
APPENDIX H

PUBLIC COMMENTS RECEIVED ON INITIAL STUDY

----- Original message -----

From: Serena Burnett <serena.burnett@verizon.net>

Date: 3/17/20 12:29 PM (GMT-08:00)

To: tnelson@cityofbradbury.org

Cc: 'Serena Burnett' <serena.burnett@verizon.net>

Subject: EXTERNAL: Comments regarding the Chadwick Ranch Estates

Hello Trayci –

As a local resident and a member of Bradbury's safety committee, I have a few concerns about the Chadwick Ranch Estates:

1. Are the planned roads easily accessible by first responders? Are they wide enough for firefighting equipment and residents to pass safely?
2. Is any type of mitigation being offered to the community by the developers to enhance the community?
3. Are there enough fire hydrants planned and can the Bradbury water supply support additional firefighting efforts for that area?
4. Is additional brush clearance beyond what is required by the Fire Dept. needed to make the area safe for residential properties?

Also, relating to wildlife, I have the following concerns:

1. How does this development effect wildlife corridors? Are we creating situations where we are blocking off the ability of animals to naturally migrate? Will existing wildlife pose a problem to the new residents if this project is set farther back into the foothills?

Thank you for taking the time to review these questions.

Serena Burnett, Paralegal
(818) 802-9484

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

From: Paul Novak <pnovak@lalafco.org>

Sent: Tuesday, March 17, 2020 2:49 PM

To: tnelson@cityofbradbury.org

Cc: Adriana Romo <aromo@lalafco.org>

Subject: EXTERNAL: Chadwick Ranch Estates

Ms. Nelson:

This is Paul Novak of LAFCO.

Thank you for sending me the NOP for this project.

I would request that the EIR address any potential sphere of influence amendments and/or potential annexations to the Bradbury Estates CSD and/or a water district or county sanitation district. If any arrr requires, LAFCO should be designated as a responsible agency.

Thank you.

- Paul

Sent from my iPhone

17 March 2020

Dear Ms. Nelson, Bradbury City Council, and fellow Bradbury residents,

I am writing to voice my strong objection to the planned Chadwick Ranch Estates development. Bradbury and the San Gabriel Valley does not need this development, which, as the Initial Study notes, is expected to provide new housing for a negligible 40-50 people on fourteen lots within its 112 acres. Chadwick Estates is being pitched unabashedly to the billionaire elite; the Offering Memorandum from WD Land promises not livable homes but “a once in a lifetime opportunity to build a unique trophy residential compound” among “large ultra-luxury multi-million-dollar homes” owned by “the world’s rich and famous with billionaire residents”. In exchange for these fourteen “trophy compounds”, the existing Bradbury community is being asked to sacrifice much of our precious open space, irreversibly degrading our local wilderness and straining our limited resources.

Besides the lack of any justification for this development (beyond the profit motive), practical concerns include the loss of prime native habitat, coupled with the extreme fire vulnerabilities of encroaching deeper into the urban-wildland interface. As the Initial Study notes, the entire area is “a very high fire severity zone.” In addition, the per capita resource footprint for these compounds would far exceed Bradbury’s average, let alone that of adjacent communities. Water is of particular concern – the demand for the inevitable large pools and landscape irrigation, plus the unknown number of bathrooms per unit, is bound to strain already-tight resources. I note from the Initial Study that California American Water is committed to dig a well to support the needs of this development, yet the site of this well, let alone any guarantee of its initial and long-term productivity, has not been determined. The Initial Study also states that this well will be drilled in Duarte, and that the City of Duarte must give its approval. What is the likelihood, in this age of chronic drought and depleted water tables, that Duarte will approve a well to support a new billionaire’s enclave in Bradbury? The Initial Study also notes that “pad areas” for the houses are proposed from 20,000 to 49,000 square feet - the footprint of such gargantuan mansions will destroy Bradbury’s rural essence while also degrading the adjacent wilderness areas of Monrovia and Duarte. Given that these mansions will be likely be multistory, the impact of fourteen such compounds on foothill views boggles the mind. Such environmental

and resource issues, along with many more significant impacts as noted in the Initial Study, point to years of negotiations and potential litigation involving the City of Bradbury, for a development that is clearly not in the best interests of Bradbury's current residents.

Also, no one could argue that the development is required from a housing demand perspective, even for its targeted ultrawealthy customers. If there are indeed fourteen billionaires desiring to own a trophy in "exclusive" Bradbury, they already have numerous options. Many large multi-million dollar homes have stagnated on the market for extended periods, with prices dropping over time. As of this evening (3/17/20), Zillow lists 11 mansions (or vacant lots) in Bradbury priced above \$3 million, up to \$15 million. As but one example of the slow market, I purchased my home at 6 Bradbury Hills Rd early in 2019. This is a desirable home on a large lot with spectacular views, yet it was on the market for more than a year before I bought it at far below the initial asking price (to live in, not tear down). Clearly, if market demand were high, my property would have been snapped up for a teardown and new mansion. In addition, the large empty lot adjacent to me at 8 Bradbury Hills Rd was also on the market for an extended period before being sold for \$1.55 million in July. And as you are aware, the large lot at Winston and Royal Oaks Drive remains to be developed into several new mansions. The new large home on Winston just north of City Hall as well as the new construction north of the bike path are examples of megamansions that were built without destroying precious hillside open space. Surely the desire of fourteen investors to claim a Bradbury address can be accommodated by the existing pool of homes and vacant lots without loss of our remaining open space.

In summary, in contrast to the prospectus from WD Land, Bradbury is not (only) for "the world's rich and famous", "the youngest female billionaire", the "third richest man in China", etc. Their prospectus pitches Chadwick Ranch Estates as a US investment for uberwealthy foreign investors, and highlights elite private schools miles away on the westside, while the local "Amenities Map" is also concentrated in LA and on the westside (the Getty is noted but the Huntington is not). Clearly, these "trophy residential compounds" will be occupied by people who will not become part of the fabric of the local Bradbury/Duarte/Monrovia community.

Also, the approval of one such billionaire's development does nothing to address the real issues of housing access for working families. Given Bradbury's goal of "Preserving Rural Tranquility", this will always be a challenge, yet these trophy estates are a giant step in the wrong direction. Approval of these estates will certainly pave the way for more development of our pristine hillsides – not only in Bradbury, but in other foothill communities. Such development is not inevitable; Monrovia's Hillside Wilderness Preserve sets a fine example for the importance of curbing development in the foothills. If Monrovia had and has the vision and resources to achieve this level of open space protection, certainly Bradbury can do the same.

I find it ironic that the WD Land prospectus notes that "The property is the last remaining vacant land parcel in Bradbury Estates" (which is untrue), and also, without a trace of irony, states that the Chadwick family "remain excellent stewards of the land." Although I do not know the financial rationale behind their desiring such a large development, I urge the Chadwick family to consider a conservancy arrangement to protect ALL their wilderness land in perpetuity.

In summary, if this project is allowed to proceed, it will irreversibly damage the rural/wilderness character of Bradbury, as well as significantly burden already stretched water and emergency response resources. Therefore, I strongly recommend against approval of the Chadwick development. The recent dramatic economic downturn should highlight the folly of destroying precious open space to provide trophy estates for a handful of billionaires. I hope that the desires of the Bradbury community at large, those of us who live in and love Bradbury not as a trophy address, but for its "rural tranquility", will prevail.

Thank you.

A handwritten signature in black ink, reading "David Szymkowski". The signature is fluid and cursive, with the first name "David" and last name "Szymkowski" clearly legible.

David Szymkowski
6 Bradbury Hills Road
Bradbury
Phone 626 512 9731
Email david.szymkowski@gmail.com

My name is Andrew Raubitschek. I come here tonight with my neighbors from the MESA side of Spinks Canyon. We are here to express our concerns about the Chadwick development. Many of our concerns are presented in the Initial Study for the Chadwick Ranch Estates. We would like to emphasize three areas of importance for the residences on the Duarte side of Spinks Canyon.

First, this area has been designated as a high-risk fire zone by the county of Los Angeles. In 2016 we were forced to evacuate because of neighboring fires in the area. We have been told that this area has not burned in recent history making it at extremely high risk in the upcoming fire season. The land between the Chadwick property and the MESA residences is occupied by the Duarte Wilderness Preserve. There are many dead trees and debris in the area posing a significant fire risk. A forest fire in this area would not only pose a risk from the fire but also subsequent flooding and mudslides in the aftermath. The Initial Study sites 4 potentially significant areas of concern.

Second, the Chadwick Ranch is part of the watershed for two rivers, the Los Angeles River and the San Gabriel River. The proposed development with major land excavation would contribute negatively to this vital role. The proposed new septic system, at a time when California is considering outlawing such systems, would also have a major impact. The Initial Study sites 7 significant problems with hydrology and water quality.

Third, this area has been used as sediment disposal site. The planned development would move tons of earth to flatten the terrain and contribute to the instability of the area. This would be especially critical in the aftermath of fire and subsequent flooding. Damage to the hillside would have a significant impact on the wildlife, requiring decades to recover. The old sediment site remains a scar on the hillside which after more than 30 years is just now supporting plant growth. The initial study sites 9 potential significant issues.

I marveled at the suggestion that this would be good horse property, given the slope it would be more appropriate to utilize pack mules.

Tract 9 and 10 in the proposed development border on the Duarte Wilderness Preserve. In addition, Lot E, Lot F and Lot G are designated as desilting basins also bordering on the Duarte Wilderness Preserve.

The City of Duarte enacted an ordinance to prevent development of their hillsides in the late 1990s. This ordinance was converted into a more permanent solution when Duarte was able to obtain state funds to buy the property and convert it into the Duarte Wilderness Preserve in 2005.

I would hope that Bradbury would be able to mount a similar proposal, given the support of Portantino and Chu for such projects. I am sure that the Duarte officials who were responsible for the establishment of the Duarte Wilderness Preserve would be of assistance.

On a final note I wonder if either Bradbury or Chadwick understood the importance of this land and protected it from future development into multiple home sites?



NATIVE AMERICAN HERITAGE COMMISSION

March 2, 2020

MAR 09 2020

CHAIRPERSON
Laura Miranda
Luiseño

Trayci Nelson
City of Bradbury
600 Winston Avenue
Bradbury, CA 91008

Re: 2020020548, Chadwich Ranch Estates Project, Los Angeles County

VICE CHAIRPERSON
Reginald Pagaling
Chumash

Dear Ms. Nelson:

SECRETARY
Merri Lopez-Keifer
Luiseño

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit. 14, § 15064.5 (b) (CEQA Guidelines § 15064.5 (b))). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines § 15064 (a)(1))). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

PARLIAMENTARIAN
Russell Attebery
Karuk

COMMISSIONER
Marshall McKay
Wintun

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

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William Mungary
Paiute/White Mountain
Apache

COMMISSIONER
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Pomo

COMMISSIONER
Julie Tumamait-Stenslie
Chumash

COMMISSIONER
[Vacant]

EXECUTIVE SECRETARY
Christina Snider
Pomo

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov
NAHC.ca.gov

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:

Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

- a. A brief description of the project.
- b. The lead agency contact information.
- c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
- d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report:

A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).

- a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

- a. Alternatives to the project.
- b. Recommended mitigation measures.
- c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).

4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:

- a. Type of environmental review necessary.
- b. Significance of the tribal cultural resources.
- c. Significance of the project's impacts on tribal cultural resources.
- d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

- a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
- b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:

- a.** The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
- b.** A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).

8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).

9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).

10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:

- a.** Avoidance and preservation of the resources in place, including, but not limited to:
 - i.** Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii.** Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
- b.** Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i.** Protecting the cultural character and integrity of the resource.
 - ii.** Protecting the traditional use of the resource.
 - iii.** Protecting the confidentiality of the resource.
- c.** Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
- d.** Protecting the resource. (Pub. Resource Code §21084.3 (b)).
- e.** Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
- f.** Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).

11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:

- a.** The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
- b.** The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
- c.** The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
 - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
 - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, § 15064.5(f) (CEQA Guidelines § 15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
 - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
 - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code § 7050.5, Public Resources Code § 5097.98, and Cal. Code Regs., tit. 14, § 15064.5, subdivisions (d) and (e) (CEQA Guidelines § 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address:
Andrew.Green@nahc.ca.gov.

Sincerely,



Andrew Green
Staff Services Analyst

cc: State Clearinghouse

From: Toan Duong <TDUONG@dpw.lacounty.gov>

Date: 3/19/20 6:18 PM (GMT-08:00)

To: tnelson@cityofbradbury.org

Cc: Jose Suarez <JSUAREZ@dpw.lacounty.gov>, Jose Cruz <JoCruz@dpw.lacounty.gov>, Long Thang <LTHANG@dpw.lacounty.gov>

Subject: EXTERNAL: Chadwick Ranch Estate NOP-DEIE time extension

Ms. Trayci Nelson,

This project is under review by Los Angeles County Public Works. The comment deadline is 03/30/2020. Due to the COVID-19 pandemic shut down and delay, I would like to ask for a 30 days time extension to respond to the NOP-DEIR of the subject project. Thank you for your consideration.

Toan Duong
Civil Engineer
Los Angeles County Public Works
626-458-4921

From: CITY OF BRADBURY <email@blackboard.com>
Sent: Monday, March 23, 2020 3:15 PM
To: Kevin Kearney <kkearney@cityofbradbury.org>
Subject: Bradbury Updates



Dear Bradbury Resident,

This email serves to update you on the change of hours for the City's Building and Planning services and to provide you with information on the extension of the comment period for the Chadwick Ranch Estates development project. Bradbury City Hall will be maintaining regular hours: Monday through Friday, 8:30 a.m. to 5:00 p.m.

The City of Bradbury wishes you and your family much health, security, and happiness during these times of uncertainty.

Building & Planning: Change of Hours

In an effort to protect City Hall employees, residents, and visitors alike, the following changes to the City of Bradbury's Building and Planning hours are effective immediately:

- Planning Department: Tuesdays, 8:30 a.m. to 11:00 a.m.
- Building Department: Wednesdays & Thursdays, 8:30 a.m. to 11:00 a.m.
- Building Inspections: Wednesdays & Thursdays, After 11:00 a.m.

Chadwick Ranch Estates Development

Given the current situation with COVID-19, the comment period for the Chadwick Ranch Estates Development has been extended. Please send responses **no later than April 30, 2020** to Ms. Trayci Nelson, Project Manager at tnelson@cityofbradbury.org or in writing at Bradbury City Hall, 600 Winston Avenue, Bradbury, CA 91008. Please keep checking the project website for updates, which can be accessed by clicking [here](#)

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3250 Wilshire Blvd
Suite #1106,
Los Angeles, CA 90010



(213) 387-6528 phone
(213) 387-5383 fax
www.sierraclub.org

San Gabriel Valley Task Force
March 24, 2020

To: Ms. Trayci Nelson
Project Manager
tnelson@cityofbradbury.org
(562) 200-7180

From: Joan Licari, Chair, San Gabriel Valley Task Force of Angeles Chapter of Sierra Club

RE: Initial Study (IS) Chadwick Ranch Estates, Feb. 2020

Dear Ms. Nelson:

The San Gabriel Task Force of the Angeles Chapter of Sierra Club thanks the City of Bradbury for the opportunity to submit the following scoping comments for the Initial Study (IS) of the Chadwick Ranch Estates, Feb. 2020.

