cannot be mitigated to a less than significant level. However, recordation of the resource prior to construction activities</p>		



**Table IV-1  
2021 Sierra Madre General Plan SEIR Mitigation Monitoring Program**

Environmental Impact	Mitigation Measures	Time Frame/Monitoring Milestone	Implementing/Responsible Party
	<p>devegetation, etc.), the construction contractor shall ensure that all work stops within 25 feet of the find until the qualified archaeologist can assess the significance of the find and, if necessary, shall develop appropriate treatment or disposition of the resources in consultation with the City of Sierra Madre and representatives of any affected Native American tribes. The archaeologist monitor, in coordination with the construction contractor, shall have the authority to halt any project-related activities that may be adversely impacting potentially significant cultural resources. Suspension of ground disturbances in the vicinity of the discoveries shall not be lifted until an archaeologist monitor has evaluated the discoveries to assess whether they are classified as significant cultural resources, pursuant to the California Environmental Quality Act.</p> <p>If the archaeological resources are found to be significant, then the project applicant shall be required to perform data recovery, professional identification, radiocarbon dates as applicable, and other special studies; submit materials to the California State University, Fullerton; and provide a comprehensive final report to the City including appropriate records for the California Department of Parks and Recreation (Building, Structure, and Object Record; Archaeological Site Record; or District Record, as applicable). Any materials meeting significant criteria under CEQA should be donated to the County of Los Angeles or an accredited repository such as the Natural History Museum of Los Angeles County. Materials including isolates that do not meet those criteria may be offered to the Sierra Madre Historical Preservation Society or local school district for educational use.</p>		<p>Preservation Department, Public Works Department</p>



**Table IV-1  
2021 Sierra Madre General Plan SEIR Mitigation Monitoring Program**

Environmental Impact	Mitigation Measures	Time Frame/Monitoring Milestone	Implementing/Responsible Party
	professional identification, radiocarbon dates as applicable, and other special studies; submit materials to the California State University, Fullerton; and provide a comprehensive final report to the City including appropriate records for the California Department of Parks and Recreation (Building, Structure, and Object Record; Archaeological Site Record; or District Record, as applicable). Any materials meeting significant criteria under CEQA should be donated to the County of Los Angeles or an accredited repository such as the Natural History Museum of Los Angeles County. Materials including isolates that do not meet those criteria may be offered to the Sierra Madre Historical Preservation Society or local school district for educational use.		
<b>Geology and Soils</b>			
<i>Impact E-6: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?</i>	<p><b>GEO-1: GP EIR MM 5.4-2.</b> In the event that paleontological resources (sites, features, artifacts, or fossilized remains) are exposed during construction activities, the City of Sierra Madre shall be notified immediately and all work shall cease within a 50-foot radius of the discovery. A qualified paleontologist shall determine whether additional study shall be warranted. Construction activity may continue unimpeded on other portions of the project site. Personnel of the project shall not collect or move any paleontological materials and associated materials. The found deposits shall be treated in accordance with Federal, State, and local guidelines, including those set forth in PRC Section 21083.2. Any significant fossils collected during project-related excavations shall be prepared to the point of identification and curated into an accredited repository with retrievable storage.</p> <p>The qualified paleontologist shall prepare a final monitoring</p>	During construction	Construction contractors, City of Sierra Madre Planning and Community Preservation Department, Public Works Department

**Table IV-1  
2021 Sierra Madre General Plan SEIR Mitigation Monitoring Program**

Environmental Impact	Mitigation Measures	Time Frame/Monitoring Milestone	Implementing/Responsible Party
	and mitigation report for submittal to the City in order to document the results of the monitoring effort and any discoveries. If there are significant discoveries, fossil locality information and final disposition shall be included with the final report which shall be submitted to the appropriate repository and the City.		
<b>Noise</b>			
<i>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?</i>	<p><b>NOI-1: GP EIR MM 5.10-5.</b></p> <p><b>10-1.</b> Construction contractors shall:</p> <ol style="list-style-type: none"> <li>1. Require that construction vehicles and equipment (fixed or mobile) be equipped with properly operating and maintained mufflers.</li> <li>2. Restrict haul routes and construction-related traffic.</li> <li>3. Place stock piling and/or vehicle-staging areas as far as practical from residential uses.</li> <li>4. Replace audible backup warning devices with strobe lights or other warning devices during evening construction activity to the extent permitted by the California Division of Occupational Safety and Health.</li> <li>5. Reduce nonessential idling of construction equipment to no more than five minutes.</li> <li>6. Consider the installation of temporary sound barriers for construction activities that are adjacent to occupied noise-sensitive structures when construction activity with multiple pieces of equipment occurs within 50 feet of a sensitive</li> </ol>	During construction	Construction contractors, City of Sierra Madre Planning and Community Preservation Department, Public Works Department

