

Appendix A
**Notice of Preparation &
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: West San Gabriel Valley Area Plan

Lead Agency: County of Los Angeles Contact Person: Evan Sensibile
 Mailing Address: 320 West Temple Street, Room 1362 Phone: (213) 974-6425
 City: Los Angeles Zip: 90012 County: Los Angeles

Project Location: County: Los Angeles City/Nearest Community: West San Gabriel Valley
 Cross Streets: N/A Zip Code: Several
 Longitude/Latitude (degrees, minutes and seconds): _____ ° _____ ' _____ " N / _____ ° _____ ' _____ " W Total Acres: 14,848
 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: GHG Emissions

Present Land Use/Zoning/General Plan Designation:
Several

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

The West San Gabriel Valley Area Plan (WSGVAP) is a new community-based plan that focuses on land use and policy issues that are specific to the unique characteristics and needs of the West San Gabriel Valley Planning Area and its communities. The WSGVAP is intended to guide long-term growth within the WSGV Planning Area by encouraging development of housing options and affordability, preserving/sustaining open space, protecting community health, safety, and general welfare, increasing access to community amenities, and promoting areas suitable for growth. Goals, policies, and implementation programs would be developed for the WSGVAP to support these objectives, especially to support smart growth and sustainable development throughout the WSGV Planning Area.

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 type="checkbox"/> Caltrans Division of Aeronautics	<input checked="" type="checkbox"/> Regional WQCB # <u>4</u>
<input 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 November 14, 2023 Ending Date December 22, 2023

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, CA 90012</u>
Contact: <u>Marlie Long</u>	Phone: <u>213.974.6425</u>
Phone: <u>619.719.4197</u>	

Signature of Lead Agency Representative:  Date: 11/9/2023

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

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

DATE: November 14, 2023

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 for the West San Gabriel Valley Area Plan

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 West San Gabriel Valley Area Plan (WSGVAP, Area Plan, or Project). 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. The public comment period associated with the release of this NOP will commence on **Tuesday, November 14, 2023**, and end on **Friday, December 22, 2023**.

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: West San Gabriel Valley Area Plan

PROJECT/PERMIT NUMBERS: Project No. PRJ2023-003982
Environmental Assessment No. RPPL2023005884
Advance Planning Case No. RPPL2023005880
General Plan Amendment No. RPPL2023005882
Zone Change No. RPPL2023005883

PROJECT APPLICANT: Los Angeles County

PROJECT LOCATION. The West San Gabriel Valley (WSGV) Planning Area is one of the County's 11 Planning Areas identified in the County General Plan (General Plan). The WSGV Planning Area encompasses 23.2 square miles within the southeast portion of Los Angeles County and is bound by the Antelope Valley Planning Area and the San Gabriel Mountains to the north, the East San Gabriel Valley Area Planning Area to the east, the Gateway Planning Area to the south, and the Metro and San Fernando Valley Planning Areas to the west. The WSGV Planning Area includes the following nine unincorporated communities of the County: Altadena, East Pasadena-East San Gabriel, Kinneloa Mesa, La Crescenta-Montrose, San Pasqual, South Monrovia Islands, South San Gabriel, Whittier Narrows, and South El Monte Island. Collectively, these communities are referred to as the "WSGVAP Communities." The WSGV Planning Area and its associated communities are identified on **Figure 1, Regional Location with WSGVAP Communities.**

PROJECT DESCRIPTION. The West San Gabriel Valley Area Plan (WSGVAP) is a new community-based plan that focuses on land use and policy issues that are specific to the unique characteristics and needs of the WSGV Planning Area and its communities. The WSGVAP is intended to guide long-term growth within the WSGV Planning Area by encouraging development of housing options and affordability, preserving/sustaining open space, protecting community health, safety, and general welfare, increasing access to community amenities, and promoting areas suitable for growth. Goals, policies, and implementation programs would be developed for the WSGVAP to support these objectives, especially to support smart growth and sustainable development throughout the WSGV Planning Area. The WSGVAP would execute these goals primarily through, but not limited to, the following Project components:

General Plan Amendment No. RPPL2023005882. The General Plan Amendment would establish the WSGVAP as part of the County General Plan. The WSGVAP would create goals and policies for the unincorporated area communities of Altadena, East Pasadena-East San Gabriel, Kinneloa Mesa, La Crescenta-Montrose, San Pasqual, South Monrovia Islands, South San Gabriel, Whittier Narrows, and South El Monte Island. This new area plan includes the following:

- Areawide goals and policies with respect to the following topics, including but not limited to: Land Use, Mobility, Conservation and Open Space, Public Services and Facilities, Economic Development, and Historic Preservation.
- Areawide Implementation Programs.
- Community chapters, as needed, with additional goals, policies, and implementation programs that are community-specific, addressing planning issues that are unique to a particular geographic community and cannot be addressed through areawide goals, policies, and programs.
- Update and incorporation of the existing Altadena Community Plan into the WSGVAP as a community chapter.