The San Gabriel Valley Task Force was organized by the Angeles Chapter of the Sierra Club in 1999 to work with San Gabriel Valley cities and political leaders to seek ways to create a more livable environment for valley residents while preserving or improving natural habitat. Since that time, we have worked with cities of the San Gabriel Valley and Los Angeles County/Orange County to create projects that promote low impact outdoor recreation along the urban rivers in San Gabriel Valley, and to preserve natural habitats in foothills of the San Gabriel Mountains and the Puente-Chino Hills.

We regret the necessity of cancelling the Scoping meeting originally planned for Mar. 18, 2020 due to the Coronavirus disease (COVID-19). That meeting would have been an opportunity for interested parties and the public an opportunity to discuss the proposal, issues, and/or ask questions with consultants and City representatives that must be addressed in the DEIR. Because of this cancellation, we believe the comment period for the Initial Study should be extended and somehow a presentation (PowerPoint perhaps) be posted on the website if the limitations to avoid meetings are not be rescinded soon (not likely).

The Chadwick Ranch Estates includes 14 numbered estate residential lots and 14 lettered non-residential lots. The proposed project includes a site access roadway extending from the intersection of Bliss Canyon Road/Long Canyon Road, an on-site backbone circulation system, as well as requisite infrastructure, including a water tank, a booster station, a debris and water quality basin, among others. Easements for a portion of the site access roadway will be required

from the Los Angeles County Flood Control District (LACFCD). The 111.8-acre project has been designated in such a manner that more than half of the land area of the site will remain undisturbed. The applicant indicates an intent to ultimately dedicate this area to a conservancy to be named.

Comments: We provide the following comments and concerns that must be addressed in the DEIR:

A complete study of the environment surrounding this project and relationships to the project area, the San Gabriel Mountains National Monument, other nearby conservancies already in the foothills of the San Gabriel Mountains, as well as relationships/impact to the proposed of Rim of the Valley Corridor. The latter was passed by the House of Representatives on Feb. 19, 2020. Are there connections between the project area through surrounding cities into the San Gabriel Mountains National Monument that could be important links for wildlife along any wildlife corridor and/or other existing conservancies?

- The project must conform to the General Plan and include grading, construction activities and any waivers necessary for the development must be included. Timelines must be included.
- A thorough discussion must be made of the need for this project and other alternatives that exist, including a no-project alternative. The need for this level of housing and 14 estates is questionable. Keeping this area as open space may be a more important contribution to the region as open space for biological and recreational needs.
- A comprehensive field study of the biological components of this project area must be made to determine the makeup of the flora and fauna and to determine if any protected or nominated species may be on the property since protected species are present in the foothill areas nearby.

The study should also include observations to see if the San Gabriel Chestnut Snail (*Glyptostoma gabrielense*) is present. This species has been recently documented in foothill areas. This observance was substantiated by an independent expert of fauna in the San Gabriel Mountains. This snail is a narrow endemic native only to Los Angeles County. The Project should consider avoiding all appropriate habitat on-site and maintaining a minimum 1000-foot buffer to avoid impacts to this extremely rare species. Pursuant to Section 4(b) of the Endangered Species Act ("ESA"), 16 U.S.C. §1533(b), Section 553(3) of the Administrative Procedures Act, 5 U.S.C. § 553(e), and 50 C.F.R. §424.14(a), the Center for Biological Diversity and Tierra Curry have formally petitioned the Secretary of the Interior, through the United States Fish and Wildlife Service ("FWS", "the Service") to list the San Gabriel chestnut snail (*Glyptostoma gabrielense*) as a threatened or endangered species under the Endangered Species Act and to designate critical habitat concurrently with listing. If found, detailed studies must be done.

Biological studies must be done during seasons most likely for breeding or nesting activities of species or presence of flora with short periods of visibility (i.e. *Brodiaea filifolia*). Existing wildlife corridors must be evaluated and analyzed how they may be affected by construction activities, permanent structures/infrastructure and residential activities. Avoidance or mitigation plans must be included in the DEIR.

Vegetation communities and habitats must be mapped and thoroughly discussed. How many trees will be destroyed and of which species? Particular emphasis needs to be placed on coast live oak woodland areas and the impacts of the project on breeding and movements of species within the project area. Emphasis in mitigation should be on preservation of the woodland areas rather than tree replacement. Mitigation in other areas does not equate with the impacts to established mature trees and habitat loss in the project area.

Areas designated as mitigation should be protected from future development in perpetuity.

- Cumulative project impacts as well as direct and indirect impacts on flora and fauna must be evaluated. What alternatives might exist for public ownership of this area?
- We are aware that the designs for homes that will not be available at the time of the DEIR. Individual owners will not be known, and they will develop their individual homes after purchase of lots. Therefore, restrictions to maintain environmental quality must be developed prior to DEIR studies and included in contracts at time of sale. These constraints should include acceptable landscape pallets. Outdoor lighting should be directed downward to minimize light pollution that could affect wildlife in the area. Impacts from proposed lighting on activity of crepuscular and nocturnal wildlife must be evaluated. Location with respect to dangerous fire areas and vegetation clearance must be fully addressed.
- The project area has close proximity to active fault zones. Impacts from potential movements on these faults must be evaluated **using the most recent research available**. How will anticipated ground motion affect slopes, fill areas on lots, fill behind retaining walls, structures, and the potential for liquefaction and landslides? What impact could a seismic event have on the planned water tank that could be damaged? Would that damage cause a flood event in nearby residential areas?
- We are concerned about changes to hydrology in the region. There will be extensive clearing of vegetation on ridgelines and impermeable hardscapes. How will these affect the project area? Terrain is steep. What effect will this have on erosion and stability of those slopes? Will stream channels be modified. Will cut and fill slopes in this steep terrain, retaining walls or other site modifications needed for infrastructure require waivers from building codes or the General Plan or building codes?
- Will offsets for air quality be required? If so, these should be in the local area, not at a distance.

- Plans must also be put in place to minimize fugitive dust for the construction activities that may be spread long term estimated to over the 5 years (or possibly more). To limit air quality impacts of this expensive development, solar installation should be mandated in the HOA requirements to minimize climate impacts and energy use.
- Will this be a gated community? If so, will there be public access to any trails in the area or in the National Monument?
- This area is in a High Fire Hazard area as well as flood hazard. These must be fully evaluated, along with planned response to meet the needs should these events occur, including pathways for evacuation. A possible response would be a large helicopter pad/pads plus very large water storage tanks above all of the project to provide gravity fed water to estate house sprinklers and water support for water dropping helicopter's should there be another out of control hillside fire-storm.
- Are any park facilities planned for this project? Are there trails that will link the project to the adjacent open space? The project is bordered by predominantly vacant land to the immediate east in the City of Duarte, vacant land to the north, both within the City of Bradbury and beyond the city's northern corporate limits in the City of Monrovia, and a combination of flood control facilities and vacant land within the City of Bradbury to the west. What impact on any local parks nearby are anticipated from the new residents?
- Since no public transport companies operate within the City of Bradbury, will there be options such as bike trails within the project and Bradbury to allow residents easy access to transit lines in nearby Duarte or the Gold Line? How will an estimated 80 (or what could be possibly more) auto trips per day impact surrounding areas in Bradbury and adjacent cities?
- These large homes will be situated along ridgelines; visual impacts affecting areas beyond the project boundaries must be addressed.

Thank you again for the opportunity to offer comments on this project.

Sincerely,
Joan Licari, D.Env.



Chair, San Gabriel Valley Task Force
Angeles Chapter of Sierra Club
626-330-4229
16017 Villa Flores
Hacienda Heights CA 91745
jlicari2013@gmail.com

March 23, 2020

To: Ms. Trayci Nelson
City of Bradbury Planning Department
600 Winston Avenue
Bradbury, CA 91008

RE: Initial Study (IS) Chadwick Ranch Estate, Feb. 2020

Dear Ms. Nelson,

The California Environmental Quality Act (CEQA) requires agencies to ensure “the long-term protection of the environment...” (Pub. Res. Code § 21001 (d).) To effectuate this purpose, CEQA requires public agencies considering a project of this magnitude to prepare an Environmental Impact Report (EIR) that informs governmental decision makers and the public about the potential significant environmental impacts of proposed activities, identifies ways that environmental damage can be avoided or significantly reduced, and requires the adoption of feasible alternatives and mitigation measures. CEQA Guidelines § 15002 (a)(1)-(3).

Unfortunately, the Oak View Estates Project now under review falls far short of meeting the legal mandates imposed by CEQA. The Project will have significant impacts on biological resources, traffic, air quality, water supply, and quality of life. I will follow up with more specific details in the rest of my letter regarding these concerns and issues.

Section 15123(b)(2) of the CEQA Guidelines states that an EIR summary should identify areas of controversy known to the Lead Agency, including issues raised by agencies and the public. A complete Draft EIR for the Oak View Estates Project is located in an extremely high fire area. The foothills and surrounding wildlands/urban interface are covered with large amounts of vegetation, also known by the LA County Fire Department as “fuel load”/ high fire danger. Recall that not too long ago, wildlands/urban interface homes in the nearby foothills were destroyed by the Colby Fire (2014).

Here are some of my areas of concern and controversy:

1. Living Conditions/Fire Prevention in Essential Planning for High Fire Risk Zones.
Regarding the proposed 14 homes on the Chadwick Ranch Estates Project, the site is located in a High Fire Hazard Severity Zone on the foothill slopes of the San Gabriel Mountains. Existing fuel loads of vegetation on the site consist of mixed non-native grasslands, riparian woodlands, and chaparral/sagebrush scrub, including additional fire risks of canyons separated by hilltops. Thus, the proposed project does expose people

and/or structures to a significant risk of personal and property losses, including injury or death involving wildlands fires.

2. Fire Prevention, Health Risks, and Mitigation Concerns. The city of City of Bradbury is well-known for the Santa Ana winds with red flag warnings. Gusts of winds can pose safety concerns regarding fires within the foothills. In wildlands/urban interface areas, hot embers can come from many sources, such as devastating brushfires and family barbecues. Many homes have liquid- petroleum- gas -fueled cooking devices, plus outdoor barbecues, fire pits, and fire places, Even electric cooking devices pose a potential risk for brush fires in this area. Studies need to address these concerns and related mitigation plans? Related concerns affect both local and regional AQMD studies of air quality impacts, spread, and residual effects of toxic smoke and gases, resulting in more agency involvement which an EIR in final draft should emphasize. What health problems are most likely to happen to people, plants domestic animals, people with health problems, elderly, young children? What health effects will smoke potentially pose for us and wildlife? The DEIR needs to address these concerns regarding indoor and outdoor fires and cooking in the foothills.

3. Wildlife & Increase of Pest Control, Prevention, Intervention. Will cooking and smell of food attract wildlife to these areas and adjacent areas creating more of a danger to people and pets? The DEIR needs to assess this potential threat and provide in-depth local and regional studies, including comment from regional, state, and federal agencies on Pest Control, Prevention, and/or Intervention. These impacts are becoming of increasing concern in the foothill and wildlands/urban interface areas. Just for first steps, the DEIR for air quality for the above questions and concerns needs to be addressed. I'm sure the South coast Air Quality Management District has plenty of data to share for your area to help design more healthful planning, or recommend mitigation or no fireplaces, etc. for these impacts. As the impacts are becoming more varied and far-reaching in terms of negative and detrimental impacts on neighborhoods and wildlife, more agencies are needed and getting involved in planning processes.

4. Wildlife Urban Interface Issues. When we put housing developments in the hillsides of The City of Bradbury, we are building in nature's back yard. The deer, bear, rabbits, squirrels and birds inhabited the hillsides and fields long before homes and residential neighborhoods showed up. Animals do not recognize property boundaries. They live where there is habitat: food, water, shelter, and space. Normally these are provided for by nature. When subdivisions are built where the foothills areas once were open space, the animals will continue to live nearby. If the necessities for life are provided around houses, wild animals and people will intermingle. This creates a conflict and an opportunity for dangerous encounters and interactions, putting children and people at risk and possibly being attacked and injured or even killed.

The conflict arises because humans and wild animals do not necessarily make good neighbors. If pets and their food are left outside, these might prove to be an irresistible attraction to hungry bears or mountain lions. Bears will eat nearly anything including

garbage, pet food, seeds, and suet from bird feeders. Mountain lions and coyotes have been known to kill pets, and in many instances, attack small children. If wildlife is being attracted by food and garbage that homeowners leave out, either purposely or inadvertently, animals become attracted to our homes. Once animals lose their natural tendency to avoid people, dangerous situations are created. The DEIR needs to address this concern and should be addressed to insure and evaluate the potential dangers.

5. Recorded Easements Omissions. There are no recorded easements allowing waterlines, utility services, and roadways traveling through this property. Of particular concern are DEIR essential needs to address the known blue-line streams that travel through this proposed development. The three federal agencies, the State Resources Division Wildlife Conservation Board, USFWS and US Army Corps of Engineers, all will need to grant permits before anything is decided on this proposed development. My question and concern is that without the permits being granted, this proposed development does not have essential legal access. This is another concern that needs to be addressed in the DEIR. Also, the existing tanks that are intended to provide water have not been evaluated to meet codes for fire safety sprinklers for adequate water supply for fire protection. And also, are the water tanks undersized for additional housing to supply water services?

6. Oak Woodlands Environmental Impacts. I'm very concerned about the environmental impacts this proposed development will have on oak woodlands. Think of all the oxygen production and air cleaning by the oaks for an urban area that we will be losing. This is one of the last of the largest oak woodlands in the San Gabriel Valley and Foothills.

The draft EIR needs to take into account that more oak trees will be adversely impacted that run adjacent to this site increasing the number of oaks that will be destroyed. There are several mature oak trees that run adjacent to this property. Any mitigation by the major oak and established oak woodlands loss with this proposed project will fail.

The extensive grading in this area will also negatively impact the woodlands, causing the oaks to die from the alteration and disturbance of the soils. Native oaks valuable to humans and environment tolerate very few impacts and changes in their environment once established. Any substantial change in the mature oak's environment can weaken or kill an oak, even a healthy specimen. A good rule of thumb is to leave the tree's root protection zone (RPZ) undisturbed. This area, which is half again as large as the area from the trunk to the drip-line, is the most critical to the oak. Many problems for oaks are initiated by disturbing the roots within this zone. This impact cannot be mitigated. How does the city or developer prepare to mitigate the above issues? Where and how does the City Oak or Tree Ordinance help protect trees in developments? There are no supporting facts or studies that cover off-site tree impacts with adjacent proposed developments.

