

Appendix A
**Initial Study, NOP & Comments
Received**



Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613
 For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH #

Project Title: East San Gabriel Valley Area Plan

Lead Agency: County of Los Angeles, Department of Regional Planning Contact Person: Mi Kim
 Mailing Address: 320 West Temple Street, Room 1354 Phone: (213) 974-6425
 City: Los Angeles, CA Zip: 90012 County: Los Angeles

Project Location: County: Los Angeles City/Nearest Community: East San Gabriel Valley
 Cross Streets: N/A Zip Code: Several

Longitude/Latitude (degrees, minutes and seconds): _____ ° _____ ' _____ " N / _____ ° _____ ' _____ " W Total Acres: 32,826

Assessor's Parcel No.: Several Section: _____ Twp.: _____ Range: _____ Base: _____

Within 2 Miles: State Hwy #: Several Waterways: Several
 Airports: Several Railways: Several Schools: Several

Document Type:

CEQA: NOP Draft EIR NEPA: NOI Other: Joint Document
 Early Cons Supplement/Subsequent EIR EA Final Document
 Neg Dec (Prior SCH No.) _____ Draft EIS Other: _____
 Mit Neg Dec Other: _____ FONSI _____

Local Action Type:

General Plan Update Specific Plan Rezone Annexation
 General Plan Amendment Master Plan Prezone Redevelopment
 General Plan Element Planned Unit Development Use Permit Coastal Permit
 Community Plan Site Plan Land Division (Subdivision, etc.) Other: _____

Development Type:

Residential: Units _____ Acres _____ Transportation: Type _____
 Office: Sq.ft. _____ Acres _____ Employees _____ Mining: Mineral _____
 Commercial: Sq.ft. _____ Acres _____ Employees _____ Power: Type _____ MW _____
 Industrial: Sq.ft. _____ Acres _____ Employees _____ Waste Treatment: Type _____ MGD _____
 Educational: _____ Hazardous Waste: Type _____
 Recreational: _____ Other: Area Plan
 Water Facilities: Type _____ MGD _____

Project Issues Discussed in Document:

Aesthetic/Visual Fiscal Recreation/Parks Vegetation
 Agricultural Land Flood Plain/Flooding Schools/Universities Water Quality
 Air Quality Forest Land/Fire Hazard Septic Systems Water Supply/Groundwater
 Archeological/Historical Geologic/Seismic Sewer Capacity Wetland/Riparian
 Biological Resources Minerals Soil Erosion/Compaction/Grading Growth Inducement
 Coastal Zone Noise Solid Waste Land Use
 Drainage/Absorption Population/Housing Balance Toxic/Hazardous Cumulative Effects
 Economic/Jobs Public Services/Facilities Traffic/Circulation Other: _____

Present Land Use/Zoning/General Plan Designation:

Several

Project Description: (please use a separate page if necessary)

The proposed East San Gabriel Valley Area Plan (ESGVAP or Project) is a community-based plan that is designed to focus on land use and policy issues that are specific to the unique characteristics and needs of the ESGV Planning Area and its communities. Some of these communities are currently subject to various overlapping plans, policies, and regulations, the proposed Project will update and consolidate these existing regulations into the Area Plan. The ESGVAP will include area-wide goals, policies, and implementation programs within nine different elements. The ESGVAP will include changes to land use designations and zoning in order increase residential density and commercial and mixed uses in areas near transit amenities.

Note: The State Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in.

Reviewing Agencies Checklist

Lead Agencies may recommend State Clearinghouse distribution by marking agencies below with an "X".
If you have already sent your document to the agency please denote that with an "S".

<input checked="" type="checkbox"/> Air Resources Board	<input checked="" type="checkbox"/> Office of Historic Preservation
<input checked="" type="checkbox"/> Boating & Waterways, Department of	<input checked="" type="checkbox"/> Office of Public School Construction
<input checked="" type="checkbox"/> California Emergency Management Agency	<input checked="" type="checkbox"/> Parks & Recreation, Department of
<input checked="" type="checkbox"/> California Highway Patrol	<input checked="" type="checkbox"/> Pesticide Regulation, Department of
<input checked="" type="checkbox"/> Caltrans District # <u>7</u>	<input checked="" type="checkbox"/> Public Utilities Commission
<input checked="" type="checkbox"/> Caltrans Division of Aeronautics	<input checked="" type="checkbox"/> Regional WQCB # <u>4</u>
<input checked="" type="checkbox"/> Caltrans Planning	<input checked="" type="checkbox"/> Resources Agency
<input type="checkbox"/> Central Valley Flood Protection Board	<input checked="" type="checkbox"/> Resources Recycling and Recovery, Department of
<input type="checkbox"/> Coachella Valley Mtns. Conservancy	<input type="checkbox"/> S.F. Bay Conservation & Development Comm.
<input type="checkbox"/> Coastal Commission	<input checked="" type="checkbox"/> San Gabriel & Lower L.A. Rivers & Mtns. Conservancy
<input type="checkbox"/> Colorado River Board	<input type="checkbox"/> San Joaquin River Conservancy
<input checked="" type="checkbox"/> Conservation, Department of	<input type="checkbox"/> Santa Monica Mtns. Conservancy
<input type="checkbox"/> Corrections, Department of	<input checked="" type="checkbox"/> State Lands Commission
<input type="checkbox"/> Delta Protection Commission	<input type="checkbox"/> SWRCB: Clean Water Grants
<input type="checkbox"/> Education, Department of	<input checked="" type="checkbox"/> SWRCB: Water Quality
<input checked="" type="checkbox"/> Energy Commission	<input type="checkbox"/> SWRCB: Water Rights
<input checked="" type="checkbox"/> Fish & Game Region # <u>5</u>	<input type="checkbox"/> Tahoe Regional Planning Agency
<input type="checkbox"/> Food & Agriculture, Department of	<input checked="" type="checkbox"/> Toxic Substances Control, Department of
<input checked="" type="checkbox"/> Forestry and Fire Protection, Department of	<input checked="" type="checkbox"/> Water Resources, Department of
<input checked="" type="checkbox"/> General Services, Department of	<input type="checkbox"/> Other: _____
<input type="checkbox"/> Health Services, Department of	<input type="checkbox"/> Other: _____
<input checked="" type="checkbox"/> Housing & Community Development	
<input checked="" type="checkbox"/> Native American Heritage Commission	

Local Public Review Period (to be filled in by lead agency)

Starting Date April 28, 2022 Ending Date June 1, 2022

Lead Agency (Complete if applicable):

Consulting Firm: <u>Environmental Science Associates</u>	Applicant: <u>County of Los Angeles</u>
Address: <u>626 Wilshire Boulevard, Suite 1100</u>	Address: <u>320 West Temple Street, Room 1362</u>
City/State/Zip: <u>Los Angeles, CA 90017</u>	City/State/Zip: <u>Los Angeles, California 90012</u>
Contact: <u>Ruta Thomas</u>	Phone: <u>(213) 974-6425</u>
Phone: <u>213.542.6064</u>	

Signature of Lead Agency Representative: Mi Kim

Digitally signed by Mi Kim
Date: 2022.04.13 07:59:57 -0700

Date: 4/13/2022

Authority cited: Section 21083, Public Resources Code. Reference: Section 21161, Public Resources Code.



Los Angeles County Department of Regional Planning

Planning for the Challenges Ahead



Amy J. Bodek, AICP
Director of Regional Planning

Dennis Slavin
Chief Deputy Director,
Regional Planning

NOTICE OF PREPARATION OF A DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT AND PUBLIC SCOPING MEETING

DATE: April 28, 2022

TO: State Clearinghouse, Responsible Agencies, Trustee Agencies, Organizations, and Interested Parties

SUBJECT: Notice of Preparation of a Draft Program Environmental Impact Report and Notice of Public Scoping Meeting

The County of Los Angeles (County), as Lead Agency pursuant to the California Environmental Quality Act (CEQA), will prepare a Draft Program Environmental Impact Report (PEIR) for the proposed Project identified below. The County has prepared this Notice of Preparation (NOP) to provide agencies, organizations, and other interested parties with sufficient information describing the Project and its potential environmental effects to enable meaningful response to this NOP.

All interested parties, including the public, responsible agencies, and trustee agencies, are invited to provide comments and input on the scope and content of the environmental information contained in the Draft PEIR. Trustee and responsible agencies should provide comments and input related to the agencies' respective areas of statutory responsibilities in connection with the proposed Project. As a responsible or trustee agency, your agency may need to use the PEIR prepared by the County when considering any permits that your agency must issue, or other approval for the Project.

PROJECT NAME: East San Gabriel Valley Area Plan

PROJECT/PERMIT NUMBERS: Project No. 2020-000612
Advance Planning Case No. RPPL2021013047
Environmental Assessment No. RPPL2022003550
General Plan Amendment No. RPPL2022003554
Zone Change No. RPPL2022003557

PROJECT APPLICANT: Los Angeles County

PROJECT LOCATION. The East San Gabriel Valley (ESGV) Planning Area is one of the 11 Planning Areas identified in the County General Plan (General Plan). The East San Gabriel Valley Planning Area includes the easternmost portions of the County. It is located south of the Angeles National Forest, north of the Orange County border east of Interstate-605, and west of the San Bernardino County line and includes the following 24 unincorporated communities: Avocado Heights, Charter Oak, Covina Islands, East Azusa, East Irwindale, East San Dimas, Glendora Islands, Hacienda Heights, North Claremont, North Pomona, Northeast La Verne, Northeast San Dimas, Rowland Heights, South Diamond Bar, South San Jose Hills, South Walnut, Valinda, Walnut Islands, West Claremont, West Puente Valley, West San Dimas, Pellissier Village, Unincorporated South El Monte, and Unincorporated North Whittier. These communities are identified in **Figure 1, ESGVAP Communities.**

PROJECT DESCRIPTION. The proposed East San Gabriel Valley Area Plan (ESGVAP or Area Plan) is a community-based plan that is designed to focus on land use and policy issues that are specific to the unique characteristics and needs of the ESGV Planning Area and its communities. As a part of the project, Rowland Heights Community Plan and Hacienda Heights Community Plan will be updated and incorporated into the ESGVAP. The Project will also update to Rowland Heights Community Standards District (CSD) as well as Avocado Heights and Trailside Ranch Equestrian Districts (EQDs). In addition, the East San Gabriel Valley Planning Area boundary will be updated to include the unincorporated communities of Pellissier Village, South El Monte, and North Whittier.

The ESGVAP is intended to the guide long-term growth of the ESGV Planning Area, enhance community spaces, promote a stable and livable environment that balances growth and preservation, and improve the quality of life in the ESGV through the creation of vibrant, thriving, safe, healthy, and pleasant communities. Its primary goals are to: a) retain the residential character of the ESGV Planning Area in harmony with its surroundings; b) promote an active regional hub with diverse options for housing, shopping, entertainment, recreation, and services; c) develop goals, policies, and implementation programs that support smart growth, sustainable development, and thoughtful enhancement/upgrade of existing neighborhoods; d) establish more public spaces and public realm improvements; and e) encourage diversity of housing options and affordability, and economic development. The ESGVAP consists of the following three primary project components:

General Plan Amendment No. RPPL2022003554

Amend the Los Angeles County General Plan to:

- Update, reorganize, and incorporate the existing Rowland Heights Community Plan and Hacienda Heights Community Plan into the ESGVAP as community chapters.

- Adjust the ESGV Planning Area boundary to include the unincorporated communities of South El Monte, Pellissier Village, and North Whittier.
- Establish the ESGVAP, which will be a comprehensive policy document for the unincorporated communities in the ESGV Planning Area that will include:
 - Area-wide goals and policies for the following topic specific elements: Land Use, Economic Development, Community Character and Design, Conservation and Natural Resources, Mobility, Public Services and Facilities, Health and Safety, Parks and Recreation, and Environmental Justice.
 - Area-wide Implementation Program.
 - Proposed land use changes to increase housing and enhance commercial and residential development within one mile of major transit stops, within a half mile of high-quality transit areas (HQTAs), near major intersections where there is accessibility to existing or proposed frequent transit and commercial services. The goal of these land use changes is to target growth near transit and active transportation facilities and everyday commercial services, and coordinate growth with improvements and investments that support walkable, thriving, and connected communities.
 - Community chapters with additional goals, policies, and implementation programs that are community-specific to address planning issues unique to a particular community that cannot be addressed through area-wide goals, policies, and implementation programs.
 - An updated land use policy map that utilizes the General Plan Land Use Legend, which at a minimum, will:
 - Reflect proposed changes to land use designations to accomplish the focused growth proposed in the Land Use Element and updated Housing Element.
 - Address inconsistencies between zoning, land use policy designation, and existing use by updating zoning or land use designations, where appropriate.

Zone Change No. RPPL2022003557

Amend Title 22 (Planning and Zoning Code) to:

- Make changes to the zoning map. The zone changes under consideration are targeted within a one-mile radius of major transit stops and near high-quality transit corridors as follows:
 - A-1 (Light Agriculture) to R-1 (Single-Family Residence, R-2 (Two-Family Residence), R-A (Residential Agricultural), C-1 (Restricted Business), or MXD (Mixed Use Development)

- C-1 (Restricted Business), C-2 (Neighborhood Business), C-3 (General Commercial), or C-H (Commercial Highway) to MXD (Mixed Use Development)
- R-A (Residential Agriculture) to R-2 (Two-Family Residence), R-3 (Limited Multiple Residence), C-1 (Restricted Business), or MXD (Mixed Use Development)
- R-1 (Single-Family Residence) to R-2 (Two-Family Residence or MXD (Mixed Use Development).
- Incorporate the proposed rezoning as identified in the Housing Element 2021-2029 to meet the Regional Housing Needs Assessment goals for the County.
- Re-zone agricultural zones that are developed with residential uses from A-1 (Light Agriculture) to an appropriate residential zone, such as R-1 (Single-family residence) or R-A (Residential Agricultural), so that zoning reflects the existing use and is consistent with the General Plan land use policy designations.

Advanced Planning Case No. RPPL2021013047

Amend Title 22 (Planning and Zoning) to implement the goals and policies of the Area Plan that would, in part, improve walkability of neighborhoods, create communal space, improve community character and design, increase neighborhood greening, increase access to transit, and promote land use compatibility. For the proposed amendments to Title 22, the Project would:

- Reassess and revise the existing Rowland Heights CSD to bring it into conformance with the goals and policies of the Area Plan.
- Adjust the boundaries of Avocado Heights and the Trailside Ranch Equestrian Districts to create one consolidated equestrian district and include adjacent properties with existing equestrian use.
- Establish an area-wide overlay to regulate height, protect significant ridgelines, and provision of public communal space in new development.

POTENTIAL ENVIRONMENTAL EFFECTS OF THE PROJECT. As suggested in State CEQA Guidelines Section 15060, the County prepared an Initial Study as a preliminary review of the environmental impacts of the Project, which will inform the preparation of the Draft PEIR. The Draft PEIR will evaluate potentially significant environmental effects of the proposed Project, identify feasible mitigation measures that may lessen or avoid such impacts, and identify a range of reasonable alternatives to the proposed Project. Potentially significant Project impacts that will be analyzed in the Draft PEIR will include the following environmental topics: Aesthetics; Agriculture/Forestry Resources; Air Quality; Biological Resources; Cultural Resources; Energy; Greenhouse Gas Emissions; Hazards/Hazardous Materials; Hydrology/Water Quality; Land Use/Planning; Noise;

Population/Housing; Public Services; Recreation; Transportation; Tribal Cultural Resources; Utilities/Service Systems, and Wildfire.

The County has determined that several impact categories are not expected to have potentially significant effects. Although not potentially significant, the following environmental topics will be briefly discussed in the Draft PEIR: Geology and Soils and Mineral Resources.

NOTICE OF PUBLIC SCOPING MEETING. Consistent with Assembly Bill 361, which allows teleconference provisions for local agency public meetings, the County will conduct a virtual public Scoping Meeting to inform the public and interested agencies about the Project and solicit oral and written comments as to the appropriate scope and content of the Draft PEIR. All interested parties are invited to attend the virtual scoping meeting to assist in identifying issues to be addressed in the Draft PEIR. The Scoping Meeting will involve a presentation about the proposed Project, the environmental review process, and schedule. The Project's Scoping Meeting will be held virtually, online via Zoom Webinar on **Tuesday, May 10, 2022 at 6:00 PM.**

The link below will take you to the virtual Scoping Meeting Webpage with instructions on joining the meeting:

<https://planning.lacounty.gov/site/esgvap/>

Spanish and Chinese translation and interpretation will be available during the Scoping Meeting. Translation in other languages can be made available at the meeting upon request. Please submit translation requests for other languages at least seven business days in advance of the scheduled meeting to Mi Kim at commplan@planning.lacounty.gov.

PUBLIC REVIEW PERIOD. In accordance with Title 14, Section 15082(b) of the California Code of Regulations, this NOP is available for a 30-day public review period **beginning April 28, 2022**, and comments on this NOP must be received by the County by no later than June 1, 2022, at 5:30 p.m. When submitting written comments, please reference the project name and number and include your contact information. Any comments provided should identify specific topics of environmental concern and your reason for suggesting the study of these topics in the PEIR. Responsible and trustee agencies are requested to indicate their statutory responsibilities in connection with this Project when responding. All written responses will be included as Appendices in the PEIR and their contents will be considered in the preparation of the PEIR.

Though email is the preferred form of communication, you may direct your written comments via email, fax, and/or U.S. Postal Services to:

Mi Kim
County of Los Angeles
Department of Regional Planning
320 West Temple Street, Room 1362
Los Angeles, California 90012
Tel: (213) 974-6425
Fax: (213) 626-0434
commplan@planning.lacounty.gov

DOCUMENT AVAILABILITY. The NOP and Initial Study for this Project is available for public review on the East San Gabriel Valley Area Plan website at the following locations:

<https://planning.lacounty.gov/site/esgvap/> or

<https://planning.lacounty.gov/ceqa/notices> (under “Advance Planning Projects”)

The NOP is also available for public review at the following public libraries:

Rowland Heights Library	1850 Nogales Street	Rowland Heights, CA	91748
Hacienda Heights Library	16010 La Monde Street	Hacienda Heights, CA	91745
Diamond Bar Library	21800 Copley Drive	Diamond Bar, CA	91765
Walnut Library	21155 La Puente Road	Walnut, CA	91789
La Puente Library	15920 E Central Avenue	La Puente, CA	91744
La Verne Library	3640 D Street	La Verne, CA	91750
San Dimas Library	145 N Walnut Avenue	San Dimas, CA	91773
Charter Oak Library	20540 E Arrow Highway, Suite K	Covina, CA	91724
Sunkist Library	840 N Puente Avenue	La Puente, CA	91746
West Covina Libraries	1601 W West Covina Parkway	West Covina, CA	91790
South El Monte Library	1430 North Central Avenue	South El Monte, CA	91733
Azusa City Library	729 N Dalton Avenue	Azusa, CA	91702
Covina Public Library	234 N Second Avenue	Covina, CA	91723

The hours of operation at each library varies. Please see the County library website to confirm this information before visiting: <https://lacountylibrary.org/>

PROJECT WEBSITE. Visit the ESGVAP website for more information: planning.lacounty.gov/site/esgvap/.

Thank you for your participation in the environmental review of this Project.

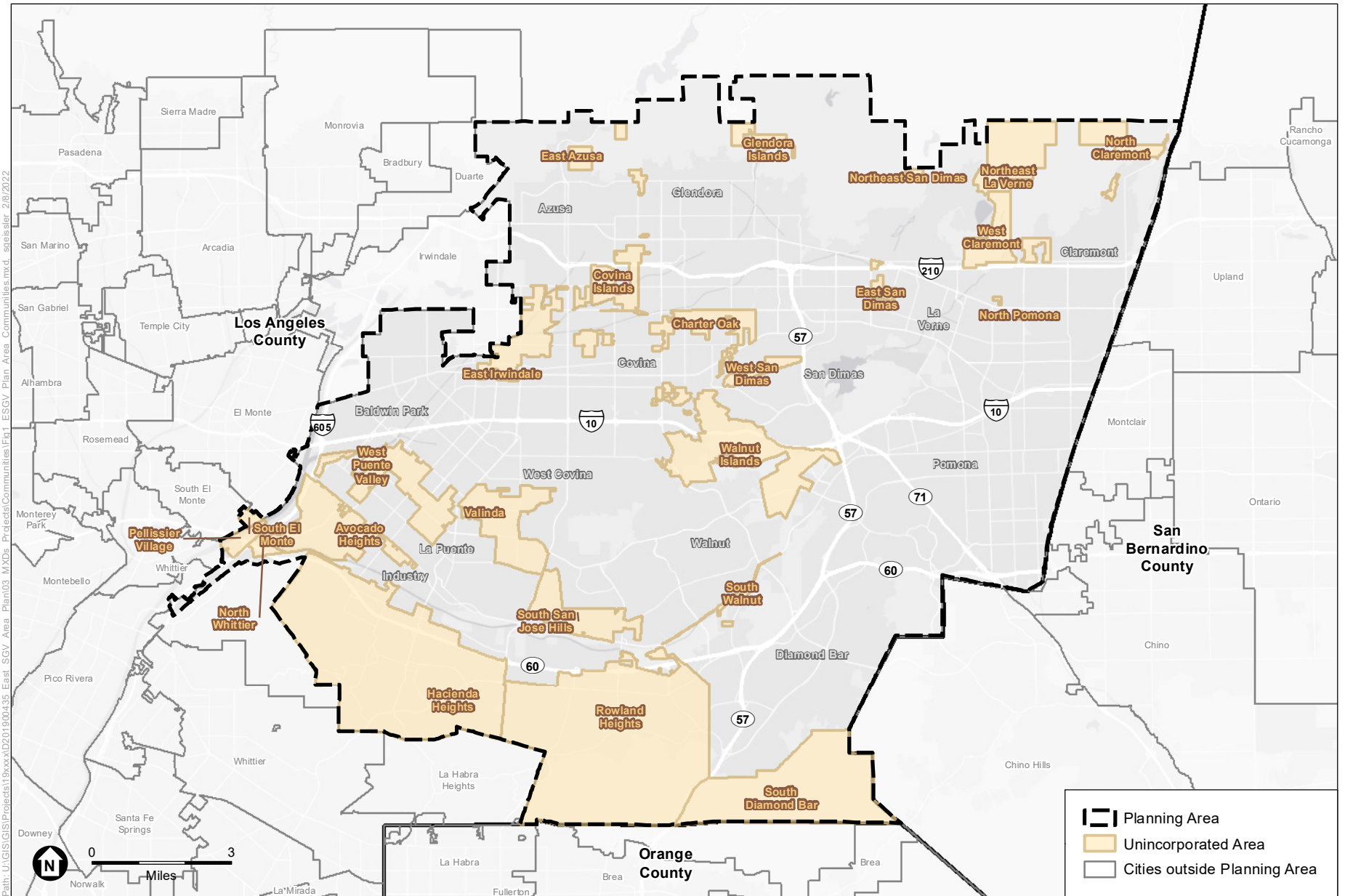
For more information about the East San Gabriel Valley Area Plan and Programmatic Environmental Impact Report (PEIR) visit: planning.lacounty.gov/site/esgvap/ or email commplan@planning.lacounty.gov or call (213) 974-6425 and leave a message. To view the Notice of Preparation (NOP) online, including a Spanish and Chinese version of the NOP, please visit: planning.lacounty.gov/site/esgvap/about/project-documents/ or planning.lacounty.gov/ceqa/notices.

Si desea conocer más información sobre el Plan de Área del Valle del Este de San Gabriel y sobre el Informe Programático de Impacto Ambiental (PEIR, por sus siglas en inglés) visite la página web: planning.lacounty.gov/site/esgvap/, envíe un correo electrónico a commplan@planning.lacounty.gov o llame al (213) 974-6425 y deje un mensaje. Es posible consultar el Aviso de Preparación (NOP) en línea, incluida una versión en español y otra en chino, en: planning.lacounty.gov/site/esgvap/about/project-documents/ o planning.lacounty.gov/ceqa/notices.

如需 East San Gabriel Valley 地區計劃和計劃環境影響報告 (PEIR) 的更多資訊，請造訪：planning.lacounty.gov/site/esgvap/、傳送電郵至 commplan@planning.lacounty.gov 或致電(213)974-6425 並留言。如需線上查閱《編制通知》(NOP)，包括西班牙文及中文版本，請造訪：planning.lacounty.gov/site/esgvap/about/project-documents/ 或 planning.lacounty.gov/ceqa/notices。

ATTACHMENTS: Initial Study

Figure 1: ESGVAP Communities



SOURCE: ESRI; Los Angeles County GIS; ESA, 2022

East San Gabriel Valley Area Plan

Figure 1
ESGVAP Communities



EAST SAN GABRIEL VALLEY AREA PLAN

Environmental Checklist Form (Initial Study)

April 2022

Prepared for:
County of Los Angeles
Department of Regional Planning
320 West Temple Street, 13th Floor
Los Angeles, California 90012

Prepared by:
Environmental Science Associates
626 Wilshire Boulevard Suite 1100
Los Angeles, California 90017



EAST SAN GABRIEL VALLEY AREA PLAN

Environmental Checklist Form (Initial Study)

April 2022

Prepared for:
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Prepared by:
Environmental Science Associates
626 Wilshire Boulevard Suite 1100
Los Angeles, California 90017



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Appendix A: Zoning & Land Use Change Figures

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Environmental Checklist Form (Initial Study)

County of Los Angeles, Department of Regional Planning



Project Title:

East San Gabriel Valley Area Plan

- Project No. 2020-000612
- Advanced Planning Case No. RPPL2021013047
- Environmental Assessment No. RPPL2022003550
- General Plan Amendment No. RPPL2022003554
- Zone Change No. RPPL2022003557

Lead Agency Name and Address:

Los Angeles County, 320 West Temple Street, Los Angeles, CA 90012

Contact Person and Phone Number:

Mi Kim, (213)-974-6425

Project Sponsor's Name and Address:

Los Angeles County Department of Regional Planning
320 West Temple Street
Los Angeles, California 90012

Project location:

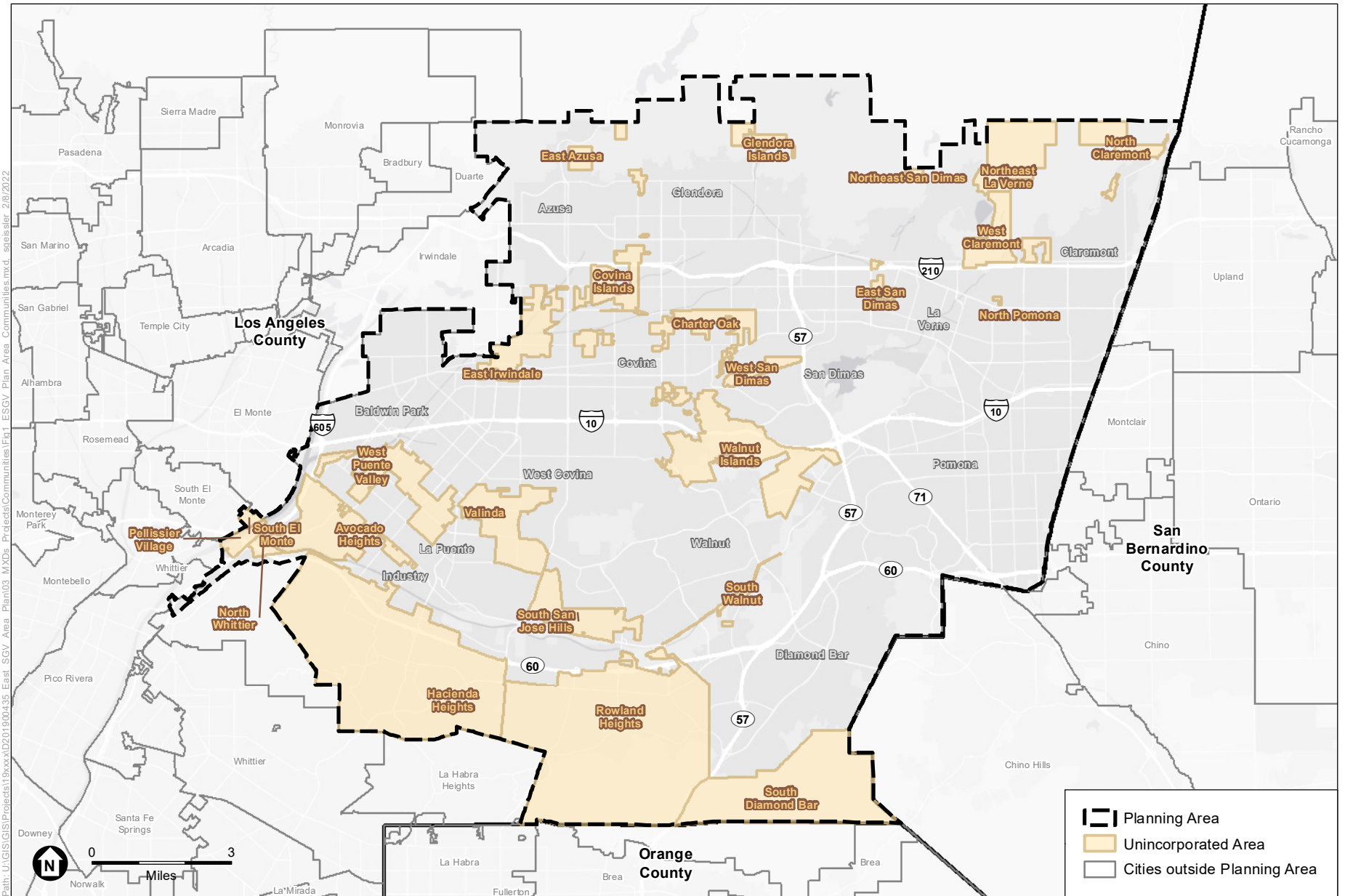
The East San Gabriel Valley Area Plan (ESGVAP, Area Plan, or Project) is comprised of the following 24 unincorporated communities of Los Angeles County (County): Avocado Heights, Charter Oak, Covina Islands, East Azusa, East Irwindale, East San Dimas, Glendora Islands, Hacienda Heights, North Claremont, North Pomona, Northeast La Verne, Northeast San Dimas, Rowland Heights, South Diamond Bar, South San Jose Hills, South Walnut, Valinda, Walnut Islands, West Claremont, West Puente Valley, West San Dimas, Pellissier Village, Unincorporated South El Monte, Unincorporated North Whittier. Collectively, these 24 communities are referred to as the East San Gabriel Valley Planning Area (ESGV Planning Area or Project Site), which is one of the County's 11 Planning Areas identified in the County General Plan (General Plan). The ESGV Planning Area includes the easternmost portions of the County and is generally located south of the Angeles National Forest, north of the Orange County border, east of Interstate-605 and west of the San Bernardino County line. Figure 1 depicts the 24 unincorporated communities of the ESGVAP.

Gross Acreage:

Approximately 32,826 acres (or 51.29 square miles of unincorporated areas)

General Plan Designation:

Residential 2, Residential 5, Residential 9, Residential 18, Residential 30, Residential 50, General Commercial, Light Industrial, Conservation, Parks and Recreation, Public and Semi-Public, Rural Land 1, Rural Land 2, Rural Land 10, Rural Land 20, Water



SOURCE: ESRI; Los Angeles County GIS; ESA, 2022

East San Gabriel Valley Area Plan

Figure 1
ESGVAP Communities



Community/Area-wide Plan Designation:

Rowland Heights Community Plan and Hacienda Heights Community Plan

Zoning:

R-1 (Single-Family Residence), R-2 (Two-Family Residence), R-3-U (Limited Density Multiple Residence), R-4-U (Medium Density Multiple Residence), R-A (Residential Agricultural), RPD (Residential Planned Development), A-1 (Light Agricultural), A-2 (Heavy Agricultural), C-1 (Restricted Business), C-2 (Neighborhood Business), C-3 (General Commercial), C-R (Commercial Recreation), C-H (Commercial Highway), C-M (Commercial Manufacturing), CPD (Commercial Planned Development), M-1 (Light Manufacturing), M-1.5 (Restricted Heavy Manufacturing), M-2 (Heavy Manufacturing), MPD (Manufacturing--Industrial Planned), B-1 (Buffer Strip), B-2 (Corner Buffer), O-S (Open Space), MXD (Mixed Use Development), IT (Institutional), P-R (Parking Restricted).

Description of Project:

Executive Summary

The proposed East San Gabriel Valley Area Plan (Area Plan or Project) is a long-range policy document to enhance, guide, and support the long-term growth, development, and maintenance of 24 unincorporated communities in East San Gabriel Valley (ESGV). The Area Plan is an extension of the Los Angeles County General Plan focused on the unique characteristics and needs of ESGV communities. The Area Plan consists of nine elements and 15 community specific chapters which contain goals, policies and implementation actions. The Project proposes changes to land use and zone designations to accommodate targeted growth and bring zoning, land use designation, and/or existing land use into consistency. The Project also includes an update to land use regulations (County Code Title 22) and maps to implement the goals and policies of the Area Plan. The purpose of the Area Plan is to promote a stable and pleasant environment, balance growth and preservation, and promote housing to enhance quality of life and support vibrant, thriving, safe, healthy communities in East San Gabriel Valley.

The Area Plan will include and address the following nine community-specific elements: Land Use Element, Economic Development Element, Community Character and Design Element, Natural Resources Conservation and Open Space Element, Mobility Element, Public Services and Facilities Element, Health and Safety Element, Parks and Recreation, and Environmental Justice Element. Each element will establish area-wide goals, policies, and implementation programs that would apply to the entire ESGV Planning Area. The Area Plan will also include community chapters that will consist of either a single community or a group of communities that have similar characteristics and needs. Each community chapter will contain additional community-specific goals, policies, and implementation programs that will only apply to its respective communities.

The ESGVAP's primary goals are to: a) retain the residential character of the ESGV Planning Area in harmony with its surroundings; b) promote an active regional hub with diverse options for housing, shopping, entertainment, recreation, and services; c) develop goals, policies, and implementation programs that support smart growth, sustainable development, and thoughtful enhancement/upgrade of existing neighborhoods; d) establish more public spaces and public realm improvements; and e) encourage diversity of housing options and affordability, and economic development. Thus, the Area Plan developed seven vision statements that serve as a comprehensive land use vision for the ESGV Planning Area. These vision statements provide the foundation for the development of growth and preservation strategies, as well as the goals, policies, and implementation programs in the Land Use Element of the Area Plan.

The following seven principles helped shape the ESGVAP to create a planning area that supports:

- a) Sustainable Growth Patterns
- b) Diverse, Walkable Communities
- c) Connected and Active Communities
- d) Thriving Economy and Workforce
- e) Shared Community Identity and Character
- f) Sustainable Built and Natural Environment
- g) Informed, Empowered, and Environmental Just Community

Consistent with the guiding principles, the ESGVAP is proposing amendments to various land use and zoning designations. In addition to changes to land use designations and zoning to accomplish the growth and preservation strategies, the ESGVAP has updated some existing zoning and land use designations to ensure consistency between the ESGVAP and the General Plan land use policy map. In certain cases, updates would not change the density or type of land use allowed, but would simply provide consistency with the General Plan. Proposed changes to land use and zoning that would increase growth are summarized in Table 1. Land use and zoning changes proposed to create consistency with the General Plan are not included in Table 1. In addition, some up-zoning to allow higher densities will focus growth within one mile of major transit stops, within a half-mile of high-quality transit corridors, and within a quarter-mile of established or new commercial centers that have access to frequent transit services.

Table 1: Land Use and Zoning Change Summary for Proposed Growth

Community	Location of Change	Existing Land Use Designation	Proposed Land Use Designation	Existing Zoning Designation	Proposed Zoning Designation
Avocado Heights	Areas near the intersection of Don Julian Road and Workman Mill Road	H9	Increase in residential density to H18 and H30	A1 C1 (Restricted Businesses)	R-A, R-2 or R-4 MXD (Mixed-Use Development)
Charter Oaks	Areas within a quarter-mile of a major transit stop (Arrow Highway and Grand Avenue). These areas are also located in proximity to HQTAs, existing commercial centers, and proposed village centers	H9	CG (General Commercial)	A-1	C-3
	Areas within a quarter-mile of an HQTA. Many of these areas are also within one mile of a major transit stop	H9	H18	A-1	R-2
	Areas within a quarter-mile of an HQTA and located between E. Cienega Avenue and E. Arrow Highway	H9	H18	A-1	R-2

Community	Location of Change	Existing Land Use Designation	Proposed Land Use Designation	Existing Zoning Designation	Proposed Zoning Designation
	Some areas along E. Arrow Highway and S. Valley Center Avenue	H9	CG	A-1, C-1, C-2, C-3	MXD
Covina Islands	Areas near the intersection of N. Citrus Avenue and E. Covina Boulevard, adjacent to Cypress Park, which are within a half-mile of a major transit stop (Metrolink Covina)	H9	H30	R-A	R-3
	Areas within a half-mile of the Arrow Highway and Azusa Avenue Transit Stop	H9	H18	A-1	R-2
	Area near E. Gladstone Avenue and Barranca Avenue near a proposed commercial center	H9	CG	R-A	C-1
	Area near Arrow Highway and Barranca Avenue and another near E Gladstone Street and Barranca Avenue	H9	CG	A-1	C-1
	Area near E. Mauna Loa Avenue and Barranca Avenue (near Stanton Elementary School)	H9	H18	No change	No change
	Area on the southeast corner of Irwindale Avenue and E. San Bernardino Avenue	No change	No change	C-1	C-3
East San Dimas	Within a half-mile from proposed village centers	H9	H18	R-A	R-2
	Select residential areas along N. San Dimas Canyon Road and near proposed commercial areas	H9	CG	R-A	C-1

Community	Location of Change	Existing Land Use Designation	Proposed Land Use Designation	Existing Zoning Designation	Proposed Zoning Designation
Hacienda Heights	Three areas that are within a half-mile of the proposed Village Center and existing Commercial Center at the corner of S. Hacienda Boulevard and Newton Street, that are currently designated H5 and H2, will increase in density to H30	H2 and H5	H30	R-1 and R-A	R-2
	Select areas that are within a half-mile of the proposed Village Center and existing Commercial Center at the intersection of S. Azusa Avenue and Colima Street	H5	H30	R-A	R-2
	Two areas that are within a quarter-mile of the Village Center and Commercial Center at the intersection of S. Azusa Avenue and Colima Street	No change	No change	C-2	MXD
Rowland Heights	Area on the west end of Colima Road near the proposed Village Center	No change	No change	C-3	MXD
	Along Colima Road within a quarter-mile of existing commercial centers	U1	H18	R-1 C-1, C-2, C-3	R-2 MXD
	Select areas within a quarter-mile of existing commercial centers	U1 or U2	H18	A-1	R-2
San Jose Hills	An area near the Commercial Center at the intersection of Temple Ave and S. Azusa Avenue	H9	CG	A-1	C-1

Community	Location of Change	Existing Land Use Designation	Proposed Land Use Designation	Existing Zoning Designation	Proposed Zoning Designation
	An area near the Commercial Center at the intersection of S. Nogales Street and Northam Street	No change	No change	C-2	MXD
Valinda	One area which is located along an HQTA and near a Village Center located at Amar Road and Walnut Avenue	H9	CG	R-1	MXD
	Another area that is within a half-mile of a major transit center (Azusa Avenue and Amar Road)	H18	CG	C-1	MXD
	One area located along S. Glendora Avenue	No change	No change	C-2 and C-H	MXD
East Irwindale	An area within one mile of a major transit stop and within a half-mile of an HQTA north of East Arrow Highway and south of West Gladstone Street	H9	H18	A1	R-1, R-2
	An area within a half-mile of a major transit stop and within a quarter-mile of an HQTA north of East Arrow Highway and south of West Gladstone Street	H9	H30	A1	R2, R4, MXD
	The majority of the community located north of E. Badillo Street and south of the San Dimas Wash.	No change	No change	A-1	R-1

A General Plan amendment and associated zoning amendments are required to implement the proposed ESGAVP and promote its vision of the ESGV Planning Area. The ESGVAP consists of the components described below.

Components of the ESGVAP

As a component of the General Plan, the ESGVAP would be consistent and compliant with the General Plan and other County and regional plans that have been adopted such as the County Housing Element Update, the Los Angeles County Community Climate Action Plan, Metro Active Transportation Strategic Plan, Connect SoCal, and Step by Step Los Angeles County. As an amendment to the General Plan, a General Plan amendment and associated zoning amendments are required to implement the proposed ESGAVP and promote its vision of the ESGV Planning Area. The components of the ESGVAP are summarized below.