**Table IV-1  
2021 Sierra Madre General Plan SEIR Mitigation Monitoring Program**

Environmental Impact	Mitigation Measures	Time Frame/Monitoring Milestone	Implementing/Responsible Party
	property line. Barriers should block the line of sight.		
<i>Impact H-2: Would the project generate excessive groundborne vibration or groundborne noise levels?</i>	<p><b>NOI-2: GP EIR MM 5.10-6</b></p> <p><b>10-2.</b> Individual development projects that involve vibration-intensive construction activities—such as blasting, pile drivers, jack hammers, and vibratory rollers—within 200 feet of sensitive receptors shall be evaluated for potential vibration impacts. A construction-related vibration study shall be conducted for individual development projects where vibration-intensive impacts may occur. If construction-related vibration is determined to be perceptible at vibration-sensitive uses, additional requirements, such as use of less-vibration-intensive equipment or construction techniques, shall be implemented during construction (e.g., nonexplosive blasting methods, drilled piles as opposed to pile driving, etc.).</p>	During application process and prior to issuance of grading and building permits	City of Sierra Madre Planning and Community Preservation Department, Public Works Department
<b>Transportation</b>			
<i>Impact K-2: Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?</i>	A TDM program would be implemented as part of each opportunity site’s mitigation program aimed at further reducing VMT and vehicular trips to each Project Site through transportation services. The TDM Program would be intended to promote non-automobile travel and the reduction of single occupancy vehicle trips. As the individual development projects are submitted to the City, the TDM program for each opportunity site would be subject to review and approval by the City. The individual site TDM programs analyzed for the analysis would include various combinations of the Tier 4 TDM measures listed on the bottom of Table IV.K-1. These strategies include school carpool programs, marketing and education, telecommuting and alternative work schedules,	During application process and prior to issuance of grading and building permits	City of Sierra Madre Planning and Community Preservation Department, Public Works Department

**Table IV-1  
2021 Sierra Madre General Plan SEIR Mitigation Monitoring Program**

Environmental Impact	Mitigation Measures	Time Frame/Monitoring Milestone	Implementing/Responsible Party
	<p>neighborhood schools, unbundled parking costs, and bike share programs. Each of these strategies is explained briefly below.</p> <p><b>TDM Mitigation Strategies</b></p> <p><b>School Carpool Programs</b></p> <p>The individual site’s TDM program would provide services to match residents to establish carpools to provide the potential for school-aged children to carpool to and from school and reduce the number of vehicle trips to and from each Site.</p> <p><b>Marketing and Education</b></p> <p>The TDM program would provide informational services to opportunity site residents to educate them on the various non-automobile travel modes available in the area. Generally, this program consists of an informational kiosk in the development with information on accessible transit, bike, and ride-sharing services.</p> <p><b>Telecommuting and Alternative Work Schedules</b></p> <p>The TDM program would encourage or incentivize working from home and/or alternative work schedules that reduce the potential for employees to travel to work thereby reducing the number of vehicle trips to and from the Project Site.</p> <p><b>Provision of Neighborhood Schools</b></p> <p>The TDM program would encourage opportunity site residents to send children to local schools rather than out-of-area schools to reduce travel distance of trips between the</p>		