7. Alternative Road Access to the Property. Ingress and Egress Concerns. The DEIR needs to evaluate alternate road access points that may be feasible. This should be included in the DEIR to inform public full disclosure, including a comparison chart showing the impacts each road access alternative would have on adjacent stress, and also including traffic studies to help distribute the flow of traffic onto multiple street access points and ways to lessen the flow of traffic during peak hours. An environmental impact study needs to be included to compare the proposed Road Extension in comparison to alternate streets, and also, impacts each road access would pose.

If waivers or variances are approved for this project, will these approvals set City legal precedent by allowing other developers requesting similar waivers and variances to take advantage? Such approvals would weaken what the City had intended and adopted with what were once high standards to protect the hillsides and the scenic views of the hillsides for all to enjoy.

8. Cultural Resources. In 2014, the California Legislature approved Assembly Bill 52. AB 52 creates a new category of environmental resources that must be considered under the California Environmental Quality Act: “tribal cultural resources.” The legislation imposes new requirements for consultation regarding projects that may affect a tribal cultural resource, includes a broad definition of what may be considered to be a tribal cultural resource, and includes a list of recommended mitigation measures. AB 52 requires lead agencies to consider the effects of projects on tribal cultural resources and to conduct consultation with federally and non-federally recognized Native American tribe(s) early in the environmental planning process. If your project has filed a Notice of Preparation (NOP) or a notice of Negative Declaration or Mitigated Negative Declaration (MND) on or after July 1, 2015, and the tribe has submitted a request for consultation, your project is subject to AB 52.

CEQA defines tribal cultural resources as “sites, features, places cultural landscapes, sacred places and objects with cultural value to a California Native American Tribe” that have been determined to be significant. (Public Resources Code §21074.) It is important to note that tribal cultural resources are not limited to archeological artifacts, but also include landscapes and places of importance to tribes. The DSEIR needs to examine/review the Project site for possible impacts on such resources. It is well documented that the Gabrieleno Band of Mission Indians/ Kizh Nation has resided in the San Gabriel Valley Foothills. Dr. Gary Stickel, Ph.D., Tribal Archaeologist should be consulted for relevant input, studies, and maps.

9. Chadwick Ranch Estate, Noise & Vibration Studies. The residents who live adjacent to the proposed development would be impacted. Construction of the new roadways would include the use of a vibratory roller. It is anticipated that the vibratory roller would result in vibration levels that may exceeded State Standards. Such studies

need to be included in the DEIR to Consider Mitigation Measures for Significant Construction Noise and Vibration Impacts.

10. Additional COMMENTS AND RECOMMENDATIONS for Sensitive Species & Geology Studies. A number of state and federally listed rare and sensitive species are and have been studied and documented regionally, cautioning all proposed developments to include thorough studies within the San Gabriel Mountains/ Foothills Biodiversity Hotspot Areas.

The Thread-leaved Brodiaea is a California endangered plant species, also federally listed and protected. Studies need to be conducted by a trained biologist to see if this plant is on onsite. Thread-leaved brodiaea has been well documented in the San Gabriel Valley Foothills including Glendora and adjacent areas.

The plant species known as Braunton's Milk Vetch, another protected, endangered plant species, is also well-documented in nearby Monrovia.

The California Gnatcatcher is federally protected by the USFWS and CDFW. Focused surveys need to be done on site. California Gnatcatcher has been well documented within the San Gabriel Valley Foothills.

The Coastal Cactus Wren is presently listed as a California State Species of Special of Concern by the USFWS, and is well-known within the San Gabriel Valley Foothills. Surveys studies need to be done within this project site.

A complete study under CEQA and the impacts this proposed development will have on very rare snail Glyptostoma Gabrielense that is known to be on this proposed development site. The Glyptostoma genus of air-breathing land snails, terrestrial pulmonate gastropod mollusks in the family Megomphicidae. These are large (to about 40 mm or 1.5 inches in diameter) dark brown snails, much shorter than wide. They are found in hilly areas, or low mountains, along the Pacific coast of North America, from California to Baha California.

The San Gabriel Mountains is well documented for having the Sierra Madre Fault traveling through on and near this proposed development site. Complete Geotechnical Investigation and Geologic Study need to be verified and/or initiated to include: slope stability studies and groundwater studies. Historical springs have been noted in the Bradbury Foothills. Since faults can disrupt the movement of groundwater to the surface to form springs, the location of springs can be very important in locating faults.

11. Establishment of the National Monument

The National Monument was established on October 10, 2014, by proclamation of President Barack Obama under the Antiquities Act. More than 15 million people live within 90 minutes of the San Gabriel Mountains, which provides 70 percent of the open space for Angeleños and 30 percent of their drinking water. The Oak View Estates

Project is adjacent to The National Monument. CEQA studies need to be done to see how this project will impact adjacent properties. The City of Monrovia and Duarte will be negatively impacted by this proposed development. CEQA studies need to address these issues.

12. CONCLUSIVELY. For the record: Chadwick Ranch Estate, needs to have a complete EIR under CEQA. There are many unanswered questions that need to addressed to help the decision-makers including the City, State, and Federal Agencies.

Thank you in advance for considering all of the above comments.

Respectfully submitted,

Jeff Michelsen

Enironmental Science Enforcement

DEPARTMENT OF TRANSPORTATION
DISTRICT 7- OFFICE OF REGIONAL PLANNING
100 S. MAIN STREET, SUITE 100
LOS ANGELES, CA 90012
PHONE (213) 897-0067
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*Making Conservation
a California Way of Life.*

March 25, 2020

Trayci Nelson
City of Bradbury
600 Winston Avenue
Bradbury, CA 91008

RE: Chadwick Ranch Estates – Notice of
Preparation (NOP)
SCH# 2020020548
GTS# 07-LA-2020-03175
Vic. LA-210 PM R36.151
Vic. LA-605 PM 26

Dear Trayci Nelson,

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The Project involves a specific plan and vesting tentative tract map to address the development of 14 numbered estate residential lots and 14 lettered non-residential lots. The proposed project also includes a site access roadway extending from the intersection of Bliss Canyon Road/Long Canyon Road, an on-site backbone circulation system, requisite infrastructure, as well as a water tank, a booster station, and debris and water quality basins, among others. Easements for a portion of the site access roadway will be required from the Los Angeles County Flood Control District (LACFCD). The 111.8-acre project has been designed in such a manner that more than half of the land area of the site will remain undisturbed. It is the Applicant's intent to ultimately dedicate this area to a conservancy to be named.

The nearest State facilities to the proposed project are SR-210 and I-605. After reviewing the NOP, Caltrans has the following comments:

As required by SB 743, VMT will be the standard transportation metric for land use projects and new Transportation Impact Studies, and these guidelines will be used to analyze and address transportation impacts on the State Transportation System. Caltrans concurs with the decision to use of the California Governor's Office of Planning and Research's (OPR) suggested VMT reduction thresholds and looks forward to the full VMT analysis to confirm that the project will result in a net reduction in per capita VMT.

Currently the project is designed in a way that induces a high number of trips per household due to being exclusively large-lot, single-family residential. The Lead Agency is encouraged to

integrate transportation and land use in a way that reduces VMT and Greenhouse Gas (GHG) emissions by facilitating the provision of more proximate goods and services to shorten trip lengths and achieve a high level of non-motorized travel and transit use. To address the significant transportation impacts of a project of this nature, Caltrans supports the prioritization of nearby transit service, like the Metro Gold Line Duarte/City of Hope Station, to offset the daily trip generation that the project will create.

Additionally, transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. We recommend large size truck trips be limited to off-peak commute periods.

If you have any questions, please contact project coordinator Anthony Higgins, at anthony.higgins@dot.ca.gov and refer to GTS# 07-LA-2020-03175.

Sincerely,



MIYA EDMONSON

IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

DEPARTMENT OF WATER RESOURCES

1416 NINTH STREET, P.O. BOX 942836
SACRAMENTO, CA 94236-0001
(916) 653-5791



MAR 24 2020

Ms. Trayci Nelson
City of Bradbury
600 Winston Avenue
Bradbury, California 91008

MAR 30 2020

Notice of Completion and Environmental Document Transmittal for the Chadwick Ranch Estates

SCH# 2020020548

Los Angeles County

Dear Ms. Nelson:

The Division of Safety of Dams (DSOD) has reviewed the Notice of Preparation for the residential Chadwick Ranch Estates project. This project includes the development of 14 residential lots and 14 non-residential lots, the construction of an access roadway, an onsite circulation system, a water tank, a booster station, debris and water quality basins, and requisite infrastructure.

The project description does not provide enough information to make an accurate jurisdictional determination for the water quality basins and the water tank. Furthermore, it is unclear whether part or all the work will be subject to State jurisdiction for dam safety. Therefore, the City of Bradbury must submit preliminary plans for each of the proposed basins and the water tank so that DSOD can make an accurate jurisdictional determination.

As defined in Sections 6002 and 6003, Division 3, of the California Water Code, dams 25 feet or higher with a storage capacity of more than 15 acre-feet, and dams higher than 6 feet with a storage capacity of 50 acre-feet or more are subject to State jurisdiction. The dam height is the vertical distance measured from the maximum possible water storage level to the downstream toe of the barrier.

If any of the dams are subject to State jurisdiction, a construction application, together with plans, specifications, and the appropriate filing fee, must be filed with DSOD for this project. All dam safety-related issues must be resolved prior to the approval of the application, and the work must be performed under the direction of a Civil Engineer registered in California. Erik Malvick, our Design Engineering Branch Chief, is responsible for the application process and can be reached at (916) 565-7840.

Ms. Nelson
MAR 24 2020
Page 2

If you have any questions or need additional information, you may contact, Area Engineer Ashley Moran at (916) 565-7830 or me at (916) 565-7827.

Sincerely,

A handwritten signature in black ink, appearing to read 'Richard Draeger', with a large, stylized loop at the end.

Richard Draeger, Southern Regional Engineer
Field Engineering Branch
Division of Safety of Dams

cc: Governor's Office of Planning and Research
State Clearinghouse
state.clearinghouse.opr.ca.gov



SOUTHERN CALIFORNIA
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Transportation
Cheryl Viegas-Walker, El Centro

March 30, 2020

Ms. Trayci Nelson, Project Manager
City of Bradbury
600 Winston Avenue
Bradbury, California 91008
Phone: (626) 358-3218
E-mail: tnelson@cityofbradbury.org

RE: SCAG Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Chadwick Ranch Estates Specific Plan [SCAG NO. IGR10141]

Dear Ms. Nelson,

Thank you for submitting the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the Chadwick Ranch Estates Specific Plan ("proposed project") to the Southern California Association of Governments (SCAG) for review and comment. SCAG is the authorized regional agency for Inter-Governmental Review (IGR) of programs proposed for Federal financial assistance and direct Federal development activities, pursuant to Presidential Executive Order 12372. Additionally, SCAG reviews the Environmental Impact Reports of projects of regional significance for consistency with regional plans pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.

SCAG is also the designated Regional Transportation Planning Agency under state law, and is responsible for preparation of the Regional Transportation Plan (RTP) including the Sustainable Communities Strategy (SCS) pursuant to Senate Bill (SB) 375. As the clearinghouse for regionally significant projects per Executive Order 12372, SCAG reviews the consistency of local plans, projects, and programs with regional plans.¹ SCAG's feedback is intended to assist local jurisdictions and project proponents to implement projects that have the potential to contribute to attainment of Regional Transportation Plan/Sustainable Community Strategies (RTP/SCS) goals and align with RTP/SCS policies.

SCAG staff has reviewed the NOP of a DEIR for the Chadwick Ranch Estates Specific Plan. The proposed project will develop 111.8 acres of hillside land adjacent to the US Forest land. In conjunction with the Vesting Tentative Tract Map 82349, 14 residential parcels and 14 non-residential parcels are proposed.

When available, please email environmental documentation to au@scag.ca.gov or send to SCAG's Los Angeles office in Los Angeles (900 Wilshire Boulevard, Ste. 1700, Los Angeles, California 90017) providing, at a minimum, the full public comment period for review.

If you have any questions regarding the attached comments, please contact the Inter-Governmental Review (IGR) Program, attn.: Anita Au, Associate Regional Planner, at (213) 236-1874 or au@scag.ca.gov. Thank you.

Sincerely,

Ping Chang
Manager, Compliance and Performance Monitoring

¹ Lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency with the 2016 RTP/SCS for the purpose of determining consistency for CEQA. Any "consistency" finding by SCAG pursuant to the IGR process should not be construed as a determination of consistency with the 2016 RTP/SCS for CEQA.

**COMMENTS ON THE NOTICE OF PREPARATION OF A
DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE
CHADWICK RANCH ESTATS SPECIFIC PLAN [SCAG NO. IGR10141]**

CONSISTENCY WITH RTP/SCS

SCAG reviews environmental documents for regionally significant projects for their consistency with the adopted RTP/SCS. For the purpose of determining consistency with CEQA, lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency with the RTP/SCS.

Please note the Draft 2020 RTP/SCS (Connect SoCal) was released for public review on November 14, 2019 until January 24, 2020. The Final Connect SoCal is anticipated to be adopted by SCAG's Regional Council in late April 2020. Please refer to Connect SoCal goals and growth forecast for RTP/SCS consistency for future projects. The Proposed Final Connect SoCal is now available for review here: <https://www.connectsocial.org/Pages/Connect-SoCal-Final-Plan.aspx>.