General Plan Amendment No. RPPL2022003554

Amend the Los Angeles County General Plan to:

1. Update, reorganize, and incorporate the existing Rowland Heights Community Plan and Hacienda Heights Community Plan into the ESGVAP as community chapters.
 - i) Adjust the ESGV Planning Area boundary to include the unincorporated communities of South El Monte, Pellissier Village, and North Whittier.
 - ii) Establish the ESGVAP, which will be a comprehensive policy document for the unincorporated communities in the ESGV Planning Area that will include:
 - a. Area-wide goals and policies for the following topic specific elements: Land Use, Economic Development, Community Character and Design, Conservation and Natural Resources, Mobility, Public Services and Facilities, Health and Safety, Parks and Recreation, and Environmental Justice.
 - b. Area-wide Implementation Program.
 - c. Proposed land use changes to increase housing and enhance commercial and residential development within one mile of major transit stops, within a half mile of high-quality transit areas (HQTAs), near major intersections where there is accessibility to existing or proposed frequent transit and commercial services. The goal of these land use changes is to target growth near transit and active transportation facilities and everyday commercial services, and coordinate growth with improvements and investments that support walkable, thriving, and connected communities.
 - d. Community chapters with additional goals, policies, and implementation programs that are community-specific to address planning issues unique to a particular community that cannot be addressed through area-wide goals, policies, and implementation programs.
 - e. An updated land use policy map that utilizes the General Plan Land Use Legend, which at a minimum, will:
 - Reflect proposed changes to land use designations to accomplish the focused growth proposed in the Land Use Element and updated Housing Element.
 - Address inconsistencies between zoning, land use policy designation, and existing use by updating zoning or land use designations, where appropriate.

Zone Change No. RPPL2022003557

Amend Title 22 (Planning and Zoning Code) to:

- a. Make changes to the zoning map. The zone changes under consideration are targeted within a one-mile radius of major transit stops and near high-quality transit corridors as follows:
 1. A-1 (Light Agriculture) to R-1 (Single-Family Residence), R-2 (Two-Family Residence), R-A (Residential Agricultural), C-1 (Restricted Business), or MXD (Mixed Use Development)
 2. C-1 (Restricted Business), C-2 (Neighborhood Business), C-3 (General Commercial), or C-H (Commercial Highway) to MXD (Mixed Use Development)
 3. R-A (Residential Agriculture) to R-2 (Two-Family Residence), R-3 (Limited Multiple Residence), C-1 (Restricted Business), or MXD (Mixed Use Development)
 4. R-1 (Single-Family Residence) to R-2 (Two-Family Residence or MXD (Mixed Use Development).
2. Incorporate the proposed rezoning as identified in the Housing Element 2021-2029 to meet the Regional Housing Needs Assessment goals for the County.
3. Re-zone agricultural zones that are developed with residential uses from A-1 (Light Agriculture) to an appropriate residential zone, such as R-1 (Single-family residence) or R-A (Residential Agricultural), so that zoning reflects the existing use and is consistent with the General Plan land use policy designations.

Advanced Planning Case No. RPPL2021013047

Amend Title 22 (Planning and Zoning) to implement the goals and policies of the Area Plan that would, in part, improve walkability of neighborhoods, create communal space, improve community character and design, increase neighborhood greening, increase access to transit, and promote land use compatibility. For the proposed amendments to Title 22, the Project would:

4. Reassess and revise the existing Rowland Heights CSD to bring it into conformance with the goals and policies of the Area Plan.
5. Adjust the boundaries of Avocado Heights and the Trailside Ranch Equestrian Districts to create one consolidated equestrian district and include adjacent properties with existing equestrian use.
6. Establish an area-wide overlay to regulate height, protect significant ridgelines, and provision of public communal space in new development.

Land Use Element

The overarching goal of the Land Use Element is to conserve the residential character of the East San Gabriel Valley communities while allowing communities to grow sustainably into a dynamic regional hub that provides diverse options for housing, shopping, entertainment, recreation, and services for its residents, workers, and visitors.

Economic Development Element

The Economic Development Element is intended to increase economic mobility for ESGV residents, create local jobs in ESGV communities, create a sustainable and revitalized economy, and prioritize equity in revitalization efforts.

Community Character and Design Element

The ESGVAP strives to conserve the ESGV's character that is identified by rural equestrian roots and safe residential neighborhood while fostering more diverse residential commercial, mixed-use and open space amenities.

Natural Resources Conservation and Open Space Element

The Natural Resources, Conservation, and Open Space Element establishes a vision and priorities to guide conservation in the ESGV.

Mobility Element

The Mobility Element includes goals and strategies to improve the Area's mobility system and will include goals and policies to address traffic and emissions from traffic, improve infrastructure for mobility, provide for safe mobility of walkers and bikers, increase access to public transit and improve community connectedness.

Public Services and Facilities Element

This Element identifies community infrastructure challenges include the vulnerability of infrastructure and community services to climate change, communities' lack of access to internet, the vulnerability of linguistically isolated individuals, and the difficulty of providing services to community members across jurisdictional boundaries.

Health and Safety Element

The Health and Safety presents a guiding framework to create healthy, safe, and resilient communities. This element builds off the policies in the General Plan and its Safety Element, the LA County Sustainability Plan, the Community Climate Action Plan, and other applicable County and regional plans that address health and safety to create policies and programs that address the specific concerns of the planning area.

Parks and Recreation Element

The intent of this element is to provide equitable access to open space, parks, and recreation; preserved natural, historical and cultural resources; recreational opportunities and education on indigenous history; enhanced parks and recreational programs; and improved, expanded, and connected trails.

Environmental Justice Element

The intent of this element is to focus on the needs of impacted areas and sensitive groups as it relates to environmental and social justice issues. With equity as the primary objective, the goals, policies, and implementation actions located in this element aim to promote environmental justice and resiliency in communities with histories of injustice and inequity.

Community Chapters

Community chapters may consist of individual communities or may include a group of communities that have similar characteristics and needs. Community chapters include goals, policies, and implementation programs tailored to meet the specific needs, challenges, and opportunities of communities.

References

Los Angeles County Department of Regional Planning. 2021. East San Gabriel Valley Area Plan Task 1.1 Land Use Issues, Challenges, and Opportunities Memo. July 2021.

Surrounding Land Uses and Setting:

The ESGV is comprised of a largely developed collection of unincorporated communities sharing boundaries with other jurisdictions. The combined Planning Area makes up approximately 32,826 acres and is characterized by rolling, dry hills framing the lowland valley. The San Gabriel River and Interstate (I-) 605 (also called the San Gabriel River Freeway) form the western boundary of the Planning Area. The Puente Hills, with areas of open space and habitat form the southern boundary. The steep slopes and urban-wildland interface with the San Gabriel Mountains and Angeles National Forest form the northern extent of the Planning Area. The region is heavily traversed by east-west transportation routes and corridors, with a few major north/south directional routes. The land contains highly varied topographies.

Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code § 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

On February 4, 2022, the County submitted notification and request to consult letters to 5 tribes pursuant to AB 52. To date, no requests for consultation have been received from any of the tribes pursuant to AB 52. On February 4, 2022, the County also submitted notification and request to consult letters to 11 tribes and organizations pursuant to SB 18. To date, no requests for consultation have been received from any of the tribes or organizations pursuant to SB 18.

Other public agencies whose approval may be required (e.g., permits, financing approval, or participation agreement):

Los Angeles County has approval authority over the East San Gabriel Valley Area Plan. Approval from other public agencies is not required. The County Board of Supervisors would certify the Final Environmental Impact Report (EIR), and adopt the East San Gabriel Valley Area Plan.

Reviewing Agencies:

Responsible Agencies

- None
- Regional Water Quality Control Board:
 - Los Angeles Region
 - Lahontan Region
- Coastal Commission
- Army Corps of Engineers
- LAFCO

Special Reviewing Agencies

- None
- Santa Monica Mountains Conservancy
- National Parks
- National Forest
- Edwards Air Force Base
- Resource Conservation District of Santa Monica Mountains Area
- US Fish and Wildlife Service

Regional Significance

- None
- SCAG Criteria
- Air Quality
- Water Resources
- Santa Monica Mtns. Area
-

Trustee Agencies

- None
- State Dept. of Fish and
Wildlife
- State Dept. of Parks and
Recreation
- State Lands Commission
- University of California
(Natural Land and Water
Reserves System)

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially significant impacts affected by this project.

- | | | |
|--|---|--|
| <input checked="" type="checkbox"/> Aesthetics | <input checked="" type="checkbox"/> Greenhouse Gas Emissions | <input checked="" type="checkbox"/> Public Services |
| <input checked="" type="checkbox"/> Agriculture/Forestry | <input checked="" type="checkbox"/> Hazards/Hazardous Materials | <input checked="" type="checkbox"/> Recreation |
| <input checked="" type="checkbox"/> Air Quality | <input checked="" type="checkbox"/> Hydrology/Water Quality | <input checked="" type="checkbox"/> Transportation |
| <input checked="" type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Land Use/Planning | <input checked="" type="checkbox"/> Tribal Cultural Resources |
| <input checked="" type="checkbox"/> Cultural Resources | <input type="checkbox"/> Mineral Resources | <input checked="" type="checkbox"/> Utilities/Services |
| <input checked="" type="checkbox"/> Energy | <input checked="" type="checkbox"/> Noise | <input checked="" type="checkbox"/> Wildfire |
| <input type="checkbox"/> Geology/Soils | <input checked="" type="checkbox"/> Population/Housing | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

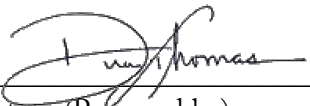
DETERMINATION: (To be completed by the Lead Department.)

On the basis of this initial evaluation:

- I find that the proposed project **COULD NOT** have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project **MAY** have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

I find that the proposed project **MAY** have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.


- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.



 Signature (Prepared by)

4/28/2022

 Date



 Signature (Approved by)

4/28/2022

 Date

EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources the Lead Department cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the Lead Department has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level. (Mitigation measures from Section XVII, "Earlier Analyses," may be cross-referenced.)
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA processes, an effect has been adequately analyzed in an earlier EIR or negative declaration. (State CEQA Guidelines § 15063(c)(3)(D).) In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of, and adequately analyzed in, an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 7) The explanation of each issue should identify: the significance threshold, if any, used to evaluate each question, and; mitigation measures identified, if any, to reduce the impact to less than significant. Sources of thresholds include the County General Plan, other County planning documents, and County ordinances. Some thresholds are unique to geographical locations.

1. AESTHETICS

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Except as provided in Public Resources Code Section 21099, would the project:

a) Have a substantial adverse effect on a scenic vista?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The visual character of the East San Gabriel Valley has developed over time from its agricultural and rural routes. The area is defined by wide topographic variation dominated by mountains and hills in the background and the valley floor. Currently the visual character of the ESGV is primarily defined by residential land uses in the valley, access to open space throughout the Plan Area, and the hills and mountains which ring the valley. There are no County-designated scenic vistas in the ESGV. However, wide viewsheds or views with important aesthetic or community significance may be available from elevated points and hills. The ESGVAP would allow for development around high-quality transit areas and major transit stops at densities that are higher than what currently exists. Implementation of the ESGVAP would involve construction of new development and would involve changes to the existing visual appearance of development in the ESGV. Construction of new development and increases in building heights and changes to building forms could result in visual impacts that are visible from scenic vistas. Therefore, impacts to scenic vistas are considered **potentially significant** and this criterion will be analyzed further in the EIR.

b) Be visible from or obstruct views from a regional riding, hiking, or multi-use trail?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The ESGV is encircled by hills and mountains which provide access to a variety of trails. Additionally, the ESGV is unique with regard to the equestrian trails that are present throughout the Plan Area. The ESGVAP would allow for development around high-quality transit areas and major transit stops at densities that are higher than what currently exists. Implementation of the ESGVAP would involve construction of new development and would involve changes to the existing visual appearance of development in the ESGV. Construction of new development and increases in building heights and changes to building forms could result in visual impacts that are visible from regional trails. Therefore, impacts to scenic vistas are considered **potentially significant** and this criterion will be analyzed further in the EIR.

c) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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There is one designated state scenic highway near the ESGVAP area: Angeles Crest Highway Route-2, from 2.7 miles north of I-210 to the San Bernardino County line. There are also three highways within or near the Plan Area that are eligible for designation including Route 142, Route 57, and Route 39 (Los Angeles County 2014; Caltrans 2019). As discussed above, future projects proposed under the ESGVAP could result in temporary visual contrast or changes during construction or create new structures that create contrast compared to existing visual conditions. These projects could occur near designated scenic highways and could, depending on the location and design of the projects, result in changes to the visual resources visible along a scenic highway, such as trees, rock outcroppings or historic buildings. Therefore, impacts to scenic resources within a state scenic highway are considered **potentially significant** and this criterion will be analyzed further in the EIR.

d) Substantially degrade the existing visual character or quality of public views of the site and its surroundings because of height, bulk, pattern, scale, character, or other features and/or conflict with applicable zoning and other regulations governing scenic quality? (Public views are those that are experienced from a publicly accessible vantage point)

As described above, the visual character of the East San Gabriel Valley has developed over time from its agricultural and rural roots. The area is defined by wide topographic variation dominated by mountains and hills in the background and the valley floor in the forefront. Currently the visual character of the ESGV is primarily characterized by residential land uses in the valley, access to open space throughout the Plan Area, and the hills and mountains which ring the valley. The ESGVAP would allow for development around high-quality transit areas and major transit stops at densities that are higher than what currently exists. Implementation of the ESGVAP would involve construction of new development and would involve changes to the existing visual appearance of development in the ESGV due to changes in allowed height limits and design standards. Construction of new development and increases in building heights and changes to building forms could result in visual impacts that could adversely affect visual character. Therefore, impacts to scenic vistas are considered **potentially significant** and this criterion will be analyzed further in the EIR.

e) Create a new source of substantial shadows, light, or glare which would adversely affect day or nighttime views in the area?

Shade and shadow could be created if buildings or structures block direct sunlight from adjacent properties potentially affecting the users or occupants of adjacent land uses. Shade and shadow can be influenced by the time of day, season, weather, height and bulk of building, spacing, topography and other factors. Shade can result in positive effects such as cooling or can result in negative effects such as the loss of natural light. The ESGVAP would include changes to land use designations and zoning that would allow for increased residential density, as well as new commercial and mixed-use development in some areas near existing transit amenities or village centers. The ESGVAP also includes policies to create flexible land use policies to protect industrial land uses and encourage the development of businesses in the area. Together, these land use changes and policies could result in changes to allowed building heights and forms, increased commercial or industrial uses and greater residential densities. All of these development types could increase sources of glare and nighttime lighting, which is considered a **potentially significant impact**. As a result, this criterion will be evaluated further in the EIR.

References

California Department of Transportation (Caltrans). 2019. "California State Scenic Highways." Last updated July 2019. <https://dot.ca.gov/programs/design/lap-landsESGVAPe-architecture-and-community-livability/lap-liv-i-scenic-highways>.

Los Angeles County. 2014. General Plan Update Environmental Impact Report. June 2014. Available online; https://planning.lacounty.gov/assets/upl/project/gp_2035_deir.pdf. Accessed October 23, 2021.

Los Angeles County Office of the County Counsel. 2016. Ordinance Amending Title 22 of the Los Angeles County Code to Establish or Amend Requirements for Certain Renewable Energy Systems and Facilities, Wineries and Tasting Rooms, and Minor Conditional Use Permits. December 13, 2016. URL: <http://file.lacounty.gov/SDSInter/bos/supdocs/109934.pdf>.

2. AGRICULTURE/FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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There is a relatively small quantity of land area located within Los Angeles County that contains designated farmland. Important farmland in the County is located in Antelope Valley, Santa Clarita Valley, the Santa Monica Mountains, and the San Fernando Valley. Approximately 90 percent of the important farmland in the County is located in Antelope Valley. Within unincorporated areas of the County, there are approximately 26,235 acres of prime farmland, farmland of statewide importance, and unique farmland. There are approximately 6,853 acres of farmland of local importance and 205,193 acres of grazing land (Los Angeles County 2014; DOC 2021). There are isolated pockets of prime farmland and unique farmland in the ESGV which are concentrated near the southeastern corner of the Walnut Islands near CalPoly Pomona. Within the ESGV Planning Area, there are approximately 204 acres of Prime Farmland, 120 acres of Unique Farmland, and 40 acres of Farmland of Statewide Importance (DOC 2017). A few of these areas designated as prime farmland are located on the CalPoly Pomona campus, portions of which are located in unincorporated Walnut Islands. Another area designated as prime farmland is located further to the southeast and is not located in the unincorporated areas that make up the ESGVAP. Another small area designated as Unique Farmland is located near San Jose Creek and the I-605, and overlaps with some portions of the Area Plan (DOC 2017). None of the areas in the Area Plan that contain Unique or Prime Farmland are proposed for land use designation changes or zoning changes. Nonetheless, impacts to designated farmland is considered a **potentially significant impact**. As a result, this criterion will be evaluated further in the EIR.

b) Conflict with existing zoning for agricultural use, with a designated Agricultural Resource Area, or with a Williamson Act contract?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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There are no Williamson Act contracts in the ESGV; therefore, the Project would have no impact to Williamson Act contracts. Title 22 (Zoning Code) Chapter 22.16 (Agricultural, Open Space, Resort and Recreation, and Watershed Zones) establishes the Light Agricultural Zone (A-1) and Heavy Agricultural Zone (A-2), which allow for a comprehensive range of agricultural uses in areas particularly suited for agricultural activities. As described within Section 22.16.100 (Purpose) of the Zoning Code, permitted uses are intended to encourage agricultural activities and other such uses required for, or desired by, the inhabitants of the community. An area so zoned may provide the land necessary to permit low-density single-family residential

development, outdoor recreational uses, and public and institutional facilities. For example, some older suburban communities, particularly in the ESGV, maintain agricultural zoning.

As indicated in the Project Description, the ESGVAP includes zoning and land use designation changes to ensure consistency between the General Plan and Zoning Ordinance. For example, a number of parcels are proposed to be rezoned from Light Agriculture (A-1) to Residential Agriculture (R-A). This change does not represent a substantive change in zoning but just a change to ensure consistency between the General Plan and Zoning Ordinance. Areas currently proposed for these zoning and land use designation changes are currently developed as residential areas, and not used for agricultural purposes. Therefore, the change in zoning or land use designation would not result in any physical environmental change to agricultural land.

The ESGVAP includes preservation strategies as part of the Conservation and Natural Resources Element, which prioritize the preservation of agricultural lands that characterize the ESGV, and identify locations to enhance and restore these resources and amenities for current and future populations. Conserving agricultural and forest lands keeps carbon in the ground and provides a multitude of benefits, from maintaining biodiversity in the SEAs, to preserving the character of the unincorporated County’s rural areas. Therefore, adoption of the ESGVAP would require that future development be located or designed in a manner that preserves existing agricultural land.

For the reasons discussed above, potential impacts relating to conflict with existing zoning for agricultural use, with a designated Agricultural Resource Area, or with a Williamson Act contract would be **less than significant**. With regard to cumulative impacts, the ESGVAP is a long-range planning document intended to guide future development in the Plan Area to accommodate sustainable growth that will create livable connected communities and preserve existing natural resources, such as agricultural land. The growth and preservation strategies which are developed as the vision for future development in the Plan Area include an overarching strategy to conserve agricultural lands. Additionally, the ESGVAP Land Use Element and Natural Resources and Conservation Element include policies intended to protect agricultural lands. Therefore, adoption of the ESGVAP is likely to improve cumulative conditions with regard to the impact of future development on agricultural land. Due to this, the ESGVAP would have less-than-significant cumulative impacts to agricultural zoning. As such, this criterion will not be evaluated further in the EIR.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code § 12220 (g)), timberland (as defined in Public Resources Code § 4526), or timberland zoned Timberland Production (as defined in Government Code § 51104(g))?

Forest land is defined as “land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits” (Public Resources Code § 12220[g]). Timberland is defined as “land...which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees” (Public Resources Code § 4526).

As described in the Los Angeles County General Plan EIR, “The Los Angeles County Zoning Code does not contain zones specifically for forest use or production of forest resources. Additionally, forest use is not specified as a permitted use in any of the three agricultural zones” (Los Angeles County 2015). The County has no existing zoning specifically designating forest use. Nonetheless, since implementation of the Proposed Project has the potential to conflict with existing zoning for forest land or timberland, a **potentially**

significant impact could occur. No impact would occur. As such, this criterion will be evaluated further in the EIR.

d) Result in the loss of forest land or conversion of forest land to non-forest use?

Forests in Los Angeles County are largely limited to mountain ranges in three of the eleven Planning Areas: Antelope Valley, Santa Clarita Valley, and Santa Monica Mountains. Small areas of forest are also found at the northern edge of the East San Gabriel Valley and West San Gabriel Valley Planning Areas (Los Angeles County 2015). As described in the LA County General Plan EIR, forest land in Los Angeles County is protected through the County’s Significant Ecological Area (SEA) Ordinance. Any projects located in SEAs would be required to obtain a CUP that demonstrates compliance with the ordinance or includes the application of conditions of approval that would reduce impacts to forestland. Further, the Land Use and Conservation and Natural Resources Elements include policies and implementation programs to preserve forests, natural areas, and open space. Specific implementation programs that are relevant include the Native Woodlands Conservation Management Plan, the Mitigation Land Banking Program/Open Space Master Plan, and the SEA Preservation Program. Nonetheless, implementation of the ESGVAP could have a **potentially significant impact** as it relates to the loss of forest land or conversion of forest land to non-forest use. As such, this criterion will be evaluated further in the EIR.

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

The ESGVAP would be a long-range policy document intended to respond to local planning challenges, guide long-term development, enhance community spaces, promote a stable and livable environment that balances growth with preservation, and improve the quality of life in the ESGV through the creation of vibrant, thriving, safe, healthy, and pleasant communities. The ESGVAP would target community-serving growth near planned or existing transit stations, commercial retail service areas, high-quality transit areas, and active transportation corridors, tailored to the meet the needs of the ESGV community consistent with goals and policies of the County’s General Plan. All changes in land use and zoning that is currently proposed as part of the ESGVAP is located in urbanized areas that are already developed. None of the land use changes or zoning changes would result in physical changes to existing agricultural areas or forest lands. Additionally, the ESGVAP includes growth and preservation strategies and policies in the Land Use Element and the Conservation and Natural Resources Element that are intended to guide future growth in the Plan Area. These strategies include components to protect and preserve agricultural lands. Therefore, with regard to future development in the Plan Area that could occur outside of the areas of growth identified in the Project Description, the Land Use Element includes a policy to ensure that any future development is consistent with the growth and preservation strategies which protect and preserve agricultural lands.

Nonetheless, implementation of the ESGVAP could have a **potentially significant impact** as it relates to resulting in changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use. As such, this criterion will be evaluated further as a part of the EIR.

References

Department of Conservation (DOC). 2017. Farmland Mapping & Monitoring Program.

DOC. 2021. Important Farmland Viewer, Los Angeles County. Available online: <https://maps.conservation.ca.gov/DLRP/CIFF/> Accessed October 23, 2021.

Los Angeles County. 2014. General Plan Update Environmental Impact Report. June 2014. Available online; https://planning.lacounty.gov/assets/upl/project/gp_2035_deir.pdf. Accessed October 23, 2021.

Los Angeles County. 2015. Los Angeles County General Plan 2035. Chapter 9, Conservation and Natural Resources Element, page 153.

3. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
Would the project:				
a) Conflict with or obstruct implementation of applicable air quality plans of either the Antelope Valley AQMD (AVAQMD) or the South Coast AQMD (SCAQMD)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The Antelope Valley Air Quality Management District (AVAQMD) and the South Coast Air Quality Management District (SCAQMD), together with the Southern California Association of Governments (SCAG), are responsible for formulating and implementing air pollution control strategies throughout the County. The SCAQMD is responsible for regulating stationary sources of air pollution in the ESGVAP area. The SCAQMD 2016 Air Quality Management Plan (AQMP) contains measures to meet the Federal 24-hour standards for particulate matter less than 2.5 microns in diameter (PM 2.5) by 2019, annual PM2.5 standards by 2025, and 1-hour ozone (O₃) standards by 2022.

The ESGVAP’s Land Use Element would allow new development and redevelopment within the ESGVAP area at densities and intensities higher than currently exist. The construction and operation of future development could create increased pollutant emissions from both stationary and mobile sources. Components of the ESGVAP, including the Land Use Element, Mobility Element, and Health and Safety Element would encourage land use, transit, and housing development that would encourage active transportation in order to reduce emissions. Depending on the nature of development proposed in the Land Use Element and the ability for policy in the Land Use, Mobility, and Health and Safety Elements to reduce air pollution, the ESGVAP has the potential to affect implementation of the AQMP. As such, impacts are considered **potentially significant** and this criterion will be analyzed further in the EIR.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Los Angeles County is characterized by relatively poor air quality. State and federal air quality standards often are exceeded in portions of the County. The County currently is designated as being in non-attainment of federal and/or state air quality standards for O₃, particulate matter less than 10 microns in diameter (PM 10) and particulate matter less than 2.5 microns in diameter (PM 2.5). The ESGV is a primary area for goods movement from warehouse facilities in San Bernardino County to Los Angeles County. PM2.5 is particulate matter which can include dust, dirt, soot, or smoke that can travel into the lungs and cause health concerns. The ESGV has a higher concentration of fine particulate matter than the rest of the unincorporated areas on average, and at higher rates than other County areas (71.7% compared to 63.6%). This indicates a higher level of air pollution and potential respiratory issues in the ESGV than other County areas (CalEnviroScreen 2019).

As mentioned above, the ESGVAP Land Use Element would allow new development and redevelopment within the ESGV area at densities and intensities higher than currently exist. The construction and operation

of future development could create increased pollutant emissions from both stationary and mobile sources. Components of the ESGVAP, including the Land Use Element, Mobility Element, and Health and Safety Element would encourage land use, transit, and housing development that encourages active transportation in order to reduce emissions. Additionally, the Mobility Element includes policies to reduce mobile emissions from trucking. Depending on the nature of development proposed under the Land Use Element and the ability for policy in the Land Use, Mobility, and Health and Safety Elements to reduce air pollution, the ESGVAP has the potential to affect implementation of the AQMP.

As such, implementation of the ESGVAP could have the potential to contribute to cumulatively significant air quality impacts in combination with other existing and future emission sources in the ESGVAP area. Indirect pollutant emissions resulting from the construction and operation of future development within the County under the ESGVAP would also have the potential to affect implementation of the AQMP. As such, impacts are considered **potentially significant** and this criterion will be analyzed further in the EIR.

c) Expose sensitive receptors to substantial pollutant concentrations?

Sensitive receptors include children, elderly people, people with asthma, and others who are at a heightened risk of negative health outcomes due to exposure to air pollution. The locations where these sensitive receptors congregate are considered sensitive receptor locations. Existing sensitive receptor locations include, but are not limited to, residential communities, schools and school yards, day care centers, parks and playgrounds, hospitals and medical facilities. Implementation of the ESGVAP could increase air emissions above current levels, including potentially toxic air contaminants (TACs), thereby potentially affecting nearby sensitive receptors. As such, impacts are considered **potentially significant** and this criterion will be analyzed further in the EIR.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Other emissions, such as those leading to odors, typically are associated with industrial developments involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes. Odors also are associated with such uses as sewage treatment facilities and landfills. The ESGVAP would be a policy document, the approval of which would not directly result in the generation of other emissions, such as those leading to odors. Indirect pollutant emissions, such as odorous emissions, could result from the construction and operation of future development within the ESGVAP area. Common sources of odors from development within a community may include the use of volatile organic compound (VOC)-containing architectural coatings and solvents, municipal solid waste collection areas, and transfer stations and material recovery facility operations. In general, the ESGVAP does not propose the type of development, identified above, that generally results in new odors. Rather the ESGVAP generally proposes to increase densities and development intensities near HQTAs, to increase access to transit, greenways and walking and biking paths, and to preserve open space. Additionally, the Environmental Justice Element includes goals and policies intended to create buffers between residential communities and the types of land uses that typically generate odors.

The SCAQMD has adopted rules for controlling nuisance emissions, such as those leading to odors, from community sources. SCAQMD Rule 402 prohibits emissions that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public. The SCAQMD regulates the VOC content of architectural coatings and solvents via several adopted rules including Rules 442, 1107, 1113 and 1171, as numbered by both air districts. The SCAQMD, has adopted additional source-specific rules that assist in

controlling odors, including Rule 410 for controlling odors from transfer stations and material recovery facilities and Rule 1138 for controlling emissions from restaurant cooking operations. Future development within the County would be required to comply with all applicable regulatory requirements for controlling emissions, such as those leading to odors. Thus, the ESGVAP is not expected to increase the exposure of people to emissions such as those leading to odors or to increase the generation of odors. Nonetheless, impacts are considered **potentially significant**. As such, this criterion will be evaluated further in the EIR.

References

CalEnviroScreen. 2019. CalEnviroScreen 3.0. PM 2.5 Indicator Map. <https://oehha.ca.gov/calenviroscreen>.

4. BIOLOGICAL RESOURCES

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS)?

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Species and habitats identified by the California Department of Fish and Wildlife (CDFW) as candidate, sensitive, or special status that may be present in unincorporated areas of the County include, for example, Swainson’s hawk (*Buteo swainsoni*). Species and habitats identified by the United States Fish and Wildlife Service (USFWS) that may be present include, for example, arroyo toad (*Anaxyrus californicus*). There is a potential for any of these species or their habitats to be affected by the construction of future projects under the ESGVAP.

The ESGVAP would be a long-range policy document intended to respond to local planning challenges, guide long-term development, enhance community spaces, promote a stable and livable environment that balances growth with preservation, and improve the quality of life in the ESGV through the creation of vibrant, thriving, safe, healthy, and pleasant communities. The ESGVAP would target community-serving growth near planned or existing transit stations, commercial retail service areas, high-quality transit areas, and active transportation corridors consistent with goals and policies of the County General Plan (Land Use Element Goals LU 4 and LU 5). The overarching vision of the ESGVAP is to help this region retain its residential character, but also grow into an active regional hub with diverse options for housing, shopping, entertainment, recreation, and services. This vision is further supported by the community’s desire to preserve the historical rural and equestrian roots of the ESGV; create walkable communities linked by paths and greenways; and achieve affordable communities where residents can stay and age in the neighborhoods they call home. Individual projects implementing the ESGVAP’s vision are anticipated to be located primarily within the ESGVP area, which has 24 unincorporated islands and communities, surrounded by 13 cities.

Depending on the location of these future projects, construction could result in impacts to candidate, sensitive, or special status species, or their habitats. Future individual projects to implement the goals, policies, strategies and implementation actions proposed in the ESGVAP would undergo site-specific review and CEQA analysis to analyze and mitigate potential significant impacts to candidate, sensitive, or special status species and their habitats. Furthermore, implementation of individual projects implementing the ESGVAP’s goals, policies, strategies, and implementation actions would be subject to policies included in the General Plan, as well as other local, state, and federal regulations regarding candidate, sensitive, or special status species. Impacts to candidate, sensitive, or special status species are considered to be **potentially significant** and will be further evaluated in the EIR.

b) Have a substantial adverse effect on any sensitive natural communities (e.g., riparian habitat, coastal sage scrub, oak woodlands, non-jurisdictional wetlands) identified in local or regional plans, policies, regulations or by CDFW or USFWS?

Sensitive natural communities present in unincorporated LA County include southern riparian forest and juniper woodland. There is a potential for any of these sensitive natural communities to be affected by the construction of one or more of the projects undertaken to implement the ESGVAP.

The ESGVAP would be a long-range policy document intended to respond to local planning challenges, guide long-term development, enhance community spaces, promote a stable and livable environment that balances growth with preservation, and improve the quality of life in the ESGV through the creation of vibrant, thriving, safe, healthy, and pleasant communities. The ESGVAP would target community-serving growth near planned or existing transit stations, commercial retail service areas, high-quality transit areas, and active transportation corridors, tailored to the meet the needs of the ESGV community consistent with goals and policies of the County General Plan (Land Use Element Goals LU 4 and LU 5). The overarching vision of the ESGVAP is to help this region retain its residential character, but also grow into an active regional hub with diverse options for housing, shopping, entertainment, recreation, and services. This vision is further supported by the community’s desire to preserve the historical rural and equestrian roots of the ESGV; create walkable communities linked by paths and greenways; and achieve affordable communities where residents can stay and age in the neighborhoods they call home. Individual projects implementing ESGVAP vision are anticipated to be located primarily within the ESGV Planning Area has 24 unincorporated islands and communities, surrounded by 13 cities.

Depending on the location of the implementing projects, construction could result in impacts to sensitive natural communities. Future individual projects to implement the goals, policies, strategies and implementation actions proposed in the ESGVAP would undergo site-specific review and CEQA review to analyze and mitigate potential significant impacts to sensitive natural communities. Further, the individual projects implementing the ESGVAP’s goals, policies, strategies, and implementation actions also would be subject to policies included in the General Plan, as well as other local, state, and federal regulations regarding sensitive natural communities. Impacts to sensitive natural communities are considered to be **potentially significant** and will be further evaluated in the EIR.

c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal wetlands, etc.) through direct removal, filling, hydrological interruption, or other means?

Protected wetlands are present in unincorporated areas of the County. For example, marshes may be found in San Fernando Valley, vernal pools may be found in Simi Valley, and coastal wetlands may be found in Topanga Lagoon and Arroyo Sequit. There is a potential for any of these species or corridors to be affected by the construction of one or more of the future projects undertaken to implement the ESGVAP.

The ESGVAP would target community-serving growth near planned or existing transit stations, commercial retail service areas, high-quality transit areas, and active transportation corridors, tailored to the meet the needs of the ESGV community consistent with goals and policies of the County General Plan (Land Use Element Goals LU 4 and LU 5). In addition, the Community Chapters for preservation communities, as well as the Natural Resource, Conservation and Open Space Element, provide guidance for development to ensure its

conformance with the natural environment, conservation of biological resources, and protection of sensitive watersheds and water quality, as the region's waters flow through the creeks and washes into the San Gabriel River and ultimately to the Pacific Ocean.

Depending on the location of the development associated with the specific growth community, future construction could result in impacts to wildlife movement, migratory fish or wildlife species corridors, and native wildlife nursery sites. Future individual projects would undergo site-specific review and CEQA analysis to identify and mitigate potential significant impacts to wildlife movement, migratory fish or wildlife species corridors, and native wildlife nursery sites. Further, implementation of individual projects implementing the ESGVAP's goals, policies, strategies, and implementation actions would also be consistent with the goals, policies, strategies, and implementation actions included in the General Plan, as well as other local, state, and federal regulations regarding wildlife movement, migratory fish or wildlife species corridors, and native wildlife nursery sites. For example, individual projects implementing the vision of the ESGVAP would be subject to the Migratory Bird Treaty Act, which prohibits taking, killing, possessing, transporting, and importing of migratory birds, parts of migratory birds, and their eggs and nests, except when specifically authorized by the Department of the Interior. Impacts to wildlife movement, migratory fish or wildlife species corridors, and native wildlife nursery sites are considered to be **potentially significant** and will be further evaluated in the EIR.

d) Convert oak woodlands (as defined by the state, oak woodlands are oak stands with greater than 10% canopy cover with oaks at least 5 inch in diameter measured at 4.5 feet above mean natural grade) or other unique native woodlands (juniper, Joshua, southern California black walnut, etc.)?

Oak woodlands may be found in unincorporated areas of the County including, but not limited to, the Santa Monica Mountains and areas around the Angeles National Forest. Other unique native woodlands (such as juniper and southern California black walnut) may also be found there. There is a potential for any of these unique native woodlands to be affected by the construction of one or more of the future projects undertaken to implement the ESGVAP.

The ESGVAP would target community-serving growth near planned or existing transit stations, commercial retail service areas, high-quality transit areas, and active transportation corridors, tailored to the meet the needs of the ESGV community consistent with goals and policies of the County General Plan (Land Use Element Goals LU 4 and LU 5). In addition, the Natural Resource, Conservation and Open Space Element provides guidance for development to ensure its conformance with the natural environment, conservation of biological resources and open space, which would protect existing oak woodland and other unique woodlands, as well as increase canopy cover such as oak woodland within the County.

However, some of the ESGVAP's goals, policies, strategies, and implementation actions could include future projects that involve construction and development. Depending on the location of these future projects, construction could result in impacts to oak woodlands or other unique native woodlands. Future individual projects implementing the ESGVAP's goals, policies, strategies, and implementation actions would also be subject to policies included in the General Plan, as well as other state and federal laws and regulations regarding the conversion of oak woodlands or other unique native woodlands, such as the state's Oak Woodlands Protection Act, which prohibits a person from removing from an oak woodland (as defined) or specified oak trees, unless an oak removal plan and oak removal permit application for the oak tree removal has been submitted to and approved by the Director of Fish and Wildlife. The County administers the Oak Woodlands Plan and other biological resource protection ordinances which similarly prohibits a person from removing

or converting native woodlands unless a discretionary permit application has been submitted to and approved by the Director of Regional Planning. Potential impacts related to the Los Angeles County Oak Tree Ordinance (L.A. County Code, Title 22, Ch. 22.174) will be analyzed in the EIR. As such, impacts to oak woodlands or other unique native woodlands are considered to be **potentially significant** and will be further evaluated in the EIR.

e) Conflict with any local policies or ordinances protecting biological resources, including Wildflower Reserve Areas (L.A. County Code, Title 12, Ch. 12.36), the Los Angeles County Oak Tree Ordinance (L.A. County Code, Title 22, Ch. 22.174), the Significant Ecological Areas (SEAs) (L.A. County Code, Title 22, Ch. 102), Specific Plans (L.A. County Code, Title 22, Ch. 22.46), Community Standards Districts (L.A. County Code, Title 22, Ch. 22.300 et seq.), and/or Coastal Resource Areas (L.A. County General Plan, Figure 9.3)?

Wildflower Reserve Areas are found, but not limited to, the areas in northern Los Angeles County. SEAs can be found throughout Los Angeles County and multiple are located in the ESGV. Oaks are widely dispersed throughout the County. Coastal Resource Areas can only be found in three areas (Santa Catalina Island, Marina Del Rey, and the Santa Monica Mountain Coastal Zone), none of which are included in the ESGVAP area. Communities within the ESGVAP that contain SEAs include Hacienda Heights, Rowland Heights, South Diamond Bar, Northeast La Verne, North Claremont, West Claremont, North Whittier, Northeast San Dimas, and East Azusa. There is a potential for Wildflower Reserve Areas, SEAs, or oak trees to be affected by the construction of one or more of the future projects undertaken to implement growth in the selected communities of the ESGVAP area. Therefore, this impact is considered **potentially significant** and will be evaluated further in the EIR.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved state, regional, or local habitat conservation plan?

There are currently no adopted Habitat Conservation Plans, Natural Community Conservation Plans, or other approved state, regional, or local habitat conservation plans in effect in the ESGV (Los Angeles County 2015; CDFW 2022). As such, **no impact** would occur, and this criterion will not be analyzed further in the EIR.

References

California Department of Fish and Wildlife (CDFW). 2022. Natural Community Conservation Planning (NCCP).
 Los Angeles County. 2015. Los Angeles County General Plan 2035. Chapter 9, Conservation and Natural Resources Element.

5. CULTURAL RESOURCES

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

a) Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines § 15064.5?

The ESGVAP would be a long-range policy document intended to respond to local planning challenges, and would allow new development and redevelopment within the ESGVAP at densities and intensities higher than currently exist. As a policy document, the ESGVAP itself would not result in direct impacts to tribal cultural resources. However, future projects implementing the policies and goals contained in the ESGVAP could involve structural improvements and/or ground-disturbing activities that could, depending on their location, result in direct or indirect adverse changes to the significance of historical resources. For example, such changes could result from future projects intended to increase the diversity of housing near transit or future projects intended to create new community gathering spaces (as proposed in the Land Use Element). Future projects would be required to comply with existing federal, state, and local regulations that protect historical resources and undergo the County’s discretionary review process, where applicable, including completion of subsequent project-level planning and environmental review under CEQA. Such projects could nonetheless result in significant impacts to historic architectural resources and/or archaeological resources qualifying as historical resources. As such, impacts to historical resources are considered to be **potentially significant** and will be further evaluated in the EIR.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines § 15064.5?

As mentioned above, the ESGVAP is a policy document that would allow new development and redevelopment within the ESGVAP at densities and intensities higher than currently exist. As a policy document, the ESGVAP itself would not result in direct impacts to unique archaeological resources. However, future projects implementing the policies and goals contained in the ESGVAP could involve structural improvements and/or ground-disturbing activities that could, depending on their location, result in direct or indirect adverse changes to the significance of unique archaeological resources. Future projects would be required to comply with existing federal, State, and local regulations that protect archaeological resources and undergo the County’s discretionary review process, where applicable, including completion of subsequent project-level planning and environmental review under CEQA. Such projects could nonetheless result in significant impacts to unique archaeological resources. As such, impacts to unique archaeological resources are considered to be **potentially significant** and will be further evaluated in the EIR.

c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Paleontological resources are buried fossil remains. Surficial and near-surface paleontological resources in the ESGVAP area most likely would have been destroyed or recovered as a result of past development and redevelopment. However, future projects that implement the goals and policies of the ESGVAP could involve the disturbance of soils and bedrock at depths not previously disturbed by existing or past development. As such, future development could result in impacts to paleontological resources. As such, impacts to paleontological resources are considered to be **potentially significant** and will be evaluated in the EIR.

d) Disturb any human remains, including those interred outside of dedicated cemeteries?