**Table IV-1  
2021 Sierra Madre General Plan SEIR Mitigation Monitoring Program**

Environmental Impact	Mitigation Measures	Time Frame/Monitoring Milestone	Implementing/Responsible Party
	<p>Sites and schools.</p> <p><b>Unbundling Parking Costs</b></p> <p>The individual site’s TDM Program would unbundle the parking costs from the rental/sale price of the multifamily unit. The parking space monthly rental or purchase price would be separated from the unit monthly rental or purchase price. Research has shown that the number of vehicles per household decreases when the tenants/owners realize the actual costs of the parking spaces fr residential units and the overall VMT form that unit decreases.</p> <p><b>Bike Share Programs</b></p> <p>The individual site’s TDM program would provide either financial assistance or physical space to help establish or expand a City-wide bike share program.</p>		
<b>Utilities and Service Systems</b>			
<p><i>Impact L-2: Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?</i></p>	<p><b>UT-1: GP EIR MM 13-1.</b> The City of Sierra Madre shall apply the city’s water conservation measures and policies (including those of the General Plan Update) to all development proposals (new development and redevelopment) and encourage water conservation in construction and landscape design.</p> <p><b>UT-2: GP EIR MM 13-2.</b> The City of Sierra Madre shall promote energy efficiency and water conservation upgrades to existing non-residential buildings at the time of major remodel or additions.</p> <p><b>UT-3: GP EIR MM 13-3.</b> The City of Sierra Madre shall</p>	<p>During application process and prior to issuance of grading and building permits</p>	<p>City of Sierra Madre Planning and Community Preservation Department, Public Works Department</p>

**Table IV-1  
2021 Sierra Madre General Plan SEIR Mitigation Monitoring Program**

Environmental Impact	Mitigation Measures	Time Frame/Monitoring Milestone	Implementing/Responsible Party
	<p>evaluate development proposals (new development and redevelopment) for consistency with the 2020 Green Building Standards Code (adopted by reference in Chapter 15.30 [Green Building Standards Code] of the City’s Municipal Code.</p> <p><b>UT-4: GP EIR MM 13-4.</b> The City of Sierra Madre shall evaluate development proposals (new development and redevelopment) for consistency with the city’s Water Efficient Landscape Ordinance (Chapter 15.60 of the city’s Municipal Code) and Low Impact Development Ordinance (integrated within Section 15.04.070 [Stormwater Retention] of the city’s Municipal Code) to ensure that development proposals incorporate all necessary and feasible water conservation measures.</p> <p><b>UT-5: GP EIR MM 13-5.</b> The City of Sierra Madre shall require that all development proposals (new development and redevelopment) demonstrate a sufficient and sustainable water supply (i.e., provision of a “will serve” letter from the city’s Water Division) prior to approval of the development proposal, consistent with the requirement of the city’s Water Division.</p> <p><b>UT-6: GP EIR MM 13-6.</b> The City of Sierra Madre shall encourage project applicants/developers of development proposals (new development and redevelopment), where feasible, to retain stormwater for onsite use and thereby offset the use of other water sources.</p> <p><b>UT-7: GP EIR MM 13-7.</b> The City of Sierra Madre shall monitor development growth and coordinate with the city’s Water Division to ensure that long-range needs for potable water will be met.</p>		

**Table IV-1  
2021 Sierra Madre General Plan SEIR Mitigation Monitoring Program**

Environmental Impact	Mitigation Measures	Time Frame/Monitoring Milestone	Implementing/Responsible Party
	<p><b>UT-8: GP EIR MM 13-8.</b> If water supplies are reduced from projected levels due to drought, emergency, or other unanticipated events, the City of Sierra Madre shall take appropriate steps to limit, reduce, or otherwise modify growth permitted by the General Plan Update in consultation with the city’s Water Division to ensure adequate long-term supply for existing businesses and residents.</p> <p><b>UT-9: GP EIR MM 13-9.</b> The City of Sierra Madre shall conduct a periodic assessment of the city’s water conservation measures and policies based on water supply changes, droughts, and environmental issues (e.g. contamination of potable water).</p> <p><b>UT-10: GP EIR MM 13-10.</b> The City of Sierra Madre shall promote programs for retrofitting plumbing, providing cost rebates, identifying leaks, changing landscaping, irrigating efficiently and other methods of reducing water consumption by existing users.</p> <p><b>UT-11: GP EIR MM 13-11.</b> The City of Sierra Madre shall assess the water use by city buildings and facilities (e.g. City Hall, parks) and reduce water consumption to the maximum extent practicable.</p> <p><b>UT-12: GP EIR MM 13-12.</b> The City of Sierra Madre shall develop an information sharing program in cooperation with the city’s Water Division to make appropriate data available to the public pertaining to water supply and water use in Sierra Madre.</p>		

EcoTierra Consulting, 2021.