2016 RTP/SCS GOALS

The SCAG Regional Council adopted the 2016 RTP/SCS in April 2016. The 2016 RTP/SCS seeks to improve mobility, promote sustainability, facilitate economic development and preserve the quality of life for the residents in the region. The long-range visioning plan balances future mobility and housing needs with goals for the environment, the regional economy, social equity and environmental justice, and public health (see <http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx>). The goals included in the 2016 RTP/SCS may be pertinent to the proposed project. These goals are meant to provide guidance for considering the proposed project within the context of regional goals and policies. Among the relevant goals of the 2016 RTP/SCS are the following:

| SCAG 2016 RTP/SCS GOALS | |
|--|--|
| RTP/SCS G1: | <i>Align the plan investments and policies with improving regional economic development and competitiveness</i> |
| RTP/SCS G2: | <i>Maximize mobility and accessibility for all people and goods in the region</i> |
| RTP/SCS G3: | <i>Ensure travel safety and reliability for all people and goods in the region</i> |
| RTP/SCS G4: | <i>Preserve and ensure a sustainable regional transportation system</i> |
| RTP/SCS G5: | <i>Maximize the productivity of our transportation system</i> |
| RTP/SCS G6: | <i>Protect the environment and health for our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking)</i> |
| RTP/SCS G7: | <i>Actively encourage and create incentives for energy efficiency, where possible</i> |
| RTP/SCS G8: | <i>Encourage land use and growth patterns that facilitate transit and active transportation</i> |
| RTP/SCS G9: | <i>Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies*</i> |
| *SCAG does not yet have an agreed-upon security performance measure. | |

For ease of review, we encourage the use of a side-by-side comparison of SCAG goals with discussions of the consistency, non-consistency or non-applicability of the goals and supportive analysis in a table format. Suggested format is as follows:

| SCAG 2016 RTP/SCS GOALS | | |
|-------------------------|---|---|
| | Goal | Analysis |
| RTP/SCS G1: | <i>Align the plan investments and policies with improving regional economic development and competitiveness</i> | <i>Consistent: Statement as to why; Not-Consistent: Statement as to why; Or Not Applicable: Statement as to why; DEIR page number reference</i> |
| RTP/SCS G2: | <i>Maximize mobility and accessibility for all people and goods in the region</i> | <i>Consistent: Statement as to why; Not-Consistent: Statement as to why; Or Not Applicable: Statement as to why; DEIR page number reference</i> |
| | etc. | etc. |

2016 RTP/SCS STRATEGIES

To achieve the goals of the 2016 RTP/SCS, a wide range of land use and transportation strategies are included in the 2016 RTP/SCS. Technical appendances of the 2016 RTP/SCS provide additional supporting information in detail. To view the 2016 RTP/SCS, please visit: <http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx>. The 2016 RTP/SCS builds upon the progress from the 2012 RTP/SCS and continues to focus on integrated, coordinated, and balanced planning for land use and transportation that the SCAG region strives toward a more sustainable region, while the region meets and exceeds in meeting all of applicable statutory requirements pertinent to the 2016 RTP/SCS. These strategies within the regional context are provided as guidance for lead agencies such as local jurisdictions when the proposed project is under consideration.

DEMOGRAPHICS AND GROWTH FORECASTS

Local input plays an important role in developing a reasonable growth forecast for the 2016 RTP/SCS. SCAG used a bottom-up local review and input process and engaged local jurisdictions in establishing the base geographic and socioeconomic projections including population, household and employment. At the time of this letter, the most recently adopted SCAG jurisdictional-level growth forecasts that were developed in accordance with the bottom-up local review and input process consist of the 2020, 2035, and 2040 population, households and employment forecasts. To view them, please visit <http://www.scag.ca.gov/Documents/2016GrowthForecastByJurisdiction.pdf>. The growth forecasts for the region and applicable jurisdictions are below.

| | Adopted SCAG Region Wide Forecasts | | | Adopted City of Bradbury Forecasts | | |
|------------|------------------------------------|------------|------------|------------------------------------|-----------|-----------|
| | Year 2020 | Year 2035 | Year 2040 | Year 2020 | Year 2035 | Year 2040 |
| Population | 19,663,000 | 22,091,000 | 22,138,800 | 1,100 | 1,200 | 1,200 |
| Households | 6,458,000 | 7,325,000 | 7,412,300 | 400 | 400 | 400 |
| Employment | 8,414,000 | 9,441,000 | 9,871,500 | 200 | 200 | 200 |

MITIGATION MEASURES

SCAG staff recommends that you review the Final Program Environmental Impact Report (Final PEIR) for the 2016 RTP/SCS for guidance, as appropriate. SCAG's Regional Council certified the Final PEIR and adopted the associated Findings of Fact and a Statement of Overriding Considerations (FOF/SOC) and Mitigation Monitoring and Reporting Program (MMRP) on April 7, 2016 (please see: <http://scagrtpscs.net/Pages/FINAL2016PEIR.aspx>). The Final PEIR includes a list of project-level performance standards-based mitigation measures that may be considered for adoption and implementation by lead, responsible, or trustee agencies in the region, as applicable and feasible. Project-level mitigation measures are within responsibility, authority, and/or jurisdiction of project-implementing agency or other public agency serving as lead agency under CEQA in subsequent project- and site- specific design, CEQA review, and decision-making processes, to meet the performance standards for each of the CEQA resource categories.

Please note the Draft Connect SoCal PEIR was released for public review from December 9, 2019 to January 24, 2020. The Final Connect SoCal PEIR is anticipated to be certified by SCAG's Regional Council in late April 2020. Please refer to the certified Final Connect SoCal PEIR and adopted Findings of Fact and a Statement of Overriding Considerations (FOF/SOC) and Mitigation Monitoring and Reporting Program (MMRP) for future projects. The Proposed Final Connect SoCal PEIR is now available for review here: <https://www.connectsocal.org/Pages/Final-2020-PEIR.aspx>.



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
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www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



March 30, 2020

Trayci Nelson
City of Bradbury
600 Winston Ave
Bradbury, CA 91008
tnelson@cityofbradbury.org

Subject: Comments on the Notice of Preparation of a Draft Environmental Impact Report for Chadwick Ranch Specific Plan, SCH # 2020020548, Los Angeles County

Dear Ms. Nelson:

The California Department of Fish and Wildlife (CDFW) has reviewed the above-referenced Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for Chadwick Ranch Specific Plan (Project).

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW's Role

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

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

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Project Location: The Project site is located along the northern urban fringe of the City of Bradbury. It is bordered by predominantly vacant land to the immediate east in the City of Duarte, vacant land to the north, both within the City of Bradbury and in the City of Monrovia. A combination of flood control facilities and vacant land within the City of Bradbury are to the west. Urban development both in the City of Bradbury and City of Duarte generally occurs southwest, south, and southeast of the Project site. The Assessor's Parcel Numbers (APNs) for the Project site are 8527-005-001, 8527-005-004, and 8527-001-010. Collectively, these three parcels total approximately 111.8 acres.

Project Description/Objectives: Chadwick Ranch Estates is comprised of 14 numbered estate residential lots and 14 lettered non-residential lots. The proposed Project also includes a site access roadway extending from the intersection of Bliss Canyon Road/Long Canyon Road as well as an on-site backbone circulation system and requisite infrastructure. In addition, a water tank, a booster station, and debris and water quality basins, among others will also be included. Easements for a portion of the site access roadway will be required from the Los Angeles County Flood Control District (LACFCD). The Project has been designed in such a manner that more than half of the land area of the site will remain undisturbed and dedicated to a conservancy.

COMMENTS AND RECOMMENDATIONS

CDFW offers the following comments and recommendations to assist the City of Bradbury in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources.

Specific Comments

- 1) Lake and Streambed Alteration Agreement (LSA): Figures 2.2-1 and 2.2-2 (Site Imagery) as well as review of the United States Geological Survey - The National Map indicate that the Project activities could impact at least three ephemeral streams located in the Project area.
 - a) As a Responsible Agency under CEQA, CDFW has authority over activities in streams and/or lakes that will divert or obstruct the natural flow; or change the bed, channel, or bank (including vegetation associated with the stream or lake) of a river or stream; or use material from a streambed. For any such activities, the Project applicant (or "entity") must provide written notification to CDFW pursuant to section 1600 *et seq.* of the Fish and Game Code. Based on this notification and other information, CDFW determines whether an LSA Agreement (Agreement) with the applicant is required prior to conducting the proposed activities. CDFW's issuance of an Agreement for a Project that is subject to CEQA will require related environmental compliance actions by CDFW as a Responsible Agency. As a Responsible Agency, CDFW may consider the CEQA document prepared by the local jurisdiction (Lead Agency) for the Project. To minimize additional requirements by CDFW pursuant to section 1600 *et seq.* and/or under CEQA, the DEIR should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the LSA (available at www.wildlife.ca.gov/habcon/1600).
 - b) The Project area is located in an area that support aquatic, riparian, and/or wetland habitats; therefore, CDFW recommends an investigation of the site for possible

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surface drainages in the surrounding areas that may feed into these ephemeral streams. A preliminary jurisdictional delineation of the streams and their associated riparian habitats should be included in the DEIR. The delineation should be conducted pursuant to the U. S. Fish and Wildlife Service (USFWS) wetland definition adopted by the CDFW (Cowardin et al. 1970). Some wetland and riparian habitats subject to CDFW's authority may extend beyond the jurisdictional limits of the U.S. Army Corps of Engineers' section 404 permit and Regional Water Quality Control Board section 401 Certification.

- c) In areas of the Project site which may support ephemeral streams, herbaceous vegetation, woody vegetation, and woodlands also serve to protect the integrity of ephemeral channels and help maintain natural sedimentation processes; therefore, CDFW recommends effective setbacks be established to maintain appropriately-sized vegetated buffer areas adjoining ephemeral drainages.
 - d) Project-related changes in upstream and downstream drainage patterns, runoff, and sedimentation should be included and evaluated in the DEIR.
 - e) As part of the LSA Notification process, CDFW requests the 100, 50, 25, 10, 5, and 2-year frequency storm event for existing and proposed conditions. CDFW recommends the DEIR evaluate the results and address avoidance, minimization, and/or mitigation measures that may be necessary to reduce potential significant impacts.
- 2) Nesting Birds. As stated in the Initial Study, the Project site is "heavily vegetated with trees and shrubs." This vegetation may provide potential nesting habitat where Project activities may impact nesting birds. Project activities occurring during the breeding season of nesting birds could result in the incidental loss of fertile eggs, or nestlings, or otherwise lead to nest abandonment in trees directly adjacent to the Project boundary. The Project could also lead to the loss of foraging habitat for sensitive bird species.
- a) CDFW recommends that measures be taken to avoid Project impacts to nesting birds. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (Code of Federal Regulations, Title 50, § 10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA).
 - b) Proposed Project activities including (but not limited to) staging and disturbances to native and nonnative vegetation, structures, and substrates should occur outside of the avian breeding season which generally runs from February 15 through August 31 (as early as January 1 for some raptors) to avoid take of birds or their eggs. If avoidance of the avian breeding season is not feasible, CDFW recommends surveys by a qualified biologist with experience in conducting breeding bird surveys to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 300-feet of the disturbance area (within 500-feet for raptors). Project personnel, including all contractors working on site, should be instructed on the sensitivity of the area. Reductions in the nest buffer distance may be appropriate depending on the avian

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species involved, ambient levels of human activity, screening vegetation, or possibly other factors.

- 3) Landscaping. Section 4.9 indicates that landscaping will occur as part of the on-site improvements. Habitat loss and invasive plants are a leading cause of native biodiversity loss. Invasive plant species spread quickly and can displace native plants, prevent native plant growth, and create monocultures. CDFW recommends using native, locally appropriate plant species for landscaping on the Project site. CDFW recommends invasive/exotic plants, including pepper trees (*Schinus* genus) and fountain grasses (*Pennisetum* genus), be restricted from use in landscape plans for this Project. A list of invasive/exotic plants that should be avoided as well as suggestions for better landscape plants can be found at <https://www.cal-ipc.org/solutions/prevention/landscaping/>.
- 4) Tree Replacement: Section 2.3 states the Project site is "heavily vegetated with trees and shrubs, the majority of which is mixed chaparral with inclusions of coastal sage scrub, as well as native scrub oak woodland and scattered large oaks on the canyon floor areas." Figures 2.2-1 and 2.2-2 Site Imagery show the presence of trees on areas of the Project site that will be developed. Habitat loss is one of the leading causes of native biodiversity loss. To compensate for any loss of trees, CDFW recommends replacing all non-native trees removed as a result of the proposed work activities at least a 1:1 ratio with native trees. CDFW recommends replacing native trees at least a 3:1 ratio with a combination of native trees and/or appropriate understory and lower canopy plantings. CDFW considers oak woodlands a sensitive vegetation community. Oak woodlands are a community that includes the trees, as well as any understory plants, duff, and dead logs. Removal or thinning of an understory in oak woodland directly impacts the functions and values of the entire oak woodland. CDFW recommends that any loss of oaks should be replanted at a minimum 10:1 ratio. Replacement oaks should come from nursery stock grown from locally sourced acorns, or from acorns gathered locally, preferably from the same watershed in which they were planted.
- 5) Biological Baseline Assessment. Section 2.2.1 states, "The Project site is vacant and devoid of man-made improvements." In addition, Figure 2.1-3 indicates that the Project site is located on undeveloped land and is heavily vegetated. A review of California Natural Diversity Data Base (CNDDB) indicates the presence of Southern Coast Live Oak Riparian Forest, a sensitive vegetative community, on the Project site. Undisturbed land may be considered sensitive habitat or may provide suitable habitat for special status or regionally and locally unique species. CDFW recommends providing a complete assessment and impact analysis of the flora and fauna within and adjacent to the Project area, with emphasis upon identifying endangered, threatened, sensitive, regionally and locally unique species, and sensitive habitats. Impact analysis will aid in determining any direct, indirect, and cumulative biological impacts, as well as specific mitigation or avoidance measures necessary to offset those impacts, as referred in Specific Comment 6 and General Comment 3. CDFW recommends avoiding any sensitive natural communities found on or adjacent to the Project. CDFW also considers impacts to Species of Special Concern a significant direct and cumulative adverse effect without implementing appropriate avoid and/or mitigation measures. The DEIR should include the following information:
 - a) Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region [CEQA Guidelines, § 15125(c)]. The DEIR should include measures to fully avoid

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and otherwise protect Sensitive Natural Communities from Project-related impacts. Project implementation may result in impacts to rare or endangered plants or plant communities that have been recorded adjacent to the Project vicinity. CDFW considers these communities as threatened habitats having both regional and local significance. Plant communities, alliances, and associations with a state-wide ranking of S1, S2, S3 and S4 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by visiting <https://www.wildlife.ca.gov/Data/VegCAMP/Natural-Communities#sensitive%20natural%20communities>;

- b) A thorough, recent, floristic-based assessment of special status plants and natural communities, following CDFW's *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (see <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline>);
 - c) Floristic, alliance- and/or association-based mapping and vegetation impact assessments conducted at the Project site and within the neighboring vicinity. *The Manual of California Vegetation*, second edition, should also be used to inform this mapping and assessment (Sawyer, 2008). Adjoining habitat areas should be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions;
 - d) A complete, recent, assessment of the biological resources associated with each habitat type on site and within adjacent areas that could also be affected by the Project. CDFW's CNDDDB in Sacramento should be contacted to obtain current information on any previously reported sensitive species and habitat. CDFW recommends that CNDDDB Field Survey Forms be completed and submitted to CNDDDB to document survey results. Online forms can be obtained and submitted at http://www.dfg.ca.gov/biogeodata/cnddb/submitting_data_to_cnddb.asp;
 - e) A complete, recent, assessment of rare, threatened, and endangered, and other sensitive species on site and within the area of potential effect, including California Species of Special Concern and California Fully Protected Species (Fish & G. Code, §§ 3511, 4700, 5050 and 5515). Species to be addressed should include all those which meet the CEQA definition of endangered, rare or threatened species (CEQA Guidelines, § 15380). Seasonal variations in use of the Project area should also be addressed. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with CDFW and the USFWS; and,
 - f) A recent, wildlife and rare plant survey. CDFW generally considers biological field assessments for wildlife to be valid for a one-year period, and assessments for rare plants may be considered valid for a period of up to three years. Some aspects of the proposed Project may warrant periodic updated surveys for certain sensitive taxa, particularly if build out could occur over a protracted time frame, or in phases.
- 6) Biological Direct, Indirect, and Cumulative Impacts. Section 2.2.1 of the Initial Study states, "Adjacent land uses include vacant, undeveloped land to the west; open space to the east