The ESGVAP would be a long-range policy document intended to respond to local planning challenges, and would allow new development and redevelopment within the ESGVAP at densities and intensities higher than currently exist. As a policy document, the ESGVAP itself would not result in the disturbance of human remains. However, future projects implementing the policies and goals contained in the ESGVAP could involve ground disturbing activities that might, depending on their location, result in the disturbance of human remains interred outside of a dedicated cemetery. As such, impacts to human remains are considered to be **potentially significant** and will be further evaluated in the EIR.

6. ENERGY

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The ESGVAP would target community-serving growth near planned or existing transit stations, commercial retail service areas, high-quality transit areas, and active transportation corridors, tailored to the meet the needs of the ESGV community consistent with goals and policies of the County General Plan (Land Use Element Goals LU 4 and LU 5). As a policy document, the ESGVAP itself would not result in direct impacts to energy resources. However, future projects implementing the policies and goals contained in the ESGVAP would involve construction that would likely require the use of gasoline and diesel. Vehicles used during construction would be required to comply with federal and state standards for on- and off-road vehicles, which would reduce the potential for an inefficient or wasteful use of energy during future project construction. The implementation of the ESGVAP would support development in the ESGV area at greater densities and intensities. Therefore, implementation of the ESGVAP could result in significant impacts with regard to the use of energy resources. As such, impacts to energy resources are considered to be **potentially significant** and will be further evaluated in the EIR.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The California Title 24 Building Code contains energy efficiency standards for development of all types, including electricity and natural gas efficiency and the efficiency of building envelopes. Future projects proposed under the ESGVAP that would require development would be required to comply with the Title 24 CALGreen standards. Implementing projects or actions would also be required to comply with the County’s General Plan and Climate Action Plan, which include policies and requirements related to energy conservation. The Southern California Association of Governments’ (SCAG) 2045 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) Connect SoCal is a growth strategy and transportation plan with the primary purpose of describing how the SCAG region would meet its GHG reduction target through the year 2045. Land use growth and preservation strategies were guided by regional plans such as the SCAG Connect SoCal, with priority growth areas and HQTAs identified. The potential for the ESGVAP to conflict with state or local plans for renewable energy or energy efficiency is considered **potentially significant**, and as such, this criterion will be further evaluated in the EIR.

7. GEOLOGY AND SOILS

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known active fault trace? Refer to Division of Mines and Geology Special Publication 42.

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The Alquist-Priolo Earthquake Fault Zoning Act (Alquist-Priolo Act) prohibits the development of structures for human occupancy across Holocene-active fault traces. Under this Act, the California Geological Survey (CGS) has established “Zones of Required Investigation” on either side of an active fault that delimits areas susceptible to surface fault rupture. The zones are referred to as Earthquake Fault Zones (EFZs) and are shown on official maps published by the CGS (CGS 2021). Surface rupture occurs when the ground surface is broken due to a fault movement during an earthquake; typically, these types of hazards occur within 50 feet of an active fault.

The California Earthquake Hazards Zone Application (EQ Zapp) is an interactive map available on CGS’s website. The EQ Zapp allows users to view all available earthquake hazard zone data, including earthquake fault, liquefaction, and earthquake-induced landslide zones. According to the EQ Zapp, there are four EFZs that cross through portions of the ESGV Planning Area—the East Montebello, Sierra Madre, Elsinore, and Whittier fault zones (CGS 2021).

The Health and Safety Element presents policies that promote the ability of communities to continue healthy and active lifestyles in the midst of climate change and in the presence of safety hazards, including seismic hazards. The overall objective of the Health and Safety Element is to direct development away from environmental hazards and avoid them to the greatest extent possible.

The ESGVAP would be a long-range policy document for unincorporated areas of the County that does not propose the development of specific habitable structures that could be directly impacted by known EFZs. However, future projects encouraged by the ESGVAP’s goals, policies, strategies, and implementation actions could develop habitable structures within or adjacent to EFZs. Additionally, the construction of any new structures, and improvements to certain existing structures, in California is subject to the standards and requirements included in the most current version of the California Building Code (CBC) and the County of Los Angeles Building Code (which is derived from the CBC). In general, the CBC requires that every newly constructed structure (habitable or not) be subject to a geotechnical review (a preliminary and final review). The CBC further requires that a fault study be included in the geotechnical review of any new development that is proposed near an active fault. The Alquist Priolo Earthquake Fault Zoning Act sets up regulatory zones around active surface faults prohibiting development on or within a minimum distance from an active fault,

which is typically 50 feet on either side of the active fault. The CBC provides regulations for building structures to resist seismic shaking and seismic-induced ground failures (i.e., liquefaction).

All new future development within the ESGVAP area would be constructed in accordance with all applicable state and County laws (e.g., Alquist-Priolo Earthquake Fault Zoning Act, CBC, and the County Building Code). Adherence to project-specific geotechnical recommendations and applicable state and County building code requirements for structural safety would ensure that any risk of loss, injury, or death due to fault rupture is **less than significant** at the project level and cumulatively. As such, this criterion will not be analyzed further in the EIR.

ii) Strong seismic ground shaking?

The ESGVAP area is located in an historically seismically active region of California, as is evident by the presence of several Holocene-active faults in the ESGVAP area. The 2014 Working Group on California Earthquake Probabilities (WGCEP) concluded that there is a 50 percent probability (approximate) that a magnitude (MW) 6.7 earthquake or higher could occur in the Los Angeles region before the year 2044, and a 53 percent chance of a MW 6.7 (or higher) earthquake within the southern portion of the San Andreas fault zone before the year 2044 (Field et al. 2015). As discussed above, there are several faults that transect unincorporated Los Angeles County. The presence of these faults suggests that unincorporated Los Angeles County may be subject to strong seismic ground shaking in the event of an earthquake in the region.

The ESGVAP would be a long-range policy document intended to respond to local planning challenges, guide long-term development, enhance community spaces, promote a stable and livable environment that balances growth with preservation, and improve the quality of life in the ESGV through the creation of vibrant, thriving, safe, healthy, and pleasant communities.

Future projects encouraged by the ESGVAP's goals, policies, strategies, and implementation actions could include structures (both habitable and not habitable), which could be affected by strong seismic ground shaking. Additionally, the construction of any new structures, and improvements to certain existing structures in California, is subject to the standards and requirements included in the most current version of the CBC and the County of Los Angeles Building Code (which is derived from the CBC). In general, the CBC requires that every newly constructed structure (habitable or not) be subject to a geotechnical review (a preliminary and final review). Geotechnical design criteria are incorporated into every geotechnical review to ensure structures can withstand potential ground shaking from regional fault sources.

Adoption of the ESGVAP and the application of its policies to future development, along with compliance with state and County building code requirements would ensure that future projects implementing the ESGVAP's goals, policies, strategies, and implementation actions would not cause substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking at the project level and cumulatively. As such, impacts are considered **less than significant**, and this criterion will not be analyzed further in the EIR.

iii) Seismic-related ground failure, including liquefaction and lateral spreading?

Liquefaction is a phenomenon in which unconsolidated, water-saturated sediments become unstable due to the effects of strong seismic shaking. During an earthquake, these sediments can behave like a liquid, potentially causing severe damage to overlying structures. Lateral spreading is a variety of a minor landslide that occurs when unconsolidated liquefiable material breaks and spreads due to the effects of gravity, usually down gentle slopes. Liquefaction-induced lateral spreading has been defined as the finite, lateral displacement of gently sloping ground as a result of pore-pressure buildup or liquefaction in a shallow underlying deposit

during an earthquake (Rauch 1997). The occurrence of this phenomenon is dependent on many complex factors, including the intensity and duration of ground shaking, particle-size distribution, and density of the soil. In general, a relatively high potential for liquefaction exists in loose, sandy soils that are within 50 feet of the ground surface and are saturated (below the groundwater table).

The potential damaging effects of liquefaction include differential settlement, loss of ground support for foundations, ground cracking, heaving and cracking of structure slabs due to sand boiling, and buckling of deep foundations due to ground settlement. Dynamic settlement (i.e., pronounced consolidation and settlement from seismic shaking) may also occur in loose, dry sands above the water table, resulting in settlement of and possible damage to overlying structures. Lateral spreading can move blocks of soil, placing strain on buried pipelines that can lead to leaks or pipe failure.

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According to the EQ Zapp, there are several areas in unincorporated areas of the County that are subject to earthquake-induced liquefaction (CGS 2021). Future projects implementing the ESGVAP's goals, policies, strategies, and implementation actions could be subject to the effects of liquefaction and/or lateral spreading if they are proposed in susceptible areas, thereby exposing people and structures to the potentially damaging effects of liquefaction and/or lateral spreading.

As discussed above, future projects implementing the ESGVAP's goals, policies, strategies, and implementation actions would be subject to all applicable state and County regulations and building codes, which would require project-specific geotechnical review prior to issuance of grading permits. This review would identify and address potential project-specific geotechnical hazards, including liquefaction and/or lateral spreading. The project-specific geotechnical design criteria and proper soil engineering procedures would be incorporated into individual project design plans to address problematic soils and ensure that structures are able to withstand potential damage due to liquefaction and/or lateral spreading. Therefore, the Project would not cause substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure such as liquefaction and/or lateral spreading at the project level or cumulatively. As such, impacts are considered **less than significant**, and this criterion will not be analyzed further in the EIR.

iv) Landslides?

Landslides are one of the various types of downslope movements (mass wasting) in which rock, soil, and other debris are displaced due to the effects of gravity. The potential for material to detach and move down slope depends on multiple factors including the type of material, water content, and steepness of terrain.

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According to the EQ Zapp, there are several areas that have the potential for earthquake-induced landslides in the unincorporated County (CGS 2021). Future projects implementing the ESGVAP's goals, policies, strategies, and implementation actions would be subject to the effects of earthquake-induced landslides if they

are proposed in susceptible areas, thereby exposing people and structures to the potentially damaging effects of landslides.

However, as discussed above, all new future developments are obligated by state and local laws to comply with the CBC and County Building Code. Compliance with the applicable standards and codes would ensure that each new future development has undergone a project-specific geotechnical review prior to issuance of grading permits to identify and address project-specific geotechnical hazards. Furthermore, each future project development must incorporate all geotechnical design criteria recommended for the project to ensure soil and slope stability. Therefore, the Project would not cause substantial adverse effects, including the risk of loss, injury, or death involving landslides. As such, impacts are considered **less than significant** at the project level and cumulatively, and this criterion will not be analyzed further in the EIR.

b) Result in substantial soil erosion or the loss of topsoil?

Future projects implementing the ESGVAP's goals, policies, strategies, and implementation actions could include earth-moving activities, including clearing, excavation, grading, trenching, or soil stockpiling. Such activities could create a significant increase in the amount and rate of soil erosion or loss of topsoil.

To address the potential increase in erosion and sedimentation caused by earth-moving activities, new future developments that would disturb one or more acres would be subject to the provisions of the National Pollutant Discharge and Elimination System (NPDES) General Permit for Stormwater Discharge Associated with Construction and Land Disturbance Activities Order 2012-0006-DWQ (Construction General Permit). New future projects that would disturb less than one acre, but are part of a larger common plan of development that in total disturbs one or more acres, would also be regulated under this permit. Future projects that propose to disturb less than one acre would be regulated under the Los Angeles County Municipal Separate Storm Water System (MS4) Permit.

These state and County requirements were developed to ensure that erosion from construction sites is controlled and monitored. The Construction General Permit requires preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP), which requires implementation of Best Management Practices (BMPs) to control stormwater run-on and run-off from construction work sites. BMPs may include, but would not be limited to, physical barriers to prevent erosion and sedimentation, construction of sedimentation basins, limitations on work periods during storm events, use of infiltration swales, protection of stockpiled materials, and a variety of other goals and policies to be identified by a qualified SWPPP developer that would substantially reduce or prevent erosion from occurring during construction. As such, impacts are considered **less than significant** at the project level and cumulatively, and this criterion will not be analyzed further in the EIR.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

As discussed above, EQ Zapp indicates that there are several areas within the unincorporated County that are susceptible to earthquake-induced liquefaction, lateral spreading, and landslides. Additionally, according to the interactive map depicting areas of land subsidence in California, provided on the United States Geological Survey (USGS) website, there are areas within the unincorporated County that show evidence of land subsidence due to groundwater withdrawal (USGS 2021). Subsidence in an area can be exacerbated by dewatering—a common construction technique used to lower the water table when excavations are planned

to be deeper than the existing water table. Dewatering involves the removal or draining of groundwater via various pumping methods. If excessive dewatering occurs as a result of individual future projects, it could exacerbate land subsidence in the region.

New future development supporting the ESGVAP’s goals, policies, strategies, and implementation actions could include projects that are proposed in areas subject to liquefaction, lateral spreading, and landslides; additionally, these new developments could require dewatering during construction.

As discussed above, all new future developments are obligated by state and local laws to comply with the CBC and County Building Code. Compliance with the applicable building codes would ensure that each new future development has undergone a project-specific geotechnical review prior to issuance of grading permits, whereby project-specific geotechnical hazards would be identified and the specific design criteria would be incorporated into individual project design plans. Geotechnical design criteria are incorporated into geotechnical reviews to verify the stability of nearby slopes and soils, and to provide recommendations to protect developments from causing or being affected by liquefaction, lateral spreading, landslides, and subsidence. Compliance with project-specific geotechnical design recommendations and all applicable building code standards and requirements would ensure that future projects do not cause substantial adverse effects, including loss, injury, or death involving on- or off-site landslides, lateral spreading, subsidence, liquefaction or collapse. As such, impacts are considered **less than significant** at the project level and cumulatively, and this criterion will not be analyzed further in the EIR.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994)¹, creating substantial direct or indirect risks to life or property?

Expansive soils are soils that possess a “shrink-swell” characteristic. Shrink-swell is the cyclic change in volume (expansion and contraction) that occurs in fine-grained clay sediments from the process of wetting and drying; the volume change is reported as a percent change for the whole soil. This property is measured using the coefficient of linear extensibility (COLE) (NRCS 2017). The Natural Resources Conservation Service (NRCS) relies on linear extensibility measurements to determine the shrink-swell potential of soils. If the linear extensibility percent is more than 3 percent (COLE=0.03), shrinking and swelling may cause damage to buildings, roads, and other structures (NRCS 2017). NRCS Web Soil Survey data indicates that the soils within unincorporated areas of the County have highly variable linear extensibility ratings with percentages ranging from 1.5 to 6.5, indicating linear extensibility ratings ranging from low to high (NRCS 2021).

New projects implementing the ESGVAP’s goals, policies, strategies, and implementation actions could be proposed in areas that are underlain by expansive soils, which could subject them to the damaging effects of expansive soils.

However, there are existing laws, regulations, plans, and standards in place that would reduce the potential impact to less-than-significant levels. The CBC requires geotechnical reviews to include soil testing, which identify the presence of a variety of geotechnical constraints related to soil quality, including the expansion potential of the soil. Compliance with state and local laws governing new development in the unincorporated County would ensure impacts related to expansive soils are not significant. As such, impacts are considered **less than significant** at the project level and cumulatively, and this criterion will not be analyzed further in the EIR.

¹ The CBC, based on the International Building Code and the now defunct Uniform Building Code, no longer includes a Table 18-1-B. Instead, Section 1803.5.3 of the CBC describes the criteria for analyzing expansive soils.

e) Have soils incapable of adequately supporting the use of onsite wastewater treatment systems where sewers are not available for the disposal of wastewater?

The ESGVAP would be a long-range policy document intended to respond to local planning challenges and would allow new development and redevelopment within the ESGVAP at densities and intensities higher than currently exist. Implementation of future development supported by the ESGVAP’s goals, policies, strategies, and implementation actions may generate wastewater. Individual future projects that include structures may connect to existing sewer lines, on-site septic tanks, and/or alternative waste water disposal systems (rare). In the event that a septic tank or alternative waste water disposal system installation is proposed as part of a future project, a required testing and permitting process would be completed prior to installation, based on individual project-level review by the County.

A web soil survey provides septic tank absorption field data to inform developers of the suitability of soil for supporting the use of septic tanks and other alternative wastewater treatments systems. Web soil survey data suggests that the suitability of the soils in the unincorporated County varies from not limited to very limited and may have one or more features that are unfavorable to septic tank usage (NRCS 2021). Any new future development that proposed the use of a septic tank or alternative wastewater disposal system would be regulated by the Los Angeles County Department of Public Health (LACDPH) and the Land Use Program of the Environmental Health Division.

Home and business property owners that want to install or replace an onsite wastewater treatment system (OWTS) must submit an application, along with the required documents listed on the application, in order to go through the OWTS review process. Obtaining a permit would be required prior to the construction of any septic tank or alternative waste water disposal system, and each system would be constructed within the parameters of the State Water Resources Control Board (SWRCB) Water Quality Control Policy for Siting, Design, Operation, and Maintenance of Onsite Wastewater Treatment Systems (SWRCB 2012). System design approvals may also be required to be submitted to the County Building and Safety Department prior to obtaining building permits for proposed projects.

Since this procedure would be required prior to the construction of any and all septic tanks and alternative wastewater disposal systems, all new future projects implementing the ESGVAP’s goals, policies, strategies, and implementation actions would be subject to the applicable state and County requirements. Proper soils are essential for the installation and maintenance of septic tanks and alternative wastewater disposal systems; compliance with the applicable state and local requirements would ensure that future project impacts are not significant. As such, impacts are considered **less than significant** at the project level and cumulatively, and this criterion will not be analyzed further in the EIR.

f) Conflict with the Hillside Management Area Ordinance (L.A. County Code, Title 22, Ch.22.104)?

The Hillside Management Area (HMA) Ordinance is a component of the County General Plan and is designed to preserve significant natural features in hillside areas. HMAs are defined as areas with natural slopes of 25 percent or greater. Compliance with the Hillside Design Guidelines is required for development in HMAs, unless exempted under the HMA Ordinance provisions. In hillside areas with less than 25 percent slope, use of the Hillside Design Guidelines is optional, but encouraged. These guidelines include specific and measurable design techniques that can be applied to residential, commercial, industrial, and other types of projects to ensure natural features in hillside areas are preserved.

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growth with preservation, and improve the quality of life in the ESGV through the creation of vibrant, thriving, safe, healthy, and pleasant communities. Implementation of future projects supported by the ESGVAP's goals, policies, strategies, and implementation actions could occur within HMA-designated areas. If so, the new future development would be regulated under the HMA Ordinance and subject to the Hillside Design Guidelines on a project-specific basis. Requisite compliance with the ordinance would assure that new future projects implementing the ESGVAP's goals, policies, strategies, and implementation actions would not result in a significant impact to hillside areas. As such, the Project would not conflict with the HMA Ordinance and impacts are considered **less than significant** at the project level and cumulatively. This criterion will not be analyzed further in the EIR.

References

- California Geological Survey (CGS). 2021. California Earthquake Hazards Zone Application (EQ Zapp).
- Field, E. H., Glenn P. Biasi, Peter Bird, Timothy E. Dawson, Karen R. Felzer, David D. Jackson, Kaj M. Johnson, Thomas H. Jordan, Christopher Madden, Andrew J. Michael, Kevin R. Milner, Morgan T. Page, Tom Parsons, Peter M. Powers, Bruce E. Shaw, Wayne R. Thatcher, Ray J. Weldon II, and Yuehua Zeng. 2015. Long-Term Time-Dependent Probabilities for the Third Uniform California Earthquake Rupture Forecast (UCERF3). *Bulletin of the Seismological Society of America*, Vol. 105, No. 2A. pp. 511-543. April 2015. doi: 10.1785/0120140093.
- Natural Resources Conservation Service (NRCS). 2017. National Soil Survey Handbook. Part 618 – Soil Properties and Qualities. Section 618.41, Linear Extensibility Percent.
- NRCS. 2021. Linear Extensibility—Los Angeles County, California. Map. Scale 1:158,000.
- Rauch, A.F. 1997. EPOLLS: An Empirical Method for Predicting Surface Displacements Due to Liquefaction-Induced Lateral Spreading in Earthquakes. May 5.
- State Water Resources Control Board (SWRCB). 2012. Water Quality Control Policy for Siting, Design, Operation, and Maintenance of Onsite Water Treatment Systems. June 19, 2012.
- U.S. Geological Survey (USGS). 2021. Areas of Land Subsidence in California.

8. GREENHOUSE GAS EMISSIONS

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

a) Generate greenhouse gas (GHGs) emissions, either directly or indirectly, that may have a significant impact on the environment?

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The ESGVAP Land Use Element would allow for an increase in the intensity and density of development within the ESGVAP area, which would generate GHGs due to energy demand, water demand, wastewater generation, etc. The Land Use, Mobility, and Health and Safety Elements include goals and policies to reduce GHG emissions through strategies such as mobility options, locating housing in greater densities near HQTAs, and making ESGV communities more walkable and bikeable. While the ESGVAP would include goals and policies to address GHG emissions, it would also facilitate development that could increase greenhouse gas emissions. As such, impacts are considered **potentially significant**, and this criterion will be evaluated further in the EIR.

b) Conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The potential for implementation of the ESGVAP to conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs will be evaluated further in the EIR. Applicable plans, policies, or regulations that will be evaluated in the EIR include the 2017 Climate Change Scoping Plan, the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, the Renewables Portfolio Standard (Senate Bill 1078 and subsequent amendments in Senate Bill 100), and the California Building Energy Efficiency Standards and Green Building Code (Title 24, Parts 6 and 11). The ESGVAP would facilitate development at greater densities and intensities in the ESGV area; therefore, the potential for the ESGVAP to conflict with plans, policies, or regulations adopted for the purpose of reducing GHGs could be significant. As such, impacts are considered **potentially significant**, and this criterion will be evaluated further in the EIR.

9. HAZARDS AND HAZARDOUS MATERIALS

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

a) Create a significant hazard to the public or the environment through the routine transport, storage, production, use, or disposal of hazardous materials?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The ESGVAP would be a long-range policy document intended to respond to local planning challenges and would allow new development and redevelopment within the ESGV Planning Area at densities and intensities higher than currently exist. Future construction activities associated with projects implementing the ESGVAP’s goals, policies, strategies, and implementation actions could involve the use of standard construction equipment, which would include the following commonly used hazardous materials and substances: fuel, oils and lubricants, hydraulic fluid, paints and thinners, and cleaning solvents to maintain vehicles and motorized equipment. Routine use of any of these substances could pose a hazard to people or the environment if construction activities are not regulated. Similarly, the transport, storage, or disposal of these commonly used hazardous materials during construction activities could cause a significant impact if they are exposed to people or the environment.

Further, future developments as a result of the ESGVAP could include land uses in the ESGV Planning Area that would typically involve the use, storage, disposal and transportation of hazardous materials; residential, commercial, and light industrial land uses are examples of future land uses that could involve hazardous materials.

The use, storage, transport, and disposal of hazardous materials during construction and operation of the Project would be carried out in accordance with federal, state, and county regulations. For instance, contractors would be required to prepare and implement Hazardous Materials Business Plans (HMBPs) that requiring hazardous materials used for construction be used properly and stored in appropriate containers with secondary containment, as needed, to contain a potential release. HMBPs are also required for future developments that would include the use, storage, or disposal of hazardous materials on-site. The California Fire Code would also require measures for the safe storage and handling of hazardous materials during construction and operation of the Project.

Construction contractors would be required to prepare Storm Water Pollution Prevention Plan (SWPPP) for construction activities according to the National Pollutant Discharge Elimination System (NPDES) General Construction Permit requirements. The SWPPP would list the hazardous materials (including petroleum products) proposed for use during construction; describe spill prevention measures, equipment inspections, equipment and fuel storage; protocols for responding immediately to spills; and describe BMPs for controlling site run-on and runoff.

In addition, the transportation of hazardous materials would be regulated by the U.S. Department of Transportation (USDOT), Caltrans, and the California Highway Patrol (CHP). Together, federal and state agencies determine driver-training requirements, load labeling procedures, and container specifications designed to minimize the risk of a release of hazardous materials.

In the event of a hazardous materials spill/release at a future development in the ESGV Planning Area, a coordinated response would occur at the federal, state, and local levels, including the County. The Los Angeles

County Fire Department (LACoFD) is the local Certified Unified Program Agency (CUPA) and hazardous materials response team. In the event of a hazardous materials spill, the LACoFD would be notified and sent to the scene to respond to and assess the situation.

Any fuel tanks required for a future project implementing the ESGVAP would be maintained and operated according to all federal, state, and local regulations during construction and operation, and hazardous material storage would be detailed in a Spill Prevention, Control, and Countermeasure (SPCC) Plan. Refueling and general maintenance for construction equipment, such as changing fluids and lubricating parts, also would be subject to sufficient containment capabilities and according to goals, policies, strategies, and implementation actions outlined in an SPCC Plan.

Compliance with applicable federal, state, and local laws and regulations would ensure that any impact resulting from future projects implementing the ESGVAP's goals, policies, strategies, and implementation actions would be **less than significant**.

Regarding cumulative impacts, all future projects implementing the ESGVAP would be subject to the same existing laws as the Project would, which are in place to regulate the transport, use, storage, and disposal of hazardous materials. As with the Project, all future projects would be required to comply with these various federal, state, and local laws. Further, the Environmental Justice Element includes policies that require the creation of buffers between sensitive land uses and land uses that involve the use of hazardous materials. Together, the elements of the ESGVAP would improve cumulative conditions with regard to the exposure of residents to hazardous materials. Additionally, while individual future projects implementing the ESGVAP may require the use or transport of hazardous materials, they too would be required to comply with the requirements discussed above.

Therefore, the adoption and implementation of the ESGVAP would not result in cumulative impacts with respect to this criterion. As such, this criterion will not be analyzed further in the EIR.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials or waste into the environment?

The ESGVAP would target community-serving growth near planned or existing transit stations, commercial retail service areas, high-quality transit areas, and active transportation corridors, tailored to the meet the needs of the ESGV community consistent with goals and policies of the County General Plan (Land Use Element Goals LU 4 and LU 5). As discussed above, the adoption of the ESGVAP could lead to new future developments in support of the ESGVAP's goals, policies, strategies, and implementation actions. During the construction of future projects implementing the ESGVAP's goals, policies, strategies, and implementation actions, construction activities may involve the transportation, storage, use, or disposal of a variety of hazardous materials, including batteries, hydraulic fluid, diesel fuel, gasoline, grease, lubricants, paints, solvents, and adhesives. Additionally, if future developments are affected by the presence of known hazardous materials sites, the removal and handling of hazardous wastes could lead to an accidental release. If during development, hazardous materials were accidentally released into the environment, a potential significant impact could result.

As previously noted, there are numerous laws and regulations that regulate the transportation, handling, storage, and disposal of hazardous materials—this requirement applies to construction activities and during operation of all new developments that would require handling hazardous materials on-site. The required HMBP, SWPPP, and SPCC Plan, discussed above would include procedures that help prevent the accidental release of hazardous materials into the environment. A standard HMBP and SPCC Plan would include BMPs,

as well as spill control and spill response goals, policies, strategies, and implementation actions, to ensure any potential release is handled appropriately. If a spill did occur, the SPCC would include appropriate goals and policies to ensure that workers cease work activities to contain any release and enact the protocols for cleanup, including the notification of appropriate agencies and the use of exposure-reducing materials stored on-site (such as absorbent pads to minimize spread). Further, the SWPPP would list the hazardous materials proposed for use during construction and operation; describe spill prevention measures, equipment inspections, equipment, and fuel storage; protocols for responding immediately to spills; and describe BMPs for controlling site run-on and runoff. In addition, the transportation of hazardous materials would be regulated by the USDOT, Caltrans, and CHP. Together, federal and state agencies determine driver-training requirements, load labeling procedures, and container specifications designed to minimize the risk of an accidental release.

Accidents or mechanical failure involving heavy equipment could result in the accidental release of fuel, lubricants, hydraulic fluid, or other hazardous substances. These types of spills on construction sites are typically in small quantities, localized, and cleaned up in a timely manner. Construction contractors are contractually responsible for their hazardous materials and are required under their contract to properly store and dispose of these materials in compliance with state and federal laws, including implementing a HMBP/SPCC. Accidental spills/releases of hazardous materials can also occur during operation of any future development that would involve handling hazardous materials. In both circumstances, the LACoFD (the local CUPA) would be the agency that is responsible for responding to sites of accidental hazardous material release. Response measures would include protocols for cleaning, removing, and containing any contamination, so that the public and/or environment would not be impacted.

As discussed, future projects implementing the ESGVAP's goals, policies, strategies, and implementation actions could require coverage under the Construction General Permit (or related stormwater permit), and if so, would be subject to the protections included in a SWPPP, which outline BMPs to contain a potential release and prevent any such release from reaching an adjacent waterway or stormwater collection system (e.g., erosion control, sediment control, and waste management).

Compliance with applicable federal, state, and local laws and regulations would ensure that any impact resulting from future projects implementing the ESGVAP's goals, policies, strategies, and implementation actions would be **less than significant**.

Regarding cumulative impacts, all future projects implementing the ESGVAP would be subject to the same existing laws as the Project would, which are in place to regulate the transport, use, storage, and disposal of hazardous materials. As with the Project, all future projects would be required to comply with these various federal, state, and local laws. Further, the Environmental Justice Element includes policies that require the creation of buffers between sensitive land uses and land uses that involve the use of hazardous materials. Together, the elements of the ESGVAP would improve cumulative conditions with regard to the exposure of residents to hazardous materials. Additionally, while individual future projects implementing the ESGVAP may require the use or transport of hazardous materials, they too would be required to comply with the requirements discussed above.

Therefore, the adoption and implementation of the ESGVAP would not result in cumulative impacts with respect to this criterion. As such, this criterion will not be analyzed further in the EIR.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of sensitive land uses?

Some populations (e.g., children, elderly, sick or disabled persons) are more susceptible to health effects of hazardous materials than the general population. Hazardous materials used near schools, day care centers, senior living communities, hospitals, etc., must consider potential health effects to these populations, often referred to as “sensitive receptors.” Construction or redevelopment on contaminated properties that could potentially generate vapors or fugitive dust containing contaminants may potentially pose a health risk to these populations. In addition, commercial businesses in proximity to sensitive receptors may have hazardous emissions or handle hazardous or acutely hazardous materials or wastes that could pose a health risk to these sensitive receptors.

As discussed in Section 3, Air Quality, there are several sensitive receptors and receptor locations within the ESGVAP area and it is not known at the time of this analysis whether future projects implementing the ESGVAP’s goals, policies, strategies, and implementation actions would be constructed in proximity to one or more of them. Typically, developments that would handle hazardous materials or discharge hazardous emissions within one-quarter mile of a sensitive receptor are at risk of exposing sensitive receptors to hazardous materials and emissions. While the ESGVAP adoption would not directly cause hazardous emissions, it would encourage new developments that could create hazardous emissions. Impacts generated by the release of hazardous emissions in proximity to sensitive receptors would occur during construction phases and would be temporary.

The Health and Safety Element presents policies that promote the ability of communities to continue healthy and active lifestyles in the midst of climate change and in the presence of safety hazards. The overall objective of the Health and Safety Element is to direct development away from environmental hazards and avoid them to the greatest extent possible. To protect sensitive receptors, Section 17210 et seq. of the State Education Code, Sections 21151.2 and 21151.4, and 21151.8 of the Public Resources Code require that prospective school sites be reviewed to determine that such sites are not a current or former hazardous waste disposal site, a hazardous substance release site, or the site of hazardous substance pipelines. These laws also require consultation with local hazardous materials agencies and air quality districts to ensure that sites within one-quarter mile of a school that handle or emit hazardous substances would not potentially endanger sensitive receptors.

The other federal, state, and local laws and regulations that regulate hazardous materials, discussed above in criteria a) and b) and in criterion d) below, also would be applied to any future projects involving the handling of hazardous materials or the release of hazardous emissions within one-quarter mile of a sensitive receptor. Compliance with the applicable federal, state, and local laws and regulations would ensure any potential impacts to sensitive receptors from future projects are **less than significant**.

Regarding cumulative impacts, all future projects implementing the ESGVAP would be subject to the same existing laws as the Project would, which are in place to regulate the transport, use, storage, and disposal of hazardous materials. As with the Project, all future projects would be required to comply with these various federal, state, and local laws. Additionally, the Environmental Justice Element includes policies that require the creation of buffers between sensitive land uses and land uses that involve the use of hazardous materials. Together, the elements of the ESGVAP would improve cumulative conditions with regard to the exposure of residents to hazardous materials. Additionally, while individual future projects implementing the ESGVAP may require the use or transport of hazardous materials, they are not likely to be built at the same time and would be required to comply with the requirements listed above. Therefore, the adoption and implementation of the ESGVAP would not result in cumulative impacts with respect to this criterion. As such, this criterion will not be analyzed further in the EIR.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

The provisions in Government Code Section 65962.5, commonly referred to as the “Cortese List,” require the California Department of Toxic Substances Control (DTSC) to compile and maintain a list of Hazardous Waste and Substances sites, including the State Water Resources Control Board’s (SWRCB) leaking underground storage tank (LUST) sites, active Cease and Desist Orders (CDO) and Cleanup and Abatement Orders (CAO), and certain solid waste disposal sites and hazardous waste facilities. As discussed in the context of criterion a), above, there are several hazardous materials sites within the unincorporated County, many of which are included on the Cortese List. If new future developments implementing the ESGVAP’s goals, policies, strategies, and implementation actions are proposed on or near hazardous materials sites that have been included on the Cortese List, then the risk of creating a significant hazard to the public or environment increases, as potentially contaminated soil and/or groundwater could be exposed during ground-disturbing activities. A potentially significant impact could occur if the new future development is located on or near a site listed on the Cortese List and exposed hazardous materials to people or the environment.

However, as discussed under Criterion a) and Criterion b), there are numerous existing federal, state, and local laws that regulate the use, transportation, storage, and disposal of hazardous materials. These same laws would apply to future developments that are proposed on or near Cortese List sites; applicable laws would require that hazardous materials sites are identified and tested prior to development on such a site, and if contamination exists there are laws that regulate the remediation of the site prior to new development. In addition, sites listed on the Cortese List are under the jurisdiction of a regulatory agency (e.g., DTSC, Regional Water Quality Control Board [RWQCB], or a local agency), hence the reason for their inclusion on the Cortese List. As such, the overseeing regulatory agency is in the process of requiring the owners/operators of listed sites to bring their sites into compliance. This includes requiring sites with spills or releases to soil and/or groundwater to investigate and clean up their sites to levels that no longer pose risks to people or the environment. The listing of a site on the Cortese List is part of the public record. When a future project is proposed, the status of nearby sites on the Cortese list would be checked and the project would be planned accordingly to ensure compliance with any overseeing regulatory agency requirements, as applicable. Compliance with applicable federal, state, and local laws and regulations would ensure that future projects would not create a significant hazard to the public or the environment at the project level or cumulatively. As such, impacts are considered **less than significant**, and this criterion will not be analyzed further in the EIR.

e) For a project located within an airport land use plan, or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

There are numerous heliports located within and adjacent to the ESGVAP area, including the Brackett Field Airport in La Verne and the San Gabriel Valley Airport in El Monte. Implementation of the ESGVAP could result in future development within a safety or noise hazard zone as delineated in an Airport Land Use Compatibility Plan (ALUCP), such as the Los Angeles County ALUCP, Brackett Field ALUCP and/or the

El Monte Airport² Master Plan Report. However, future development would be required to be consistent with any applicable ALUCP constraints, such as building height restrictions, and restrictions on development within any delineated safety or noise hazard zones.

Additionally, compliance with policies included in the Land Use Element and Noise Element of the General Plan related to land use compatibility would ensure that future development does not conflict with ALUCPs. In particular, LA County General Plan Policy LU 7.6 explicitly requires that airport land use plans address conflicts between airport operations and surrounding land uses. LA County General Plan Policy N 1.12 requires that land use decisions on parcels adjacent to transportation facilities, including those adjacent to airports, consider existing and future noise levels of the adjacent transportation facilities.

Furthermore, the Federal Aviation Administration (FAA) regulates all civil aviation in the country. One responsibility of the FAA is to regulate transportation safety and developing and carrying out programs to control aircraft noise and other environmental effects of civil aviation. Compliance with FAA regulations applicable to safety and noise impact as they relate to civil aviation and the environment.

Required compliance with applicable ALUCPs, the General Plan, and FAA regulations would ensure that the implementation of future projects under the ESGVAP result in a less-than-significant impact relative to the potential exposure of people residing or working in unincorporated areas of the County to excessive airport or airstrip noise at the project level and cumulatively. As such, this is considered a **less-than-significant impact**, and this criterion will not be evaluated further in the EIR.

f) Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?

The ESGVAP Health and Safety Element includes goals and policies to increase accessibility to information about emergency response and access. The ESGVAP would increase development densities and intensities, which could include road closures or road work, which could impact emergency access. Impacts are considered to be **potentially significant**, and as such, the potential for the ESGVAP to have an impact on emergency access will be further evaluated in the EIR.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving fires, because the project is located: (i) within a high fire hazard area with inadequate access; (ii) within an area with inadequate water and pressure to meet fire flow standards; (iii) within proximity to land uses that have the potential for dangerous fire hazard; or (iv) would constitute a potentially dangerous fire hazard.

According to fire hazard mapping by the California Department of Forestry and Fire Protection (CAL FIRE), as part of the Fire and Resource Assessment Program (FRAP), there are several areas of the unincorporated County that are classified as Very High Fire Hazard Severity Zones (VHFHSZ); within the ESGV Planning Area, the communities of Covina Islands, East Azusa, Glendora Islands, Hacienda Heights, North Claremont, Northeast La Verne, Northeast San Dimas, Rowland Heights, South Diamond Bar, Walnut Islands, and West Claremont would be within or adjacent to one of these zones (CAL FIRE 2011).

² The El Monte Airport change its name to San Gabriel Valley Airport in 2014.

The ESGVAP would be a long-range policy document intended to respond to local planning challenges, guide long-term development, enhance community spaces, promote a stable and livable environment that balances growth with preservation, and improve the quality of life in the ESGV through the creation of vibrant, thriving, safe, healthy, and pleasant communities. The Health and Safety Element's overall objective is to direct development away from environmental hazards and avoid them to the greatest extent possible.

If new future projects implementing the ESGVAP's goals, policies, strategies, and implementation actions would involve construction activities, then the use of construction equipment and the possible temporary on-site storage of fuels and/or other flammable construction chemicals could pose an increased fire risk resulting in injury to workers or the public during construction.

However, as discussed under Criteria a) and b), contractors would be required to comply with hazardous materials storage and fire protection regulations (i.e., HMBP, SWPPP, and California Fire Code), which would minimize the potential for fire creation by requiring proper storage and handling procedures of flammable hazardous materials. Proper storage and handling of hazardous materials reduced the chanced of igniting an accidental fire.

Further, for projects that would require a project-specific CEQA analysis, a detailed site-specific, project-specific fire risk analysis would be required. If it is determined during the CEQA process that the project is proposed to be constructed within or adjacent to a VHFHSZ, or future project activities would exacerbate an existing fire risk, then appropriate mitigation actions would be proposed to address the potential fire risk posed by a project. Other developments in the ESGV Planning Area that may not require a CEQA review, would be subject to Title 32 of the Los Angeles County Code (the Los Angeles County Fire Code). Compliance with the County Fire Code would ensure that any new future development proposed in the unincorporated County is in an area with adequate access (for emergency vehicles/personnel) and water pressure (to meet flow standards) in the event that a fire needs to be extinguished. Compliance with the County Fire Code would also ensure that future projects that are developed within mapped VHFHSZs are properly inspected, obtain the applicable permits, and abide by fire prevention techniques. The LACoFD and Count Department of Public Works enforce fire and building codes related to development within or near VSFHSZs, such as access requirements for single family residential uses (with requirements for other structures determined on a case-by-case basis).

Given that any future project that would result from the adoption of the ESGVAP would address fire risks at the time of development, and that any future development would be required to comply with the County Fire Code, the impacts as a result of implementing the ESGVAP are considered **less than significant**. The Land Use Element, Public Health and Safety Element, and Natural Resources Element include goals and policies that would require that new development be located away from areas with high fire hazards, retrofit existing development to increase fire resiliency, require fuel modifications, vegetation management defensive space, fire resistant building materials and landscaping for high fire hazard areas. The Health and Safety Element also includes policies to work with utilities to underground lines, ensure that there is adequate ingress and egress for communities, and adequate fire suppression equipment. Together, these goals, policies, and implementation strategies would improve cumulative conditions relative to wildfires and would ensure that future development does not worsen environmental conditions with respect to wildfire risks. Therefore, adoption of the ESGVAP would not result in adverse cumulative impacts with respect to this criterion. As such, this criterion will not be analyzed further in the EIR.

References

California Department of Forestry and Fire Protection (CAL FIRE). 2011. Fire Hazard Severity Zones in Local Responsibility Areas (LRA). Forest Resource Assessment Program. Map. Scale 1:150,000.

10. HYDROLOGY AND WATER QUALITY

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The ESGVAP would be a long-range policy document intended to respond to local planning challenges and would allow new development and redevelopment within the ESGVAP at densities and intensities higher than currently exist. The ESGVAP would not include measures or actions that would degrade surface or groundwater quality or violate any water quality standards or waste discharge requirements. However, future projects implementing the ESGVAP's goals and policies, depending on the nature of future developments, could include activities that create an impact to surface or groundwater quality. Construction activities associated with new development in the ESGV Planning Area could include grading, excavation, and other types of earth-moving; increased erosion, sedimentation, and discharge from other construction-related pollutants can potentially impact water quality. Sedimentation and polluted construction run-off can enter stormwater or nearby water bodies and introduce polluted or contaminated water, which would adversely affect water quality. Operation of future developments could also include activities (i.e., using, storing, or disposing of hazardous materials) that may introduce contaminated discharge that could affect water quality.

To address the potential impacts to water quality, proposed projects implementing the ESGVAP's goals and policies would be required to comply with the independently enforceable requirements of the National Pollutant Discharge and Elimination System (NPDES) General Permit for Stormwater Discharge Associated with Construction and Land Disturbance Activities Order 2012-0006-DWQ (Construction General Permit) and the Los Angeles County Municipal Separate Storm Water System (MS4) Permit (CAS004004, Order No. R4-2021-0105) (2021 MS4 Permit). The Construction General Permit and the County 2021 MS4 Permit are designed to regulate stormwater and non-stormwater discharges.

The Construction General Permit requires the preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP) for projects disturbing 1.0 acre (or more) of land, which would include construction best management practices (BMPs) designed to prevent the occurrence of soil erosion and discharge of other construction-related pollutants that could contaminate water quality.

The County prepared the 2014 Low Impacts Development Standards Manual (LID Standards Manual) to comply with the requirements of the NPDES 2021 MS4 Permit. The LID Standards Manual provides guidance for the implementation of stormwater quality control measures in new development and redevelopment project in unincorporated areas of the County with the intention of improving water quality and mitigating potential water quality impacts from stormwater and non-stormwater discharges.

New developments stemming from the ESGVAP would be required to submit a LID Plan for review and approval by the Director of Public Works. The LID Plan must provide a comprehensive, technical discussion of how a proposed project would comply with the requirements of the LID Ordinance and LID Standards Manual. A projects compliance with the required LID Plan, ordinance, and standards manual would be sufficient to address potential impacts related to conflicting with County LID Ordinance.

New development within the ESGV Planning Area would need to be compliant with the NPDES Construction General Permit and the Los Angeles County 2021 MS4 Permit. Compliance with the provisions of these permits would ensure that future construction activities are consistent with the County LID Ordinance and would not create a significant impact to water quality. Further, the Natural Resources Element and Land Use Elements of the ESGVAP include goals and policies to protect water quality. Therefore, implementation of the ESGVAP would not violate water quality standards, waste discharge requirements, or otherwise substantially degrade surface or groundwater quality; there would be a less-than-significant impact.

Regarding cumulative impacts, many future projects implementing the goals and policies of the Natural Resources Element would improve surface water quality. Future projects that have the potential to impact surface water quality within the ESGVAP area are not likely to be constructed at the same time and are not likely to overlap in a manner that would create cumulative impacts to water quality. Additionally, as described above, future projects implementing the ESGVAP that have the potential to degrade surface water quality would be regulated by the permitting requirements listed above. For these reasons, the ESGVAP would result in less-than-significant cumulative impacts. Impacts are considered **less than significant**, and this criterion will not be analyzed further in the EIR.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

The ESGVAP identifies area of growth within the ESGV area where the intensity and density of development would increase relative to existing conditions. This would support long-term development and growth which could result in an increase in the use of water and groundwater resources. As such, as impacts to groundwater resources are considered to be a **potentially significant impact**, this criterion will be analyzed further in the EIR.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of a Federal 100-year flood hazard area or County Capital Flood floodplain; the alteration of the course of a stream or river; or through the addition of impervious surfaces, in a manner which would: (i) result in substantial erosion or siltation on- or off-site; (ii) substantially increase the rate, amount, or depth of surface runoff in a manner which would result in flooding on- or off-site; (iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or (iv) impede or redirect flood flows which would expose existing housing or other insurable structures in a Federal 100-year flood hazard area or County Capital Flood floodplain to a significant risk of loss or damage involving flooding?

The ESGVAP would be a long-range policy document intended to respond to local planning challenges, and would allow new development and redevelopment within the ESGVAP at densities and intensities higher than currently exist. The adoption of the ESGVAP would not directly cause alterations to drainage patterns

through the alteration of the course of a stream or river, or through the addition of impervious surfaces. It is possible, however, that future projects implementing the goals and policies of the ESGVAP would include projects or components that could contribute to the alteration of an existing drainage pattern of a site.

According to the General Plan, there are no 100-year flood hazard zones within the ESGV Planning Area, apart from sparse areas in the communities of Azusa and Hacienda Heights; there are mapped 500-year flood zones in West Covina. New development could involve the addition of new impervious surfaces in the ESGV Planning Area, which could lead to increased erosion or pollution, or on or off-site flooding.

As discussed above, new development within the ESGV Planning Area is required to comply with the NPDES Construction General Permit (and associated SWPPP and construction BMPs) and the County 2021 MS4 Permit. The County has prepared the LID Standards Manual to comply with the requirements of the NPDES 2021 MS4 Permit. The LID Standards Manual provides guidance for avoiding impacts to natural drainage systems and other water bodies, and for ensuring proper LID design strategies to regulate the addition of impervious surfaces.

New developments under the ESGVAP would be required to submit a LID Plan for review and approval by the Director of Public Works. The LID Plan must provide a comprehensive, technical discussion of how a proposed project would comply with the requirements of the LID Ordinance and LID Standards Manual. A project's compliance with the required LID plan, ordinance, and standards manual would be adequate to address potential impacts related to conflicting with County LID Ordinance.

Further, both the existing General Plan and the Health and Safety Element of the ESGVAP discourages development in flood hazard zones, floodplains, or flood prone areas. If future developments are approved within a flood hazard zone, additional policies have been adopted to require new developments to have access to emergency services and avoid areas where flood-related property damage could impact biological (and other) resources. Compliance with the NPDES Construction General Permit, County 2021 MS4 Permit, existing General Plan, and the Health and Safety Element of the ESGVAP would reduce impacts related to altering a drainage pattern or course of a river or stream due to the addition of new impervious surfaces; these impacts would be **less than significant**.

While the implementation of the ESGVAP would include new development that could add new impervious surfaces and/or involve activities that would alter the existing drainage pattern, they would be required to comply with the same existing federal, state, and local laws and policies in the General Plan and the ESGVAP. Therefore, implementation of the ESGVAP would result in less-than-significant cumulative impacts related to altering a drainage pattern or course of a river or stream due to the addition of new impervious surfaces. As such, this criterion will not be evaluated further in the EIR.

d) Otherwise place structures in Federal 100-year flood hazard or County Capital Flood floodplain areas which would require additional flood proofing and flood insurance requirements?

According to the General Plan, there are no 100-year flood hazard zones within the ESGV Planning Area, apart from sparse areas in the communities of Azusa and Hacienda Heights; there are mapped 500-year flood zones in West Covina.

While the ESGVAP would facilitate future development in certain portions of the ESGVAP area, both the existing General Plan and the Health and Safety Element of the ESGVAP discourages development in flood hazard zones, floodplains, or flood prone areas. If future developments are approved within a flood hazard

zone, additional policies have been adopted to require new developments to have access to emergency services and avoid areas where flood-related property damage could impact biological (and other) resources.

The ESGVAP would have a **less-than-significant impact** with respect to this criterion. As such, this criterion will not be evaluated further in the EIR.

e) Conflict with the Los Angeles County Low Impact Development Ordinance (L.A. County Code, Title 12, Ch. 12.84)?

The ESGVAP would be a long-range policy document intended to respond to local planning challenges and would allow new development and redevelopment within the ESGVAP at densities and intensities higher than currently exist. Future developments implementing the goals and policies of the ESGVAP could include construction or operation activities that could impact water quality by introducing pollutants into stormwater and non-stormwater discharges.

The County has prepared the LID Standards Manual to comply with the requirements of the NPDES 2021 MS4 Permit. The LID Standards Manual provides guidance for the implementation of stormwater quality control measures in new development and redevelopment project in unincorporated areas of the County with the intention of improving water quality and mitigating potential water quality impacts from stormwater and non-stormwater discharges.

New developments under the ESGVAP would be required to submit a LID Plan for review and approval by the Director of Public Works. The LID Plan must provide a comprehensive, technical discussion of how a proposed project would comply with the requirements of the LID Ordinance and LID Standards Manual. A project's compliance with the required LID plan, ordinance, and standards manual would be sufficient to address potential impacts related to conflicting with County LID Ordinance.

New development within the ESGV Planning Area would be compliant with the NPDES Construction General Permit and the Los Angeles County 2021 MS4 Permit. Compliance with the provisions of these permits would ensure that future construction activities are consistent with the County LID Ordinance. Requisite compliance with the independently enforceable requirements of the LID Ordinance would assure that adoption and implementation of the ESGVAP would result in a **less-than-significant impact** relating to this criterion. Therefore, the ESGVAP would have no cumulative impact with respect to the LID ordinance. As such, this criterion will not be evaluated further in the EIR.

f) Use onsite wastewater treatment systems in areas with known geological limitations (e.g., high groundwater) or in close proximity to surface water (including, but not limited to, streams, lakes, and drainage course)?

The ESGVAP would be a long-range policy document intended to respond to local planning challenges, and would allow new development and redevelopment within the ESGVAP at densities and intensities higher than currently exist. Potential future projects implementing ESGVAP policies and implementation actions may connect to existing sewer lines, on-site septic tanks, and/or alternative waste water disposal systems.

The Natural Resources Conservation Service (NRCS) Web Soil Survey is an online database containing soil data for land throughout California; the Web Soil Survey provides septic tank absorption field data to inform developers of the suitability of soil for supporting the use of septic tanks and other alternative wastewater treatments systems. Web Soil Survey data suggests that the suitability of the soils in the ESGV Planning Area

varies from not limited to very limited and may have one or more features that are unfavorable to septic tank usage (NRCS 2021).

In the event that a septic tank or alternative waste water disposal system installation is proposed, a testing and permitting process would need to be completed prior to installation; the process is regulated by the Los Angeles County Department of Public Health (LACDPH) and the Land Use Program of the Environmental Health Division. Home and business property owners that want to install or replace an Onsite Wastewater Treatment System (OWTS) must submit an application along with the required documents listed on the application in order to go through the OWTS review process; part of the process requires soil testing to ensure the soil is suitable for septic tank use. Obtaining a permit would be required prior to the construction of any septic tank or alternative wastewater disposal system, and each system would be constructed within the standards and parameters of the State Water Resources Control Board (SWRCB) Water Quality Control Policy for Siting, Design, Operation, and Maintenance of Onsite Wastewater Treatment Systems (SWRCB 2012), which are enforced locally by the LACDPH. System design approvals may also be submitted to the County's Building and Safety Department prior to obtaining building permits for proposed projects.

Since this procedure would be required prior to the construction of all septic tanks and alternative wastewater disposal systems, all new future developments would be subject to these state and local requirements. Proper soils are essential for installation and maintenance of septic tank and alternative wastewater disposal systems; requisite compliance with these independently enforceable state and local requirements would ensure that adoption and implementation of the ESGVAP would have a **less-than-significant impact** related to this criterion at the project level or cumulatively. As such, this criterion will not be evaluated further in the EIR.

g) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

The ESGV Planning Area is over 20 miles east of the Pacific Ocean and is not near any other large body of water. As such, the ESGV Planning Area is not within an established a tsunami or seiche zone.

According to the General Plan, there are no 100-year flood hazard zones within the ESGV Planning Area, apart from sparse areas in the communities of Azusa and Hacienda Heights; there are mapped 500-year flood zones in West Covina (Los Angeles County 2015). The ESGVAP would target community-serving growth near planned or existing transit stations, commercial retail service areas, high-quality transit areas, and active transportation corridors, tailored to the meet the needs of the ESGV community consistent with goals and policies of the County General Plan (Land Use Element Goals LU 4 and LU 5).

Although adoption of the ESGVAP would not directly result in the release of pollutants due to inundation, it is possible that future projects implementing ESGVAP policies or implementation actions could involve using or storing pollutants on-site and could be in or near a flood zone. If future developments subject to a discretionary agency approval are proposed within flood hazard zones, then project-specific CEQA analyses would be required. As discussed in Section 9, *Hazards and Hazardous Materials*, any future development or facility that would require the use or storage of hazardous materials (or other pollutants) would be required to prepare and implement a Hazardous Materials Business Plan (HMBP), Storm Pollution Prevention Plan (SWPPP), and a Spill Prevention, Control, and Countermeasure (SPCC) Plan. Compliance with these plans would ensure that any hazardous materials on-site are properly contained to prevent accidental release. In the event of inundation from a flood, any hazardous materials would be stored properly to reduce the likelihood that flood waters would introduce pollutants into the environment.

Further, both the existing General Plan and the Health and Safety Element of the ESGVAP discourages development in flood hazard zones, floodplains, or flood prone areas. If future developments are approved within a flood hazard zone, additional policies have been adopted to require new developments to have access

to emergency services and avoid areas where flood-related property damage could impact biological (and other) resources. Compliance with the existing General Plan and the Health and Safety Element of the ESGVAP would further reduce impacts related to pollutant release due to inundation. Compliance with the goals and policies included in the General Plan would ensure impacts are **less than significant**.

Adoption of the ESGVAP would include goals that require new development to be located away from flood-prone areas and to be designed to minimize flood hazard risks (Goal 5); that encourage implementation strategies to reduce flooding in the ESGVAP area (Goal 6); and that discourage the use and storage of hazardous products (i.e., pesticides, herbicides, etc.) on-site (Goal 7). By implementing strategies that minimize flood risk, avoiding development in flood-prone areas, and discouraging the use of hazardous products, the adoption of the ESGVAP would reduce impacts due to release of pollutants due to inundation to **less than significant**.

At the cumulative level, adoption of the ESGVAP would improve cumulative conditions with respect to the release of pollutants due to flooding. Therefore, the ESGVAP would result in a less-than-significant cumulative effects with respect to this criterion. As such, this criterion will not be evaluated further in the EIR.

h) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

The ESGVAP would support long-term development within the Planning Area at densities and intensities higher than existing conditions. This change could result in a substantial increase in the use of groundwater resources which could have a **potentially significant impact** on groundwater resources. As such, the potential for the ESGVAP to conflict with a Water Quality Control Plan or groundwater management plan will be evaluated further in the EIR.

References

Los Angeles County. 2015. Los Angeles County General Plan 2035.

NRCS. 2021. Linear Extensibility—Los Angeles County, California. Map. Scale 1:158,000.

State Water Resources Control Board (SWRCB) 2012. Water Quality Control Policy for Siting, Design, Operation and Maintenance of Onsite Wastewater Treatment Systems (OWTS Policy).

11. LAND USE AND PLANNING

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

a) Physically divide an established community?

The ESGVAP is a long-range planning document for the ESGV. The ESGVAP identifies proposed land use changes but does not include the approval of individual projects. As discussed in the Project Description above, most land use and zoning changes proposed in the ESGVAP would be concentrated around high-quality transit areas, major transit stops, and commercial areas. Land use changes would include targeted increases in density and development capacity in areas with urbanized land use patterns and established roadway and transit networks. These changes would not introduce radically different land uses to neighborhoods or propose new street patterns or otherwise divide these areas. While some policies in the ESGVAP may encourage land use changes to expand commercial areas, the intent of these policies is to connect communities with amenities that they need and to create central commercial centers for communities. For example, the Land Use Element includes policies to create village and social centers that can become centers of community activity and create most established connections within the community. The ESGVAP does not, at a programmatic level allow land use patterns that would divide an established neighborhood or community.

As demonstrated in the Growth and Preservation Strategies, one goal/strategy is to create more diverse and walkable communities with a greater sense of community identity and greater access to retail and commercial uses for all residents. Additionally, the growth and preservation strategies aim to create dedicated greenways to connect neighborhoods and communities together and create safe routes between communities, commercial centers, housing, employment centers, schools, parks etc. The Land Use Element and Mobility Element propose to create more walkable and bikeable routes within communities, which will serve to increase the accessibility and connection within communities and reduce existing barriers within communities. For example, the Land Use Element includes policies to create a network of bikeways and walking paths to make communities more walkable and safer for pedestrians, as well as policies to improve transit connections and “last mile” connections. Therefore, the ESGVAP does not include any policies or implementation actions that would physically divide existing communities. The ESGVAP includes goals and policies in multiple elements which would serve to increase connectivity and walkability within communities. Therefore, the ESGVAP would have a **less-than-significant impact** with respect to dividing an established community.

As described above, the land use changes proposed as part of the ESGVAP would consist primarily of increases in density around transit centers and existing roadways and would not result in significant changes to land uses that create barriers in communities or divide an established community. Additionally, as identified above, the Land Use and Mobility Elements include policies intended to increase the sense of community and increase connectivity within communities. Implementation of these policies over time is likely to improve cumulative conditions regarding community connectivity over time. Implementation of the ESGVAP would not result in cumulative impacts as it relates to dividing an established community. Therefore, this criterion will not be evaluated further in the EIR.

b) Cause a significant environmental impact due to a conflict with any County land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

The ESGVAP Land Use Element proposes long-term future development which would increase densities and intensities in certain areas of the ESGVAP area that have the transit connections and amenities to support additional development. These changes would necessitate changes in land use designations and zoning in order to facilitate the changes needed to meet the growth and preservation goals of the ESGVAP. The development and growth proposed under the ESGVAP is consistent with the LA County General Plan and the 2021-2029 Housing Element. Additionally, the growth areas proposed as part of the Land Use Element of the ESGVAP were informed by SCAG Connect SoCal. Additionally, the Natural Resources Element and Health and Safety Elements of the ESGVAP include goals and policies that create consistency with County plans and policies to mitigate environmental impacts. Overall, the Natural Resources Element and Health and Safety Element include goals and policies to protect natural resources and open spaces. While **potentially significant** impacts are not anticipated, this criterion will nonetheless be further evaluated in the EIR to provide a more detailed analysis of the ESGVAP's consistency with existing land use plans and zoning.

c) Conflict with the goals and policies of the General Plan related to Hillside Management Areas or Significant Ecological Areas?

The ESGVAP area is located within LA County; therefore, the Hillside Management Areas (HMA) Ordinance and Significant Ecological Area (SEA) Ordinance would apply to future development in the Planning Area. The HMA Ordinance is intended to “to ensure that development preserves and enhances the physical integrity and scenic value of Hillside Management Areas (HMAs), to provide open space, and to be compatible with and enhance community character” (Los Angeles County 2015). The HMA Ordinance requires that HMA Design Guidelines be in compliance with Hillside Design Guidelines. The HMA Ordinance also requires that a Conditional Use Permit (CUP) be obtained for most development in an HMA. The CUP would require project review and would apply conditions to project approval, if necessary, to ensure compliance with the HMA Ordinance. Additionally, the Natural Resources Element includes additional goals and policies intended to protect resources within HMAs and manage development in HMAs. Therefore, the ESGVAP would be required to be consistent with the County HMA Ordinance and includes additional policies intended to protect HMAs. As such, the ESGVAP would not conflict with any policies related to the protection of HMAs.

The County SEA Ordinance applies to areas within the ESGVAP designated as SEAs. The updated Ordinance would apply to development in the ESGVAP area and requires that CUPs be obtained for most types of development. CUP applications for development in SEAs would require a Biological Constraints Analysis (BCA) and a Biota Report, and may also require other reports, site visits, or evaluations. Ultimately, the CUP process would evaluate a project for consistency with the SEA Ordinance and may impose conditions to ensure consistency with the SEA Ordinance. The purpose of the SEA Ordinance is to “establish regulations to conserve the unique biological and physical diversity of the natural communities found within SEAs by requiring development to be designed to avoid and minimize impacts to SEA Resources” (Los Angeles County 2019). Additionally, the Natural Resources Element of the ESGVAP includes goals, policies, and implementation programs to enhance preservation of the SEAs in the ESGV area. Therefore, the ESGVAP would not conflict with any policies related to the protection of SEAs. As projects implementing the ESGVAP located in HMAs or SEAs would be required to demonstrate compliance with the SEA Ordinance and HMA Ordinance, and also be required to obtain CUPs, this permitting process would reduce the potential for the ESGVAP to have cumulative impacts on SEAs and HMAs to a less-than-significant level.

The potential impacts of the ESGVAP conflicting with the goals and policies of the General Plan related to HMAs or SEAs is considered **less than significant**. Therefore, this criterion will not be analyzed further in the EIR.

References

- Los Angeles County. 2015. Los Angeles County Hillside Management Area (HMA) Ordinance. November 5, 2015. Available online: https://planning.lacounty.gov/assets/upl/project/hma_adopted-ordinance.pdf
- Los Angeles County. 2019. Los Angeles County Significant Ecological Areas (SEA) Ordinance. January 16, 2020. Available online: <http://file.lacounty.gov/SDSInter/bos/supdocs/142407.pdf>

12. MINERAL RESOURCES

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The General Plan includes a map of designated Mineral Resource Zones (MRZs) within the County. The map specifically delineates areas that are designated as MRZ-2, which indicates that an area contains known mineral resources; the mineral resources map also includes areas of oil and gas resources within the ESGV Planning Area (Los Angeles County 2015). According to the General Plan, there are areas within the communities of Avocado Heights, West Puente Valley, East Irwindale, Charter Oak, West Claremont, and North Pomona that are designated MRZ-2, that include active and inactive wells that are also developed with residential, commercial, and industrial land uses and parks and schools.

The ESGVAP would be a long-range policy document to respond to local planning challenges, guide long-term development, enhance community spaces, promote a stable and livable environment that balances growth with preservation, and improve the quality of life in the ESGV through the creation of vibrant, thriving, safe, healthy, and pleasant communities. The ESGVAP would target community-serving growth near planned or existing transit stations, commercial retail service areas, high-quality transit areas, and active transportation corridors, tailored to the meet the needs of the ESGV community consistent with goals and policies of the County General Plan (Land Use Element Goals LU 4 and LU 5).

Individual future projects implementing the ESGVAP goals, policies, and implementation actions are anticipated to be located primarily within the urban environment, vacant or underutilized land uses, and on disturbed areas with existing infrastructure. As a result, future projects could be proposed in an area designated as an MRZ-2 of a known mineral resource that would be of value to the region and the residents of the state and, as a result, could result in the loss of availability of such resources.

However, the Conservation and Natural Resources Element of the General Plan includes goals and policies that are designed to protect significant mineral resources by restricting land uses adjacent to known mineral resources and by regulating the extraction of mineral resources. Additionally, the Surface Mining and Reclamation Act of 1975 (SMARA) regulates surface mining operations to assure that adverse environmental impacts are minimized, and mined lands are reclaimed to a usable condition. SMARA also encourages the production, conservation, and protection of the state’s mineral resources. Compliance with the existing goals and policies included in the General Plan, as well as the existing SMARA regulations, would be sufficient to address the potential impacts of the Project. Additionally, the MRZ-2 areas in the ESGV Planning Area are developed with residential, commercial, and industrial land uses and parks and schools, as well as the mineral extraction activities already occurring in MRZ-2.

Considering, the General Plan policies, SMARA, and the current developments within MRZ-2, the Project would not result in the loss of availability of a known mineral resource and the impact would be **less than significant**. As the ESGVAP would have a less-than-significant impact with respect to this criterion, it would not contribute to a cumulative impact with respect to mineral resources. As such, this criterion will not be analyzed further in the EIR.

b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

As discussed above, adoption and implementation of future ESGVAP projects could result in a potentially significant impact to known mineral resources in the ESGV Planning Area. However, as also discussed above, required compliance with the existing goals and policies included in the General Plan, as well as the existing SMARA regulations, would be sufficient to address the potential impacts of the Project. Additionally, the MRZ-2 areas in the ESGV Planning Area are developed with residential, commercial, and industrial land uses and parks and schools. As such, there would be a **less-than-significant impact**. As the ESGVAP would have a less-than-significant impact with respect to this criterion, it would not contribute to a cumulative impact with respect to mineral resources. As such, this criterion will not be analyzed further in the EIR.

References

Los Angeles County. 2015. Los Angeles County General Plan 2035. Chapter 9, Conservation and Natural Resources Element. Mineral Resources Zones.

13. NOISE

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project result in:

a) **Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the County General Plan or noise ordinance (Los Angeles County Code, Title 12, Chapter 12.08), or applicable standards of other agencies?**

	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The ESGVAP would result in long-term development and growth in certain portions of the planning area. These changes would result in construction and temporary noise sources as a result of construction. Additionally, changes in the intensity and density of development in portions of the ESGVAP area could result in changes in land use that could result in permanent increase in ambient noise. As such, this **potentially significant impact** will be analyzed further in the EIR.

b) **Generation of excessive groundborne vibration or groundborne noise levels?**

	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The ESGVAP would result in long-term development and growth in certain portions of the planning area. These changes would result in construction activities and ongoing operational activities which could generate temporary, periodic, and permanent sources of noise and vibration due to more intense development. As such, this **potentially significant impact** will be analyzed further in the EIR.

c) **For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?**

	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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There are numerous heliports located within and adjacent to the ESGVAP area, with Brackett Field Airport being located in close vicinity to ESGV communities. Implementation of the ESGVAP could result in future development within an ALUCP, such as Brackett Field Airport’s plan area. However, future development would be required to be consistent with any applicable ALUCP constraints. Furthermore, compliance with policies included in the Land Use Element and Noise Element of the General Plan related to land use compatibility would ensure that future development does not conflict with ALUCPs. In particular, LA County General Plan Policy LU 7.6 explicitly requires that airport land use plans address conflicts between airport operations and surrounding land uses. LA County General Plan Policy N 1.12 requires that land use decisions on parcels adjacent to transportation facilities, including those adjacent to airports, consider existing and future noise levels of the adjacent transportation facilities. Requisite compliance with independently enforceable obligations of ALUCPs and the General Plan would ensure that the implementation of future projects under the ESGVAP result in a less-than-significant impact relative to the potential exposure of people residing or working in unincorporated areas of the County to excessive airport or airstrip noise at the project level and cumulatively. Nonetheless, this impact is considered **potentially significant** and will be evaluated further in the EIR.

14. POPULATION AND HOUSING

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The ESGVAP would target community-serving growth near planned or existing transit stations, commercial retail service areas, high-quality transit areas, and active transportation corridors, tailored to the meet the needs of the ESGV community consistent with goals and policies of the County General Plan (Land Use Element Goals LU 4 and LU 5). The growth and increases in density that are proposed in the Land Use Element of the ESGVAP were guided by the SCAG ConnectSocial and the LA County General Plan. While the ESGVAP would result in increases in density and development intensity which could result in population growth, this growth would not be unplanned and would be consistent with existing regional planning document assumptions regarding population growth. Impacts to induced population growth are not anticipated to be significant. Nonetheless, the potential for ESGVAP to have an impact on unplanned population growth is considered **potentially significant**, and this criterion will be further evaluated in the EIR.

b) Displace substantial numbers of existing people or housing, especially affordable housing, necessitating the construction of replacement housing elsewhere?

	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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A key component of the ESGVAP Land Use Element is to provide a greater diversity of housing stock for communities within the ESGVAP area to create affordable housing options for residents. The ESGVAP would target community-serving growth near planned or existing transit stations, commercial retail service areas, high-quality transit areas, and active transportation corridors, tailored to the meet the needs of the ESGV community consistent with goals and policies of the County General Plan (Land Use Element Goals LU 4 and LU 5). The ESGVAP would not displace people or existing housing. The ESGVAP does propose increases in density and intensity which is likely to result in the construction of housing within the ESGVAP area. The environmental impacts of these land use changes and the resultant construction of implementing projects in the future, such as denser housing developments, are analyzed throughout this Initial Study and will be further evaluated in the EIR. While implementation of the ESGVAP would not displace people and would not result in the construction of unplanned housing elsewhere, impacts are considered **potentially significant**, and this criterion will be evaluated further in the EIR.

15. PUBLIC SERVICES

<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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a) Would the project create capacity or service level problems, or result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

Fire protection, sheriff protection, schools, parks, libraries?

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Increases in demand for public services such as fire protection, schools, parks, and libraries are generally created by increases in population. The ESGVAP would be a long-range policy document intended to respond to local planning challenges, guide long-term development, enhance community spaces, promote a stable and livable environment that balances growth with preservation, and improve the quality of life in the ESGV through the creation of vibrant, thriving, safe, healthy, and pleasant communities. The ESGVAP would target community-serving growth near transit uses, commercial retail service areas, high-quality transit areas, and would be tailored to the meet the needs of the ESGV community consistent with the goals and policies of the County's General Plan. The ESGVAP would be consistent with Land Use Element Policy 5.4 of the General Plan, which encourages community-serving uses, such as early care and education facilities, grocery stores, farmers markets, restaurants, and banks to locate near employment centers. Individual future projects implementing the ESGVAP's goals, policies, and implementation actions are anticipated to be located primarily within the urban environment, vacant or underutilized land uses, and on disturbed areas with existing infrastructures.

In order to accomplish the growth and preservation strategies identified in the ESGVAP, growth is generally proposed in communities that have access to transit and commercial areas. In these communities, increases in density and development intensity is proposed near major transit centers, HQTAs, and commercial centers. The proposed changes in land use and zoning identified in Table 1, Land Use and Zoning Change Summary for Proposed Growth (and in the figures in Appendix A), are intended to focus growth within one mile of a major transit stop, a half-mile of HQTAs, and a quarter-mile of established or new commercial centers where there is accessibility to existing or proposed frequent transit and commercial services. These proposed changes are also intended to combine residential uses with mixed-use uses along major and secondary commercial corridors. Overall changes in zoning and land use will increase the intensity of development around commercial centers, HQTAs, and major transit stops, increase affordable housing options, increase land use diversity and the proximity of residential areas in growth communities to commercial areas, and increase the accessibility of community services. As the ESGVAP proposes changes to land use and zoning that could encourage population growth and increase demand for public services, such as access to schools, parks, fire protection services and law enforcement services, impacts to public services are determined to be **potentially significant** and will be evaluated further in the EIR.

16. RECREATION

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The ESGVAP is a long-range policy document that would facilitate a higher density of development than is currently allowed, increasing residential density and increasing mixed use and commercial areas around areas with high-quality transit. These land use changes could result in increases in population that could impact recreational resources. The ESGVAP also includes the Land Use Element and the Parks and Recreation Element, which include goals and policies intended to preserve historical and rural and equestrian roots, create walkable communities, and identify potential locations for open space amenities and gathering spaces within communities. These policies have the potential to increase existing access to open space and parks and recreational resources. However, as mentioned previously, implementation of the ESGVAP would also lead to population increases within certain areas of the ESGV, which could result in impacts to existing recreational resources. As a result, impacts to recreational resources are considered **potentially significant** and will be evaluated further in the EIR.

b) Does the project include neighborhood and regional parks or other recreational facilities or require the construction or expansion of such facilities which might have an adverse physical effect on the environment?

	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The ESGVAP is a long-range policy document that would facilitate a higher density of development than is currently allowed, increasing residential density and increasing mixed use and commercial areas around areas with high quality transit. These land use changes could result in increases in population that could impact recreational resources. The ESGVAP also includes the Land Use Element and the Parks and Recreation Element, which include goals and policies intended to preserve historical and rural and equestrian roots, create walkable communities, and identify potential locations for open space amenities and gathering spaces within communities. Implementation of these policies could result in the development of new parks and recreational spaces which could have environmental impacts. As a result, impact to this criterion are considered **potentially significant** and will be evaluated further in the EIR.

c) Would the project interfere with regional trail connectivity?

	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The ESGVAP is a long-range policy document that would facilitate a higher density of development than is currently allowed, increasing residential density and increasing mixed use and commercial areas around areas with high quality transit. Depending on the location, these land use changes have the potential to interfere with trails. The ESGVAP also includes the Land Use Element and the Parks and Recreation Element which include goals and policies intended to create walkable communities and to identify potential locations for open

space amenities, trails, greenways, and gathering spaces within communities. Impacts under this criterion are considered **potentially significant** and will be evaluated further in the EIR.

17. TRANSPORTATION

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

a) Conflict with an applicable program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The ESGVAP Mobility Element and Land Use Elements include goals and policies to increase access to transit, and safe bicycle paths, and pedestrian paths. One of the growth and preservation strategies identified in the Project Description is to create more connected communities and create dedicated neighborhood greenways to connect neighborhoods and communities. Therefore, the ESGVAP is expected to improve conditions overall with respect to the circulation system and access to transit, bicycle, and pedestrian facilities. Nonetheless, impacts are considered to be **potentially significant**, and as such, the ESGVAP's consistency with applicable plans, policies, and regulations related to the circulation system, transit, roadway, bicycle and pedestrian facilities will be evaluated further in the EIR.

b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The ESGVAP would allow development at densities and intensities that are higher than existing conditions and could have an impact on Vehicle Miles Traveled (VMT). However, the densities and land use changes proposed as part of the Land Use Element would focus development around HQTAs and major transit stops, with the goal of reducing VMT. Additionally, the Mobility Element of the ESGVAP includes policies to reduce VMT by creating community-oriented mobility and increasing access to transit. Nonetheless, impacts are considered to be **potentially significant**, and as such, the potential for the ESGVAP to have an impact on CEQA Guidelines Section 15064.3 subdivision (b) will be further evaluated in the EIR.

c) Substantially increase hazards due to a road design feature (e.g., sharp curves) or incompatible uses (e.g., farm equipment)?

	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The ESGVAP Land Use Element and Mobility Element include goals and policies to increase the compatibility of land uses in the ESGVAP area and to create safer transportation and circulation conditions. Nonetheless, impacts are considered to be **potentially significant**, and as such, the potential for the ESGVAP to increase hazards due to a road design feature or incompatible uses will be evaluated further in the EIR.

d) Result in inadequate emergency access?

	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The ESGVAP Health and Safety Element includes goals and policies to increase accessibility to information about emergency response and access. The ESGVAP would increase development densities and intensities, which could impact emergency access. Impacts are considered to be **potentially significant**, and as such, the potential for the ESGVAP to have an impact on emergency access will be further evaluated in the EIR.

18. TRIBAL CULTURAL RESOURCES

	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- | | | | | |
|--|-------------------------------------|--------------------------|--------------------------|--------------------------|
| i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code § 5020.1(k), or | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|--|-------------------------------------|--------------------------|--------------------------|--------------------------|

The ESGVAP would be a long-range policy document intended to respond to local planning challenges and would allow new development and redevelopment within the ESGVAP at densities and intensities higher than currently exist. As a policy document, the ESGVAP itself would not result in direct impacts to historical resources. However, future projects implementing the policies and goals contained in the ESGVAP could involve structural improvements and/or ground disturbing activities that could, depending on their location, result in direct or indirect adverse changes to a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code § 5020.1(k).

On February 4, 2022, the County submitted notification and request to consult letters to 5 tribes pursuant to AB 52. To date, no requests for consultation have been received from any of the tribes pursuant to AB 52. On February 4, 2022, the County also submitted notification and request to consult letters to 11 tribes and organizations pursuant to SB 18. To date, no requests for consultation have been received from any of the individuals/organizations pursuant to SB 18. As such, impacts under this criterion are considered to be **potentially significant** and will be further evaluated in the EIR.

- | | | | | |
|---|-------------------------------------|--------------------------|--------------------------|--------------------------|
| ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|---|-------------------------------------|--------------------------|--------------------------|--------------------------|

The ESGVAP would be a long-range policy document intended to respond to local planning challenges and would allow new development and redevelopment within the ESGVAP at densities and intensities higher than currently exist. As a policy document, the ESGVAP itself would not result in direct impacts to a resource that is significant pursuant to subdivision (c) of Public Resources Code § 5024.1 However, future projects implementing the policies and goals contained in the ESGVAP could involve structural improvements and/or

ground disturbing activities that could, depending on their location, result in direct or indirect adverse changes to a tribal cultural resource. As such, impacts under this criterion are considered to be **potentially significant** and will be further evaluated in the EIR.

19. UTILITIES AND SERVICE SYSTEMS

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

a) **Require or result in the relocation or construction of new or expanded water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?**

The ESGVAP would allow development at densities and intensities that are higher than existing conditions. This increase in density and intensity could result in increased demand for water, wastewater treatment, electric power, natural gas, and telecommunication facilities. As such, this impact is considered **potentially significant**, and this criterion will be further evaluated in the EIR.

b) **Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?**

The ESGVAP would allow development at densities and intensities that are higher than existing conditions. This increase in density and intensity could result in increased demand for water which has the potential to challenge existing water supplies and facilities. As such, this impact is considered **potentially significant**, and this criterion will be further evaluated in the EIR.

c) **Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?**

The ESGVAP would allow development at densities and intensities that are higher than existing conditions. This increase in density and intensity could result in increased demand for wastewater treatment which has the potential to challenge existing wastewater treatment facilities resulting. As such, this impact is considered **potentially significant**, and this criterion will be further evaluated in the EIR.

d) **Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?**

The ESGVAP would allow development at densities and intensities that are higher than existing conditions. This increase in density and intensity could result in an increase in the generation of solid waste that has the potential to challenge existing solid waste infrastructure. As such, this impact is considered **potentially significant**, and this criterion will be further evaluated in the EIR.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

The ESGVAP would allow development at densities and intensities that are higher than existing conditions. This increase in density and intensity could result in an increase in the generation of solid waste which has the potential to challenge existing solid waste infrastructure or create a conflict with state or local solid waste management regulations. As such, this impact is considered **potentially significant**, and this criterion will be further evaluated in the EIR.

20. WILDFIRE

<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

The ESGVAP Health and Safety Element includes goals and policies to increase accessibility to information about emergency response and access. The ESGVAP would increase development densities and intensities, which could include road closures or road work, which could impact an emergency response or evacuation plan. Impacts are considered to be **potentially significant**, and as such, the potential for the ESGVAP to have an impact on emergency access will be further evaluated in the EIR.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

LA County covers a vast area, and the topography, vegetation and climate vary across the County. Large portions of the undeveloped areas of the County (particularly in the Santa Monica Mountains, Santa Clarita Valley, and Antelope Valley) include the following vegetation types: coastal sage, riparian oak woodlands, and chaparral. Fire risk in LA County is particularly high in the undeveloped areas of the County that are designated as VHFHSZ. These areas typically contain chaparral ecosystems, as they contain volatile oils that are particularly flammable. Additionally, chaparral communities are typically located in mountainous areas where the steep terrain can fuel the spread of wildfire (LACoFD 2021).

Fire protection within unincorporated LA County is provided by the LACoFD, which responds to wildland fires and urban fires. In recent years, the LACoFD has faced planning issues related to the recent increase in the frequency and severity of wildland fires and changes to urban fire considerations due to increases in the intensity of development and the number of potentially affected populations (Los Angeles County 2015). The LA County Fire District’s 2017-2021 Strategic Fire Plan includes strategies to meet three overarching goals related to emergency operations, public service, and organizational effectiveness. Most of the strategies included in this plan are administrative in nature and aimed at building the LACoFD’s capacity to respond to fire hazards.

Individual future projects implementing the ESGVAP’s goals, policies, and implementation actions are anticipated to be located primarily within the urban environment, vacant or underutilized land uses, and on disturbed areas with existing infrastructure. The ESGVAP Health and Safety Element includes goals and policies that prioritize avoiding development in areas that present potential environmental hazards to communities. As such, the ESGVAP does not include any specific projects that could directly expose structures or occupants to wildfire risks.

Some future projects implementing the ESGVAP’s goals, policies, strategies, and implementation actions could be located in areas designated as VHFHSZs. Depending on the location and site-specific conditions of implementing projects, such projects could increase the risk of an ignition during construction due to the use

of equipment, vehicles, and tools and the storage of fuels and other flammable materials. As described in Section 9, Hazard and Hazardous Materials, under criterion g), new future development would be required to comply with Title 32 of the Los Angeles County Code (the Los Angeles County Fire Code). Compliance with the County Fire Code would ensure that any new future development in the unincorporated County would be in an area with adequate access (for emergency vehicles/personnel) and water pressure (to meet flow standards), in the event that a fire needs to be extinguished. Compliance with the County Fire Code would also ensure future developments that are located within mapped VHFHSZs are properly inspected, obtain the applicable permits, and abide by fire prevention techniques. The operation of most facilities that would be promoted by the ESGVAP would not be expected to substantially increase wildfire risk. Projects would also be required to comply with the CBC, which identifies building fire safety requirements, such as sprinklers, resistance standards, and the clearance of debris and vegetation within a prescribed distance from structures in wildfire hazard areas.