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(Duarte Wilderness Preserve); open space, including the Angeles National Forest, to the north; and open space managed by LACFCD to the south.” It is essential to understand how these open spaces and the biological diversity within them may be impacted by Project activities. This should aid in identifying specific mitigation or avoidance measures necessary to offset those impacts. CDFW recommends providing a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts. The following should be addressed in the DEIR:

- a) A discussion regarding indirect Project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands (e.g., preserve lands associated with a Natural Community Conservation Plan (NCCP, Fish & G. Code, § 2800 et. seq.). Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas, should be fully evaluated in the DEIR;
 - b) A discussion of potential adverse impacts from lighting, noise, human activity, and exotic species and identification of any mitigation measures;
 - c) A discussion on Project-related changes on drainage patterns and downstream of the Project site; the volume, velocity, and frequency of existing and post-Project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and, post-Project fate of runoff from the Project site. After review of the Natural Communities Commonly Associated with Groundwater (NCCAG) Dataset (USDAFS, 2014), this hydrology impact discussion is especially important due to the identification of Coast Live Oak as a groundwater dependent ecosystem downstream from the Project site. Coast Live Oak woodlands are a sensitive vegetative community and may be adversely impacted by changes to hydrology. The discussion should also address the proximity of the extraction activities to the water table, whether dewatering would be necessary and the potential resulting impacts on the habitat (if any) supported by the groundwater. Mitigation measures proposed to alleviate such Project impacts should be included;
 - d) An analysis of impacts from land use designations and zoning located nearby or adjacent to natural areas that may inadvertently contribute to wildlife-human interactions. A discussion of possible conflicts and mitigation measures to reduce these conflicts should be included in the DEIR; and,
 - e) A cumulative effects analysis, as described under CEQA Guidelines section 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.
- 7) Wetland Resources. A review of NCCAG Dataset indicates the presence of Palustrine wetlands (USFWS, 2016) consisting of scrub-shrub vegetation that is seasonally flooded, located on the southern edge of the Project site. CDFW, as described in Fish and Game Code section 703(a), is guided by the Fish and Game Commission’s policies. The Wetlands Resources policy (<http://www.fgc.ca.gov/policy/>) of the Fish and Game Commission “...seek[s] to provide for the protection, preservation, restoration, enhancement and expansion of wetland habitat in California. Further, it is the policy of the Fish and Game

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Commission to strongly discourage development in or conversion of wetlands. It opposes, consistent with its legal authority, any development or conversion that would result in a reduction of wetland acreage or wetland habitat values. To that end, the Commission opposes wetland development proposals unless, at a minimum, Project mitigation assures there will be 'no net loss' of either wetland habitat values or acreage. The Commission strongly prefers mitigation which would achieve expansion of wetland acreage and enhancement of wetland habitat values."

- a) The Wetlands Resources policy provides a framework for maintaining wetland resources and establishes mitigation guidance. CDFW encourages avoidance of wetland resources as a primary mitigation measure and discourages the development or type conversion of wetlands to uplands. CDFW encourages activities that would avoid the reduction of wetland acreage, function, or habitat values. Once avoidance and minimization measures have been exhausted, the Project must include mitigation measures to assure a "no net loss" of either wetland habitat values, or acreage, for unavoidable impacts to wetland resources. Conversions include, but are not limited to, conversion to subsurface drains, placement of fill or building of structures within the wetland, and channelization or removal of materials from the streambed. All wetlands and watercourses, whether ephemeral, intermittent, or perennial, should be retained and provided with substantial setbacks, which preserve the riparian and aquatic values and functions for the benefit to on-site and off-site wildlife populations. CDFW recommends mitigation measures to compensate for unavoidable impacts be included in the DEIR and these measures should compensate for the loss of function and value.
 - b) The Fish and Game Commission's Water policy guides CDFW on the quantity and quality of the waters of this state that should be apportioned and maintained respectively so as to produce and sustain maximum numbers of fish and wildlife; to provide maximum protection and enhancement of fish and wildlife and their habitat; encourage and support programs to maintain or restore a high quality of the waters of this state; prevent the degradation thereof caused by pollution and contamination; and, endeavor to keep as much water as possible open and accessible to the public for the use and enjoyment of fish and wildlife. CDFW recommends avoidance of water practices and structures that use excessive amounts of water, and minimization of impacts that negatively affect water quality, to the extent feasible (Fish & G. Code, § 5650).
- 8) Fuel Modification. Section 3.2.4 states, "The Project site is in a very high fire severity zone." In addition, the Initial Study recognizes the need for fuel modification zones within the plans for the proposed Project. The DEIR should include information as to how the Project or adjacent land may be affected by fuel modification requirements. Fuel modification should not adversely impact resources in areas adjacent or mitigation lands. A discussion of any fuel modification requirements for this Project should be included in the DEIR to allow CDFW to assess potential impacts to biological resources. CDFW recommends all fuel modification requirements be met on the Project, and not in mitigation lands or habitat adjacent to the Project. Habitat being subjected to fuel modification (e.g., thinning, trimming, removal of mulch layer) should be considered an impact to these vegetation communities and mitigated accordingly. CDFW also recommends any irrigation proposed in fuel modification zones drain back into the development and not onto natural habitat land as perennial sources of water allow for the introduction of invasive Argentine ants.

Trayci Nelson
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General Comments

- 1) Project Description and Alternatives. To enable CDFW to adequately review and comment on the proposed Project from the standpoint of the protection of plants, fish, and wildlife, we recommend the following information be included in the DEIR:
 - a) A complete discussion of the purpose and need for, and description of, the proposed Project, including all staging areas and access routes to the construction and staging areas; and,
 - b) A range of feasible alternatives to Project component location and design features to ensure that alternatives to the proposed Project are fully considered and evaluated. The alternatives should avoid or otherwise minimize direct and indirect impacts to sensitive biological resources and wildlife movement areas.
- 2) CESA. CDFW considers adverse impacts to a species protected by CESA to be significant without mitigation under CEQA. As to CESA, take of any endangered, threatened, candidate species, or State-listed rare plant species that results from the Project is prohibited, except as authorized by state law (Fish and G. Code, §§ 2080, 2085; Cal. Code Regs., tit. 14, §786.9). Consequently, if the Project, Project construction, or any Project-related activity during the life of the Project will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, CDFW recommends that the Project proponent seek appropriate take authorization under CESA prior to implementing the Project. Appropriate authorization from CDFW may include an Incidental Take Permit (ITP) or a consistency determination in certain circumstances, among other options [Fish & G. Code, §§ 2080.1, 2081, subds. (b) and (c)]. Early consultation is encouraged, as significant modification to a Project and mitigation measures may be required in order to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, may require that CDFW issue a separate CEQA document for the issuance of an ITP unless the Project CEQA document addresses all Project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA ITP.
- 3) Compensatory Mitigation. The DEIR should include mitigation measures for adverse Project-related impacts to sensitive plants, animals, and habitats. Mitigation measures should emphasize avoidance and reduction of Project impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be discussed in detail. If on-site mitigation is not feasible or would not be biologically viable and therefore not adequately mitigate the loss of biological functions and values, off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed. Areas proposed as mitigation lands should be protected in perpetuity with a conservation easement, financial assurance and dedicated to a qualified entity for long-term management and monitoring. Under Government Code section 65967, the lead agency must exercise due diligence in reviewing the qualifications of a governmental entity, special district, or nonprofit organization to effectively manage and steward land, water, or natural resources on mitigation lands it approves.

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- 4) Long-term Management of Mitigation Lands. For proposed preservation and/or restoration, the DEIR should include measures to protect the targeted habitat values from direct and indirect negative impacts in perpetuity. The objective should be to offset the Project-induced qualitative and quantitative losses of wildlife habitat values. Issues that should be addressed include (but are not limited to) restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, and increased human intrusion. An appropriate non-wasting endowment should be set aside to provide for long-term management of mitigation lands.
- 5) Translocation/Salvage of Plants and Animal Species. Translocation and transplantation is the process of moving an individual from the Project site and permanently moving it to a new location. CDFW generally does not support the use of, translocation or transplantation as the primary mitigation strategy for unavoidable impacts to rare, threatened, or endangered plant or animal species. Studies have shown that these efforts are experimental and the outcome unreliable. CDFW has found that permanent preservation and management of habitat capable of supporting these species is often a more effective long-term strategy for conserving sensitive plants and animals and their habitats.
- 6) Moving out of Harm's Way. The proposed Project is anticipated to result in clearing of natural habitats that support many species of indigenous wildlife. To avoid direct mortality, we recommend that a qualified biological monitor approved by CDFW be on-site prior to and during ground and habitat disturbing activities to move out of harm's way special status species or other wildlife of low mobility that would be injured or killed by grubbing or Project-related construction activities. It should be noted that the temporary relocation of on-site wildlife does not constitute effective mitigation for the purposes of offsetting Project impacts associated with habitat loss. If the Project requires species to be removed, disturbed, or otherwise handled, we recommend that the DEIR clearly identify that the designated entity should obtain all appropriate state and federal permits.

CONCLUSION

CDFW appreciates the opportunity to comment on the NOP to assist the City of Bradbury in identifying and mitigating Project impacts on biological resources. If you have any questions or comments regarding this letter, please contact Felicia Silva, Environmental Scientist, at (562) 430-0098 or by email at Felicia.Silva@wildlife.ca.gov.

Sincerely,

DocuSigned by:
Erinn Wilson-Olgin

B6E58CFE24724F5...
Erinn Wilson

Environmental Program Manager I

ec: CDFW
Victoria Tang – Los Alamitos
Andrew Valand – Los Alamitos
Felicia Silva – Los Alamitos
Malinda Santonil – Los Alamitos
CEQA Program Coordinator – Sacramento

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State Clearinghouse

References

Cowardin, Lewis M., et al. 1970. Classification of Wetlands and Deepwater Habitats of the United States. U.S. Department of the Interior, Fish and Wildlife Service.

Sawyer, J. O., Keeler-Wolf, T., and Evens J.M. 2008. A manual of California Vegetation, 2nd ed. ISBN 978-0-943460-49-9.

US Department of Agriculture Forest Service. 2014. Existing Vegetation South Coast, 2002-2010, v2 [ESRI File Geodatabase]. McClellan, CA. Accessed June 2016.

US Fish and Wildlife Service. 2016. National Wetlands Inventory, v2, California Wetlands. Accessed May 2016.



Gavin Newsom
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Kate Gordon
Director

Memorandum

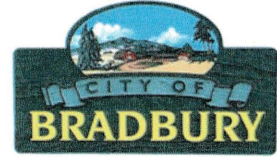
Date: April 17, 2020
To: All Reviewing Agencies
From: Scott Morgan, Director
Re: SCH # 2020020548
Chadwick Ranch Estates Specific Plan

Pursuant to the attached letter, the Lead Agency has *extended* the review period for the above referenced project to **April 30, 2020** to accommodate the review process. All other project information remains the same.

Please contact the Lead Agency for further information if you no longer have the project.

cc: Trayci Nelson, Project Manager
City of Bradbury
600 Winston Avenue
Bradbury, CA 91008

City of Bradbury



UPDATED NOTICE OF SCOPING MEETING

DATE: April 6, 2020

TO: Responsible Agencies, Trustee Agencies, CA Office of Planning and Research and Other Interested Parties

SUBJECT: Updated Notice of Scoping Meeting (Original Notice of Preparation of an Environmental Impact Report and Scoping Meeting sent February 27, 2020)

Project Title: Chadwick Ranch Estates Specific Plan

Project Applicant: Nevis Capital, LLC, C/O TRG Land Inc.

Given the COVID-19 crisis, the City has extended the time to comment on the Notice of Preparation for the Chadwick Ranch Estates Specific Plan Project until April 30, 2020 and has rescheduled a scoping meeting for **April 22, 2020 at 7:00 p.m.** The scoping meeting will be held via GoToWebinar which can be accessed through your computer, tablet, iPad, or smart phone.

Please register for CHADWICK RANCH ESTATES PROJECT PUBLIC SCOPING MEETING on Apr 22, 2020 7:00 PM PDT at:

<https://attendee.gotowebinar.com/register/6464159008046798347>

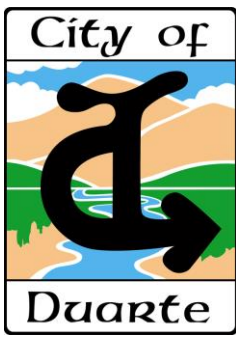
After registering, you will receive a confirmation email containing information about joining the webinar. At the time of the scoping meeting, click on "join the webinar" from your email.

When you log on, you will have the choice to listen from your computer or from your phone – please note that the screen comes quickly on which to choose so be prepared. The phone call in number will be 1 (562) 247-8422 and the access code is 344-753-755.

You may provide comments and questions via email ahead of the meeting by sending them to Ms. Trayci Nelson, Project Manager at tnelson@CityofBradbury.org. Please include your name, phone number, address and email or that of your agency's contact person in your response. Please include "Chadwick Ranch Estates" in the subject line. Additionally, you will have the opportunity to post questions and comments during this presentation.

The Initial Study and original Notice of Preparation are available for public review on the City's website at: <http://www.cityofbradbury.org/city-services/development-projects/chadwick-project-2>. There will also be a link on the City's website allowing direct registration from there. Detailed instructions will also be included on the City's website.

APR 16 2020
STATE CLEARINGHOUSE



City of Duarte

1600 Huntington Drive, Duarte, CA 91010 - (626) 357-7931 - FAX (626) 358-0018

April 22, 2020

-- REVISED --

Trayci Nelson
Project Manager City of Bradbury
Bradbury, CA 91008

Dear Ms. Nelson:

On behalf of the City of Duarte ("Duarte"), we have reviewed the Notice of Preparation ("NOP") advising that the City of Bradbury ("COB") intends to prepare an Environmental Impact Report ("EIR") for the project entitled "Chadwick Ranch Estates" ("Project"). The Project is characterized by the development of an 111.8 acre parcel for 14 residential lots and 14 non-residential lots.

The City has a significant interest in the consideration of the Project. The project's location is directly adjacent to the part of Duarte referred to as the Mesa, and as such, impacts caused by this development are anticipated to directly impact Duarte residents. First, the project allows for one million cubic yards of grading to accommodate roadways and building pads and grading to this extent could mar the natural beauty of this undisturbed hillside with retaining walls and roadway cutbacks. Second, the project will disturb the plant and animal communities within its borders and adjacent areas. Years ago the City of Duarte established an area immediately adjacent to the eastern boundary of the project site as wilderness space. Developing the land immediately adjacent to the wilderness area will reduce the effectiveness of this area as a wildlife habitat.