Furthermore, future projects would be required to comply with General Plan policies, which are intended to reduce the potential for development to be located in high fire hazard areas and encourage mitigation to ensure that developments are built to be fire resistant and have the capacity to ensure proper ingress, egress, and sufficient fire suppression resources onsite:

- Policy S 3.1: Discourage high density and intensity development in VHFHSZs.
- Policy S 3.2: Consider climate change implications in planning for FHSZs.
- Policy S 3.3: Ensure that the mitigation of fire related property damage and loss in FHSZs limits impacts to biological and other resources.
- Policy S 3.4: Reduce the risk of wildland fire hazards through the use of regulations and performance standards, such as fire-resistant building materials and vegetation.
- Policy S 3.5: Encourage the use of fire-resistant vegetation that is compatible with the area's natural vegetative habitats in fuel modification activities.
- Policy S 3.6: Ensure adequate infrastructure, including ingress, egress, and peak load water supply availability for all projects located in FHSZs.
- Policy S 3.7: Consider siting and design for developments located within FHSZs, particularly in areas located near ridgelines and on hilltops, to reduce the wildfire risk.
- Policy S 3.8: Support the retrofitting of existing structures in FHSZs to help reduce the risk of structural and human loss due to wildfire.

Compliance with the LA County Fire Code, CBC, and the General Plan would reduce the risk that future projects are proposed in fire-prone areas, and ensure that developments contain proper fire prevention goals, policies, strategies and capacity for fire suppression during construction and operation. While the ESGVAP itself would not result in any direct impacts to wildfire risk, compliance with these codes and policies would significantly reduce the potential for the ESGVAP to indirectly result in future projects that could expose people to the risks from the spread of wildfire. Requisite compliance with independently enforceable provisions of laws, regulations, plans and standards (including those set forth in the LA County Fire Code, CBC, and the General Plan) would assure that the adoption and implementation of the ESGVAP would result in a **less-than-significant impact** relating to the potential exposure of future project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

With regard to cumulative impacts, many future projects implementing the goals and policies of the Natural Resources Element would avoid growth in areas of hazard, such as areas designated as VHFHSZs. In addition, future projects implemented as a result of the ESGVAP would be required to assess project impacts on a case-by-case basis and would also be required to comply with the enforceable provisions of laws, regulations, plans, and standards. Additionally, future projects implementing the ESGVAP that have the potential to exacerbate wildfire risks would be regulated by the permitting requirements listed above. For these reasons, the ESGVAP would not result in cumulative impacts. As such, this criterion will not be evaluated further in the EIR.

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

The ESGVAP would be a long-range policy document intended to respond to local planning challenges, guide long-term development, enhance community spaces, promote a stable and livable environment that balances growth with preservation, and improve the quality of life in the ESGV through the creation of vibrant, thriving, safe, healthy, and pleasant communities. The ESGVAP would target community-serving growth near planned or existing transit stations, commercial retail service areas, high-quality transit areas, and active transportation corridors, tailored to the meet the needs of the ESGV community consistent with goals and policies of the County General Plan (Land Use Element Goals LU 4 and LU 5). The goals and policies of the Natural Resources Element require preservation of sensitive resources, scenic hillsides, conservation areas, agricultural lands, parks, open spaces, water channels, and equestrian amenities that characterize the ESGV and avoid growth in areas of hazard, such as areas designated as VHFHSZs. The ESGVAP does not include any specific project proposal, and therefore, would not result in any direct increases in wildfire risk that would necessitate the installation of fire prevention infrastructure, such as fuel breaks and emergency water sources. Individual proposals for future projects supported by the ESGVAP's goals, policies, strategies, and implementation actions would be required to undergo project-level review and disclose any potential impacts related to wildfire risk and provide mitigation of any significant impacts, if necessary. If fuel breaks, emergency water sources, or other fire prevention features are required to reduce wildfire risks, then the environmental impacts of those features would be evaluated as part of the project-level CEQA review. In addition to any project-specific fire-related mitigation recommendations, any new development within Los Angeles County (including the unincorporated areas) would be subject to Title 32 of the Los Angeles County Code (the Los Angeles County Fire Code). Compliance with the County Fire Code would ensure that any new development in the unincorporated County would be in an area with adequate access (for emergency vehicles/personnel) and adequate water and pressure to meet flow standards (in the event that a fire needs to be extinguished). Compliance with the County Fire Code would also ensure developments that are located within mapped VHFHSZs are properly inspected, obtain the applicable permits, and abide by fire prevention techniques. Further, any future project that would result from the adoption of the ESGVAP would be required to address fire risks before the potential impact could result. As such, impacts are considered **less than significant**, and this criterion will not be evaluated further in the EIR.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

As described under criterion b), the portions of the County that are designated as VHFHSZs are characterized by steep slopes that could create the potential for downslope or downstream flooding, landslides, or runoff. Also as described under criterion b), the ESGVAP would not directly result in any future projects that would increase wildfire risk or alter slopes or drainage patterns in a manner that could increase the risk for post-fire downslope or downstream flooding or landslides. Future projects implementing the ESGVAP's goals, policies, strategies, and implementation actions could, depending on the location and site-specific conditions of projects, increase the risk of wildfire and post-fire flooding or landslides. As described above, all future projects would be required to comply with the County Fire Code, CBC, and General Plan policies, which would reduce the extent to which future projects could increase fire risk. Additionally, future projects would be subject to project-level review where site-specific fire risk would be evaluated and mitigation, if necessary, would be applied to address significant impacts. Therefore, the potential for future projects to result in the ignition of a fire which could result in downstream flooding or landslides would be **less than significant** at the project level, as well as cumulatively.

Additionally, as discussed in Section 7, Geology and Soils, under criterion a.iv), if future projects implementing the ESGVAP's goals, policies, strategies, and implementation actions were to be proposed in susceptible areas, significant effects due to the impacts of landslides could result. However, all new future developments would be required to comply with the CBC and the County Building Code. Requisite compliance with these codes would ensure that each new development would not result in a potential significant impact either at the project level or cumulatively.

Requisite compliance with applicable laws, regulations, and ordinances would assure that new projects implementing the ESGVAP's goals, policies, strategies, and implementation actions would not result in a significant impact. With regard to cumulative impacts, many future projects implementing the goals and policies of the Natural Resources Element would avoid growth in areas of hazard, such as areas designated as VHFHSZs. In addition, future projects implemented as a result of the ESGVAP would be required to assess project impacts on a case-by-case basis and would also be required to comply with the enforceable provisions of laws, regulations, plans, and standards. Additionally, projects implementing the ESGVAP that have the potential to exacerbate wildfire risks would be regulated by the permitting requirements listed above. For these reasons, the ESGVAP would not result in cumulative impacts. As such, impacts are considered **less than significant**, and this criterion will not be analyzed further in the EIR.

e) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

The ESGVAP would be a long-range policy document intended to respond to local planning challenges, guide long-term development, enhance community spaces, promote a stable and livable environment that balances growth with preservation, and improve the quality of life in the ESGV through the creation of vibrant, thriving, safe, healthy, and pleasant communities. The ESGVAP would target community-serving growth near planned or existing transit stations, commercial retail service areas, high-quality transit areas, and active transportation corridors, tailored to the meet the needs of the ESGV community consistent with goals and policies of the County General Plan (Land Use Element Goals LU 4 and LU 5). Individual projects implementing the ESGVAP's goals, policies, and implementation actions are anticipated to be located primarily within the urban environment, vacant or underutilized land uses, and on disturbed areas with existing

infrastructures. The ESGVAP does not include any specific projects that could directly expose structures or occupants to a significant risk of loss, injury or death involving wildland fires. Since no changes to land use designations or specific projects are proposed as part of the ESGVAP, no new or substantially increased risks associated with wildfires are anticipated. Some future projects implementing the ESGVAP's goals, policies, strategies, and implementation actions could be located in areas designated as VHFHSZs. Depending on the location and site-specific conditions of implementing projects, they could increase the risk of an ignition during project construction due to the use of equipment, vehicles, and tools and the storage of fuels and other flammable materials.

As described in Section 9, Hazard and Hazardous Materials, under criterion g), and further analyzed above under criterion b), new future development would be required to comply with the Los Angeles County Fire Code, the CBC, and policies in the General Plan that require fire prevention goals and policies to be incorporated into development and that developments include proper ingress and egress and equipment to respond to fire hazards. Compliance with these requirements would ensure that any new future development in the unincorporated County would be in an area with adequate access (for emergency vehicles/personnel) and water pressure (to meet flow standards), in the event that a fire needs to be extinguished. Compliance would also ensure that any future developments that are proposed within mapped VHFHSZs are properly inspected, obtain the applicable permits, and abide by fire prevention techniques. The operation of most facilities that would be promoted by the ESGVAP would not be expected to substantially increase wildfire risk.

For these reasons, any new future projects implementing the ESGVAP's goals, policies, strategies, and implementation actions would be considered to have a **less-than-significant impact**. With regard to cumulative impacts, many future projects implementing the goals and policies of the Natural Resources Element would avoid growth in areas of hazard, such as areas designated as VHFHSZs. Future projects implemented as a result of the ESGVAP would be required to assess project impacts on a case-by-case basis and would also be required to comply with the enforceable provisions of laws, regulations, plans, and standards. Additionally, projects implementing the ESGVAP that have the potential to exacerbate wildfire risks would be regulated by the permitting requirements listed above. For these reasons, the ESGVAP would not result in cumulative impacts. As such, this criterion will not be analyzed further in the EIR.

References

- California Department of Forestry and Fire Protection (CAL FIRE). 2011. Fire Hazard Severity Zones in Local Responsibility Areas (LRA). Forest Resource Assessment Program. Map. Scale 1:150,000.
- LA County Fire Department (LACoFD). 2021. LA County Fire Department 2021 Strategic Plan. URL: https://osfm.fire.ca.gov/media/lyulfm3z/2021_lac_fireplan.pdf . June 9, 2021.
- Los Angeles County. 2015. Los Angeles County General Plan 2035. Chapter 12, Safety Element. Disaster Routes.

21. MANDATORY FINDINGS OF SIGNIFICANCE

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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As disclosed in Section 4, Biological Resources under criterion a), projects implementing the ESGVAP goals and policies have the potential to result in impacts to candidate, sensitive, or special status species such as Swainson’s hawk and Arroyo toad. Impacts to candidate, sensitive, and special status species are considered to be potentially significant and will be further evaluated in the EIR. Similarly, the potential for ESGVAP to result in substantial adverse effects on sensitive natural communities (evaluated in Section 4, Biological Resources under criterion b) is considered to be potentially significant and will be evaluated further in the EIR. Section 4, Biological Resources also identified the potential for projects implementing ESGVAP measures to impact federally protected wetlands (evaluated in criterion c), interfere with the movement of migratory fish, native resident, or wildlife species (evaluated under criterion d), or convert oak woodlands or other unique native woodlands (evaluated under criterion e) to be potentially significant. As such, overall impacts are considered **potentially significant**, and the potential for the ESGVAP to result in impacts to these biological resources will be evaluated further in the EIR.

As analyzed in Section 5, Cultural Resources, the ESGVAP has the potential to impact historical resources and archaeological resources. As analyzed in Section 13, the ESGVAP has the potential to impact tribal cultural resources. As such, potential impacts related to cultural resources and tribal cultural resources are considered **potentially significant**, and this criterion will be evaluated further in the EIR.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The ESGVAP would be a long-range policy document intended to respond to local planning challenges, guide long-term development, enhance community spaces, promote a stable and livable environment that balances growth with preservation, and improve the quality of life in the ESGV through the creation of vibrant, thriving, safe, healthy, and pleasant communities. The potential for the ESGVAP to result in cumulative impacts is evaluated throughout this Initial Study. As described throughout this document, the ESGVAP would not result in cumulative impacts to certain resource areas or criterion. However, the ESGVAP does

have the potential result in cumulative impacts to Aesthetics, Agriculture and Forestry Resources, Air Quality, Biological Resources, Cultural Resources, Energy, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Noise, Population and Housing, Public Services, Recreation, Transportation, Tribal Cultural Resources, Utilities and Services, and Wildfire. The potential for cumulative effects is considered **potentially significant** for these resource areas. As such, the cumulative impacts of those resource areas will be evaluated further in the EIR.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

The ESGVAP would be a long-range policy document intended to respond to local planning challenges, guide long-term development, enhance community spaces, promote a stable and livable environment that balances growth with preservation, and improve the quality of life in the ESGV through the creation of vibrant, thriving, safe, healthy, and pleasant communities. The ESGVAP does not include any specific projects that could directly result in adverse effects on human beings. However, future projects implementing ESGVAP goals and policies could result in potentially significant impacts as disclosed throughout this Initial Study. As such, the potential for Air Quality, Noise, and Transportation and other potentially significant impacts to result in a **potentially significant impact** to human beings will be evaluated further in an EIR.

DEPARTMENT OF TRANSPORTATION

District 7 – Office of Regional Planning
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 266-3562
FAX (213) 897-1337
TTY 711
www.dot.ca.gov



*Making Conservation
a California Way of Life.*

June 1, 2022

Mi Kim
County of Los Angeles
Department of Regional Planning
320 West Temple Street, Room 1362
Los Angeles, CA 90012

RE: East San Gabriel Valley Area Plan –
Notice of Preparation of an
Environmental Impact Report (NOP)
SCH # 2022040512
GTS # 07-LA-2022-03927

Dear Mi Kim:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced NOP. The proposed East San Gabriel Valley Area Plan (ESGVAP or Project) is a community-based plan that is designed to focus on land use and policy issues that are specific to the unique characteristics and needs of the ESGV Planning Area and its communities. Some of these communities are currently subject to various overlapping plans, policies, and regulations, the proposed Project will update and consolidate these existing regulations into the Area Plan. The ESGVAP will include area-wide goals, policies, and implementation programs within nine different elements. The ESGVAP will include changes to land use designations and zoning in order increase residential density and commercial and mixed uses in areas near transit amenities. The County of Los Angeles is the Lead Agency under the California Environmental Quality Act (CEQA).

The East San Gabriel Valley Planning Area includes the easternmost portions of the County. It is located south of the Angeles National Forest, north of the Orange County border east of Interstate-605 (I-605), and west of the San Bernardino County line.

According to the NOP, The ESGVAP would allow development at densities and intensities that are higher than existing conditions and could have an impact on Vehicle Miles Traveled (VMT). However, the densities and land use changes proposed as part of the Land Use Element would focus development around High-Quality Transit Areas (HQTA's) and major transit stops, with the goal of reducing VMT. The Mobility Element of the ESGVAP includes policies to reduce VMT by creating community-oriented mobility and increasing access to transit. Nonetheless, impacts are potentially significant, and as such, the potential for the ESGVAP to have an impact on CEQA Guidelines Section 15064.3 subdivision (b) will be further evaluated in the Environmental Impact Report (EIR). Additionally, the potential for the ESGVAP to have an impact on emergency access and the potential to increase hazards due to a road design feature or incompatible uses will also be further evaluated in the EIR. Caltrans would request the study to provide trip generation, trip distribution and trip assignment estimates to the State

facilities on/off-ramps and any arising inadequate weaving or queue spillback onto State facilities. Caltrans looks forward to reviewing these analyses.

We encourage the Lead Agency to evaluate the potential of additional Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications to better manage the transportation network, as well as transit service and bicycle or pedestrian connectivity improvements. For more TDM strategies, please refer to the Federal Highway Administration's Integrating Demand Management into the Transportation Planning Process: A Desk Reference (Chapter 8). This reference is available online at:
<http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>

Caltrans also encourages the Lead Agency to promote alternative transportation. This will increase accessibility and decrease Greenhouse Gas Emissions, which supports Caltrans' mission to provide a safe and reliable transportation network that serves all people and respects the environment. For supplementary strategies that will promote equity and environmental preservation, please refer to the 2010 Quantifying Greenhouse Gas Mitigation Measures report by the California Air Pollution Control Officers Association (CAPCOA), which is available online at: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

If you have any questions regarding these comments, please contact Ronnie Escobar, the project coordinator, at Ronnie.Escobar@dot.ca.gov, and refer to GTS # 07-LA-2022-03927.

Sincerely,



MIYA EDMONSON
LDR/CEQA Branch Chief

cc: State Clearinghouse



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

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



SENT BY EMAIL ONLY

May 31, 2022

Mi Kim
Los Angeles County Department of Regional Planning
320 West Temple Street, Room 1354
Los Angeles, CA 90012
MKim@planning.lacounty.gov

Subject: Notice of Preparation of a Draft Environmental Impact Report for the East San Gabriel Valley Area Plan, SCH #2022040512, Los Angeles County Department of Regional Planning, Los Angeles County

Dear Ms. Kim:

The California Department of Fish and Wildlife (CDFW) has reviewed a Notice of Preparation (NOP) of a Draft Environmental Impact Report (EIR) from the Los Angeles County Department of Regional Planning (DRP) for the East San Gabriel Valley Area 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", as defined by State law, of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 *et seq.*), or CESA-listed rare plant pursuant to the Native Plant Protection Act (NPPA);

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Fish & G. Code, §1900 *et seq.*), CDFW recommends the Project proponent obtain appropriate authorization under the Fish and Game Code.

Project Description and Summary

Objective: The proposed Project is a long-range policy document that aims to support growth, development, and maintenance of 24 unincorporated communities in the East San Gabriel Valley. The Project is an extension of the Los Angeles County General Plan with focus on the characteristics and needs of the 24 unincorporated communities. The Project will entail nine elements and 15 community specific chapters with goals, policies, and actions that will be implemented and enforced. In addition, a general plan amendment and associated zoning amendments will be required for implementation of the proposed Project. Some zoning amendments will allow for higher densities within one mile of major transit stops and transit corridors. To strengthen the unincorporated communities and successfully execute the Project the following components will need to be implemented:

- Amend the Los Angeles General Plan to update, reorganize, and incorporate the existing Rowland Heights Community Plan and Hacienda Heights Community Plan as community chapters within the Project;
- Update existing zoning and land use designations to ensure consistency between the proposed Project and the General Plan land use policy map;
- Amend Title 22 to make changes to the existing zoning map;
- Incorporate the proposed rezoning as identified in the Housing Element 2021-2029;
- Rezone agricultural zones that are developed with residential uses from light agriculture to an appropriate residential zone;
- Reassess and revise the Rowland Heights Community Standards District to bring it into conformance with proposed Project;
- Adjust the boundaries of Avocado Heights and the Trailside Ranch Equestrian Districts; and
- Establish an area-wide overlay to regulate height, ridgelines, and public communal space in new development.

The Project does not approve any specific project-level development or construction activities.

Location: The Project site encompasses 51.29 square miles of unincorporated communities within the easternmost portions of Los Angeles County. The Project site is generally located south of the Angeles National Forest, north of the Orange County border, east of Interstate 605, and west of the San Bernardino County line. The Project site is comprised of the following 24 unincorporated communities: Avocado Heights, Charter Oak, Covina Islands, East Azusa, East Irwindale, East San Dimas, Glendora Islands, Hacienda Heights, North Claremont, North Pomona, Northeast La Verne, Northeast San Dimas, Rowland Heights, South Diamond Bar, South San Jose Hills, South Walnut, Valinda, Walnut Islands, West Claremont, West Puente Valley, West San Dimas, Pellissier Village, unincorporated South El Monte, and unincorporated North Whittier.

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Comments and Recommendations

CDFW offers the comments and recommendations below to assist the DRP in adequately identifying, avoiding, and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources. The EIR should provide adequate and complete disclosure of the Project's potential impacts on biological resources [Pub. Resources Code, § 21061; CEQA Guidelines, §§ 15003(i), 15151]. CDFW looks forward to commenting on the EIR when it is available.

Specific Comments

- 1) Impacts on Mountain Lion (*Puma concolor*). The Project is located within the range of the Southern California/Central Coast Evolutionary Significant Unit of mountain lion. More specifically, the Project is located within the range of the San Gabriel Mountains mountain lion population. The NOP states that depending on the location of individual development, future construction could result in impacts to wildlife movement or wildlife species corridors. The mountain lion population within the Project site may be impacted by future projects through increased human presence, increased habitat loss and fragmentation, and reduced species population.
 - a) Protection Status. 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 CESA-listed plant species that results from the Project is prohibited, except as authorized by state law (Fish & G. Code §§ 2080, 2085; Cal. Code Regs., tit. 14, §786.9). The mountain lion is a specially protected mammal in the State (Fish and G. Code, § 4800). In addition, on April 21, 2020, the California Fish and Game Commission accepted a petition to list the Southern California/Central Coast Evolutionary Significant Unit of mountain lion as threatened under CESA (CDFW 2020). As a CESA candidate species, the mountain lion in southern California is granted full protection of a threatened species under CESA.
 - b) Analysis and Disclosure. The EIR should analyze and discuss the Project's potential impact and cumulative impact on mountain lion during both future project activities and for the Project's lifetime. Impacts on mountain lion behavior, reproductive viability, and overall survival success should be analyzed and discussed in the EIR. In addition, the EIR should analyze from the standpoint of the following impacts: 1) future projects introducing new/additional barriers to dispersal; 3) constraining wildlife corridors and pinch points leading to severed migration; 4) habitat loss, fragmentation, and encroachment; 5) increased human presence; and 6) and use of herbicides, pesticides, and rodenticides. Lastly, the EIR should discuss the Project's potential effect on any on-going or planned habitat recovery and restoration efforts for mountain lion.
 - c) CESA. If the Project or any Project-related activity 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 take authorization under CESA may include an Incidental Take Permit (ITP) among other options [Fish & G. Code, §§ 2080.1, 2081, subds. (b) and (c)]. To obtain appropriate take authorization under CESA, early consultation with CDFW is encouraged, as significant modification to a project and

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mitigation measures may be required 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's CEQA document addresses all Project impacts on 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.

- 2) Impacts to Birds. Based on the [United States Fish and Wildlife Service \(USFWS\) Critical Habitat for Threatened and Endangered Species](#) mapper, the Project sites provides critical habitat for southwestern willow flycatcher (*Empidonax trailii extimus*) and California gnatcatcher (*Polioptila californica californica*) (USFWS 2022a). Alongside critical habitat for these two species, there are a myriad of trees and shrubs within the Project site that could support nesting birds. In Los Angeles, urban forests and street trees both native and some non-native species that provide habitat for a high diversity of birds (Wood and Esaian 2020). In addition, several species of raptor have adapted to and exploited urban areas for breeding and nesting (Cooper et al. 2020). Future projects facilitated under the proposed Project may occur during the nesting bird season, which may result in the incidental loss of fertile eggs or nestlings, or nest abandonment.
- a) Protection Status. Southwestern willow flycatcher is a species listed as endangered under CESA and the Endangered Species Act (ESA). Coastal California gnatcatcher is a species designated as an SSC and threatened under the ESA. Furthermore, 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). It is unlawful to take, possess, or needlessly destroy the nest or eggs of any raptor.
- b) Analysis and Disclosure. CDFW recommends the EIR discuss the Project's potential impact to the population and critical habitat of southwestern willow flycatcher and coastal California gnatcatcher. The EIR should also discuss the Project's potential impact on nesting birds and raptors within the Project site. A discussion of potential impacts should include impacts that may occur during implementation of future projects facilitated by the proposed Project resulting in ground-disturbing activities and vegetation removal.
- c) Avoidance. CDFW recommends the EIR include a measure that requires future projects facilitated by the proposed Project to fully avoid impacts to nesting birds and raptors. To the extent feasible, no construction, ground-disturbing activities (e.g., mobilizing, staging, drilling, and excavating), and vegetation removal during the avian breeding season which generally runs from February 15 through September 15 (as early as January 1 for some raptors) to avoid take of birds, raptors, or their eggs.

If impacts to nesting birds and raptors cannot be avoided, CDFW recommends the EIR include measures that require future projects to minimize impacts on nesting birds and raptors. Prior to starting ground-disturbing activities and vegetation removal, a qualified biologist should conduct nesting bird and raptor surveys to identify nests. The qualified biologist should establish no-disturbance buffers to minimize impacts on those nests.

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CDFW recommends a minimum 300-foot no disturbance buffer around active bird nests. For raptors, the no disturbance buffer should be expanded to 500 feet and 0.5 mile for special status species, if feasible. Personnel working on a project, including all contractors working on site, should be instructed on the presence of nesting birds, area sensitivity, and adherence to no-disturbance buffers. Reductions in the buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors determined by a qualified biologist.

- 3) Stream Delineation and Impact Assessment. According to U.S. Fish and Wildlife Service's (USFWS) [National Wetland Inventory](#), there are several watercourses that flow through the Project site including, but not limited to, the San Gabriel River and Rio Hondo River (USFWS 2022b). Future projects may impact the stream and potentially result in loss of riverine habitat.
 - a) Analysis and Disclosure. In preparation of the EIR, CDFW recommends the EIR include a stream delineation and evaluation of impacts on any river, stream, or lake. The EIR should discuss the Project's potential impact on streams including impacts on associated natural communities. Impacts may include channelizing or diverting streams, impairing a watercourse, and removing or degrading vegetation through habitat modification (e.g., loss of water source, encroachment, and edge effects leading to introduction of non-native plants). Impacts may occur from future projects facilitated by the proposed Project.
 - b) Fish and Game Code section 1602. CDFW exercises its regulatory authority as provided by Fish and Game Code section 1600 et seq. to conserve fish and wildlife resources which includes rivers, streams, or lakes and associated natural communities. 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 notify CDFW. Accordingly, if the Project would impact streams, the EIR should include measures that require future projects facilitated by the proposed Project to notify CDFW pursuant to Fish and Game Code section 1602 prior to starting activities that may impact streams. Please visit CDFW's [Lake and Streambed Alteration Program](#) webpage for more information (CDFW 2022c).
- 4) Los Angeles County Significant Ecological Areas (SEAs). There are several significant ecological areas located within the Project site, which include Puente Hills, Rio Hondo College Wildlife Sanctuary, East San Gabriel Valley, San Gabriel Canyon, and San Dimas Canyon/San Antonio Wash. These SEAs represent the wide-ranging biodiversity of Los Angeles County and contain some of Los Angeles County's most important biological resources. The NOP states that SEAs have the potential to be impacted by construction of one or more future projects facilitated by the proposed Project. CDFW recommends that the EIR provide a discussion and analysis of Project impacts on these SEAs. CDFW also recommends the DRP include measures that require future projects to avoid development and encroachment onto these SEAs. If not feasible, recommends the EIR provide measures that require future projects facilitated by the Project to analyze impacts on SEAs being encroached upon.

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- 5) Bats. According to the [California Natural Diversity Database](#), there are several bat species observations recorded throughout the Project site (CDFW 2022a). It is also widely known that numerous bat species roost in trees and structures throughout Los Angeles (Miner and Stokes 2005). Bats and roost could be impacted by removal of trees, vegetation, and/or structures supporting roosting bats. Bats and roosts could also be impacted by increased noise, human activity, dust, and ground vibration.
 - a) Protection Status. Bats are considered non-game mammals and are afforded protection by State law from take and/or harassment (Fish & G. Code, § 4150; Cal. Code of Regs., § 251.1). In addition, some bats are considered a California Species of Special Concern (SSC). CEQA provides protection not only for CESA-listed species, but for any species including but not limited to SSC which can be shown to meet the criteria for State listing. These SSC meet the CEQA definition of endangered, rare, or threatened species (CEQA Guidelines, § 15380). Take of SSC could require a mandatory finding of significance (CEQA Guidelines, § 15065).
 - b) Analysis and Disclosure. CDFW recommends the EIR should discuss the Project's potential impact on bats and habitat supporting roosting bats. A discussion of potential impacts should include impacts that may occur during implementation of future projects facilitated by the proposed Project resulting in ground-disturbing activities and vegetation removal.

- 6) Impact on Sensitive Natural Communities. The NOP states that are unique native woodlands within the Project site that have the potential to be impacted by future projects undertaken to implement the Project. The NOP mentions oak woodlands (*Quercus* genus Woodland Alliance), California walnut groves (*Juglans californica* Woodland Alliance), and California juniper woodlands (*Juniperus californica* Woodland Alliance).
 - a) Protection Status. Natural communities with ranks of S1, S2, and S3 are considered sensitive natural communities to be addressed in the environmental review process of CEQA (CDFW 2022b). California walnut groves is a sensitive natural community with a rarity ranking of S3.2 and is endemic to southern California (Sawyer et al. 2009). Although California juniper woodland has a rarity ranking of S4 at an alliance level, there are various associations that have a rarity ranking of S3 (CDFW 2022b). Oak woodland alliances have a variety of rarity rankings ranging from S2 to S4. Dependent upon the type of oak woodland, there are some associations of oak woodland communities that are considered sensitive with a rarity ranking of S3 or S2. Woodland communities provide suitable habitat and high biological value for a multitude of wildlife species. Moreover, oak trees and woodlands are protected by the Oak Woodlands Conservation Act (pursuant under Fish and Game Code sections 1360-1372) and Public Resources Code section 21083.4 due to the historic and on-going loss of these resources.
 - b) Analysis and Disclosure. CDFW recommends the EIR discuss the Project's potential impacts on sensitive plant communities. To analyze the Project's impacts on natural communities within the Project site, the DRP should retain a qualified biologist to identify and map the natural communities. The qualified biologist should adhere to established protocols for mapping natural communities listed in General Comment #3. Association level mapping is recommended for alliances that have some associations that are designated as sensitive. CDFW recommends the DRP should avoid and minimize future

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development and encroachment onto sensitive trees and woodlands. If avoidance is not feasible, CDFW recommends the EIR provide measures that require future projects facilitated by the proposed Project to analyze and discuss impacts on sensitive plant communities within the future project sites. CDFW also recommends the EIR provide measures that require future projects facilitated by the Project to provide sufficient compensatory mitigation for the number of impacted trees and acres of impacted woodland. The number of replacement trees and woodland habitat should be higher if the future projects would impact large mature trees; impact a woodland supporting rare, sensitive, or special status plants and wildlife; or impact a woodland with a State Rarity Ranking of S1, S2, or S3.

7) Biologically Significant Sites Inventory. The proposed Project has the potential to adversely impact various areas that serve as potential habitat for wildlife and hold biological value to the unincorporated communities. CDFW recommends the DRP identify and prepare a map of the following areas if present within or adjacent to the Project site. In addition, DRP should consider the Project's potential impacts on the following areas if present within or adjacent to the Project boundary:

- a) Agricultural land that will have a zoning designation change as a result of the Project;
- b) Conservation easements or mitigation lands;
- c) U.S. Fish and Wildlife Service Threatened & Endangered Species Active Critical Habitat (USFWS 2022a);
- d) County of Los Angeles Significant Ecological Areas (SEAs);
- e) Wildflower Reserve Areas;
- f) Wildlife corridors;
- g) Sensitive Natural Communities (e.g., woodlands); and
- h) Aquatic and riparian resources including (but not limited to) rivers, channels, streams, wetlands, vernal pools, and associated natural plant communities

CDFW recommends the EIR should discuss and analyze the impact of future projects facilitated by the Project on agricultural land. Furthermore, the DRP should avoid sites that may have a direct or indirect impact on conservation easements or lands set aside as mitigation. Lastly, the EIR should include measures that require future projects facilitated by the proposed Project to mitigate (avoid if feasible) for impacts on biological resources occurring within SEAs, Wildflower Reserve Areas, and critical habitat.

8) Landscaping. Future projects facilitated by the proposed Project may result in enhanced landscaping. CDFW recommends the DRP require future projects to only use native species found in naturally occurring vegetation communities within or adjacent to the Project site. Future projects facilitated by the proposed Project should not plant, seed, or otherwise introduce non-native, invasive plant species to areas that are adjacent to and/or near native habitat areas. Accordingly, CDFW recommends the DRP restrict use of any species, particularly 'Moderate' or 'High' listed by the [California Invasive Plant Council](#) (Cal-IPC 2022). These species are documented to have substantial and severe ecological impacts on physical processes, plant and animal communities, and vegetation structure.

9) Pest Management. Future projects facilitated by the proposed Project may have the potential to spread tree pests and diseases throughout future project sites and into adjacent natural habitat not currently exposed to these stressors. This could result in expediting the

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loss of native trees. As such, CDFW recommends the EIR provide measures that require future projects to develop and implement an infectious tree disease management plan or provide mitigation measures, developed in consultation with an arborist, and describe how the plan or mitigation measures will avoid or reduce the spread of tree insect pests and diseases.

- 10) Use of Rodenticides. If the Project results in enhanced landscaping, vegetation may need to be managed via chemical methods. Herbicides, pesticides, and rodenticides may impact wildlife. Second generation anticoagulant rodenticides are known to have harmful effects on the ecosystem and wildlife. [Assembly Bill 1788](#) prohibits the use of any second-generation anticoagulant rodenticides because second generation anticoagulant rodenticides have a higher toxicity and are more dangerous to nontarget wildlife (California Legislative Information 2020). CDFW recommends the EIR include a discussion as to the future project's use of herbicides, pesticides, and second-generation anticoagulant rodenticides to maintain a project's grounds in perpetuity. CDFW recommends the DRP include measures that would prohibit the use of any second-generation anticoagulant rodenticides during future project implementation.

General Comments

- 11) Biological Baseline Assessment. The EIR should provide an adequate biological resources assessment, including a complete assessment and impact analysis of the flora and fauna within and adjacent to the Project site and where the Project may result in ground disturbance. The assessment and analysis should place 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. CDFW recommends avoiding any sensitive natural communities found on or adjacent to the Project site. CDFW also considers impacts to SSC a significant direct and cumulative adverse effect without implementing appropriate avoidance and/or mitigation measures. An environmental document 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 EIR should include measures to fully avoid and otherwise protect Sensitive Natural Communities from Project-related impacts. 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, and S3 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by visiting the [Vegetation Classification and Mapping Program - Natural Communities](#) webpage (CDFW 2022b);
 - 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 Sensitive Natural Communities](#) (CDFW 2018). Adjoining habitat areas should be included where future project construction and activities could lead to direct or indirect impacts off site;

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- c) Floristic, alliance- and/or association-based mapping and vegetation impact assessments conducted at a Project site and within the neighboring vicinity. The [Manual of California Vegetation](#) (MCV), second edition, should also be used to inform this mapping and assessment (Sawyer et al. 2009). Adjoining habitat areas should be included in this assessment the Project could lead to direct or indirect impacts off site. 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 a Project. California Natural Diversity Database in Sacramento should be contacted to obtain current information on any previously reported sensitive species and habitat. An assessment should include a nine-quadrangle search of the CNDDDB to determine a list of species potentially present at a Project site. A lack of records in the CNDDDB does not mean that rare, threatened, or endangered plants and wildlife do not occur in the Project site. Field verification for the presence or absence of sensitive species is necessary to provide a complete biological assessment for adequate CEQA review [CEQA Guidelines, § 15003(i)];
 - 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 a Project site should also be addressed such as wintering, roosting, nesting, and foraging habitat. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, may be required if suitable habitat is present. See CDFW's [Survey and Monitoring Protocols and Guidelines](#) for established survey protocol for select species (CDFW 2022d). Acceptable species-specific survey procedures may 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 a 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.
- 12) Disclosure. A EIR should provide an adequate, complete, and detailed disclosure about the effect which a proposed Project is likely to have on the environment (Pub. Resources Code, § 20161; CEQA Guidelines, §15151). Adequate disclosure is necessary so CDFW may provide comments on the adequacy of proposed avoidance, minimization, or mitigation measures, as well as to assess the significance of the specific impact relative to plant and wildlife species impacted (e.g., current range, distribution, population trends, and connectivity).
- 13) Mitigation Measures. Public agencies have a duty under CEQA to prevent significant, avoidable damage to the environment by requiring changes in projects through the use of feasible alternatives or mitigation measures [CEQA Guidelines, §§ 15002(a)(3), 15021]. Pursuant to CEQA Guidelines section 15126.4, an environmental document “shall describe

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feasible measures which could mitigate for impacts below a significant level under CEQA.”

- a) Level of Detail. Mitigation measures must be feasible, effective, implemented, and fully enforceable/imposed by the Lead Agency through permit conditions, agreements, or other legally binding instruments (Pub. Resources Code, § 21081.6(b); CEQA Guidelines, § 15126.4). A public agency “shall provide the measures that are fully enforceable through permit conditions, agreements, or other measures” (Pub. Resources Code, § 21081.6). CDFW recommends the DRP provide mitigation measures that are specific, detailed (i.e., responsible party, timing, specific actions, location), and clear in order for a measure to be fully enforceable and implemented successfully via a mitigation monitoring and/or reporting program (Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15097). Adequate disclosure is necessary so CDFW may provide comments on the adequacy and feasibility of proposed mitigation measures.
 - b) Disclosure of Impacts. If a proposed mitigation measure would cause one or more significant effects, in addition to impacts caused by the Project as proposed, the EIR should include a discussion of the effects of proposed mitigation measures [CEQA Guidelines, § 15126.4(a)(1)]. In that regard, the EIR should provide an adequate, complete, and detailed disclosure about a project’s proposed mitigation measure(s). Adequate disclosure is necessary so CDFW may assess the potential impacts of proposed mitigation measures.
- 14) Data. CEQA requires that information developed in environmental impact reports be incorporated into a database which may be used to make subsequent or supplemental environmental determinations [Pub. Resources Code, § 21003, subd. (e)]. Accordingly, please report any special status species and natural communities detected by completing and submitting [CNDDDB Field Survey Forms](#) (CDFW 2022e). The DRP should ensure data collected for the preparation of the EIR be properly submitted, with all data fields applicable filled out. The data entry should also list pending development as a threat and then update this occurrence after impacts have occurred.
- 15) Biological Direct, Indirect, and Cumulative 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 EIR should address the following:
- a) A discussion regarding Project-related indirect 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 (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 EIR;
 - b) A discussion of both the short-term and long-term effects to species population distribution and concentration and alterations of the ecosystem supporting the species impacted [CEQA Guidelines, § 15126.2(a)];

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- c) A discussion of potential adverse impacts from lighting, noise, temporary and permanent human activity, and exotic species, and identification of any mitigation measures;
- d) A discussion of Project-related changes on drainage patterns; 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 sites. The discussion should also address the potential water extraction activities 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;
- e) An analysis of impacts from proposed changes to land use designations and zoning, and existing land use designation 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 EIR; and
- f) 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 and wildlife species, habitat, and vegetation communities. If the DRP determines that the Project would not have a cumulative impact, the EIR should indicate why the cumulative impact is not significant. The DRP's conclusion should be supported by facts and analyses [CEQA Guidelines, § 15130(a)(2)].

16) 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 EIR:

- a) A complete discussion of the purpose and need for, and description of, the proposed Project, including all staging areas; access routes to the construction and staging areas; fuel modification footprint; and grading footprint;
- b) Pursuant to CEQA Guidelines section 15126.6(a), an environmental document "shall describe a reasonable range of potentially feasible alternatives to the Project, or to the location of the Project, which would feasibly attain most of the basic objectives of the Project but would avoid or substantially lessen any of the significant effects of the Project." CEQA Guidelines section 15126.6(f)(2) states if the Lead Agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion and should include reasons in the environmental document; and
- c) A range of feasible alternatives to the Project location and design features to avoid or otherwise minimize direct and indirect impacts to sensitive biological resources and wildlife movement areas. CDFW recommends the DRP consider configuring Project construction and activities, as well as the development footprint, in such a way as to fully avoid impacts to sensitive and special status plants and wildlife species, habitat, and sensitive vegetation communities. CDFW also recommends the DRP consider establishing appropriate setbacks from sensitive and special status biological resources. Setbacks should not be impacted by ground disturbance or hydrological changes for the duration of the Project. As a general rule, CDFW recommends reducing or clustering the

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development footprint to retain unobstructed spaces for vegetation and wildlife and provide connections for wildlife between properties and minimize obstacles to open space.

Project alternatives should be thoroughly evaluated, even if an alternative would impede, to some degree, the attainment of the Project objectives or would be more costly (CEQA Guidelines, § 15126.6). The EIR “shall” include sufficient information about each alternative to allow meaningful evaluation, public participation, analysis, and comparison with the proposed Project (CEQA Guidelines, § 15126.6).

- d) Where the Project may impact aquatic and riparian resources, CDFW recommends the DRP consider alternatives that would fully avoid impacts to such resources. CDFW also recommends alternatives that would allow not impede, alter, or otherwise modify existing surface flow; watercourse and meander; and water-dependent ecosystems and vegetation communities. Project-related designs should consider elevated crossings to avoid channelizing or narrowing of streams. Any modifications to a river, creek, or stream may cause or magnify upstream bank erosion, channel incision, and drop in water level and cause the stream to alter its course of flow.