Our review of the NOP reveals that several issues with the Project may cause significant impacts if not properly analyzed and/or mitigated. We have listed the issues that continue to concern the City and would like to see them included and further analyzed in the EIR. The City of Duarte's environmental concerns/comments continue to be as follows:

- **VIEWS AND AETHETICS**

- Residents of the Duarte Mesa currently enjoy westerly views of undisturbed hillside and the City of Duarte is concerned that the proposed development will significantly degrade the quality of these views during the construction phase of the project and thereafter due to maintenance requirements. Given the severity of the potential of these impacts, it is critical that a full analysis be performed to determine the extent of the anticipated impacts so that appropriate decisions can be made about the project. After reviewing the Initial Study for this project, it is clear that the analysis performed on this topic is insufficient. Additional study should be performed to address the following points:
- The views from the development, especially Figure 5 of page 2.2-3, are misleading because they don't show the homes of the Mesa that will be on the opposite ridge from the development and will clearly be visible. This section of the Initial Study should be revised to accurately show the neighboring development to first acknowledge the impact to the neighbors' views and then to properly mitigate those impacts. Another important omission in regards to view analysis is the view of site from the freeway. An analysis should be done to determine which road cuts and pad grading would be visible from the freeway since the view of the mountains in their natural state is important to the

residents of Bradbury and Duarte alike. Cuts to the slopes that leave a lasting scar of the natural vista would not be acceptable.

- A topographic map of the project site that shows the existing conditions prior to the proposed improvements is needed to understand where improvements will be relative to existing ridgelines. It would be beneficial to provide a map that overlays proposed improvements on top of existing contour lines.
- The Initial Study analysis explains that improvement of pads would rely on market forces, though buildout is expected to be completed within five years. By plan, graded pads could remain unimproved for five years. If market forces are not strong in the next five years, then the pad could remain unimproved for longer. This represents a high aesthetic risk of having eyesore unimproved pads visible from Duarte. It must be noted that at the time that this Initial Study was written the economic conditions were more stable than they are now, so one can conclude that the risk of having unimproved pads sit vacant for longer periods of time is more likely than previously forecast.
- The project residences would be situated in an area of very high risk from wildfire. As such they will be required by Los Angeles County Fire Department to maintain a fire protection zone around structures on the property. The implication of this requirement is that much of the native trees and chaparral will be removed structures, which will significantly alter the view from the Duarte Mesa and forever change the natural appearance of the hillside that currently exists.
- Given the important nature of potential view impacts, a digital 3d model or topographic map should be provided for public review. This document should provide perspectives from the Duarte Mesa, freeway, Huntington Drive, and at various points within Bradbury and Duarte.

- **BIOLOGICAL IMPACT**

- The analysis within the Initial Study determined that the project site is not within any boundaries of any area intended for the protection of biological resources. While this may be true, the project site is adjacent to a designated wilderness area within the City limits of Duarte. The plant and animal communities with the Duarte wilderness area undoubtedly extend into the project site since there is no fencing that separate these properties. The development of the project site will diminish the habitat for these plants and animals. Study should be performed to determine which critical habitats exist onsite and on the adjacent sites and examine how the proposed development will impact those habitats. Mitigation measures should be imposed to restrict property owners from altering the existing native habitat to the greatest extent possible without compromising the safety of the residents on the property.

- **GRADING IMPACTS**

- The proposed project acknowledges that approximately one million cubic yards of earth will need to be moved around to balance the site. There are aesthetic concerns with moving that much earth and those have been articulated earlier in this letter. In addition to views, there are noise concerns. It was acknowledged that blasting would be necessary if the soil was rocky, but the only information provided about this practice was that it would be temporary and done only as necessary. Given the significant sound disruption that blasting can have on nearby properties, additional study is warranted to project how much blasting will be necessary based on the existing geology.
- The practice of grading is associated with air pollution because the moving of earth material is going to create dust in the air and the machines the do the grading emit fumes. Within an urban setting, there must be an allowance for temporary disruption in air quality to allow for construction in accordance with regional air quality standards, however, the proposed project anticipates a five year buildout and the Initial Study acknowledges even more time may be necessary dependent on market forces. Given that construction of the proposed project will extend well beyond the duration of a typical construction project and what many would consider "temporary", mitigation measures should be considered to protect air quality at a higher level than typically used.

- **WATER**

- Per the Initial Study, Cal American Water requires a well to be dug to serve the community, but the perspective well sites are within the City of Duarte and require approval from Duarte. P.3.2.1. The entitlement for the well site would require its own CEQA review. Please provide an analysis to determine if the water supply is sufficient to support this development.
- SEWAGE
 - Septic tanks are proposed instead of sewer connections for the development (IS P.3.2.1), but these are not the preferred environmental option. Furthermore, on page 4.7.4 of the Initial Study there is an acknowledgement that the soils may not be suitable for septic and further study is warranted. There should be an analysis undertaken to evaluate the environmental risks of expanding Bradbury's use of septic tanks for residential properties. The analysis should specifically evaluate the risk of ground water contamination from these tanks. If septic tanks are found not to be a suitable option for the development then installation of traditional sewer infrastructure must be analyzed as part of this Environmental Impact Report.
- FLOOD HAZARD
 - The initial Study concludes that there this development has no potential flood hazard impacts. Please explain how this could be possible considering that the secondary point of access to this development utilizes a LA Flood Control District road? In the event of a major rainfall event, this road could be prioritized for utility trucks servicing the debris basin and may be unsafe for use by the general public.

Thank you for your careful consideration of these comments. Please contact me directly if you have any questions concerning the matters addressed in this letter.

Sincerely,



Nick Baldwin, AICP
Associate Planner

Cc Craig Hensley, AICP, Community Development Director
Dominic Milano, City Engineer
Jason Golding, Planning Manager
Amanda Hamilton, Public Works Manager



April 30, 2020

Sent via email and FedEx

Trayci Nelson
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600 Winston Avenue
Bradbury, CA 91008
Email to: tnelson@cityofbradbury.org

**RE: Comments on Notice of Preparation of an Environmental Impact Report for
Chadwick Ranch Estates Specific Plan, SCH# 2020020548**

Ms. Nelson,

These comments are submitted on behalf of the Center for Biological Diversity (“the Center”) regarding the Notice of Preparation of an Environmental Impact Report (“EIR”) for the Chadwick Estates Specific Plan (“the Project”). The Center urges the City to undertake a thorough and comprehensive environmental review of the Project as required under the California Environmental Quality Act (“CEQA”), prior to considering approval. Despite the Project’s relatively small scale, the Project poses significant environmental impacts to the sensitive ecological setting of the proposed site. The EIR should fully address and analyze at a minimum the Project’s impacts to sensitive species and habitat, fire hazards, water quality, aesthetics and all reasonable alternatives.

The Center is a non-profit, public interest environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center has 1.7 million members and supporters throughout California and the United States. The Center has worked for many years to protect imperiled plants and wildlife, wildlife connectivity, open space, air and water quality, and overall quality of life for people in Los Angeles County.

Under CEQA, an EIR must provide decision-making bodies and the public with detailed information about the effect a proposed project is likely to have on the environment, to list ways in which the significant effects of a project might be minimized, and to indicate alternatives to the project. (Pub. Res. Code § 21061.) The proposed Project will directly and indirectly impact over 100 acres of open space and natural habitat to construct mansions for a few ultra-rich

buyers. The EIR must fully disclose these impacts, so that the public can fully understand the publicly born costs associated with the Project that likely delivers few public benefits.

The DEIR Must Assess the Fire Risks Posed by the Project

California has experienced increasingly destructive wildfires over the course of the past decade, a trend which, fueled by drought and climate change, is likely to continue. The 2018 wildfire season in California was the “deadliest and most destructive” ever recorded, both in terms of acres burned and damage caused.¹² The increasing frequency and intensity of wildfires in California highlight the need to reassess where new development will be located. Housing along the urban-wildland interface exposes residents to greater fire risks, while simultaneously increasing the probability of fire ignition.³ The Project proposes residential development in the hills and canyons of the San Gabriel Mountains that delineate the boundary between Angeles National Forest and the City of Bradbury. (Initial Study (“IS”) at 3-1.) The DEIR must analyze the wildfire risks and impacts associated with the Project; and establish comprehensive mitigation measures to address those effects.

The Initial Study acknowledges the potential wildfire impacts, as the Project is located in a “Very High Fire Hazard Severity Zone.” (IS at 3-8.) Such a designation requires certain measures to be taken by homeowners, as noted in the Initial Study. (*Id.*) But these measures have proven to be insufficient in the face of recent fires in Southern California; therefore, the EIR should assess preventative mitigation measures that go beyond the statutorily required minimum.⁴ CEQA requires the EIR to assess the full range of wildfire impacts and potential mitigation so that the public and decision-makers can properly weigh the potentially catastrophic costs of a wildfire against the Project’s purported benefits.

In its wildfire impact assessment, the EIR should also clarify the management of the Project’s open space/conservation areas. The Initial Study states that open space will make up approximately 51 percent of the Project site, on which development will be prohibited. (IS at 3-2.) The long-term ownership and management of these spaces will be the responsibility of a yet-to-be-named conservancy. (*Id.*) The EIR should clearly outline the duties of each landowner in terms of wildfire prevention as well as provide the mechanisms for enforcing such duties. Adherence to statutorily imposed fuel modification zones and defensible areas will not protect the open space beyond the residential development pads. The EIR must identify the fire risk impacts to undeveloped areas of the Project; and provide mitigation where feasible.

The Project’s Impacts on Water Resources

The Project’s cut and fill activities have the potential to significantly alter the area’s drainage patterns. (IS at 4.10-1, 4.10-3.) The Project area serves as both a buffer to, and

¹ Calfire Incident Information, <https://www.fire.ca.gov/incidents/2018/>.

² The Guardian, *Last year’s wildfires were the most expensive in California history*, <https://www.theguardian.com/us-news/2019/may/08/california-2018-wildfires-most-expensive>

³ Radeloff et al. Rapid growth of the US wildland-urban interface raises wildfire risk. Proceedings of the National Academy of Sciences, 2018, www.pnas.org/cgi/doi/10.1073/pnas.1718850115.

⁴ Southern California Public Radio, *‘Defensible space’ couldn’t keep Thomas fire from burning Ventura County*. 12/19/17, <https://www.scpr.org/news/2017/12/19/79035/defensible-space-couldn-t-keep-thomas-fire-from-bu/>

extension of, the vital ecological systems of the Angeles National Forest and San Gabriel Mountains. Changes to the rate, timing and direction of drainage would impact the quality of area riparian and in-stream habitat, constrain the range of water-reliant plant and animal species, and alter groundwater recharge. Specifically, the Project will likely impact federally protected waters. (IS at 4.4-2.) The EIR must fully assess these impacts and provide mitigation through adequate setbacks and erosion control protocols. As the effects of climate change become more apparent, it is more important than ever for projects in Southern California to provide comprehensive analysis of impacts to water resources.

The Initial Statement acknowledges the Project may significantly deplete groundwater supplies, and that the Project will be required to drill a well to replenish the underlying aquifer to compensate for the Project's use of groundward. (IS at 4.10-2.) The EIR must first establish the baseline drainage and recharge regimes, then provide detailed analysis of how these conditions will be impacted by the Project.⁵ The amount and location of runoff, as well as stream bed recharge, will be affected by the Project's topographic alterations. The residential water use, while certainly a factor to consider, is not the only facet of the Project that will impact groundwater recharge. The EIR should provide analysis of all potential Project impacts on groundwater.

Biological Surveys and Mapping

The Center requests that thorough, seasonal surveys be performed for sensitive plant species and vegetation communities, and animal species under the direction and supervision of the BLM and resource agencies such as the US Fish and Wildlife Service and the California Department of Fish and Game. Full disclosure of survey methods and results to the public and other agencies without limitations imposed by the applicant must be implemented to assure full CEQA/ESA compliance.

Confidentiality agreements or non-disclosure agreements regarding environmental resources must not be required of any biologists participating in the surveys in support of the proposed project. Surveys for the plants and plant communities should follow California Native Plant Society ("CNPS") and California Department of Fish and Wildlife ("CDFW") floristic survey guidelines⁶ and should be documented as recommended by CNPS policy guidelines⁷. A full updated floral inventory of all species encountered needs to be documented and included in the EIR. Surveys for animals should include an evaluation of the California Wildlife Habitat Relationship System's ("CWHR") Habitat Classification. All rare species (plants or animals) need to be documented with a California Natural Diversity Data Base ("CNDDB") form and submitted to CDFW using the CNDDB Form⁸ as per the State's instructions⁹.

⁵ *Woodward Park Homeowners Assn, Inc. v. City of Fresno* (2007) 150 Cal.App.4th 683, 707 The court, in discussing § 15125 of the Guidelines, stated the EIR must "compare what will happen if the project is built with what will happen if the site is left alone."

⁶ California Native Plant Society, Botanical Survey Guidelines, https://cnps.org/wp-content/uploads/2018/03/cnps_survey_guidelines.pdf and <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline>

⁷ CNPS, <https://www.cnps.org/wp-content/uploads/2018/04/collecting-guidelines-documentation.pdf>

⁸ CDFW, California Natural Diversity Data Base, Online Field Survey Form, <https://www.wildlife.ca.gov/Data/CNDDB/Submitting-Data>

The Center requests that the vegetation maps be at a large enough scale to be useful for evaluating the impacts. Vegetation/wash habitat mapping should be at such a scale to provide an accurate accounting of wash areas and adjacent habitat types that will be directly or indirectly affected by the proposed activities. A half-acre minimum mapping unit size is recommended, such as has been used for other development projects. Habitat classification should follow CNPS' Manual of California Vegetation. (Sawyer et. al. 2009).

Project Impacts on Biological Resources

The Project site encompasses an area of immense ecological value in the foothills of the San Gabriel Mountains. This value arises not only from the wildlife and habitat present within Project boundaries but from the site's proximity to the Angeles National Forest, Duarte Wilderness Preserve and the San Gabriel Valley Sensitive Ecological Area 19 ("SEA"). The Project will directly alter the landscape of the proposed site and will indirectly impact the surrounding areas by increasing human-borne disturbances, reducing ecological buffer zones, and constraining wildlife movement. The EIR must fully analyze the direct and indirect impacts of the Project on the area's biological resources.

A fully CEQA-compliant EIR must contain a complete and up-to-date plant and wildlife survey of the potentially impacted habitats.¹⁰ The adequacy of the Project's EIR will depend on properly describing the physical environmental conditions in and around the Project site; this must include a full accounting of the biological resources that may be affected by the Project.¹¹ A number of plant and animal species utilize habitat in and around the Project site, a complete survey will allow the public and decision-makers to fully comprehend the scope of Project impacts.