17) Compensatory Mitigation. The EIR should include mitigation measures for adverse Project-related direct or indirect impacts to sensitive plants, animals, and habitats. Mitigation measures should emphasize avoidance and reduction of Project-related 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.

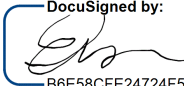
18) Long-term Management of Mitigation Lands. For proposed preservation and/or restoration, an EIR should include measures to protect the targeted habitat values from direct and indirect negative impacts in perpetuity. The objective should be to offset the Project-induced qualitative and quantitative 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.

Conclusion

We appreciate the opportunity to comment on the NOP for the East San Gabriel Valley Area Plan to assist the DRP in identifying and mitigating Project impacts on biological resources. If you have any questions or comments regarding this letter, please contact Julisa Portugal, Environmental Scientist, at Julisa.Portugal@wildlife.ca.gov or (562) 330-7563.

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Sincerely,

DocuSigned by:

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Erinn Wilson-Olgin
Environmental Program Manager I
South Coast Region

cc: CDFW

Erinn Wilson-Olgin, Los Alamitos – Erinn.Wilson-Olgin@wildlife.ca.gov
Victoria Tang, Los Alamitos – Victoria.Tang@wildlife.ca.gov
Ruby Kwan-Davis, Los Alamitos – Ruby.Kwan-Davis@wildlife.ca.gov
Felicia Silva, Los Alamitos – Felicia.Silva@wildlife.ca.gov
Frederic Rieman, Los Alamitos – Frederic.Rieman@wildlife.ca.gov
Cindy Hailey, San Diego – Cindy.Hailey@wildlife.ca.gov
CEQA Program Coordinator, Sacramento – CEQACommentLetters@wildlife.ca.gov
State Clearinghouse, Office of Planning and Research – State.Clearinghouse@opr.ca.gov

References:

- [CDFW] California Department of Fish and Wildlife. 2018. Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities. Accessed at:
<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline>
- [CDFW] California Department of Fish and Wildlife. 2020. Notice of Findings - Mountain Lion ESU declared a candidate species. Available from:
<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=178623&inline>
- [CDFWa] California Department of Fish and Wildlife. 2022. California Natural Diversity Database. Available from: <https://wildlife.ca.gov/Data/CNDDDB>
- [CDFWb] California Department of Fish and Wildlife. 2022. Natural Communities. Accessed at:
<https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities>.
- [CDFWc] California Department of Fish and Wildlife. 2022. Lake and Streambed Alteration Program. Available from: <https://wildlife.ca.gov/Conservation/LSA>.
- [CDFWd] California Department of Fish and Wildlife. 2022. Survey and Monitoring Protocols and Guidelines. Available from: <https://wildlife.ca.gov/conservation/survey-protocols>
- [CDFWe] California Department of Fish and Wildlife. 2022. Submitting Data to the CNDDDB. Available from: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>
- California Legislative Information. 2020. AB-1788 Pesticides: use of second-generation anticoagulant rodenticides. Available from:
https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201920200AB1788
- [CAL-IPC] California Invasive Plant Council. 2022. The Cal-IPC Inventory. Available from:
<https://www.cal-ipc.org/plants/inventory/>
- Cooper D.S., Yeh, P.J., and D.T. Blumstein. 2020. Tolerance and avoidance of urban cover in a southern California suburban raptor community over five decades. Urban Ecosystems.
doi.org/10.1007/s11252-020-01035-w

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Johnston, D., Tatarian, G., & Pierson, E. 2004. California Bat Mitigation Techniques, Solutions, and Effectiveness. Available from:

<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=10334>

Miner, K.L. and D.C. Stokes. 2005. Bats in the South Coast Ecoregion: Status, Conservation Issues, and Research Needs. USDA Forest Service Gen. Tech. Rep. PSW-GTR-195.

Sawyer, J. O., Keeler-Wolf, T., and Evens J.M. 2009. A Manual of California Vegetation, 2nd ed. ISBN 978-0-943460-49-9.

[USFWSa] United States Fish and Wildlife Service. 2022. Critical Habitat for Threatened and Endangered Species. Available from:

<https://fws.maps.arcgis.com/home/webmap/viewer.html?webmap=9d8de5e265ad4fe09893cf75b8dbfb77>

[USWFSb] United State Fish and Wildlife Service. 2022. National Wetlands Inventory. Wetlands Mapper. Available from: <https://www.fws.gov/program/national-wetlands-inventory/wetlands-mapper>

Wood, E.M. and S. Esaian. 2020. The importance of street trees to urban avifauna. Ecological Applications 30(7): e02149.

SKYE PATRICK
Library Director



May 25, 2022

Mi Kim, Senior Regional Planner
County of Los Angeles
Department of Regional Planning
320 West Temple Street, Room 1362
Los Angeles, CA 90012

COMMENTS FOR THE EAST SAN GABRIEL VALLEY AREA PLAN PROJECT NO. 2020-000612

Dear Mi Kim:

This is to provide comments regarding the East San Gabriel Valley Area Plan, which proposes to establish land use and zoning regulations, and policies specific to the unique characteristics and needs of the East San Gabriel Valley Planning Area and its communities.

The project is comprised of 24 unincorporated communities that include Avocado Heights, Charter Oak, Covina Islands, East Azusa, East Irwindale, East San Dimas, Glendora Islands, Hacienda Heights, North Claremont, North Pomona, Northeast La Verne, Northeast San Dimas, Rowland Heights, South Diamond Bar, South San Jose Hills, South Walnut, Valinda, Walnut Islands, West Claremont, West Puente Valley, West San Dimas, Pellissier Village, Unincorporated South El Monte, and Unincorporated North Whittier, which are in LA County Library's Planning Areas 3 and 4.

LA County Library currently provides services to the residents in the project location. Any residential land use changes could allow for future residential development projects which would create an increase in population and subsequently increase the demand for library services. LA County Library requests that technical reports related to residential land use and impact to public services, particularly libraries, be included in the environmental document for the Library's review.

If you have any questions or need additional information, please contact Elsa Muñoz at (562) 940-8450 or EMunoz@library.lacounty.gov.

Very best,

Skye Patrick
County Librarian

SP:YDR:GR:EM

c: Grace Reyes, Administrative Deputy, Library
Jesse Walker-Lanz, Assistant Director, Public Services, LA County Library
Ting Fanti, Departmental Finance Manager, Budget and Fiscal Services, LA County Library

<https://lacounty.sharepoint.com/sites/publiclibrary/docs/staffservices/Documents/EIR/San Gabriel Valley Area Plan/East San Gabriel Valley Area Plan response.doc>

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COUNTY OF LOS ANGELES SUPERVISORS

HILDA L. SOLIS
1st District

HOLLY J. MITCHELL
2nd District

SHEILA KUEHL
3rd District

JANICE HAHN
4th District

KATHRYN BARGER
5th District



523 West Sixth Street, Suite 826
Los Angeles, CA 90014

213 623 2489 OFFICE
213 623 3909 FAX
laconservancy.org

May 26, 2022

Sent Electronically

Mi Kim
County of Los Angeles, Department of Regional Planning
320 West Temple Street, Room 1354
Los Angeles, CA 90012
Email: mkim@planning.lacounty.gov

**RE: Notice of Preparation of an Environmental Impact Report
for the Proposed East San Gabriel Valley Area Plan Project
No. 2022040512**

Dear Mi Kim:

On behalf of the Los Angeles Conservancy, I am writing to comment on the Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the Proposed East San Gabriel Valley Area Plan Project (ESGVAP). As described in the NOP, the ESGVAP will establish a comprehensive policy document for twenty-four unincorporated communities in Los Angeles. The Project would update, reorganize, and incorporate the existing Rowland Heights Community Plan and Hacienda Heights Community Plan as community chapters into the new ESGVAP. It would also update the Planning Area boundary to include the unincorporated communities of South El Monte, Pellissier Village, and North Whittier.

The goals of the ESGVAP are to a) retain the residential character of the ESGV Planning Area in harmony with its surroundings; b) promote an active regional hub with diverse options for housing, shopping, entertainment, recreation, and services; c) develop goals, policies, and implementation programs that support smart growth, sustainable development, and thoughtful enhancement/upgrade of existing neighborhoods; d) establish more public spaces and public realm improvements; and e) encourage diversity of housing options and affordability, and economic development.

The Conservancy advocates for a historic resource survey across the twenty-four unincorporated communities. A better understanding of where historic resources are located and their role in the physical and cultural fabric of the ESGV Planning Area is key to several of the goals outlined in the ESGVAP. It is also necessary to fully evaluate potential adverse impacts on historic resources. The Conservancy is concerned by the initial findings that indicate



significant adverse impacts to historic resources and looks forward to seeing thorough mitigation efforts and preservation-based alternatives in the Draft Environmental Impact Report (EIR). We would appreciate the opportunity to meet with the Project team to discuss the role of historic preservation in the ESGVAP.

I. The ESGVAP should include a full historic resources survey to evaluate potential adverse impacts and leverage existing community assets.

To fully understand the Project area’s historic and cultural resources, the Conservancy urges the County to conduct a historic resources survey that incorporates and updates existing inventories. Historic resources are not only architectural, but are often related to art, culture, and important events. The ESGVAP lists five goals, two of which the Conservancy believes are directly related to historic preservation:

- Goal A - retain the residential character of the ESGV Planning Area in harmony with its surroundings
- Goal C – develop goals, policies, and implementation programs that support smart growth, sustainable development, and thoughtful enhancement/upgrade of existing neighborhoods.

Furthermore, policies in the Community Character, Land Use, and Public Services and Facilities about that reference placemaking and asset mapping are closely linked to historic preservation:

- Policy CC-1.4: Placemaking. Utilize efforts at placemaking to convey the history and story of ESGV and enhance its identity.
- Policy LU-6.1 Placemaking. Require new development and public realm improvements to enhance the community’s sense of place and identity, by considering the unique or defining elements of the community manifested through its built form, architectural character, building materials, public realm, views, and other defining elements
- Policy PSF-4.1 Asset Mapping. Encourage the identification and preservation of community and cultural resources through the development of community-led asset mapping.

Preservation is important not only to protect communities’ existing assets but also as a guide for new sustainable development that complements and enhances existing community character.

A historic resources survey is a natural complement to the County’s effort to develop a community-led asset map and an extension of the project, “A People’s Map.” Connection to the historic built environment provides an important tangible link to history that cannot be achieved through history books alone. The Conservancy believes that the community-led asset map project can guide the historic resources survey to protect historic places that tell community stories.

II. The Draft EIR should fully analyze and incorporate existing historic resources

The NOP notes that the ESGVAP, particularly the Land Use Element, may potentially cause significant impacts to historic resources. The Conservancy would like to better understand these potential impacts and how the ESGVAP intends to address them. As noted in the previous section, a historic resources survey is paramount to identify the resources that may be impacted as additional, currently unknown historic may be adversely impacted through this planning effort.



The Draft EIR should include a range of preservation-based alternatives that result in less than significant impacts to historic resources.

A key policy under the California Environmental Quality Act (CEQA) is the lead agency's duty to "take all action necessary to provide the people of this state with historic environmental qualities and preserve for future generations examples of major periods of California history." To this end, CEQA "requires public agencies to deny approval of a project with significant adverse effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects." The fact that an environmentally superior alternative may be more costly or fails to meet all project objectives does not necessarily render it infeasible under CEQA. Reasonable alternatives must be considered "even if they substantially impede the project or are more costly." Likewise, findings of alternative feasibility or infeasibility must be supported by substantial evidence.

III. The Conservancy requests a meeting with the Project team.

The Conservancy requests a meeting with the Los Angeles County Department of Regional Planning team. We hope that a meeting with the ESGVAP team will facilitate a meaningful dialogue and help to create a more well-rounded Area Plan that incorporates historic resources into its plan to enhance, guide, and support the long-term growth, development, and maintenance of the ESGV Planning Area.

IV. Conclusion

The twenty-four unincorporated communities in the East San Gabriel Valley have a rich and layered history. Until we have more details provided, The Conservancy is concerned by the ESGVAP's potential to cause significant adverse impacts to historic resources. The Conservancy urges the Project team to fully embrace preservation as an integral tool to retain community assets, guide sensitive and sustainable new development, and enhance community placemaking and storytelling efforts.

We respectfully request a meeting with the Project team to offer our perspective on the role of historic preservation in the ESGVAP.

About the Los Angeles Conservancy:

The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with nearly 5,000 members throughout the Los Angeles area. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural and cultural heritage of Los Angeles County through advocacy and education.

Please do not hesitate to contact me at (213) 430-4203 or afine@laconservancy.org should you have any questions or concerns.



Sincerely,

Adrian Scott Fine

Adrian Scott Fine
Senior Director of Advocacy





May 31, 2022

Ref. DOC 6535452

Mr. Mi Kim
County of Los Angeles
Department of Regional Planning
320 West Temple Street
Room 1362
Los Angeles, CA 90012

Dear Mr. Kim:

NOP Response to East San Gabriel Valley Area Plan

The Los Angeles County Sanitation Districts (Districts) received a Notice of Preparation (NOP) of a Draft Program Environmental Impact Report for the subject project on April 28, 2022. The proposed project is located within the jurisdictional boundaries of Districts Nos. 15, 18, 21, and 22. We offer the following comments regarding sewerage service:

1. The Districts own, operate, and maintain the large trunk sewers that form the backbone of the regional wastewater conveyance system. Local collector and/or lateral sewer lines are the responsibility of the jurisdiction in which they are located. As such, the Districts cannot comment on any deficiencies in the sewerage system in the unincorporated communities in East San Gabriel Valley of Los Angeles County (unincorporated communities) except to state that presently no deficiencies exist in Districts' facilities that serve the unincorporated communities. For information on deficiencies in the unincorporated community's sewerage system, please contact the City Department of Public Works and/or the Los Angeles County Department of Public Works.
2. The wastewater generated by the unincorporated communities will be treated at one or more of the following: San Jose Creek Water Reclamation Plant (WRP) located adjacent to the City of Industry, which has a capacity of 100 million gallons per day (mgd) and currently processes an average flow of 61.2 mgd; the Whittier Narrows WRP located near the City of South El Monte, which has a capacity of 15 mgd and currently processes an average flow of 9.9 mgd; and/or the Los Coyotes WRP located in the City of Cerritos, which has a capacity of 37.5 mgd and currently processes an average flow of 23.1 mgd.
3. The Districts should review individual developments within the unincorporated communities to determine whether sufficient trunk sewer capacity exists to serve each project and if Districts' facilities will be affected by the project.
4. In order to estimate the volume of wastewater the project will generate, go to www.lacsd.org, under Services, then Wastewater Program and Permits, select Will Serve Program, and scroll down to click on the [Table 1, Loadings for Each Class of Land Use](#) link for a copy of the Districts' average wastewater generation factors.
5. The Districts are empowered by the California Health and Safety Code to charge a fee to connect facilities (directly or indirectly) to the Districts' Sewerage System or to increase the strength or quantity of wastewater discharged from connected facilities. This connection fee is used by the Districts for its capital

facilities. Payment of a connection fee may be required before this project is permitted to discharge to the Districts' Sewerage System. For more information and a copy of the Connection Fee Information Sheet, go to www.lacsd.org, under Services, then Wastewater (Sewage) and select Rates & Fees. In determining the impact to the Sewerage System and applicable connection fees, the Districts will determine the user category (e.g. Condominium, Single Family Home, etc.) that best represents the actual or anticipated use of the parcel(s) or facilities on the parcel(s) in the development. For more specific information regarding the connection fee application procedure and fees, the developer should contact the Districts' Wastewater Fee Public Counter at (562) 908-4288, extension 2727.

6. In order for the Districts to conform to the requirements of the Federal Clean Air Act (CAA), the capacities of the Districts' wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). Specific policies included in the development of the SCAG regional growth forecast are incorporated into clean air plans, which are prepared by the South Coast and Antelope Valley Air Quality Management Districts in order to improve air quality in the South Coast and Mojave Desert Air Basins as mandated by the CAA. All expansions of Districts' facilities must be sized and service phased in a manner that will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The available capacity of the Districts' treatment facilities will, therefore, be limited to levels associated with the approved growth identified by SCAG. As such, this letter does not constitute a guarantee of wastewater service, but is to advise the developer that the Districts intend to provide this service up to the levels that are legally permitted and to inform the developer of the currently existing capacity and any proposed expansion of the Districts' facilities.

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2743, or mandyhuffman@lacsd.org.

Very truly yours,

Mandy Huffman

Mandy Huffman
Environmental Planner
Facilities Planning Department

MNH:mnh



OFFICE OF THE SHERIFF

COUNTY OF LOS ANGELES

HALL OF JUSTICE

ALEX VILLANUEVA, SHERIFF



June 1, 2022

Ms. Mi Kim, Supervising Regional Planner
Los Angeles County
Department of Regional Planning
320 West Temple Street, Room 1362
Los Angeles, California 90012

Dear Ms. Kim:

**EAST SAN GABRIEL VALLEY AREA PLAN
NOTICE OF PREPARATION
DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT
REVIEW COMMENTS
(PROJECT NO. 2020-000612)**

Thank you for inviting the Los Angeles County Sheriff's Department (Department) to review and comment on the April 2022 Notice of Preparation (NOP) of a Draft Program Environmental Impact Report (Draft PEIR) for the East San Gabriel Valley Area Plan (ESGVA Plan). The proposed ESGVA Plan would be implemented in the following twenty four unincorporated areas of the Los Angeles County (County): Avocado Heights, Charter Oak, Covina Islands, East Azusa, East Irwindale, East San Dimas, Glendora Islands, Hacienda Heights, North Claremont, North Pomona, Northeast La Verne, Northeast San Dimas, Rowland Heights, South Diamond Bar, South San Jose Hills, South Walnut, Valinda, Walnut Islands, West Claremont, West Puente Valley, West San Dimas, Pellissier Village, Unincorporated South El Monte, and Unincorporated North Whittier. It is our understanding that the twenty-four communities are referred to as the East San Gabriel Valley Planning Area, which is one of the County's 11 Planning Areas identified in the County General Plan. It is proposed that the Rowland Heights Community Plan and

211 WEST TEMPLE STREET, LOS ANGELES, CALIFORNIA 90012

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— Since 1850 —

Hacienda Heights Community Plan will be updated and incorporated into the ESGVA Plan.

The proposed ESGVA Plan will also include updates to Rowland Heights Community Standards District (CSD) as well as Avocado Heights and Trailside Ranch Equestrian Districts (EQDs). In addition, the East San Gabriel Valley Planning Area boundary will be updated to include the unincorporated communities of Pellissier Village, South El Monte, and North Whittier. The proposed ESGVA Plan consists of three primary components including a General Plan Amendment, Zone Change, and Advanced Planning Case.

Our Department's Industry, San Dimas, Temple and Walnut Stations service the ESGVA Plan and will be affected by the General Plan amendment. Although these changes do not reflect on a specific project at this time, the proposed amendments may significantly affect the level of service required by our Station personnel when a proposed project within the proposed ESGVA Plan is contemplated. There may be a significant increase in housing and enhancement of commercial and residential development within nearby major transit stops, high-quality transit areas, and major intersections resulting from the adjustment and establishment of the ESGVA Plan resulting in population growth. Various re-zoning changes, adjustment of the boundaries of Avocado Heights, the establishment of a consolidated EQD, area-wide overlay to regulate height and protection of significant ridgelines, and provision of public communal space in new development, cumulatively may contribute to a significant increase in law enforcement required to maintain the current level of service.

The Department recommends that the County require that future projects within the ESGVA Plan meet the general principles of Crime Prevention through Environmental Design. Upon future development within the ESGVA Plan area, the Department's Contract Law Enforcement Bureau shall be informed during the planning phases so that potential impacts and its cost implications to our resources, operations, and law enforcement service may be properly re-evaluated and amended as necessary.

Upon completion of the Draft PEIR, we will further evaluate the impact to law enforcement services. The Department reserves the right to amend or supplement our assessment upon subsequent reviews of the proposed Project once additional information becomes available.

Ms. Kim

- 3 -

June 1, 2022

Also, for future reference, the Department provides the following updated address and contact information for all requests for reviews comments, law documents, and other related correspondence:

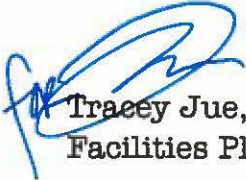
Tracey Jue, Director
Facilities Planning Bureau
Los Angeles County Sheriff's Department
211 West Temple Street
Los Angeles, California 90012

Attention: Planning Section

Should you have any questions regarding this matter, please contact me at (323) 526-5657, or your staff may contact Ms. Rochelle Campomanes of my staff, at (323) 526-5614.

Sincerely,

ALEX VILLANUEVA, SHERIFF



Tracey Jue, Director
Facilities Planning Bureau



Metro

Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

June 1, 2022

Mi Kim
County of Los Angeles
Department of Regional Planning
320 West Temple Street, Room 1362
Los Angeles, CA 90012
Sent by Email: commplan@planning.lacounty.gov

RE: East San Gabriel Valley Area Plan
Notice of Preparation of Program Environmental Impact Report (EIR)

Dear Mi Kim:

Thank you for coordinating with the Los Angeles County Metropolitan Transportation Authority (Metro) regarding the proposed East San Gabriel Valley (ESGV) Area Plan (Plan) located in the County and unincorporated areas of Los Angeles. Metro's mission is to provide a world-class transportation system that enhances quality of life for all who live, work, and play within Los Angeles County. As the County's mass transportation planner, builder and operator, Metro is constantly working to deliver a regional system that supports increased transportation options and associated benefits, such as improved mobility options, air quality, health and safety, and access to opportunities.

Metro is committed to working with local municipalities, developers, and other stakeholders across Los Angeles County on transit-supportive planning and developments to grow ridership, reduce driving, and promote walkable neighborhoods. Transit Oriented Communities (TOCs) are places (such as corridors or neighborhoods) that, by their design, allow people to drive less and access transit more. TOCs maximize equitable access to a multi-modal transit network as a key organizing principle of land use planning and holistic community development.

Per Metro's area of statutory responsibility pursuant to sections 15082(b) and 15086(a) of the Guidelines for Implementation of the California Environmental Quality Act (CEQA: Cal. Code of Regulations, Title 14, Ch. 3), the purpose of this letter is to provide the County with specific detail on the scope and content of environmental information that should be included in the Program Environmental Impact Report (PEIR) for the Project. In particular, this letter outlines topics regarding the Project's potential impacts to several Metro rail stations serviced by the L Line (Gold), J Line (Silver), and Metro-owned right-of-way (ROW) operated and maintained by the Southern California Regional Rail Authority (SCRRA) to run Metrolink commuter rail service, which should be analyzed in the PEIR, and provides recommendations for mitigation measures as appropriate. Effects of a project on transit systems and infrastructure are within the scope of transportation impacts to be evaluated under CEQA.1

In addition to the specific comments outlined below, Metro is providing the County with the Metro Adjacent Development Handbook (attached), which provides an overview of common concerns for development adjacent to Metro ROW and transit facilities, available at www.metro.net/projects/devreview/.

Project Description

The Plan intends to guide long-term growth of the ESGV Planning Area, enhance community spaces, promote a stable and livable environment that balances growth and preservation, and improve the quality of life in the ESGV through the creation of vibrant, thriving, safe, healthy, and pleasant communities. The Plan proposes to also adjust the ESGV Planning Area boundary to include the unincorporated communities of South El Monte, Pellissier Village, and North Whittier.

Recommendations for PEIR Scope and Content

Transit Services and Facilities

The Plan and PEIR should include updated information on existing and planned transit services and facilities within the Plan area. In particular, Metro’s NextGen Bus Plan (completed in December 2021) should be used as a resource to determine the location of high-frequency bus services and stops within the Plan area. For more information, visit the NextGen Bus Plan’s website at <https://www.metro.net/projects/nextgen/>. Please also refer to Metro’s 2020 Long Range Transportation Plan and Measure M Expenditure Plan.

Adjacency to Metro-owned Right-of-Way (ROW) and Facilities

The Plan area includes Metro-owned ROW and transit facilities for Metro Rail and Metro Bus. This includes the L Line (Gold), J Line (Silver), and Metrolink commuter rail service. Buses and trains operate 24 hours a day, seven days a week in these facilities.

The PEIR’s transportation section should analyze potential impacts on Metro facilities within the Plan area, and identify mitigation measures or project design features as appropriate. Metro recommends reviewing the Metro Adjacent Development Handbook (available at <https://www.metro.net/devreview>) to identify issues and best practices for development standards arising from adjacency to Metro infrastructure. In addition, Metro recommends that the Plan include a policy encouraging applicants to coordinate with Metro during the County’s Planning review if the subject parcel is within a 100-foot buffer of Metro infrastructure. Such projects should also comply with the Adjacent Development Handbook.

Transit Supportive Planning: Recommendations and Resources

Considering the Plan area’s inclusion of several L Line (Gold) stations, the El Monte Bus Station, and key bus lines, Metro would like to identify the potential synergies associated with transit-oriented development:

1. Transit Supportive Planning Toolkit: Metro strongly recommends that the County review the Transit Supportive Planning Toolkit which identifies 10 elements of transit-supportive places and, applied collectively, has been shown to reduce vehicle miles traveled by establishing community-scaled density, diverse land use mix, combination of affordable housing, and

infrastructure projects for pedestrians, bicyclists, and people of all ages and abilities. This resource is available at <https://www.metro.net/about/funding-resources/>.

2. Land Use: Metro supports development of commercial and residential properties near transit stations and understands that increasing development near stations represents a mutually beneficial opportunity to increase ridership and enhance transportation options for the users of developments. Metro encourages the County and Applicant to be mindful of the Project's proximity to Metro rail stations, including orienting pedestrian pathways towards the station.
4. Walkability: Metro strongly encourages the installation of wide sidewalks, pedestrian lighting, a continuous canopy of shade trees, enhanced crosswalks with ADA-compliant curb ramps, and other amenities along all public street frontages of the development site to improve pedestrian safety and comfort. The County should consider requiring the installation of such amenities as part of the conditions of approval of projects within the Plan area.
5. Access: The Plan should address first-last mile connections to transit, encouraging development that is transit accessible with bicycle and pedestrian-oriented street design connecting transportation with housing and employment centers. For reference, please view the First Last Mile Strategic Plan, authored by Metro and the Southern California Association of Governments (SCAG), available on-line at: http://media.metro.net/docs/sustainability_path_design_guidelines.pdf
6. Active Transportation: Metro encourages the County to promote bicycle use through adequate short-term bicycle parking, such as ground-level bicycle racks, as well as secure and enclosed long-term bicycle parking, such as bike lockers or a secured bike room, for guests, employees, and residents. Bicycle parking facilities should be designed with best practices in mind, including: highly visible siting, effective surveillance, easy to locate, and equipment installed with preferred spacing dimensions, so they can be conveniently accessed. Additionally, the Plan should help facilitate safe and convenient connections for pedestrians, people riding bikes, and transit users to/from the destinations within the Plan area.
7. Wayfinding: Wayfinding signage should be considered as part of the Plan to help people navigate through the Plan area to all modes of transportation. Any temporary or permanent wayfinding signage with content referencing Metro services, or featuring the Metro brand and/or associated graphics (such as bus or rail pictograms) requires review and approval by Metro Art & Design.
8. Art: Metro Arts & Design encourages the thoughtful integration of art and culture into public spaces and should be consulted for any proposals for public art and/or placemaking facing Metro ROW.
9. Multi-modal Connections: With an anticipated increase in traffic, Metro encourages an analysis of impacts on non-motorized transportation modes and consideration of improved non-motorized access to the Plan area and nearby transit services, including pedestrian connections and bike lanes/paths. Appropriate analyses could include multi-modal LOS calculations, pedestrian audits, etc.

10. Parking: Metro encourages the incorporation of transit-oriented, pedestrian-oriented parking provision strategies such as the reduction or removal of minimum parking requirements for specific areas and the exploration of shared parking opportunities. These strategies could be pursued to reduce automobile-orientation in design and travel demand.

Metro looks forward to continuing to collaborate with the County to effectuate policies and implementation activities that promote transit oriented communities. If you have any questions regarding this letter, please contact me by phone at 213.418.3484, by email at DevReview@metro.net, or by mail at the following address:

Metro Development Review
One Gateway Plaza
MS 99-22-1
Los Angeles, CA 90012-2952

Sincerely,



Cassie Truong
Transportation Planner, Development Review Team
Transit Oriented Communities

Attachments and links:

- Adjacent Development Handbook: <https://www.metro.net/devreview>

Los Angeles County
Metropolitan Transportation Authority

METRO ADJACENT DEVELOPMENT HANDBOOK

A GUIDE FOR CITIES AND DEVELOPERS

February 2021



Metro and Regional Rail Map

Metro & Regional Rail

metro.net
 pacificsurfliner.com
 metrolinktrains.com



Metro is currently undertaking the largest rail infrastructure expansion effort in the United States. A growing transit network presents new opportunities to catalyze land use investment and shape livable communities.

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Quick Overview

Purpose of Handbook

The Metro Adjacent Development Handbook (Handbook) is intended to provide information and guide coordination for projects adjacent to, below, or above Metro transit facilities (e.g. right-of-way, stations, bus stops) and services.

Overarching Goal

By providing information and encouraging early coordination, Metro seeks to reduce potential conflicts with transit services and facilities, and identify potential synergies to expand mobility and improve access to transit.

Intended Audience

The Handbook is a resource for multiple stakeholder groups engaged in the development process, including:

- Local jurisdictions who review, entitle, and permit development projects,
- Developers,
- Property owners,
- Architects, engineers, and other technical consultants,
- Builders/contractors,
- Utility companies, and
- other Third Parties.

Handbook Content

The Handbook includes:

- **Introduction** of Metro's Development Review coordination process, common concerns, and typical stages of review.
- **Information** on best practices during three key coordination phases to avoid potential conflicts or create compatibility with the Metro transit system:
 - Planning & Conceptual Design,
 - Engineering & Technical Review, and
 - Construction Safety & Monitoring.
- **Glossary** with definitions for key terms used throughout the Handbook.

RULE OF THUMB: 100 FEET

Metro's Development Review process applies to projects that are within 100 feet of Metro transit facilities.

While the Handbook summarizes key concerns and best practices for adjacency conditions, it does not replace Metro's technical requirements and standards.

Prior to receiving approval for any construction activities adjacent to, above, or below Metro facilities, Third Parties must comply with the Metro Adjacent Construction Design Manual, available on Metro's website.

Contact Us

For questions, contact the Development Review Team:

- Email: devreview@metro.net
- Phone: 213.418.3484
- Online In-take Form: <https://jpublic.metro.net/in-take-form>

Additional Information & Resources

- Metro Development & Construction Coordination website: <https://www.metro.net/devreview>
- Metro GIS/KML ROW Files: <https://developer.metro.net/portfolio-item/metro-right-of-way-gis-data>
- Metrolink Standards and Procedures: <https://www.metrolinktrains.com/about/agency/engineering--construction>

Metro will continue to revise the Handbook, as needed, to reflect updates to best practices in safety, operations, and transit-supportive development.

Background

Who is Metro?

The Los Angeles County Metropolitan Transportation Authority (Metro) plans, funds, builds, and operates rail, bus, and other mobility services (e.g. bikeshare, microtransit) throughout Los Angeles County (LA County). On average, Metro moves 1.3 million people each day on buses and trains. With funding from the passage of Measure R (2008) and Measure M (2016), the Metro system is expanding. Over the next 40 years, Metro will build over 60 new stations and over 100 miles of transit right-of-way (ROW). New and expanded transit lines will improve mobility across LA County, connecting riders to more destinations and expanding opportunities for development that supports transit ridership. Metro facilities include:



Metro Rail: Metro operates heavy rail (HRT) and light rail (LRT) transit lines in underground tunnels, along streets, off-street in dedicated ROW, and above street level on elevated structures. Heavy rail trains are powered by a “third rail” along the tracks. Light rail vehicles are powered by overhead catenary systems (OCS). To support rail operations, Metro owns and maintains traction power substations (TPSS), maintenance yards, and other infrastructure.



Metrolink/Regional Rail: Metro owns a majority of the ROW within LA County on which the Southern California Regional Rail Authority (SCRRA) operates Metrolink service. Metrolink is a commuter rail system with seven lines that span 388 miles across five counties, including: Los Angeles, Orange, Riverside, San Bernardino, Ventura, and North San Diego. As a SCRRA member agency and property owner, Metro reviews development activity adjacent to Metro-owned ROW on which Metrolink operates, and coordinates with Metrolink on any comments or concerns. Metrolink has its own set of standards and processes, see link on page 1.



Metro Bus Rapid Transit (BRT): Metro operates accelerated bus transit, which acts as a hybrid between rail and traditional bus service. Metro BRT may operate in a dedicated travel lane within a street or freeway, or off-street along dedicated ROW. Metro BRT stations may be located on sidewalks within the public right-of-way, along a median in the center of streets, or off-street on Metro-owned property.



Metro Bus: Metro operates 170 bus lines across more than 1,400 square miles in LA County. The fleet serves over 15,000 bus stops with approximately 2,000 buses. Metro operates “Local” and “Rapid” bus service within the street, typically alongside vehicular traffic, though occasionally in “bus-only” lanes. Metro bus stops are typically located on sidewalks within the public right-of-way, which is owned and maintained by local jurisdictions. Metro’s [NextGen Bus Plan](#) re-envision bus service across LA County to make service improvements that better serve riders.

Why is Metro interested in adjacent development?

Metro Supports Transit Oriented Communities: Metro is redefining the role of the transit agency by expanding mobility options, promoting sustainable urban design, and helping transform communities throughout LA County. Metro seeks to partner with local, state, and federal jurisdictions, developers, property owners and other stakeholders across LA County on transit-supportive planning and developments to grow ridership, reduce driving, and promote walkable neighborhoods. Transit Oriented Communities (TOCs) are places (such as corridors or neighborhoods) that, by their design, allow people to drive less and access transit more. TOCs maximize equitable access to a multi-modal transit network as a key organizing principle of land use planning and holistic community development.

Adjacent Development Leads to Transit Oriented Communities: Metro supports private development adjacent to transit as this presents a mutually beneficial opportunity to enrich the built environment and expand mobility options. By connecting communities, destinations, and amenities through improved access to public transit, adjacent developments have the potential to:

- reduce auto dependency,
- reduce greenhouse gas emissions,
- promote walkable and bikeable communities that accommodate more healthy and active lifestyles,
- improve access to jobs and economic opportunities, and
- create more opportunities for mobility – highly desirable features in an increasingly urbanized environment.

Opportunity: Acknowledging an unprecedented opportunity to influence how the built environment develops along and around transit and its facilities, Metro has created this document. The Handbook helps ensure compatibility between private development and Metro's transit infrastructure to minimize operational, safety, and maintenance issues. It serves as a crucial first step to encourage early and active collaboration with local stakeholders and identify potential partnerships that leverage Metro initiatives and support TOCs across LA County.



Metro Purview & Concerns

Metro Purview for Review & Coordination

Metro is interested in reviewing development, construction, and utility projects within 100 feet of Metro transit facilities, real estate assets, and ROW – as measured from the edge of the ROW outward – both to ensure the structural safety of existing or planned transit infrastructure and to maximize integration opportunities with adjacent development. The Handbook seeks to:

- Improve communication and coordination between developers, jurisdictions, and Metro.
- Identify common concerns associated with developments adjacent to Metro ROW.
- Highlight Metro operational needs and requirements to ensure safe, continuous service.
- Prevent potential impacts to Metro transit service or infrastructure.
- Maintain access to Metro facilities for riders and operational staff.
- Avoid preventable conflicts resulting in increased development costs, construction delays, and safety impacts.
- Streamline the review process to be transparent, clear, and efficient.
- Assist in the creation of overall marketable and desirable developments.

Key Audiences for Handbook

The Handbook is intended to be used by:

- Local jurisdictions who review, entitle, and permit development projects and/or develop policies related to land use, development standards, and mobility,
- Developers, property owners,
- Architects, engineers, design consultants,
- Builders/contractors,
- Entitlement consultants,
- Environmental consultants,
- Utility companies, and
- other Third Parties.

Metro Assets & Common Concerns for Adjacent Development

The table on the facing page outlines common concerns for development projects and/or construction activities adjacent to Metro transit facilities and assets. These concerns are discussed in greater detail in the following chapters of the Handbook.

METRO ASSETS

COMMON ADJACENCY CONCERNS



UNDERGROUND ROW

Transit operates below ground in tunnels.

- Excavation near tunnels and infrastructure
- Clearance from support structures (e.g. tiebacks, shoring, etc)
- Coordination with utilities
- Clearance from ventilation shafts, surface penetrations (e.g. emergency exits)
- Surcharge loading of adjacent construction
- Explosions
- Noise and vibration/ground movement
- Storm water drainage



AERIAL ROW

Transit operates on elevated guideway, typically supported by columns.

- Excavation near columns and support structures
- Column foundations
- Clearance from OCS
- Overhead protection and crane swings
- Setbacks from property line for maintenance activities to occur without entering ROW
- Coordination with utilities
- Noise reduction (e.g. double-paned windows)



AT-GRADE ROW

Transit operates in dedicated ROW at street level; in some cases tracks are separated from adjacent property by fence or wall.

- Pedestrian and bicycle movements and safety
- Operator site distance/cone of visibility
- Clearance from OCS
- Crane swings and overhead protection
- Trackbed stability
- Storm water drainage
- Noise/vibration
- Driveways near rail crossings
- Setbacks from property line for maintenance activities to occur without entering ROW
- Utility coordination



BUS STOPS

Metro operates bus service on city streets. Bus stops are located on public sidewalks.

- Lane closures and re-routing service during construction
- Temporary relocation of bus stops
- Impacts to access to bus stops



NON-REVENUE/OPERATIONAL

Metro owns and maintains property to support operations (e.g. bus and rail maintenance facilities, transit plazas, traction power substations, park-and-ride parking lots).

- Excavation and clearance from support structures (e.g. tiebacks, shoring, etc)
- Ground movement
- Drainage
- Utility coordination
- Access to property

Metro Coordination Process

Typical Stages of Metro Review and Coordination

Early coordination helps avoid conflicts between construction activities and transit operations and maximizes opportunities to identify synergies between the development project and Metro transit services that are mutually beneficial.



*Phases above may include fees for permits and reimbursement of Metro staff time for review and coordination.

Coordination Goal: Metro encourages developers to consult with the Development Review Team early in the design process to ensure compatibility with transit infrastructure and minimize operational, safety, and maintenance issues with adjacent development. The Development Review team will serve as a case manager to developers and other Third Parties to facilitate the review of plans and construction documents across key Metro departments.

Level of Review: Not all adjacent projects will require significant review and coordination with Metro. The level of review depends on the Project's proximity to Metro, adjacency conditions, and the potential to impact Metro facilities and/or services. For example, development projects that are excavating near Metro ROW or using cranes near transit facilities require a greater level of review and coordination. Where technical review and construction monitoring is needed, Metro charges fees for staff time, as indicated by asterisk in the above diagram.

Permit Clearance: Within the City of Los Angeles, Metro reviews and clears Building & Safety permits for projects within 100 feet of Metro ROW, pursuant to [Zoning Information 1117](#). To ensure timely clearance of these permits, Metro encourages early coordination as noted above.

To begin consultation, submit project information via an online [In-Take Form](#), found on Metro's website. Metro staff will review project information and drawings to screen the project for any potential impacts to transit facilities or services, and determine if require further review and coordination is required. The sample sections on the facing page illustrate adjacency condition information that helps Metro complete project screening.