One such species is the San Gabriel chestnut snail ("SGCS"), a terrestrial snail found only in the San Gabriel Mountains and foothills.¹² The SGCS is ranked as imperiled on the "Special Animals List" compiled by CDFW.¹³ SGCS is known to occur in the vicinity of the project.¹⁴ Similar to many terrestrial snail populations, SGCS is particularly vulnerable to development-related habitat destruction because of their limited dispersal ability.¹⁵ As noted in the Petition, via reference to a CDFW comment letter, the previously proposed Oakview Estates project posed "immitigable" impacts to SGCS individuals present on that project site.¹⁶ The Chadwick Estates Project would have the same impacts, as it is located adjacent to the proposed Oakview Estates site.

⁹ Id. see "User Guide."

¹⁰ CEQA Guidelines, 14 CCR § 15125.

¹¹ Id.

¹² San Gabriel chestnut snail ESA listing Petition, p. 4

¹³ California Department of Fish and Wildlife, California Natural Diversity Database, Special Animals List (August 2019), available at: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=109406>

¹⁴ Natural History Museum of Los Angeles County, Snails and slugs Living in Metropolitan Environments Data, https://www.inaturalist.org/observations?place_id=any&taxon_id=210624.

¹⁵ San Gabriel chestnut snail ESA listing Petition, p. 12.

¹⁶ Id. at p. 13.

Specifically, the SGCS population in the area would be significantly impacted by the cut and fill operations, alterations to hydrologic patterns, and ongoing fuel modification measures. The SGCS is dependent on moist microhabitats, such that the alteration of drainage patterns from Project activities could eliminate vital habitat. The development will also introduce barriers to dispersal, such as roads and other topographic features, further hindering SGCS survival in an altered habitat. The EIR should include surveys of the Project area and the surrounding area to ascertain the resident SGCS population and its habitat needs. Numerous other species and rare vegetation communities have been documented in the general area of the Project,¹⁷ the DEIR must also include surveys and analysis that clearly demonstrates present wildlife to the public and decision-makers.

It is critically important that the DEIR disclose and analyze the Project's potential impacts to mountain lions, including habitat fragmentation, increased lighting and noise associated with development and human activities, increased traffic on roads, use of pesticides and rodenticides, or increased risk of wildfires. There is ample scientific literature that shows that mountain lions in and near the Project area are struggling and that such human activities and land use planning can have adverse impacts on mountain lions. Continued habitat loss and fragmentation has led to 10 genetically isolated populations within California. Several populations in Southern California and along the Central Coast are facing an extinction vortex due to high levels of inbreeding, low genetic diversity, and high human-caused mortality rates from car strikes on roads, depredation kills, rodenticide poisoning, poaching, disease, and increased human-caused wildfires.¹⁸ This is detailed in the Center's petition to the California Fish and Game Commission to protect Southern California and Central Coast mountain lions under the California Endangered Species Act (Yap, Rose, & Cummings, 2019). On April 16, 2020, the California Fish and Game Commission voted unanimously to advance the Southern California and Central Coast mountain lions to candidacy under the California Endangered Species Act.¹⁹

Furthermore, Studies have shown that mountain lions alter their behavior to avoid humans and human disturbances (*e.g.*, development and associated noise and lighting). For example, mountain lions have been found to avoid human voices and move more cautiously when hearing human voices.²⁰ The presence or perceived presence of humans has been found to reduce overall feeding time.²¹ Nocturnal patterns of movement and stasis suggest that mountain lions generally avoid areas with human disturbance²², and although they are generally most active at dusk and dawn, their peak activities have been observed to shift to more nocturnal patterns when they are closer to human disturbance (Van Dyke et al., 1986). And although mountain lions will use moderately disturbed areas as they travel and hunt²³, occupancy is lower in developed areas and they are more likely to use developed areas if they border open spaces

¹⁷ California Department of Fish and Wildlife, California Natural Diversity Database QuickView Tool, accessed 4-29-2020. Available at: <https://apps.wildlife.ca.gov/bios/?tool=cnddbQuick>.

¹⁸ Benson, Mahoney, et al., 2016; Benson et al., 2019; Ernest et al., 2003; Ernest, Vickers, Morrison, Buchalski, & Boyce, 2014; Gustafson et al., 2018; Riley et al., 2014; T. W. Vickers et al., 2015.

¹⁹ California Fish & Game Commission, Notice of Findings, April 21, 2020.

²⁰ Suraci, Clinchy, Zanette, & Wilmers, 2019.

²¹ Smith et al., 2017; Smith, Wang, & Wilmers, 2015.

²² Dickson & Beier, 2002; Dickson, Jennes, & Beier, 2005.

²³ Gray, Wilmers, Reed, & Merenlender, 2016; Wilmers et al., 2013; Zeller, Vickers, Ernest, & Boyce, 2017.

(Wang, Allen, & Wilmers, 2015). Thus, mountain lions require sufficient room to roam away from human-disturbed areas and expansive, intact, heterogeneous habitats.²⁴

The DEIR must also adequately assess and mitigate the impacts to mountain lions and connectivity from increased wildfire risk due to the Project. Although fire is a natural disturbance in California ecosystems, sprawl development with low/intermediate densities extending into habitats that are prone to fire, like the proposed Project, have led to more frequent wildfires that burn larger areas.²⁵ Placing more sprawl development, infrastructure, and people in fire-prone areas could lead to more human-caused wildfires. Increased frequency of wildfires poses a threat to the survival of mountain lions in and near the Project area. Although mountain lions are highly mobile and generally able to move away from wildfires, in severe weather conditions wind-driven fires can spread quickly – they can cover 10,000 hectares in one to two days, as embers are blown ahead of the fires and towards adjacent fuels (*e.g.*, flammable vegetation, structures) (Syphard, Keeley, & Brennan, 2011). If their movement is constrained by roads and development and they are unable to access escape routes, then their chances of surviving wildfires are greatly reduced. (Vickers et al., 2015) documented one death of a collared mountain lion in the Santa Ana Mountains and one in the Eastern Peninsular Range due to human-caused wildfires, and the deaths of two collared mountain lions in the Santa Monica Mountains in 2018 have been attributed to the Woolsey Fire. Environmentally stochastic events (*e.g.*, wildfires, flooding) could destabilize small mountain lion populations and make them vulnerable to extinction.²⁶ In addition, increased frequency of fire ignitions can cause shifts in natural fire regimes, which can lead to large-scale landscape changes, such as vegetation-type conversion or habitat fragmentation, which can impact wide-ranging species like the mountain lion (Jennings, 2018).

As the urban-wildland boundary continues to encroach on natural habitat at the edge of Angeles National Forest, the importance of habitat connectivity increases. The Project represents the northward march of residential development toward Angeles and related areas. The Initial Study touts the percentage of the Project footprint comprised of open space/no built areas. (IS at 3-2.) If these areas are to be viewed as an ecological asset in the Project approval process, the EIR must explain the nature and management of the “open space.” Once the biological resource survey is conducted for the Project site, the EIR should provide an impact assessment, and management guidance for the open space. This inquiry should note the extent of municipal control over activities on privately held land, and the associated impacts on sensitive biological resources and the efficacy of proposed mitigation measures.

Similarly, the management practices deployed on the open space should be assessed in light of the site’s value as a habitat corridor for wildlife movement. The construction of fencing and roads, as well as ridge and slope alterations, can hinder the foraging and dispersal movements of area wildlife populations.

Reasonable and Prudent Alternatives

²⁴ Beier, Choate, & Barrett, 1995; Dickson & Beier, 2002; Kertson, Spencer, Marzluff, Hepinstall-Cymerman, & Grue, 2011; W. Vickers, Zeller, Ernest, Gustafson, & Boyce, 2017.

²⁵ Syphard, Radeloff, Hawbaker, & Stewart, 2009; Syphard et al., 2007.

²⁶ Benson, Mahoney, et al., 2016; Benson et al., 2019

The EIR must present and consider “a reasonable range of potentially feasible alternatives” in order to facilitate “informed decision-making and public participation.”²⁷ The EIR’s alternative analysis should assess the proposed size and location of the Project. While large residential estates are nothing new in Bradbury, the enormous size of the proposed residences begs reconsideration. The individual lots will contain varied sizes of developable areas, ranging from 20,000 square feet up to 49,000 square feet. (IS at 3-2.) Existing inventory of luxury estates currently on the market in Bradbury should be considered when discussing the need for the Project. There are currently two residences in the 16,000-18,000 square feet range that are listed for approximately 15 million dollars each, both estates have been on the market for nearly 6 months.²⁸ The EIR should include an economic feasibility analysis of the Project to determine the need for the Project in light of potential demand for such extravagant residential estates. A range of alternatives, including a no-build option, will inform the public and decision-makers about whether constructing 14 mega-mansions is worth the environmental impacts of this Project.

Other Impacts the Must be Analyzed in the EIR

In addition to those issues raised above, the EIR must also address thoroughly a variety of other related issues. For example, the EIR must fully disclose and analyze the impacts on aesthetics and noise, and discuss alternatives and effective mitigation measures to avoid, reduce, and mitigate these impacts. The EIR must also address the Project impacts on air quality in light of the poor air quality in the Southern California region.

Conclusion

The environmental effects of the proposed Chadwick Estates Specific Plan will potentially impact biological and water resources, air quality and aesthetics, while increasing the impacts associated with wildfire risks. Evaluation of each of these impacts, as well as analysis of reasonable and prudent alternatives must be included in the EIR. Thank you for the opportunity to submit comments on this proposed Project. Please do not hesitate to contact the Center with any questions at the number listed above. We look forward to reviewing any further environmental documentation on this project.

Please add the Center to your notice list for all future updates to the Project and do not hesitate to contact the Center with any questions at the number or email listed below.

Sincerely,



Ross Middlemiss

²⁷ CEQA Guidelines, 14 CCR § 15126.6(a).

²⁸ Bradbury Real Estate, viewed 4/29/2020, <https://www.redfin.com/city/2048/CA/Bradbury>

Staff Attorney
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References

- Beier, P., Choate, D., & Barrett, R. H. (1995). Movement patterns of mountain lions during different behaviors. *Journal of Mammalogy*, 76(4), 1056–1070.
- Benson, J. F., Mahoney, P. J., Sikich, J. A., Serieys, L. E. K., Pollinger, J. P., Ernest, H. B., & Riley, S. P. D. (2016). Interactions between demography, genetics, and landscape connectivity increase extinction probability for a small population of large carnivores in a major metropolitan area. *Proceedings of the Royal Society B: Biological Sciences*, 283(1837), 20160957.
- Benson, J. F., Mahoney, P. J., Vickers, T. W., Sikich, J. A., Beier, P., Riley, S. P. D., ... Boyce, W. M. (2019). Extinction vortex dynamics of top predators isolated by urbanization. *Ecological Applications*, 0(0), e01868.
- California Department of Fish and Wildlife, California Natural Diversity Database, Special Animals List (August 2019), available at:
<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=109406>
- California Department of Fish and Wildlife, California Natural Diversity Database QuickView Tool, accessed 4-29-2020 Available at:
<https://apps.wildlife.ca.gov/bios/?tool=cnddbQuick>.
- California Department of Fish and Wildlife, Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities, March 20, 2018.
- California Department of Fish and Wildlife, California Natural Diversity Data Base, Online Field Survey Form, <https://www.wildlife.ca.gov/Data/CNDDB/Submitting-Data>
- California Department of Forestry and Fire Protection (CAL FIRE), Incident Information, 2018 Fire Statistics, available at <https://www.fire.ca.gov/incidents/2018/>.
- California Fish & Game Commission, Notice of Findings, April 21, 2020.
- California Native Plant Society, Botanical Survey Guidelines, https://cnps.org/wp-content/uploads/2018/03/cnps_survey_guidelines.pdf
- Curry, T. (2017) *Petition to the U.S. Fish and Wildlife Service to Protect the San Gabriel Chestnut Snail under the Endangered Species Act*.
- Dickson, B. G., & Beier, P. (2002). Home-range and habitat selection by adult cougars in Southern California. *The Journal of Wildlife Management*, 66(4), 1235–1245.

- Dickson, B. G., Jennes, J. S., & Beier, P. (2005). Influence of Vegetation, Topography, and Roads on Cougar Movement in Southern California. *Journal of Wildlife Management*, 69(1), 264–276.
- Ernest, H. B., Boyce, W. M., Bleich, V. C., May, B., Stiver, S. J., & Torres, S. G. (2003). Genetic structure of mountain lion (*Puma concolor*) populations in California. *Conservation Genetics*, (4), 353–366.
- Ernest, H. B., Vickers, T. W., Morrison, S. A., Buchalski, M. R., & Boyce, W. M. (2014). Fractured genetic connectivity threatens a Southern California puma (*Puma concolor*) population. *PLoS ONE*, 9(10).
- Gray, M., Wilmers, C. C., Reed, S. E., & Merenlender, A. M. (2016). Landscape feature-based permeability models relate to puma occurrence. *Landscape and Urban Planning*, 147, 50–58.
- The Guardian, *Last year's wildfires were the most expensive in California history*, available at <https://www.theguardian.com/us-news/2019/may/08/california-2018-wildfires-most-expensive>
- Gustafson, K. D., Gagne, R. B., Vickers, T. W., Riley, S. P. D., Wilmers, C. C., Bleich, V. C., ... Ernest, H. B. (2018). Genetic source–sink dynamics among naturally structured and anthropogenically fragmented puma populations. *Conservation Genetics*, 20(2), 215–227.
- Jennings, M. (2018). *Effects of Wildfire on Wildlife and Connectivity*.
- Kertson, B. N., Spencer, R. D., Marzluff, J. M., Hepinstall-Cymerman, J., & Grue, C. E. (2011). Cougar space use and movements in the wildland – urban landscape of western Washington. *Ecological Applications*, 21(8), 2866–2881.
- Natural History Museum of Los Angeles County, Snails and slugs Living in Metropolitan Environments Data, https://www.inaturalist.org/observations?place_id=any&taxon_id=210624
- Radeloff et al. (2018), *Rapid growth of the US wildland-urban interface raises wildfire risk*. Proceedings of the National Academy of Sciences, www.pnas.org/cgi/doi/10.1073/pnas.1718850115.
- Redfin, Bradbury Real Estate, viewed 4/29/2020, available at: <https://www.redfin.com/city/2048/CA/Bradbury>.
- Riley, S. P. D., Serieys, L. E. K., Pollinger, J. P., Sikich, J. A., Dalbeck, L., Wayne, R. K., & Ernest, H. B. (2014). Individual behaviors dominate the dynamics of an urban mountain lion population isolated by roads. *Current Biology*, 24(17), 1989–1994.
- Smith, J. A., Suraci, J. P., Clinchy, M., Crawford, A., Roberts, D., Zanette, L. Y., & Wilmers, C.

- C. (2017). Fear of the human ‘super predator’ reduces feeding time in large carnivores. *Proceedings of the Royal Society B: Biological Sciences*, 284(1857), 20170433.
- Smith, J. A., Wang, Y., & Wilmers, C. C. (2015). Top carnivores increase their kill rates on prey as a response to human-induced fear. *Proceedings of the Royal Society B: Biological Sciences*, 282(1802).
- Southern California Public Radio, ‘Defensible space’ couldn’t keep Thomas fire from burning Ventura County. 12/19/17, available at <https://www.scpr.org/news/2017/12/19/79035/defensible-space-couldn-t-keep-thomas-fire-from-bu/>.
- Suraci, J. P., Clinchy, M., Zanette, L. Y., & Wilmers, C. C. (2019). Fear of humans as apex predators has landscape-scale impacts from mountain lions to mice. *Ecology Letters*.
- Syphard, A. D., Keeley, J. E., & Brennan, T. J. (2011). Comparing the role of fuel breaks across southern California national forests. *Forest Ecology and Management*, 261(11), 2038–2048.
- Syphard, A. D., Radeloff, V. C., Hawbaker, T. J., & Stewart, S. I. (2009). Conservation threats due to human-caused increases in fire frequency in mediterranean-climate ecosystems. *Conservation Biology*, 23(3), 758–769.
- Syphard, A. D., Radeloff, V. C., Keeley, J. E., Hawbaker, T. J., Clayton, M. K., Stewart, S. I., ... Hammer, R. B. (2007). Human influence on California fire regimes. *Ecological Society of America*, 17(5), 1388–1402.
- Van Dyke, F. G., Brocke, R. H., Shaw, H. G., Ackerman, B. B., Hemker, T. P., & Lindzey, F. G. (1986). Reactions of mountain lions to logging and human activity. *The Journal of Wildlife Management*, 50(1), 95–102.
- Vickers, T. W., Sanchez, J. N., Johnson, C. K., Morrison, S. A., Botta, R., Smith, T., ... Boyce, W. M. (2015). Survival and mortality of pumas (*Puma concolor*) in a fragmented, urbanizing landscape. *PLoS ONE*, 10(7), 1–18. <https://doi.org/10.1371/journal.pone.0131490>
- Vickers, W., Zeller, K., Ernest, H., Gustafson, K., & Boyce, W. (2017). *Mountain Lion (Puma concolor) Connectivity in the North San Diego County Multi-Species Conservation Plan Area, and Assessment of Mountain Lion Habitat Use and Connectivity in Northern San Diego and Southern Riverside and Orange Counties, with Special Focu.*
- Wang, Y., Allen, M. L., & Wilmers, C. C. (2015). Mesopredator spatial and temporal responses to large predators and human development in the Santa Cruz Mountains of California. *Biological Conservation*, 190, 23–33.

- Wilmers, C. C., Wang, Y., Nickel, B., Houghtaling, P., Shakeri, Y., Allen, M. L., ... Williams, T. (2013). Scale dependent behavioral responses to human development by a large predator, the puma. *PLoS ONE*, 8(4).
- Yap, T. A., Rose, J. P., & Cummings, B. (2019). *A Petition to List the Southern California/Central Coast Evolutionarily Significant Unit (ESU) of Mountain Lions as Threatened under the California Endangered Species Act (CESA)*.
- Zeller, K. A., Vickers, T. W., Ernest, H. B., & Boyce, W. M. (2017). Multi-level, multi-scale resource selection functions and resistance surfaces for conservation planning: Pumas as a case study. *PLoS ONE*, 12(6), 1–20.

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San Gabriel Valley Task Force
March 24, 2020

To: Ms. Trayci Nelson
Project Manager
tnelson@cityofbradbury.org
(562) 200-7180

From: Joan Licari, Chair, San Gabriel Valley Task Force of Angeles Chapter of Sierra Club

RE: Initial Study (IS) Chadwick Ranch Estates, Feb. 2020

Apr. 30, 2020

Dear Ms. Nelson:

The San Gabriel Task Force of the Angeles Chapter of Sierra Club thanks the City of Bradbury for the opportunity to submit the following scoping comments for the Initial Study (IS) of the Chadwick Ranch Estates, Feb. 2020. We applaud the City of Bradbury for the extension of the comment period and the presentation of the scoping meeting via internet for the Chadwick Ranch Estates. Our organization had submitted comments earlier but are now providing some slightly amended comments.

The San Gabriel Valley Task Force was organized by the Angeles Chapter of the Sierra Club in 1999 to work with San Gabriel Valley cities and political leaders to seek ways to create a more livable environment for valley residents while preserving or improving natural habitat. Since that time, we have worked with cities of the San Gabriel Valley and Los Angeles County/Orange County to create projects that promote low impact outdoor recreation along the urban rivers in San Gabriel Valley, and to preserve natural habitats in foothills of the San Gabriel Mountains and the Puente-Chino Hills.

The Chadwick Ranch Estates includes 14 numbered estate residential lots and 14 lettered non-residential lots. The proposed project includes a site access roadway extending from the intersection of Bliss Canyon Road/Long Canyon Road, an on-site backbone circulation system, as well as requisite infrastructure, including a water tank, a booster station, a debris and water quality basin, among others. Easements for a portion of the site access roadway will be required from the Los Angeles County Flood Control District (LACFCD). The 111.8-acre project has been designated in such a manner that more than half of the land area of the site will remain

undisturbed. The applicant indicates an intent to ultimately dedicate this area to a conservancy to be named.

Comments: We provide the following comments and concerns that must be addressed in the DEIR:

- A complete study of the environment surrounding this project and relationships to the project area, the San Gabriel Mountains National Monument, other nearby conservancies already in the foothills of the San Gabriel Mountains, as well as relationships/impact to the proposed Rim of the Valley Corridor. The latter was passed by the House of Representatives on Feb. 19, 2020. Are there connections between the project area through surrounding cities into the San Gabriel Mountains National Monument that could be important links for wildlife along any wildlife corridor and/or other existing conservancies?
- The project must conform to the General Plan and include grading, construction activities and any waivers necessary for the development must be included. Timelines must be included.
- A thorough discussion must be made of the need for this project and other alternatives that exist, including a no-project alternative. The need for this level of housing and 14 estates is questionable. Keeping this area as open space may be a more important contribution to the region as open space for biological and recreational needs.
- A comprehensive field study of the biological components of this project area must be made to determine the makeup of the flora and fauna and to determine if any protected or nominated species may be on the property since protected species are present in the foothill areas nearby.

The study should also include observations to see if the San Gabriel Chestnut Snail (*Glyptostoma gabrielense*) is present. This species has been recently documented in foothill areas. This observance was substantiated by an independent expert of fauna in the San Gabriel Mountains. This snail is a narrow endemic native only to Los Angeles County. The Project should consider avoiding all appropriate habitat on-site and maintaining a minimum 1000-foot buffer to avoid impacts to this extremely rare species. Pursuant to Section 4(b) of the Endangered Species Act (“ESA”), 16 U.S.C. § 1533(b), Section 553(3) of the Administrative Procedures Act, 5 U.S.C. § 553(e), and 50 C.F.R. § 424.14(a), the Center for Biological Diversity and Tierra Curry have formally petitioned the Secretary of the Interior, through the United States Fish and Wildlife Service (“FWS”, “the Service”) to list the San Gabriel chestnut snail (*Glyptostoma gabrielense*) as a threatened or endangered species under the Endangered Species Act and to designate critical habitat concurrently with listing. If found, detailed studies must be done.

Biological studies must be done during seasons most likely for breeding or nesting activities of species or presence of flora with short periods of visibility (i.e. *Brodiaea filifolia*). Existing wildlife corridors must be evaluated and analyzed how they may be affected by

construction activities, permanent structures/infrastructure and residential activities. Avoidance or mitigation plans must be included in the DEIR.

Vegetation communities and habitats must be mapped and thoroughly discussed. How many trees will be destroyed and of which species? Particular emphasis needs to be placed on coast live oak woodland areas and the impacts of the project on breeding and movements of species within the project area. Emphasis in mitigation should be on preservation of the woodland areas rather than tree replacement. Mitigation in other areas does not equate with the impacts to established mature trees and habitat loss in the project area.

Areas designated as mitigation should be protected from future development in perpetuity.

- Cumulative project impacts as well as direct and indirect impacts on flora and fauna must be evaluated. What alternatives might exist for public ownership of this area?
- We are aware that the designs for homes that will not be available at the time of the DEIR. Individual owners will not be known, and they will develop their individual homes after purchase of lots. Therefore, restrictions to maintain environmental quality must be developed prior to DEIR studies and included in contracts at time of sale. These constraints should include acceptable landscape pallets. Outdoor lighting should be directed downward to minimize light pollution that could affect wildlife in the area. Impacts from proposed lighting on activity of crepuscular and nocturnal wildlife must be evaluated. Location with respect to dangerous fire areas and vegetation clearance must be fully addressed.
- The project area has close proximity to active fault zones including the Sierra Madre, San Andreas and Duarte fault zones. Impacts from potential movements on these faults must be evaluated **using the most recent research available on potential ground response**. How will anticipated ground motion affect slopes, fill areas on lots, fill behind retaining walls, structures, and the potential for liquefaction and landslides? What impact could a seismic event have on the planned water tank that could be damaged? Would that damage cause a flood event in nearby residential areas?
- We are concerned about changes to hydrology in the region. There will be extensive clearing of vegetation on ridgelines and impermeable hardscapes. How will these affect the project area? Terrain is steep. What effect will this have on erosion and stability of those slopes? Will stream channels be modified? Will cut and fill slopes in this steep terrain, retaining walls or other site modifications needed for infrastructure require waivers from building codes or the General Plan or building codes? ARKStorm analysis as modeled by the USGS should be included.
- Will offsets for air quality be required? If so, these should be in the local area, not at a distance.
- Plans must also be put in place to minimize fugitive dust for the construction activities that may be spread long term estimated to over the 5 years (or possibly more). To limit air quality impacts of this expensive development, solar installation should be mandated in the HOA requirements to minimize climate impacts and energy use.

- Will this be a gated community? If so, will there be public access to any trails in the area or in the National Monument?
- This area is in a High Fire Hazard area as well as flood hazard. These must be fully evaluated, along with planned response to meet the needs should these events occur, including pathways for evacuation. A possible response would be a large helicopter pad/pads plus very large water storage tanks above all of the project to provide gravity fed water to estate house sprinklers and water support for water dropping helicopter's should there be another out of control hillside fire-storm.
- Are any park facilities planned for this project? Are there trails that will link the project to the adjacent open space? The project is bordered by predominantly vacant land to the immediate east in the City of Duarte, vacant land to the north, both within the City of Bradbury and beyond the city's northern corporate limits in the City of Monrovia, and a combination of flood control facilities and vacant land within the City of Bradbury to the west. What impact on any local parks nearby are anticipated from the new residents?
- Since no public transport companies operate within the City of Bradbury, will there be options such as bike trails within the project and Bradbury to allow residents easy access to transit lines in nearby Duarte or the Gold Line? How will an estimated 80 (or what could be possibly more) auto trips per day impact surrounding areas in Bradbury and adjacent cities?
- These large homes will be situated along ridgelines; visual impacts affecting areas beyond the project boundaries must be addressed.

Thank you again for the opportunity to offer comments on this project.

Sincerely,
Joan Licari, D.Env.



Chair, San Gabriel Valley Task Force
Angeles Chapter of Sierra Club
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From: Toan Duong <TDUONG@dpw.lacounty.gov>
Sent: Monday, May 4, 2020 9:53 AM
To: Nelson, Trayci <tnelson@mbakerintl.com>; tnelson@cityofbradbury.org
Cc: Jose Suarez <JSUAREZ@dpw.lacounty.gov>; Jose Cruz <JoCruz@dpw.lacounty.gov>; Long Thang <LTHANG@dpw.lacounty.gov>; Prabesh Sharma <PSharma@dpw.lacounty.gov>
Subject: RE: EXTERNAL: Chadwick Ranch Estate NOP-DEIE time extension

Ms. Trayci Nelson,

**NOTICE OF PREPARATION (NOP)
DRAFT ENVIRONMENTAL REVIEW (DEIR)
CHADWICK RANCH ESTATES SPECIFIC PLAN
CITY OF BRADBURY
RPPL2020001433**

Thank you for the opportunity to review the subject project NOP. The City of Bradbury is proposing the development of 14 new contour graded parcels on an undeveloped hillside for residential homes. The other 14 parcels will be used for non-residential uses including a backbone circulation system, requisite infrastructure, a water tank, a booster station, debris and water quality basins, as well as open space.

The following comments are for your consideration:

1. The proposed access improvements, access alignments, storm water runoff, and water quality would potentially affect Los Angeles County Flood Control District (LACFCD) facilities. Identify all impact and provide mitigation for all affected LACFCD facility in the DEIR. Coordination of easement access, permit, plan review and approval are required from the LACFCD for any proposed improvement affecting the debris basins.
2. It is not clear from the Initial Study if new storm drains will be proposed and if they will be transferred to the LACFCD for operation and maintenance. In the DEIR, include clarification on the proposed storm drains and how they will affect the LACFCD facilities downstream.
3. If rock blasting is needed for site preparation, impacts and mitigation to all LACFCD facility should be identified and included in the DEIR.

4. Portions of the development would not be protected by the 3 existing LACFCD debris basins. Additional basins may be required upstream for debris protection.

For questions regarding the above comments, please contact Prabesh Sharma of Public Works, Stormwater Planning Division at (626) 300-2379 or psharma@pw.lacounty.gov.

Please submit future environmental document regarding this project to Mr. Jose Suarez of Public Works, Land Development Division, at (626) 458-4921 or jsuarez@pw.lacounty.gov.

Sincerely,

Toan Duong
Civil Engineer
Los Angeles County Public Works
Office: (626) 458-4921

From: Mikayla Vaba <mikayla.vaba@opr.ca.gov>
Date: 5/1/20 3:10 PM (GMT-08:00)
To: tnelson@cityofbradbury.org
Subject: EXTERNAL: SCH# 2020020548

The State Clearinghouse would like to inform you that our office will be transitioning from providing a hard copy of acknowledging the close of review period on your project to electronic mail system.

Please visit: <https://ceqanet.opr.ca.gov/2020020548/2> for full details about your project and if any state agencies submitted comments by close of review period (note: any state agencies in bold, submitted comments and are available).

This email acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please email the State Clearinghouse at state.clearinghouse@opr.ca.gov if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

From: James Flournoy <flurnet@hotmail.com>

Sent: Wednesday, April 29, 2020 3:52 PM

To: tnelson@cityofbradbury.org; Joan Licari jlicari2013@gmail.com

Subject: EXTERNAL: Initial Study Chadwick Ranch Subdivision

California Oaks is for a different location but the issues raised must be addressed

Hamilton Biological is a copy which must be considered

Hamilton Biological Drought tolerant native plant list- use column 5 for San Gabriel Mountains

The usual invasive plant list is out of date, there are several others all of which must be considered

Several previous scoping comments which must be considered

We shall be requesting copies of all scoping comments under CPRA

Thank you very much

SOC

Jim flournoy, secretary