Contact:

Metro Development Review Team

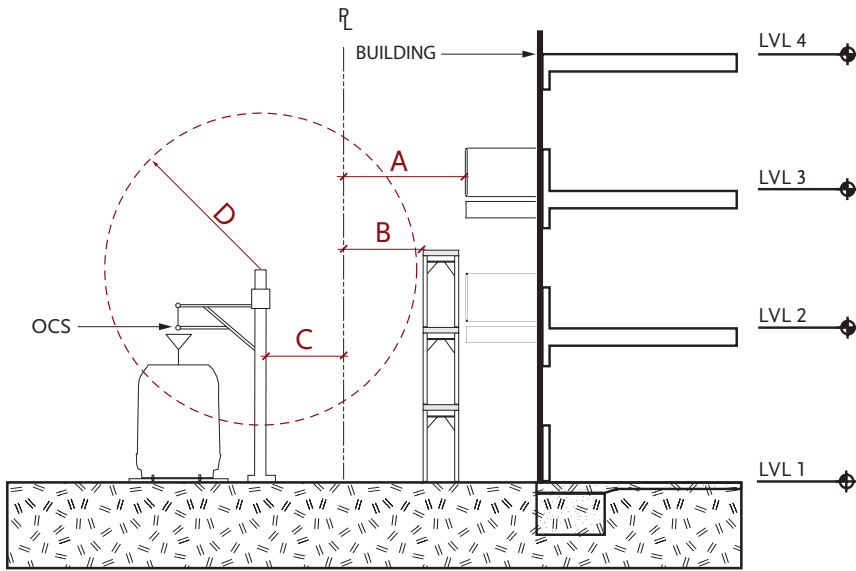
Website: <https://www.metro.net/devreview>

Online In-take Form: <https://jpublic.metro.net/in-take-form>

Email: devreview@metro.net

Phone: 213.418.3484

Sample Section: Adjacency Conditions



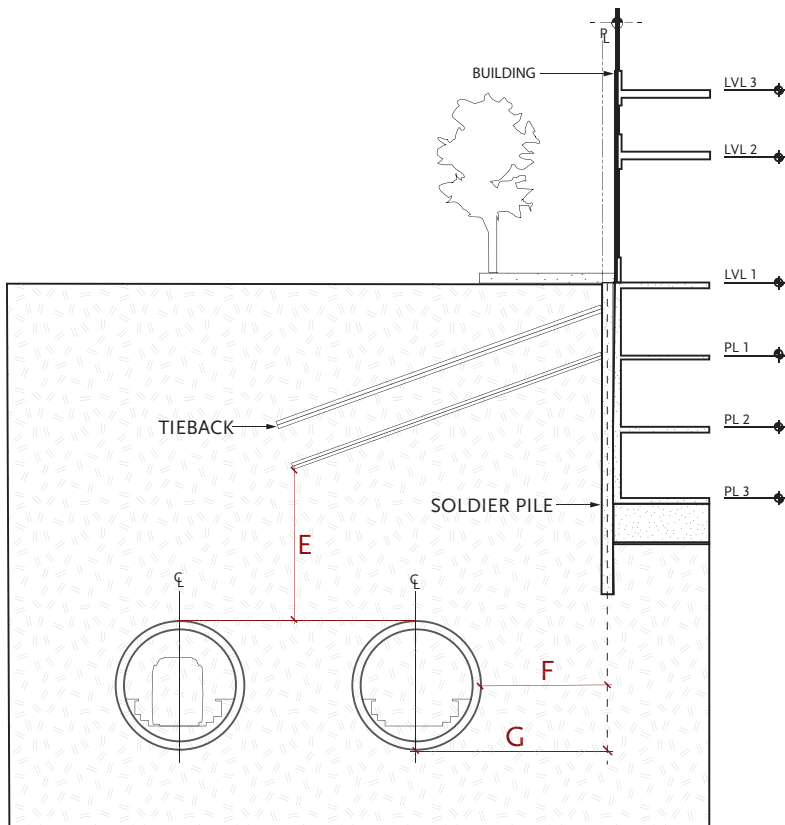
AT-GRADE CONDITION

A. Distance from property line to nearest permanent structure (e.g. building facade, balconies, terraces). Refer to Section 1.3 Building Setback of Handbook.

B. Distance from property line to nearest temporary construction structures (e.g. scaffolding).

C. Distance from property line to nearest Metro facility.

D. Clearance from nearest temporary and/or permanent structure to overhead catenary system (OCS). Refer to Section 1.4, OCS Clearance of Handbook.



BELOW-GRADE CONDITION

E. Vertical distance from top of Metro tunnel to closest temporary and/or permanent structure (e.g. tiebacks, foundation). Refer to Section 2.2, Proximity to Tunnels & Underground Infrastructure of Handbook.

F. Horizontal distance from exterior tunnel wall to nearest structure.

G. Horizontal distance from Metro track centerline to nearest structure.

Best Practices

Best Practices for Developer Coordination

Metro encourages developers of projects adjacent to Metro ROW and/or Real Estate Assets to take the following steps to facilitate Metro project review and approval:

1. **Review Metro resources and policies:** The Metro Development & Construction Coordination website and Handbook provide important information for those interested in constructing on, adjacent, over, or under Metro ROW, non-revenue property, or transit facilities. Developers and other Third Parties should familiarize themselves with these resources and keep in mind common adjacency concerns when planning a project.
2. **Contact Metro early during design process:** Metro welcomes the opportunity to provide feedback early in project design, allowing for detection and resolution of important adjacency issues, identification of urban design and system integration opportunities, and facilitation of permit approval. Metro encourages project submittal through the online [In-Take Form](#) to begin consultation.
3. **Maintain communication:** Frequent communication with Metro during project design and construction will reinforce relationships and allow for timely project completion. Contact us at devreview@metro.net or at 213.418.3484.

Best Practices for Local Jurisdiction Notification

To improve communication between Metro and the development community, Metro suggests that local jurisdictions take the following steps to notify property owners of coordination needs for properties adjacent to Metro ROW by:

- **Updating GIS and parcel data:** Integrate Metro ROW files into the City/County GIS and/or Google Earth Files for key departments (e.g. Planning, Public Works, Building & Safety) to notify staff of Metro adjacency and need for coordination during development approval process. Download Metro's ROW files [here](#).
- **Flag Parcels:** Create an overlay zone as part of local Specific Plan(s) and/or Zoning Ordinance(s) to tag parcels that are within 100 feet Metro ROW and require coordination with Metro early during the development process [e.g. City of Los Angeles Zone Information and Map Access System (ZI-1117)].
- **Provide Resources:** Direct all property owners and developers interested in parcels within 100 feet of Metro ROW to Metro's resources (e.g. website, Handbook).



M

Metro

Downtown
Santa
Monica

E

Man in a grey t-shirt and dark shorts walking towards the left.

Woman in a white t-shirt and blue jeans walking towards the right, looking at her phone.

Man in a red jacket and dark pants walking towards the right, using a cane and carrying a white shopping bag.

Man in a white t-shirt and dark pants walking towards the right, carrying a black backpack.

White shopping bags with the text 'santamonicamall.com' printed on them.



Site Plan & Conceptual Design

Site Plan & Conceptual Design

1.1 Supporting Transit Oriented Communities

Transit-oriented communities (TOCs) are places that, by their design, make it more convenient to take transit, walk, bike or roll than to drive. By working closely with the development community and local jurisdictions, Metro seeks to ensure safe construction near Metro facilities and improve compatibility with adjacent development to increase transit ridership.

RECOMMENDATION: Consider site planning and building design strategies to that support transit ridership, such as:

- Leveraging planning policies and development incentives to design a more compelling project that capitalizes on transit adjacency and economy of scales.
- Programming a mix of uses to create lively, vibrant places that are active day and night.
- Utilizing Metro policies and programs that support a healthy, sustainable, and welcoming environment around transit service and facilities.
- Prioritizing pedestrian-scaled elements to create spaces that are comfortable, safe, and enjoyable.
- Activating ground floor with retail and outdoor seating/activities to bring life to the public environment.
- Reducing and screening parking to focus on pedestrian activity.
- Incorporating environmental design elements that help reduce crime (e.g. windows and doors that face public spaces, lighting).



The Wilshire/Vermont Metro Joint Development project leveraged existing transit infrastructure to catalyze a dynamic and accessible urban environment. This project accommodates portal access into the Metro Rail system and on-street bus facilities.



1.2 Enhancing Access to Transit

Metro seeks to create a comprehensive, integrated transportation network and supports infrastructure and design that allows safe and convenient access to its multi-modal services. Projects in close proximity to Metro's services and facilities present an opportunity to enhance the public realm and connections to/from these services for transit riders as well as users of the developments.

RECOMMENDATION: Design projects with transit access in mind. Project teams should capitalize on the opportunity to improve the built environment and enhance the public realm for pedestrians, bicyclists, persons with disabilities, seniors, children, and users of green modes. Metro recommends that projects:

- Orient major entrances to transit service, making access and travel safe, intuitive, and convenient.
- Plan for a continuous canopy of shade trees along all public right-of-way frontages to improve pedestrian comfort to transit facilities.
- Add pedestrian lighting along paths to transit facilities and nearby destinations.
- Integrate wayfinding and signage into project design.
- Enhance nearby crosswalks and ramps.
- Ensure new walkways and sidewalks are clear of any obstructions, including utilities, traffic control devices, trees, and furniture.
- Design for seamless, multi-modal pedestrian connections, making access easy, direct, and comfortable.



The City of Santa Monica leveraged investments in rail transit and reconfigured Colorado Avenue to form a multi-modal first/last mile gateway to the waterfront from the Downtown Santa Monica Station. Photo by PWP Landscape Architecture

Site Plan & Conceptual Design

1.3 Building Setback

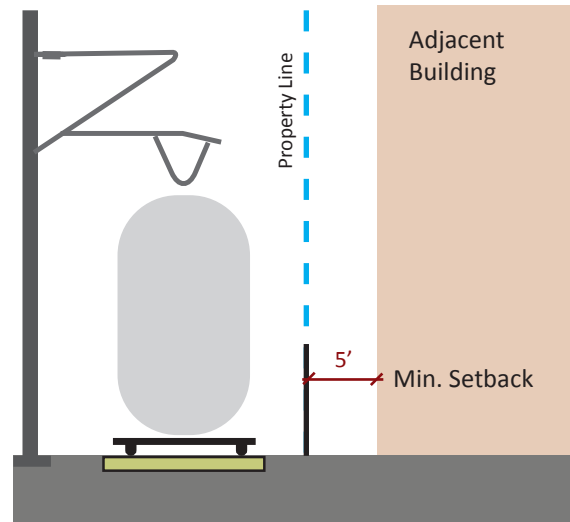
Buildings and structures with a zero lot setback that closely abut Metro ROW can pose concerns to Metro during construction. Encroachment onto Metro property to construct or maintain buildings is strongly discouraged as this presents safety hazards and may disrupt transit service and/or damage Metro infrastructure.

RECOMMENDATION: Include a minimum setback of five (5) feet from the property line to building facade to accommodate the construction and maintenance of structures without the need to encroach upon Metro property. As local jurisdictions also have building setback requirements, new developments should comply with the greater of the two requirements.

Entry into the ROW by parties other than Metro and its affiliated partners requires written approval. Should construction or maintenance of a development necessitate temporary or ongoing access to Metro ROW, a Metro Right of Entry Permit must be requested and obtained from Metro Real Estate for every instance access is required. Permission to enter the ROW is granted solely at Metro's discretion.

Coordination between property owners of fences, walls, and other barriers along property line is recommended. See Section 1.5.

Refer to Section 3.2 – Track Access and Safety for additional information pertaining to ROW access in preparation for construction activities.



A minimum setback of five (5) feet between an adjacent structure and Metro ROW is strongly encouraged to allow project construction and ongoing maintenance without encroaching on Metro property.

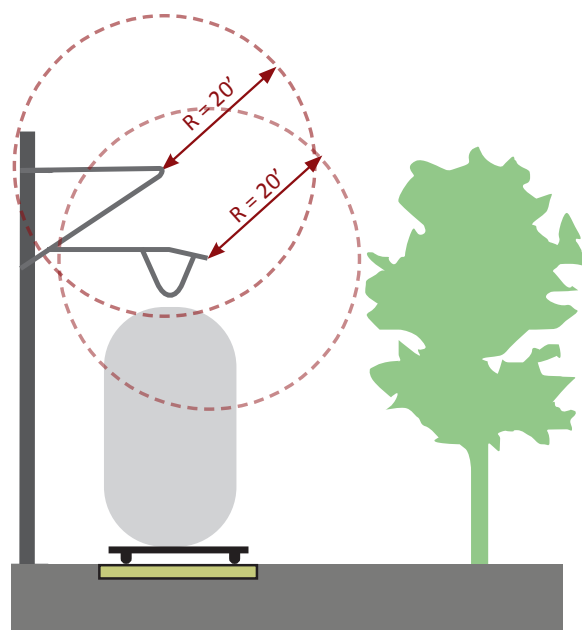


1.4 Overhead Catenary System (OCS) Clearance

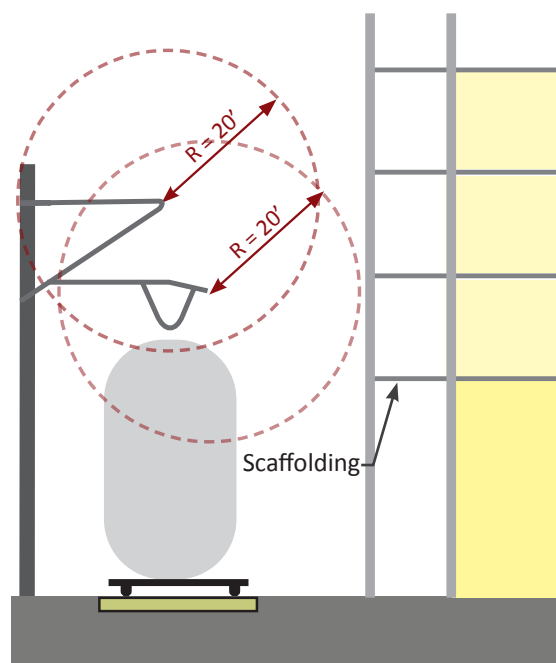
Landscaping and tree canopies can grow into the OCS above light rail lines, creating electrical safety hazards as well as visual and physical impediments for trains. Building appurtenances facing rail ROW, such as balconies, may also pose safety concerns to Metro operations as objects could fall onto the OCS.

RECOMMENDATION: Design project elements facing the ROW to avoid potential conflicts with Metro transit vehicles and infrastructure. Metro recommends that projects:

- Plan for landscape maintenance from private property and prevent growth into Metro ROW. Property owners will not be permitted to access Metro property to maintain private development.
- Design buildings such that balconies do not provide building users direct access to Metro ROW.
- Maintain building appurtenances and landscaping at a minimum distance of ten (10) feet from the OCS and support structures. If Transmission Power (TP) feeder cable is present, twenty (20) feet from the OCS and support structures is required. Different standards will apply for Metro Trolley Wires, Feeder Cables (wires) and Span Wires.



Adjacent structures and landscaping should be sited and maintained to avoid conflicts with the rail OCS.



Scaffolding and construction equipment should be staged to avoid conflicts with the rail OCS.

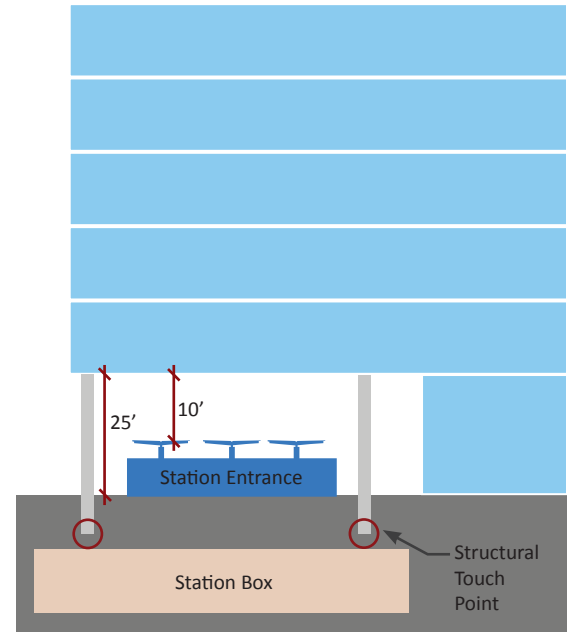
Site Plan & Conceptual Design

1.5 Underground Station Portal Clearance

Metro encourages transit-oriented development. Where development is planned above station entrances, close coordination is needed for structural safety as well as access for patrons, operations, and maintenance. Below are key design rules of thumb for development planned to cantilever over an entrance to an underground Metro Rail station.

RECOMMENDATION:

1. Preserve 25 feet clearance at minimum from plaza grade and the building structure above.
2. Preserve 10 feet clearance at minimum between portal roof and building structure above.
3. Coordinate structural support system and touchdown points to ensure a safe transfer of the building loads above the station portal.
4. Coordinate placement of structural columns and amenities (e.g. signage, lighting, furnishings) at plaza level to facilitate direct and safe connections for people of all mobile abilities to and from station entrance(s).
5. Develop a maintenance plan for the plaza in coordination with Metro.



Projects that propose to cantilever over Metro subway portals require close coordination with Metro Engineering.



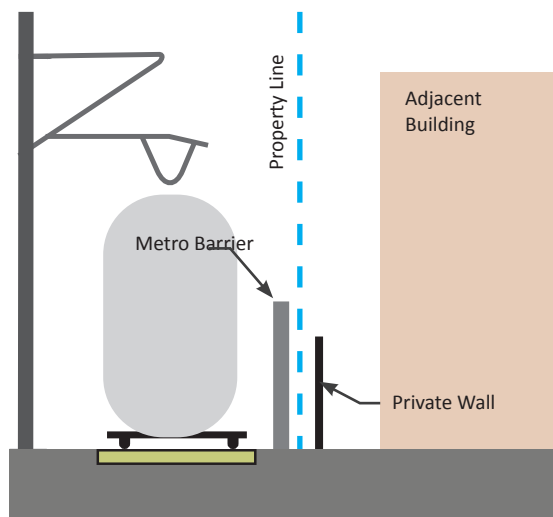
1.6 Shared Barrier Construction & Maintenance

In areas where Metro ROW abuts private property, barrier construction and maintenance responsibilities can be a point of contention with property owners. When double barriers are constructed, the gap created between the Metro-constructed fence and a private property owner's fence can accumulate trash and make regular maintenance challenging without accessing the other party's property.

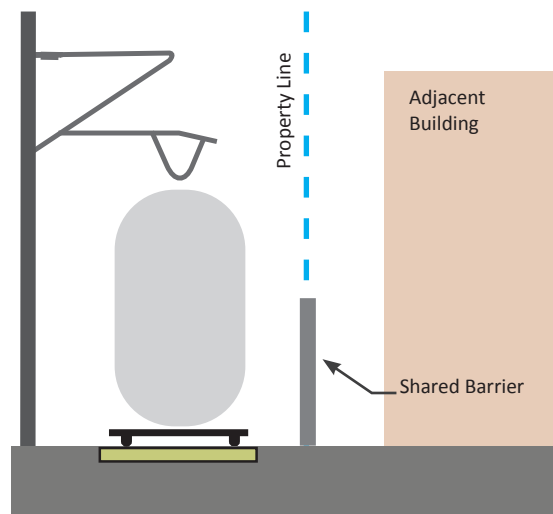
RECOMMENDATION: Coordinate with Metro Real Estate to create a single barrier condition along the ROW property line. With an understanding that existing conditions along ROW boundaries vary throughout LA County, Metro recommends the following, in order of preference:

- **Enhance existing Metro barrier:** if structural capacity allows, private property owners and developers should consider physically affixing improvements onto and building upon Metro's existing barrier. Metro is amenable to barrier enhancements such as increasing barrier height and allowing private property owners to apply architectural finishes to their side of Metro's barrier.
- **Replace existing barrier(s):** if conditions are not desirable, remove and replace any existing barrier(s), including Metro's, with a new single "shared" barrier built on the property line.

Metro is amenable to sharing costs for certain improvements that allow for clarity in responsibilities and adequate ongoing maintenance from adjacent property owners without entering Metro's property. Metro Real Estate should be contacted with case-specific questions and will need to approve shared barrier design, shared financing, and construction.



Double barrier conditions allow trash accumulation and create maintenance challenges for Metro and adjacent property owners.



Metro prefers a single barrier condition along its ROW property line.

Site Plan & Conceptual Design

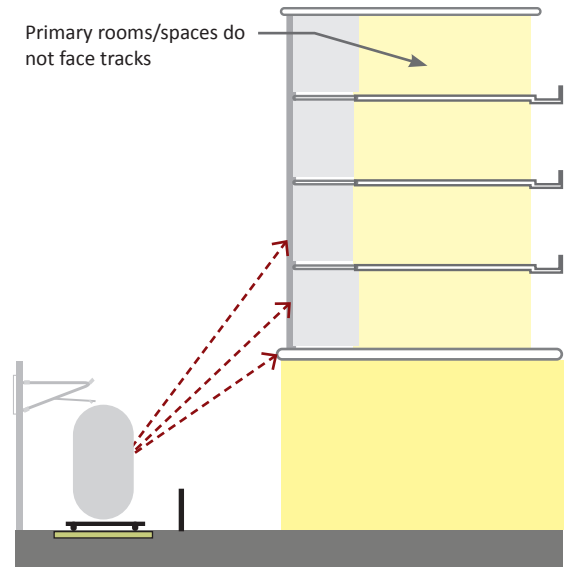
1.7 Project Orientation & Noise Mitigation

Metro may operate in and out of revenue service 24 hours per day, every day of the year, which can create noise and vibration (i.e. horns, power washing). Transit service and maintenance schedules cannot be altered to avoid noise for adjacent developments. However, noise and vibration impacts can be reduced through building design and orientation.

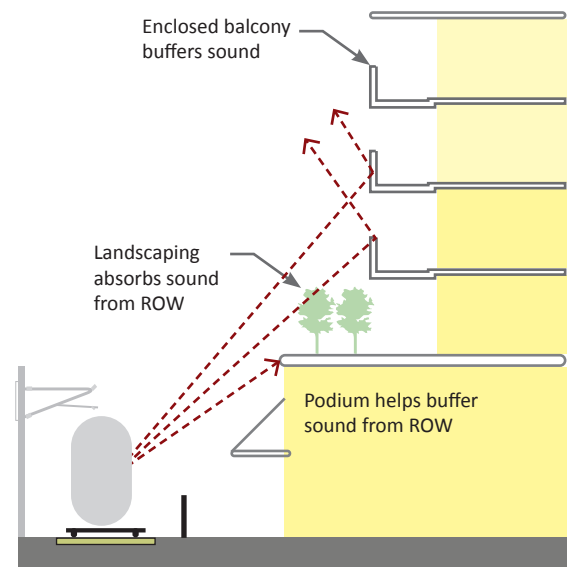
RECOMMENDATION: Use building orientation, programming, and design techniques to reduce noise and vibration for buildings along Metro ROW:

- Locate secondary or “back of house” rooms (e.g. bathrooms, stairways, laundry rooms) along ROW, rather than primary living spaces that are noise sensitive (e.g. bedrooms and family rooms).
- Use upper level setbacks and locate living spaces away from ROW.
- Enclose balconies.
- Install double-pane windows.
- Include language disclosing potential for noise, vibration, and other impacts due to transit proximity in terms and conditions for building lease or sale agreements to protect building owners/sellers from tenant/buyer complaints.

Developers are responsible for any noise mitigation required, which may include engineering designs for mitigation recommended by Metro or otherwise required by local municipalities. A recorded Noise Easement Deed in favor of Metro may be required for projects within 100 feet of Metro ROW to ensure notification to tenants and owners of any proximity issues.



Building orientation can be designed to face away from tracks, reducing the noise and vibration impacts.



Strategic placement of podiums and upper-level setbacks on developments near Metro ROW can reduce noise and vibration impacts.



1.8 At-Grade Rail Crossings

New development is likely to increase pedestrian activity at rail crossings. Safety enhancements may be needed to upgrade existing rail crossings to better protect pedestrians.

RECOMMENDATION: Coordinate with Metro, the California Public Utilities Commission (CPUC), and any other transit operators using the crossing (e.g. Metrolink) to determine if safety enhancements are needed for nearby rail crossings.

While Metro owns and operates the rail ROW, the CPUC regulates all rail crossings. Contact the CPUC early in the design process to determine if they will require any upgrades to existing rail crossings. The CPUC may request to review development plans and hold a site visit to understand future pedestrian activity. Metro's Corporate Safety Department can support the developer in coordination with the CPUC.



Gates and pedestrian arms are common types of safety elements for pedestrians at rail crossings.



Safety elements of a gate and pedestrian arms have been constructed at the Monrovia Station.

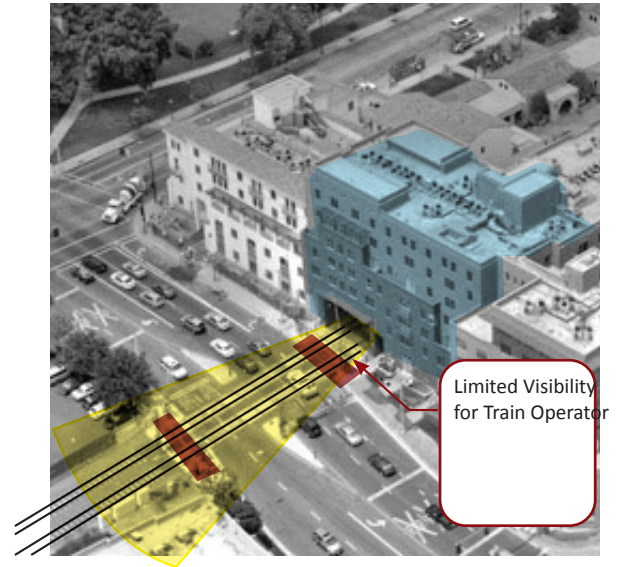
Site Plan & Conceptual Design

1.9 Sight-Lines at Crossings

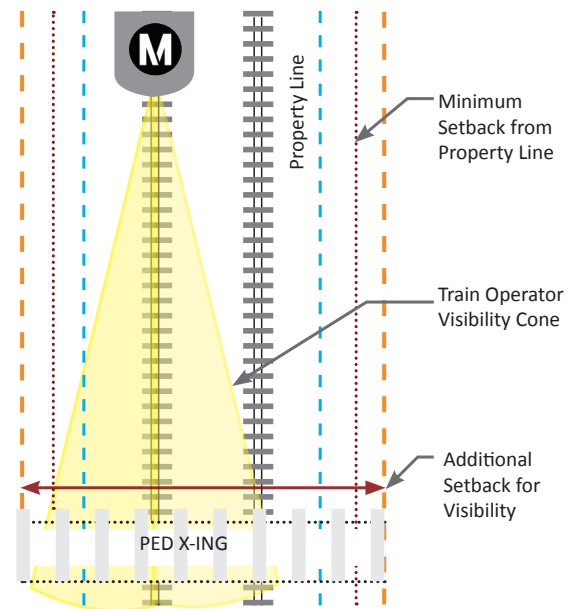
Developments adjacent to Metro ROW can present visual barriers to transit operators approaching vehicular and pedestrian crossings. Buildings and structures in close proximity to transit corridors can reduce sight-lines and create blind corners where operators cannot see pedestrians. This requires operations to reduce train speeds, which decreases efficiency of transit service.

RECOMMENDATION: Design buildings to maximize transit service sight-lines at crossings, leaving a clear cone of visibility to oncoming vehicles and pedestrians.

Metro Rail Operations will review, provide guidance, and determine the extent of operator visibility for safe operations. If the building envelope overlaps with the visibility cone near pedestrian and vehicular crossings, a building setback may be necessary to ensure safe transit service. The cone of visibility at crossings and required setback will be determined based on vehicle approach speed.



Limited sight-lines for trains approaching street crossings create unsafe conditions.



Visibility cones allow train operators to respond to safety hazards.

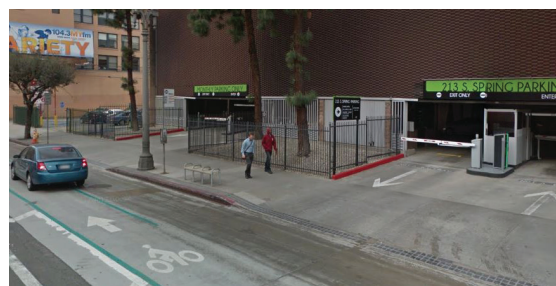


1.10 Driveway/Access Management

Driveways adjacent to on-street bus stops can create conflict for pedestrians walking to/from or waiting for transit. Additionally, driveways accessing parking lots and loading zones at project sites near Metro Rail and BRT crossings can create queuing issues along city streets and put vehicles in close proximity to fast moving trains and buses, which pose safety concerns.

RECOMMENDATION: Site driveways and other vehicular entrances to avoid conflicts with pedestrians, bicycles, and transit vehicles by:

- Placing driveways along side streets and alleys, away from on-street bus stops and transit crossings to minimize safety conflicts between active ROW, transit vehicles, and people, as well as queuing on streets.
- Locating vehicular driveways away from transit crossings or areas that are likely to be used as waiting areas for transit services.
- Placing loading docks away from sidewalks where transit bus stop activity is/will be present.
- Consolidating vehicular entrances and reduce width of driveways.
- Using speed tables to slow entering/exiting automobiles near pedestrians.
- Separating pedestrian walkways to minimize conflict with vehicles.
- Encouraging safe non-motorized travel.



Driveways in close proximity to each other compromise safety for those walking to/from transit and increase the potential for vehicle-pedestrian conflicts.

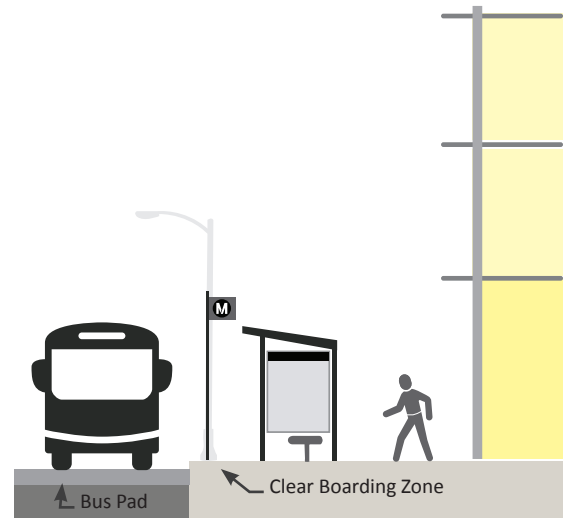
Site Plan & Conceptual Design

1.11 Bus Stop & Zones Design

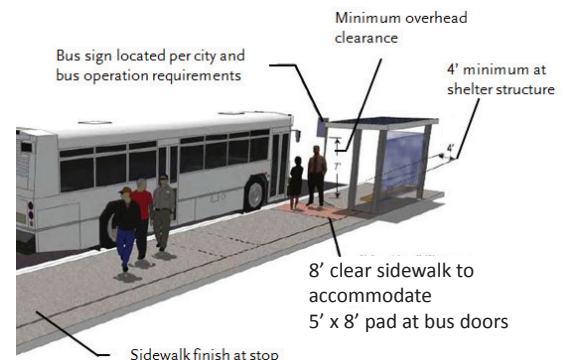
Metro Bus serves over 15,000 bus stops throughout the diverse landscape that is LA County. Typically located on sidewalks within public right-of-way owned and maintained by local jurisdictions, existing bus stop conditions vary from well-lit and sheltered spaces to uncomfortable and unwelcoming zones. Metro is interested in working with developers and local jurisdictions to create a vibrant public realm around new developments by strengthening multi-modal access to/from Metro transit stops and enhancing the pedestrian experience.

RECOMMENDATION: When designing around existing or proposed bus stops:

- Review Metro’s Transit Service Policy, which provides standards for design and operation of bus stops and zones for near-side, far-side, and mid-block stops.
- Review Metro’s Transfers Design Guide for more information at <https://www.metro.net/projects/station-design-projects/>
- Accommodate 5’ x 8’ landing pads at bus doors (front and back door, which are typically 23 to 25 feet apart).
- Locate streetscape elements (e.g. tree planters, street lamps, benches, shelters, trash receptacles and newspaper stands) outside of bus door zones to protect transit access and ensure a clear path of travel.
- Install a concrete bus pad within each bus stop zone to avoid street asphalt damage.
- Replace stand-alone bus stop signs with bus shelters that include benches and adequate lighting.
- Design wide sidewalks (15’ preferred) that accommodate bus landing pads as well as street furniture, landscape, and user travel space.
- Consider tree species, height, and canopy shape (higher than 14’ preferred) to avoid vehicle conflicts at bus stops. Trees should be set back from the curb and adequately maintained to prevent visual and physical impediments for buses when trees reach maturity. Avoid planting of trees that have an invasive and shallow root system.



A concrete bus pad should be located at bus stops and bus shelters should be located along sidewalks to ensure an accessible path of travel to a clear boarding area.



Well-designed and accessible bus stops are beneficial amenities for both transit riders and users of adjacent developments.



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DANGER DO NOT EXCEED RATED CAPACITY





Engineering & Technical Review

Engineering & Technical Review

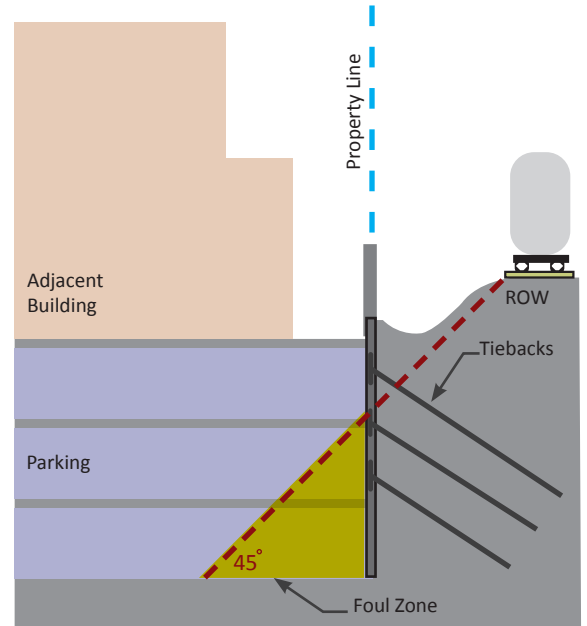
2.1 Excavation Support System Design

Excavation near Metro ROW has the potential to disturb adjoining soils and jeopardize support of existing Metro infrastructure. Any excavation which occurs within the geotechnical foul zone relative to Metro infrastructure is subject to Metro review and approval and meet Cal/OSHA requirements. This foul zone or geotechnical zone of influence shall be defined as the area below a track-way as measured from a 45-degree angle from the edge of the rail track ballast. Construction within this vulnerable area poses a potential risk to Metro service and requires additional Metro Engineering review.

RECOMMENDATION: Coordinate with Metro Engineering staff for review and approval of the excavation support system drawings and calculations prior to the start of excavation or construction. Tiebacks encroaching into Metro ROW may require a tieback easement or license, at Metro's discretion.

Any excavation/shoring within Metrolink operated and maintained ROW will require compliance with SCRRRA Engineering standards and guidelines.

See page 7 for a sample section showing Metro adjacent conditions.



An underground structure located within the ROW foul zone would require additional review by Metro.



2.2 Proximity to Tunnels & Underground Infrastructure

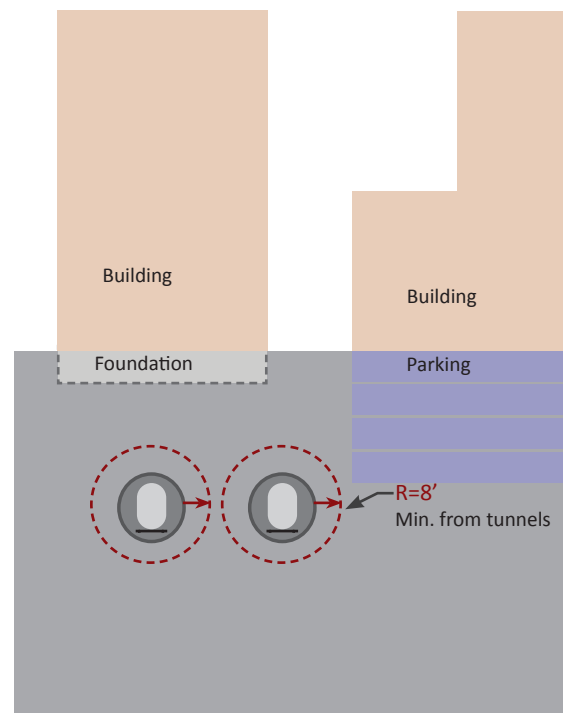
Construction adjacent to, over, or below underground Metro facilities (tunnels, stations and appendages) is of great concern and should be coordinated closely with Metro Engineering.

RECOMMENDATION: Coordinate with Metro early in the design process when proposing to build near underground Metro infrastructure. Metro typically seeks to maintain a minimum eight (8) foot clearance from existing Metro facilities to new construction (shoring or tiebacks). It will be incumbent upon the developer to demonstrate, to Metro’s satisfaction, that both the temporary support of construction and the permanent works do not adversely affect the structural integrity, safety, or continued efficient operation of Metro facilities.

Dependent on the nature of the adjacent construction, Metro will need to review the geotechnical report, structural foundation plans, sections, shoring plan sections and calculations.

Metro may require monitoring where such work will either increase or decrease the existing overburden (i.e. weight) to which the tunnels or facilities are subjected. When required, the monitoring will serve as an early indication of excessive structural strain or movement. See Section 3.4, Excavation Drilling/Monitoring for additional information regarding monitoring requirements.

See page 7 for a sample section showing Metro adjacent conditions.

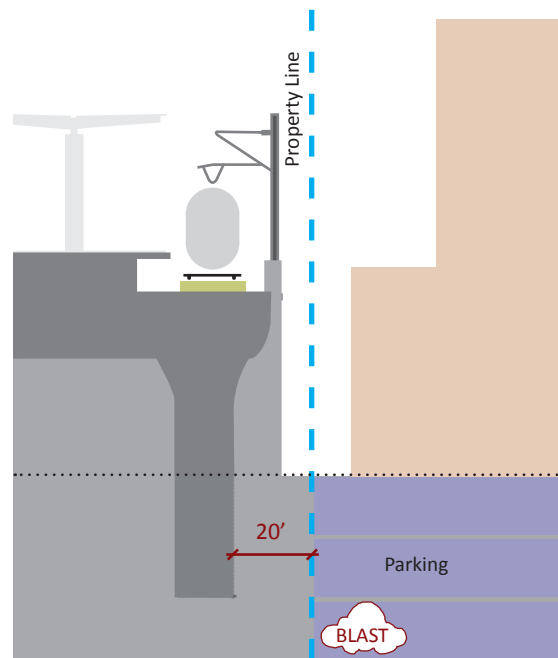


Adjacent project structures in close proximity to underground Metro infrastructure will require additional review by Metro.

2.3 Protection from Explosion/Blast

Metro is obligated to ensure the safety of public transit infrastructure from potential explosive sources which could originate from adjacent underground structures or from at-grade locations, situated below elevated guideways or near stations. Blast protection setbacks or mitigation may be required for large projects constructed near critical Metro facilities.

RECOMMENDATION: Avoid locating underground parking or basement structures within twenty (20) feet from an existing Metro tunnel or facility (exterior face of wall to exterior face of wall). Adjacent developments within this 20-foot envelope may be required to submit a Threat Assessment and Blast/Explosion Study for Metro review and approval.



An underground structure proposed within twenty (20) feet of a Metro structure may require a Threat Assessment and Blast/Explosion Study.

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Construction Safety & Management

Construction Safety & Management

3.1 Pre-Construction Coordination

Metro is concerned with impacts to service requiring rail single line tracking, line closures, speed restrictions, and bus bridging occurring as a result of adjacent project construction. Projects that will require work over, under, adjacent, or on Metro property or ROW and include operation of machinery, scaffolding, or any other potentially hazardous work are subject to evaluation in preparation for and during construction to maintain safe transit operations and passenger well-being.

RECOMMENDATION: Following an initial screening of the project, Metro may determine that additional on-site coordination may be necessary. Dependent on the nature of the adjacent construction, developers may be requested to perform the following as determined on a case-by-case basis:

- Submit a construction work plan and related project drawings and specifications for Metro review.
- Submit a contingency plan, show proof of insurance coverage, and issue current certificates.
- Provide documentation of contractor qualifications.
- Complete pre-construction surveys, perform baseline readings, and install movement instrumentation.
- Complete readiness review and perform practice run of transit service shutdown per contingency plan.
- Designate a ROW observer or other safety personnel and an inspector from the project's construction team.
- Establish a coordination process for access and work in or adjacent to ROW for the duration of construction.

Project teams will be responsible for the costs of adverse impacts to Metro transit operations caused by work on adjacent developments, including remedial work to repair damage to Metro property, facilities, or systems. Additionally, a Construction Monitoring fee may be assessed based on an estimate of required level of effort provided by Metro.

All projects adjacent to Metrolink infrastructure will require compliance with SCRRRA Engineering Standards and Guidelines.



Metro may need to monitor development construction near Metro facilities.



3.2 Track Access and Safety

Permission from Metro is required to enter Metro property for rail construction and maintenance along, above, or under Metro ROW as these activities can interfere with Metro utilities and service and pose a safety hazard to construction teams and transit riders. Track access is solely at Metro's discretion and is discouraged to prevent electrocution and collisions with construction workers or machines.

RECOMMENDATION: Obtain and/or complete the following to work in or adjacent to Metro Rail ROW:

1. **Construction Work Plan:** Dependent on the nature of adjacent construction, Metro may request a construction work plan, which describes means and methods and other construction plan details, to ensure the safety of transit operators and riders.
2. **Safety Training:** All members of the project construction team will be required to attend Metro Rail Safety Training before commencing work activity. Training provides resources and procedures when working near active rail ROW.
3. **Right of Entry Permit/Temporary Construction Easement:** All access to and activity on Metro property, including easements necessary for construction of adjacent projects, must be approved through a Right-of-Entry Permit and/or a Temporary Construction Easement obtained from Metro Real Estate and may require a fee.
4. **Track Allocation:** All work on Metro Rail ROW must receive prior approval from Metro Rail Operations Control. Track Allocation identifies, reserves, and requests changes to normal operations for a specific track section, line, station, location, or piece of equipment to allow for safe use by a non-Metro entity. If adjacent construction is planned in close proximity to active ROW, flaggers must be used to ensure safety of construction workers and transit riders.



Trained flaggers ensure the safe crossing of pedestrians and workers of an adjacent development.

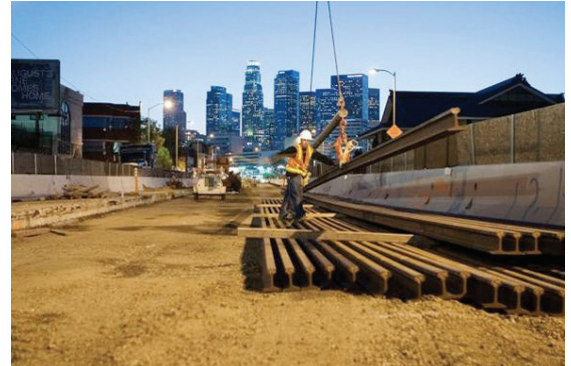
Construction Safety & Management

3.3 Construction Hours

Building near active Metro ROW poses safety concerns and may require limiting hours of construction which impact Metro ROW to night or off-peak hours so as not to interfere with Metro revenue service. To maintain public safety and access for Metro riders, construction should be planned, scheduled, and carried out in a way to avoid impacts to Metro service and maintenance.

RECOMMENDATION: In addition to receiving necessary construction approvals from the local jurisdiction, all construction work on or in close proximity to Metro ROW must be scheduled through the Track Allocation Process, detailed in Section 3.2.

Metro prefers that adjacent construction with potential to impact normal, continuous Metro operations take place during non-revenue hours (approximately 1am-4am) or during non-peak hours to minimize impacts to service. The developer may be responsible for additional operating costs resulting from disruption to normal Metro service.



Construction during approved hours ensures the steady progress of adjacent development construction and minimizes impacts to Metro's transit service.



3.4 Excavation/Drilling Monitoring

Excavation is among the most hazardous construction activities and can pose threats to the structural integrity of Metro's transit infrastructure.

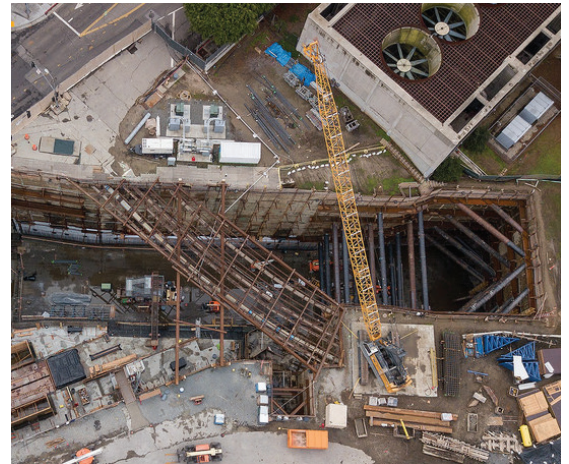
RECOMMENDATION: Coordinate with Metro Engineering to review and approve excavation and shoring plans during design and development, and well in advance of construction (see Sections 2.1 and 2.2).

Geotechnical instrumentation and monitoring will be required for all excavations occurring within Metro's geotechnical zone of influence, where there is potential for adversely affecting the safe and efficient operation of transit vehicles. Monitoring of Metro facilities due to adjacent construction may include the following as determined on a case-by-case basis:

- Pre- and post-construction condition surveys
- Extensometers
- Inclinometers
- Settlement reference points
- Tilt-meters
- Groundwater observation wells
- Movement arrays
- Vibration monitoring



Excavation and shoring plans must be reviewed by Metro to ensure structural compatibility with Metro infrastructure and safety during adjacent development construction.



A soldier pile wall used for Regional Connector station at 2nd/Hope.

Construction Safety & Management

3.5 Crane Operations

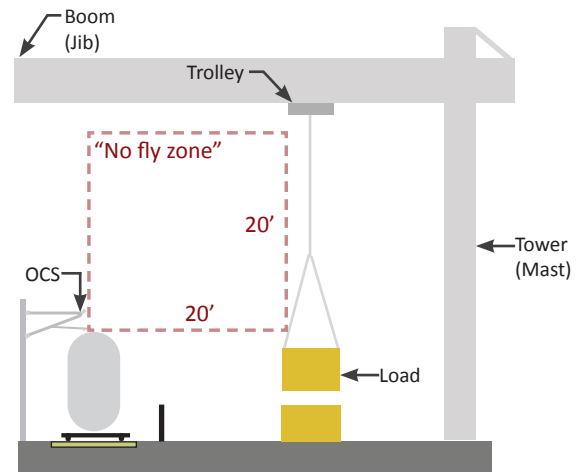
Construction activities adjacent to Metro ROW may require moving large, heavy loads of building materials and machinery using cranes. Cranes referenced here include all power-operated equipment that can hoist, lower, and horizontally move a suspended load. To ensure safety for Metro riders, operators, and transit facilities, crane operations adjacent to Metro ROW must follow the safety regulations and precautions below and are subject to California Occupational Safety and Health Administration (Cal/OSHA) standards.

RECOMMENDATION:

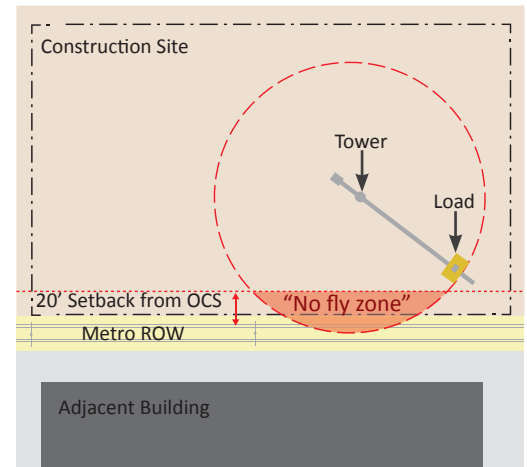
Coordinate with Metro to discuss construction methods and confirm if a crane work plan is required. Generally, crane safety near Metro's ROW and facilities largely depends on the following factors: 1) Metro's operational hours and 2) swinging a load over or near Metro power lines and facilities. Note:

1. Clearance: A crane boom may travel over energized Metro OCS only if it maintains a vertical 20-foot clearance and the load maintain a horizontal 20-foot clearance.
2. Power: Swinging a crane boom with a load over Metro facilities or passenger areas is strictly prohibited during revenue hours. To swing a load in the "no fly zone" (see diagrams to right), the construction team must coordinate with Metro to de-energize the OCS.
3. Weathervaning: When not in use, the crane boom may swing 360 degrees with the movement of the wind, including over energized Metro OCS, only if the trolley is fully retracted towards the crane tower and not carrying any loads.
4. Process: Developers and contractors must attend Metro Track Allocation (detailed in Section 3.2) to determine if Metro staff support is necessary during crane erection and load movement.
5. Permit: Developers must apply for a Metro Right-of-Entry permit to swing over Metro facilities.

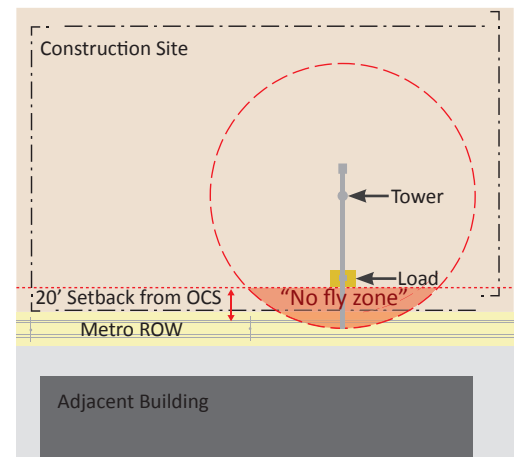
Project teams will bear all costs associated with impacts to Metro Rail operations and maintenance.



Cranes and construction equipment should be staged to avoid conflicts with the rail OCS.



Plan View: Crane swing and load are restricted near Metro ROW.



Plan View: While crane boom swings over "no fly zone," the trolley and load are retracted to maintain clearance from OCS.



3.6 Construction Barriers & Overhead Protection

During construction, falling objects can damage Metro facilities and pose a safety concern to the riders accessing them.

RECOMMENDATION: Erect vertical construction barriers and overhead protection compliant with Metro and Cal/OSHA requirements to prevent objects from falling into Metro ROW or areas designed for public access to Metro facilities. A protection barrier shall be constructed to cover the full height of an adjacent project and overhead protection from falling objects shall be provided over Metro ROW as necessary. Erection of the construction barriers and overhead protection for these areas shall be done during Metro non-revenue hours.



Overhead protection is required when moving heavy objects over Metro ROW or in areas designated for public use.



Constructed above is a wooden box over the entrance portal for overhead protection at the 4th/Hill Station.

Construction Safety & Management

3.7 Pedestrian & Emergency Access

Metro’s riders rely on the consistency and reliability of access and wayfinding to and from stations, stops, and facilities. Construction on adjacent property must not obstruct pedestrian access, fire department access, emergency egress, or otherwise present a safety hazard to Metro operations, its employees, riders, and the general public. Fire access and safe escape routes within all Metro stations, stops, and facilities must be maintained at all times.

RECOMMENDATION: Ensure pedestrian and emergency access from Metro stations, stops, and transit facilities is compliant with the Americans with Disabilities Act (ADA) and maintained during construction:

- Temporary fences, barricades, and lighting should be installed and watchmen provided for the protection of public travel, the construction site, adjacent public spaces, and existing Metro facilities.
- Temporary signage should be installed where necessary and in compliance with the latest California Manual on Uniform Traffic Control Devices (MUTCD) and in coordination with Metro Art and Design Standards.
- Emergency exits shall be provided and be clear of obstructions at all times.
- Access shall be maintained for utilities such as fire hydrants, stand pipes/connections, and fire alarm boxes as well as Metro-specific infrastructure such as fan and vent shafts.



Sidewalk access is blocked for a construction project, forcing pedestrians into the street or to use less direct paths to the Metro facility.



3.8 Impacts to Bus Routes & Stops

During construction, bus stop zones and routes may need to be temporarily relocated. Metro needs to be informed of activities that require stop relocation or route adjustments in order to ensure uninterrupted service.

RECOMMENDATION: During construction, maintain or relocate existing bus stops consistent with the needs of Metro Bus Operations. Design of temporary and permanent bus stops and surrounding sidewalk areas must be compliant with the ADA and allow passengers with disabilities a clear path of travel to the transit service. Existing bus stops must be maintained as part of the final project. Metro Bus Operations Control Special Events Department and Metro Stops & Zones Department should be contacted at least 30 days before initiating construction activities.



Temporary and permanent relocation of bus stops and layover zones will require coordination between developers, Metro, and other municipal bus operators and local jurisdictions.

Construction Safety & Management

3.9 Utility Coordination

Construction has the potential to interrupt utilities that Metro relies on for safe operations and maintenance. Utilities of concern to Metro include, but are not limited to, condenser water piping, potable/fire water, storm and sanitary sewer lines, and electrical/telecommunication services.

RECOMMENDATION: Coordinate with Metro Real Estate during project design to gauge temporary and permanent utility impacts and avoid conflicts during construction.

The contractor shall protect existing above-ground and underground Metro utilities during construction and coordinate with Metro to receive written approval for any utilities pertinent to Metro facilities that may be used, interrupted, or disturbed.

When electrical power outages or support functions are required, approval must be obtained through Metro Track Allocation in coordination with Metro Real Estate for a Right of Entry Permit.

To begin coordination with Metro Real Estate, visit www.metro.net/devreview and select the drop-down “Utility Project Coordination.”



Coordination of underground utilities is critical to safely and efficiently operate Metro service.



3.10 Air Quality & Ventilation Protection

Hot or foul air, fumes, smoke, steam, and dust from adjacent construction activities can negatively impact Metro facilities, service, and users.

RECOMMENDATION: Ensure that hot or foul air, fumes, smoke, and steam from adjacent facilities are discharged beyond 40 feet from existing Metro facilities, including but not limited to ventilation system intake shafts and station entrances. Should fumes be discharged within 40 feet of Metro intake shafts, a protection panel around each shaft shall be required.



A worker breaks up concrete creating a cloud of silica dust.

Glossary

Cone of Visibility

A conical space at the front of moving transit vehicles allowing for clear visibility of travel way and/or conflicts.

Construction Work Plan (CWP)

Project management document outlining the definition of work tasks, choice of technology, estimation of required resources and duration of individual tasks, and identification of interactions among the different work tasks.

Flagger/Flagman

Person who controls traffic on and through a construction project. Flaggers must be trained and certified by Metro Rail Operations prior to any work commencing in or adjacent to Metro ROW.

Geotechnical Foul Zone

Area below a track-way as measured from a 45-degree angle from the edge of the rail track ballast.

Guideway

A channel, track, or structure along which a transit vehicle moves.

Heavy Rail Transit (HRT)

Metro HRT systems include exclusive ROW (mostly subway) trains up to six (6) cars long (450') and utilize a contact rail for traction power distribution (e.g. Metro Red Line).

Joint Development (JD)

JD is the asset management and real estate development program through which Metro collaborates with developers to build housing, retail, and other amenities on Metro properties near transit, typically through ground lease. JD projects directly link transit riders with destinations and services throughout LA County.

Light Rail Transit (LRT)

Metro LRT systems include exclusive, semi-exclusive, or street ROW trains up to three (3) cars long (270') and utilize OCS for traction power distribution (e.g. Metro Blue Line).

Measure R

Half-cent sales tax for LA County approved in November 2008 to finance new transportation projects and programs. The tax expires in 2039.

Measure M

Half-cent sales tax for LA County approved in November 2016 to fund transportation improvements, operations and programs, and accelerate projects already in the pipeline. The tax will increase to one percent in 2039 when Measure R expires.

Metrolink

A commuter rail system with seven lines throughout Los Angeles, Orange, Riverside, San Bernardino, Ventura, and North San Diego counties governed by the Southern California Regional Rail Authority (SCRRA).

Metro Adjacent Construction Design Manual

Volume III of the Metro Design Criteria & Standards, which outlines the Metro adjacent review procedure as well as operational requirements when constructing over, under, or adjacent to Metro facilities, structures, and property.

Metro Bus

Metro "Local" and "Rapid" bus service runs within the street, typically alongside vehicular traffic, though occasionally in "bus-only" lanes.

Metro Bus Rapid Transit (BRT)

High quality bus service that provides faster and convenient service through the use of dedicated ROW, branded vehicles and stations, high frequency and intelligent transportation systems, all-door boarding, and intersection crossing priority. Metro BRT may run within dedicated ROW or in mixed flow traffic on streets.

Metro Design Criteria and Standards

A compilation of documents that govern how Metro transit service and facilities are designed, constructed, operated, and maintained.

Metro Rail

Urban rail system serving LA County consisting of six lines, including two subway lines and four light rail lines.

Metro Rail Design Criteria (MRDC)

Volume IV of the Metro Design Criteria & Standards which establishes design criteria for preliminary engineering and final design of a Metro Rail Project.

Metro Transit Oriented Communities

Land use planning and community development program that seeks to maximize access to transportation as a key organizing principle and promote equity and sustainable living by offering a mix of uses close to transit to support households at all income levels, as well as building densities, parking policies, urban design elements, and first/last mile facilities that support ridership and reduce auto dependency.

Noise Easement Deed

Easement granted by property owners abutting Metro ROW acknowledging noise due to transit operations and maintenance.

Overhead Catenary System (OCS)

One or more electrified wires situated over a transit ROW that transmit power to light rail trains via pantograph, a current collector mounted on the roof of an electric vehicle. Metro OCS is supported by hollow poles placed between tracks or on the outer edge of parallel tracks.

Right of Entry Permit

Written approval granted by Metro Real Estate to enter Metro ROW and property.

Right of Way (ROW)

Legal right over property reserved for transportation purposes to construct, protect, maintain and operate transit services.

Southern California Regional Rail Authority (SCRRA)

A joint powers authority made up of an 11-member board representing the transportation commissions of Los Angeles, Orange, Riverside, San Bernardino and Ventura counties. SCRRA governs and operates Metrolink service.

Threat Assessment and Blast/Explosion Study

Analysis performed when adjacent developments are proposed within twenty (20) feet from an existing Metro tunnel or facility.

Track Allocation/Work Permit

Permit granted by Metro Rail Operations Control to allocate a section of track and perform work on or adjacent to Metro Rail ROW. This permit should be submitted for any work that could potentially foul the envelope of a train.

Wayfinding

Signs, maps, and other graphic or audible methods used to convey location and directions to travelers.

metro.net/projects/devreview/





NATIVE AMERICAN HERITAGE COMMISSION

April 27, 2022

Mi Kim
County of Los Angeles, Department of Regional Planning
320 West Temple Street, Room 1354
Los Angeles, CA 90012

Re: 2022040512, East San Gabriel Valley Area Plan Project, Los Angeles County

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Raymond C. Hitchcock
Miwok/Nisenan

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

Dear Ms. Kim:

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).

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.

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.

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

AB 52

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
Cultural Resources Analyst

cc: State Clearinghouse



Puente Hills Habitat Preservation Authority

Endowment Provided by the Puente Hills Landfill

May 25, 2022

Mi Kim
County of Los Angeles
Department of Regional Planning
320 W Temple St, Room 1362
Los Angeles CA 90012
commplan@planning.lacounty.gov

RE: Project No2020-000612 / East San Gabriel Valley Area Plan NOP, Initial Study, and Draft Plan Documents, April 28, 2022

Dear Ms. Kim:

The Puente Hills Habitat Preservation Authority (Habitat Authority) appreciates the opportunity to comment on the East San Gabriel Valley Area Plan (ESGVAP) NOP, Initial Study, and Draft Plan Documents.

The Habitat Authority is a public joint powers authority established pursuant to California Government Code Section 6500 *et seq.* with a Board of Directors consisting of the City of Whittier, County of Los Angeles, Sanitation Districts of Los Angeles County, and the community of Hacienda Heights. According to its mission, the Habitat Authority is dedicated to the acquisition, restoration, and management of open space in the Puente Hills for preservation of the land in perpetuity, with the primary purpose to protect the biological diversity. Additionally, the agency endeavors to provide opportunities for outdoor education and low-impact recreation.

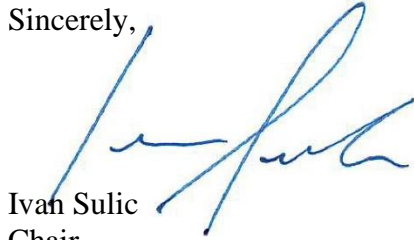
In the Puente Hills, the Habitat Authority manages the open space in its ownership as well as the open space of Board Member agencies, totaling over 3,880 acres, within the Cities of Whittier, La Habra Heights and the County unincorporated area known as Hacienda Heights. These lands are collectively referred to as the Puente Hills Preserve (Preserve) and are situated along and within the southern boundary of the ESGVAP.

The Habitat Authority's comments are included in Exhibit A.

Thank you for your consideration, and feel free to contact myself or Ecologist Michelle Mariscal (mmariscal@habitatauthority.org) at (562) 945-9003 for further discussion. Also, please maintain our agency on the contact list for this planning process.

Sincerely,

Ivan Sulic
Chair

A handwritten signature in blue ink, appearing to read 'Ivan Sulic', is written over the printed name and title.

cc: Habitat Authority Board of Directors
Citizens Technical Advisory Committee

Exhibit A

Comments on Notice of Preparation of a Draft Programmatic Environmental Impact Report, Initial Study, and Draft Planning Documents for the East San Gabriel Valley Area Plan

Brief Project Description

The proposed East San Gabriel Valley Area Plan (ESGVAP) is a community-based plan that is designed to focus on land use and policy issues that are specific to the unique characteristics and needs of the ESGV Planning Area and its communities. As a part of the project, Rowland Heights Community Plan and Hacienda Heights Community Plan will be updated and incorporated into the ESGVAP. The Project will also update to Rowland Heights Community Standards District (CSD) as well as Avocado Heights and Trailside Ranch Equestrian Districts (EQDs). In addition, the East San Gabriel Valley Planning Area boundary will be updated to include the unincorporated communities of Pellissier Village, South El Monte, and North Whittier. The ESGVAP is intended to guide long-term growth of the ESGV Planning Area, enhance community spaces, promote a stable and livable environment that balances growth and preservation, and improve the quality of life in the ESGV through the creation of vibrant, thriving, safe, healthy, and pleasant communities. Its primary goals are to: a) retain the residential character of the ESGV Planning Area in harmony with its surroundings; b) promote an active regional hub with diverse options for housing, shopping, entertainment, recreation, and services; c) develop goals, policies, and implementation programs that support smart growth, sustainable development, and thoughtful enhancement/upgrade of existing neighborhoods; d) establish more public spaces and public realm improvements; and e) encourage diversity of housing options and affordability, and economic development.

Initial Study

Section 4. Biological Resources

- Checklist item (b): “[Would the project] have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS)?”
 - Please include the following species when evaluating potential project impacts: the federally threatened Coastal California Gnatcatcher (*Poliophtila californica*), western spadefoot (*Spea hammondi*; CDFW Species of Special Concern), and all special status bat species with potential to occur in the region. For example, 11 species of bats occur on the Puente Hills Preserve, which overlaps the ESGVAP, of which several are special status species: pallid bat (*Antrozous pallidus*), western mastiff bat (*Eumops perotis californicus*), hoary bat (*Lasiurus cinereus*), western yellow bat (*Lasiurus xanthinus*), Yuma myotis (*Myotis yumanensis*), and pocketed free-tailed bat (*Nyctinomops femorosaccus*) (Remington 2006).
- Checklist item (b): “[Would the project] have a substantial adverse effect on any sensitive natural communities (e.g., riparian habitat, coastal sage scrub, oak woodlands, non-jurisdictional wetlands) identified in local or regional plans, policies, regulations or by CDFW or USFWS?”
 - The East San Gabriel Valley Area Plan (ESGVAP) includes Critical Habitat for the Coastal California Gnatcatcher as designated by the United States Fish and

Wildlife Service. Portions of Critical Habitat Units 9 and 12 overlap with and/or are adjacent to unincorporated ESGVAP communities, and therefore there is the potential for future projects to impact this species and its habitat. Please include an evaluation of potential impacts to this species and its designated critical habitat in the PEIR.

- Checklist item (d) is typically “[Would the project] interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?”. However, it appears that information pertaining to wildlife corridors was included in checklist item (c) inadvertently, and item (d) is an entirely different checklist item pertaining to woodlands.
 - Please thoroughly evaluate checklist item (c) (impacts to wetlands) and impacts to wildlife corridors separately in the PEIR.
 - We agree with the Initial Study that the Project has the potential to interfere substantially with the movement of native resident or migratory wildlife species or with established native resident or migratory wildlife corridors. The ESGVAP includes portions of the Puente-Chino Hills Wildlife Corridor along its southern boundary. Due to topography and current levels of development, Hacienda Heights, an unincorporated ESGVAP community, includes one of the narrowest stretches of the wildlife corridor (CBI 2005), particularly along Hacienda Boulevard near the Preserve boundary. Future projects have the potential to impact landscape connectivity for wildlife by further constraining the linkage between open space in this area. Please consider incorporating wildlife specific crossing structures as mitigation for potential impacts to wildlife movement corridors resulting from ESGVAP implementation, particularly increased development and increased traffic resulting from that development.

Draft Planning Documents (Habitat Authority comments are in strikethrough and italics)
Land Use Element (and associated maps)

- Please consider changing the Land Use Designation for the following areas/parcels to Open Space-Conservation (OS-C), accompanied by a compatible zoning update, to reflect their location within the Puente-Chino Hills Wildlife Corridor and proximity to adjacent Open Space-Conservation lands:
 - Rowland Heights- the southwestern portion, also known as the Aera property (APNs 8269-001-016 and 8269-001-004). This area is directly adjacent to LA County’s only undercrossing structure which was specifically built to facilitate safe wildlife movement beneath Harbor Blvd. These parcels are crucial for maintaining connectivity between the Puente Hills and Chino Hills for wildlife movement. Even low-density housing introduces edge effects and fragmentation that will cause wildlife avoidance.
 - Hacienda Heights- the International Buddhist Progress Society parcel (APN 8204-036-021). The Puente-Chino Hills Wildlife Corridor is at its narrowest width through the stretch where this parcel is located, therefore conserving it is crucial for wildlife connectivity. It also contains intact oak woodland and other native habitats.

Natural Resources, Conservation & Open Space Element

- Pg. 2, Organization: Typo identified in italics- “The Natural Resources, Conservation, and Open Space Element is divided into ~~three~~ *four* separate sections.”
- Pg. 2, Section 1. Open Space Resources:
 - Consider revising the following sentences: “Open space resources consist of largely undeveloped publicly- and privately-held lands and waters preserved in perpetuity for *conservation, education and passive recreation, which may include trails for hiking, biking, and equestrians* ~~open space, recreational, and educational use~~. The lands also generally contain biological, water and scenic resources. ~~The primary goal of open space lands is conservation and passive recreation, which may include trails for hiking, biking, and equestrians.~~”
- Pg. 3, Public Joint Powers Authorities:
 - Joint Powers Authorities are local government agencies. For example, WCCA and the Habitat Authority are not considered nonprofit 501c3 organizations – however, like all government they are not for profit agencies. Please re-word this section accordingly.
- Pg. 3, Public Joint Powers Authorities, Puente Hills Habitat Preservation Authority (PHHPA):
 - “The land is almost entirely designated as Very High *Fire Hazard Severity Zone* [...]”
 - Our agency has restored almost 250 acres of habitat to improve its ecological value and facilitate wildlife movement. Please also consider including information about the diversity of biological resources on the lands managed by the Habitat Authority. For example: “To date, the PHHPA manages 3,880 acres of preserved public open space *including habitat for many sensitive and threatened species of plants and animals.*”
- Pg. 9, Open Space, Goals and Policies:
 - The proposed Goals and Policies for the Open Space subsection are heavily focused on trails, access and recreation, which diverts focus from conservation and natural resources expected to be addressed in this Open Space section. Much of the information in this subsection is redundant with the Parks and Recreation Element, where it is more appropriately focused.
- Pg. 12, Open Space, Goal 5: Open spaces and trails are managed to ensure habitat protection.
 - The Habitat Authority appreciates that consideration is given towards avoiding impacts of recreation on sensitive natural resources demonstrated by the policies listed under this goal. However, we would like to point out that the ability to implement these policies becomes logistically infeasible as trail connectivity and access is increased as advocated in the previous goals and policies. Please address these limitations in the Implementation Actions & Programs section, or elsewhere as appropriate.
- Pg. 19, Biological Resources, Coastal Sage Scrub:
 - The ESGVAP includes Critical Habitat for the Coastal California Gnatcatcher as designated by the United States Fish and Wildlife Service. Please include this information in this section.
- Pg. 27, Biological Resources, Wildlife Vehicle Collisions:

- “Puente Hills Habitat *Preservation* Authority”

Parks and Recreation Element:

- General comment: Consideration must be given to how expanded trail access will impact lands outside the planning area (e.g., by increasing maintenance requirements of other organizations on interconnected trails, and increasing the demand for law enforcement services on interconnected trails).
- General comment: Consideration must be given to how additional trailheads will impact the immediately adjacent neighborhoods and residences (e.g., decreased residential parking, and increased vehicular traffic, noise, after-hours activity, litter, etc.)
- Pg. 3, last paragraph: “There are also other park spaces which are owned and operated by cities, conservancies, and state and federal agencies.”
 - Please add Joint Powers Authorities to this list.
- Pg. 12, Goal P/R 1: “Enhanced active and passive park and recreation opportunities for all users”
 - Please include mention that any programming does not conflict with surrounding land uses and operations, and is considerate of biological values.

References

[CBI] Conservation Biology Institute. 2005 Maintaining Ecological Connectivity Across the “Missing Middle” of the Puente-Chino Hills Wildlife Corridor. Prepared by WD Spencer

Remington, S. 2006. Bat Surveys of the Puente Hills, Los Angeles County, California. Costa Mesa, California.

City Council

Emmett Badar, Mayor
Eric Weber, Mayor Pro Tem
Denis Bertone
John Ebner
Ryan A. Vienna

City Manager

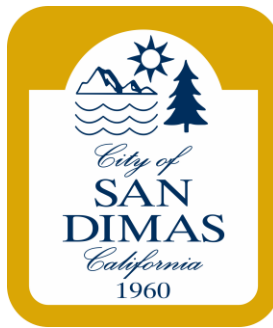
Chris Constantin

Assistant City Manager

Brad McKinney

City Attorney

Jeff Malawy



**Director of
Administrative Services**
Michael O'Brien

**Director of
Community Development**
Henry K. Noh

**Director of Parks and
Recreation**
Scott Wasserman

Director of Public Works
Shari Garwick

May 31, 2022

SENT VIA EMAIL

Mi Kim
County of Los Angeles
Department of Regional Planning
320 West Temple Street, Room 1362
Los Angeles, CA 90012

Subject: Comments on Notice of Preparation (NOP) of a Draft Program Environmental Impact Report and Notice of Public Scoping Meeting for the East San Gabriel Valley Area Plan.

Project/Permit Numbers: Project No. 2020-000612
Advance Planning Case No. RPPL2021013047
Environmental Assessment No. RPPL2022003550
General Plan Amendment No. RPPL2022003554
Zone Change No. RPPL2022003557

Dear Ms. Kim:

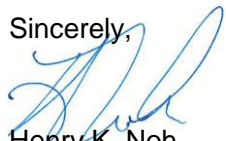
The City of San Dimas appreciates the opportunity to review and provide comments on the above referenced environmental document that proposes land use changes for properties within the unincorporated communities of East, West & Northeast San Dimas, which are adjacent to the City of San Dimas. The following comments are based on the environmental documents released for public review on April 28, 2022.

1. The DPEIR is not clear on the proposed changes for the Northeast San Dimas community. Please update the project description and maps to include changes to the properties within the Northeast San Dimas community.
2. The DPEIR shall analyze the AM and PM peak periods as well as the average daily conditions for all study area locations, specifically for the proposed changes to the West San Dimas community which propose to increase density and population.
3. The DPEIR shall provide a cumulative analysis, as it relates to density, traffic, noise and other associated impacts, that includes recently approved land use changes for Arrow Highway within the City of Glendora.

4. Proposed land use and zone changes for the Southwest corner of Arrow Highway and South Valley Center shall be consistent with properties located in the City of Glendora along the north side of Arrow Highway, which allow up to 25 dwelling units per acre and up to three stories or 35 feet in height. As proposed, the land use changes would double the density and height limit than what is allowed on the north side of Arrow Highway, which may result in significant impacts and inconsistent land use planning.
5. The City of San Dimas strongly recommends not changing the Land Use changes (H9 to CG) or Zone changes (R-A to C-1) for properties along San Dimas Canyon Road or Juanita/Damien. These properties are in the middle of established single family residential neighborhoods. The uses allowed in the C-1 zone would not be compatible with the existing single family residential uses. In addition, if the goal is to create access to commercial uses for the surrounding residential neighborhoods, there already is an existing commercial center at the northwest corner of Bonita Ave and San Dimas Canyon Road. This center is less than a ¼ mile from Juanita/San Dimas Canyon Road where one of the changes is proposed. The center includes approximately 18,000 square feet of commercial space which includes a neighborhood market, and two vacant units. Creating commercial zones in the middle of established residential neighborhoods would disrupt the character of the existing residential neighborhood, and is not warranted when there is an existing commercial center within walking distance that would meet this need.
6. Consider changing the property addressed 750 E. Foothill Boulevard, which has an existing H9 – Residential Land Use designation to Commercial to continue the existing land use and zoning designation to the east. However, we only recommend this change if the uses allowed would be compatible with the uses allowed within our CH- Commercial Highway zone, which can be found at following: https://library.qcode.us/lib/san_dimas_ca/pub/municipal_code/item/title_18-chapter_18_92. This will allow a consistent continuation of uses along Foothill Boulevard.
7. The City of San Dimas strongly recommends that all property owners within 500 feet of the affected properties be notified of all community meetings, availability of environmental documents, and public hearings to allow appropriate opportunity for community engagement and voice any concerns they may have.
8. Additional comments may be provided upon review of the DPEIR when it's made available for public review.

Thank you again for the opportunity to comment on the NOP. We look forward to reviewing the DPEIR when released for public review, at which point additional comments may be provided. Please feel free to contact Luis Torrico, Planning Manager at (909) 394-6208 or via email at ltorrico@sandimasca.gov if you have any questions or need further explanation on any of the comments in this letter.

Sincerely,



Henry K. Noh

Director of Community Development City Council



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:

May 24, 2022

commplan@planning.lacounty.gov

Mi Kim, Regional Planner

County of Los Angeles, Regional Planning Department

320 West Temple Street, Room 1354

Los Angeles, California 90012

Notice of Preparation of a Draft Program Environmental Impact Report for the East San Gabriel Valley Area Plan (Proposed Project)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. Our comments are recommendations on the analysis of potential air quality impacts from the Proposed Project that should be included in the Draft Program Environmental Impact Report (PEIR). Please send a copy of the Draft PEIR upon its completion and public release directly to South Coast AQMD as copies of the Draft PEIR submitted to the State Clearinghouse are not forwarded. **In addition, please send all appendices and technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all emission calculation spreadsheets, and air quality modeling and health risk assessment input and output files (not PDF files). Any delays in providing all supporting documentation for our review will require additional review time beyond the end of the comment period.**

CEQA Air Quality Analysis

Staff recommends that the Lead Agency use South Coast AQMD's CEQA Air Quality Handbook and website¹ as guidance when preparing the air quality and greenhouse gas analyses. It is also recommended that the Lead Agency use the CalEEMod² land use emissions software, which can estimate pollutant emissions from typical land use development and is the only software model maintained by the California Air Pollution Control Officers Association.

South Coast AQMD has developed both regional and localized significance thresholds. South Coast AQMD staff recommends that the Lead Agency quantify criteria pollutant emissions and compare the emissions to South Coast AQMD's CEQA regional pollutant emissions significance thresholds³ and localized significance thresholds (LSTs)⁴ to determine the Proposed Project's air quality impacts. The localized analysis can be conducted by either using the LST screening tables or performing dispersion modeling.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road

¹ South Coast AQMD's CEQA Handbook and other resources for preparing air quality analyses can be found at: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>.

² CalEEMod is available free of charge at: www.caleemod.com.

³ South Coast AQMD's CEQA regional pollutant emissions significance thresholds can be found at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>.

⁴ South Coast AQMD's guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips, and hauling trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers and air pollution control devices), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis. Furthermore, emissions from the overlapping construction and operational activities should be combined and compared to South Coast AQMD's regional air quality CEQA *operational* thresholds to determine the level of significance.

If the Proposed Project generates diesel emissions from long-term construction or attracts diesel-fueled vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment⁵.

The California Air Resources Board's (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective*⁶ is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process with additional guidance on strategies to reduce air pollution exposure near high-volume roadways available in CARB's technical advisory⁷.

The South Coast AQMD's *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*⁸ includes suggested policies that local governments can use in their General Plans or through local planning to prevent or reduce potential air pollution impacts and protect public health. It is recommended that the Lead Agency review this Guidance Document as a tool when making local planning and land use decisions.

Mitigation Measures

In the event that the Proposed Project results in significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize these impacts. Any impacts resulting from mitigation measures must also be analyzed. Several resources to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project include South Coast AQMD's CEQA Air Quality Handbook¹, South Coast AQMD's Mitigation Monitoring and Reporting Plan for the 2016 Air Quality Management Plan⁹, and Southern California Association of Government's Mitigation Monitoring and Reporting Plan for the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy¹⁰.

⁵ South Coast AQMD's guidance for performing a mobile source health risk assessment can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>.

⁶ CARB's *Air Quality and Land Use Handbook: A Community Health Perspective* can be found at: <http://www.arb.ca.gov/ch/handbook.pdf>.

⁷ CARB's technical advisory can be found at: <https://www.arb.ca.gov/ch/landuse.htm>.

⁸ South Coast AQMD. 2005. *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*. Available at: <http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf>.

⁹ South Coast AQMD's 2016 Air Quality Management Plan can be found at: <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf> (starting on page 86).

¹⁰ Southern California Association of Governments' 2020-2045 RTP/SCS can be found at: https://www.connectsocial.org/Documents/PEIR/certified/Exhibit-A_ConnectSoCal_PEIR.pdf.

South Coast AQMD staff is available to work with the Lead Agency to ensure that air quality, greenhouse gas, and health risk impacts from the Proposed Project are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at lsun@aqmd.gov.

Sincerely,

Lijin Sun

Lijin Sun

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS

LAC220426-03

Control Number

From: [Mi Kim](#)
To: [Ryan Nordness](#)
Subject: RE: SB18 notice for REQUEST CONSULTATION ON TRADITIONAL TRIBAL CULTURAL PLACES FOR LOS ANGELES COUNTY EAST SAN GABRIEL VALLEY AREA PLAN (ESGVAP)
Date: Monday, June 13, 2022 12:19:21 PM

Dear Mr. Nordness,

Thank you! – we appreciate your review of the additional information provided. We will be sure to add you to the contact list for this project.

Regards,

Mi

Mi Kim (she/her/hers)
SUPERVISING REGIONAL PLANNER, Community Studies East

From: Ryan Nordness <Ryan.Nordness@sanmanuel-nsn.gov>
Sent: Monday, June 13, 2022 11:39 AM
To: Mi Kim <mkim@planning.lacounty.gov>
Subject: RE: SB18 notice for REQUEST CONSULTATION ON TRADITIONAL TRIBAL CULTURAL PLACES FOR LOS ANGELES COUNTY EAST SAN GABRIEL VALLEY AREA PLAN (ESGVAP)

CAUTION: External Email. Proceed Responsibly.

Hello Mi Kim,

Thank you for contacting the Yuhaaviatam of San Manuel Nation (formerly known as the San Manuel Band of Mission Indians) regarding the above referenced project. YSMN appreciates the opportunity to review the project documentation, which was received by our Cultural Resources Management Department on June 2nd 2022. The project is located within Serrano ancestral territory, and the area for the project is of interest, but Tribe sees no conflicts with the zoning changes at this time. However, when specific projects are planned and implemented, YSMN might have comments and/or request formal consultation with the Lead Agency pursuant to CEQA (as amended, 2015) and CA PRC 21080.3.1.

This communication concludes YSMN's input on this project, at this time, and no additional consultation under SB18 is required. If you should have any further questions with regard to this matter, please do not hesitate to contact me at your convenience, as I will be your Point of Contact (POC) for YSMN with respect to this project.

Respectfully,

Ryan Nordness

From: Mi Kim <mkim@planning.lacounty.gov>
Sent: Thursday, June 2, 2022 3:23 PM
To: Ryan Nordness <Ryan.Nordness@sanmanuel-nsn.gov>
Subject: RE: SB18 notice for REQUEST CONSULTATION ON TRADITIONAL TRIBAL CULTURAL PLACES FOR LOS ANGELES COUNTY EAST SAN GABRIEL VALLEY AREA PLAN (ESGVAP)

Hello Mr. Nordness,

My apologies for the belated reply.

Thank you for your reviewing project documents.

Please see attached maps of the requested areas and let us know if you have any concerns and/or recommendations regarding cultural resources and spaces in the area.

We look forward to hearing from you.

Thank you!

Regards,
Mi

Mi Kim (she/her/hers)
SUPERVISING REGIONAL PLANNER, Community Studies East

From: Ryan Nordness <Ryan.Nordness@sanmanuel-nsn.gov>

Sent: Wednesday, May 11, 2022 3:57 PM

To: Mi Kim <mkim@planning.lacounty.gov>

Subject: SB18 notice for REQUEST CONSULTATION ON TRADITIONAL TRIBAL CULTURAL PLACES FOR LOS ANGELES COUNTY EAST SAN GABRIEL VALLEY AREA PLAN (ESGVAP)

CAUTION: External Email. Proceed Responsibly.

Hello Mi Kim,

Thank you for sending over the documents outlining the proposed ESGVAP rezoning program. Several spaces within this proposal are within Serrano ancestral territory and because of that we request more detailed maps for the Northeast San Dimas, East San Dimas, North Pomona, West Claremont, and North Claremont project areas to determine if they overlap any known cultural resources or spaces with high sensitivity for cultural resources.

Respectfully,
Ryan Nordness

Ryan Nordness

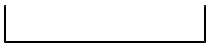
Cultural Resource Analyst

Ryan.Nordness@sanmanuel-nsn.gov

O:(909) 864-8933 Ext 50-2022

M:(909) 838-4053

26569 Community Center Dr Highland, California 92346



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