- Updates to the land use policy map which, at the minimum, would:
 - 1) Incorporate the proposed land use policy changes as identified in the Housing Element;
 - 2) Maintain consistency between zoning and land use policy;
 - 3) Redesignate certain residential and commercial areas to facilitate additional housing and local-serving businesses; and
 - 4) Utilize the General Plan Land Use Legend.

Zone Change No. RPPL2023005883. The Zone Change would:

- Update the zoning map for the Project area to maintain consistency with the updated land use policy map and incorporate the proposed rezoning as identified in the Housing Element to meet the Regional Housing Needs Assessment goals for Los Angeles County.
- Rezone certain A-1 parcels that are not currently used for agricultural purposes to R-A (Residential Agricultural), R-1 (Single-Family Residence), R-2 (Two-Family Residence), or OS (Open Space) as well as rezone certain areas identified for growth along major corridors and near major transit stops as appropriate.

Advance Planning Case No. RPPL2023005880. Amend Title 22 (Planning and Zoning Code) 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. The proposed amendments to Title 22 would:

- Establish a Planning Area Standards District to reorganize development standards that are applicable to the unincorporated communities in the WSGV Planning Area under one division and establish new planning area wide standards and/or community-specific standards, as-needed.
- Assess, update, and revise the following existing community standards districts (CSDs): East Pasadena-East San Gabriel, La Crescenta-Montrose, Altadena, and South San Gabriel to bring them into conformance with the goals and policies of the Area Plan.

The WSGVAP anticipates a buildout horizon of 2045, meaning that the capacity for additional growth anticipated through the implementation of the WSGVAP is anticipated to be fully developed by 2045.

POTENTIAL ENVIRONMENTAL EFFECTS OF THE PROJECT. As permitted by State CEQA Guidelines Section 15060(d), the County decided not to prepare an Initial Study and will begin work directly on the Draft PEIR because it has determined that a PEIR is required for the proposed Project. 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, Geology/Soils, Greenhouse Gas (GHG) Emissions, Hazards/Hazardous Materials,

Notice of Preparation of a Draft PEIR and Public Scoping Meeting

November 14, 2023

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Hydrology/Water Quality, Land Use/Planning, Mineral Resources, Noise, Population/Housing, Public Services, Recreation, Transportation, Tribal Cultural Resources, Utilities/Service Systems, and Wildfire.

NOTICE OF PUBLIC SCOPING MEETING. Consistent with Assembly Bill 361, which allows teleconference provisions for local agency meetings, the County will conduct one 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 WSGVAP, the environmental review process, and schedule. The Project’s Scoping Meeting will be held virtually, online via Zoom Webinar on **December 14th, starting at 6:30pm.**

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

planning.lacounty.gov/long-range-planning/wsgvap/documents/

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

Evan Sensibile, Regional Planner
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
wsgvap@planning.lacounty.gov

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

planning.lacounty.gov/long-range-planning/wsgvap/documents/ or

planning.lacounty.gov/environmental-review/public-notice/ (under “Advance Planning Projects”)

Notice of Preparation of a Draft PEIR and Public Scoping Meeting

November 14, 2023

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

Altadena Library	600 E Mariposa St	Altadena, CA	91001
Hastings Library	3325 E Orange Grove Blvd	Pasadena, CA	91107
La Crescenta Library	2809 Foothill Blvd	La Crescenta, CA	91214
Lamanda Park Library	140 S Altadena Drive	Pasadena, CA	91107
Live Oak Library	22 W Live Oak Ave	Arcadia, CA	91007
Montrose Library	2465 Honolulu Ave	Montrose, CA	91020
South El Monte Library	1430 North, Central Ave	South El Monte, CA	91733
Temple City Library	5939 Golden West Ave	Temple City, CA	91780

The hours of operation at each library vary. Please see the County library website to confirm this information before visiting: <https://lacountylibrary.org/>. For libraries not affiliated with the County, please confirm hours of operation using the library's website or phone line.

PROJECT WEBSITE. Visit the WSGVAP website for more information: <https://planning.lacounty.gov/long-range-planning/wsgvap/>.

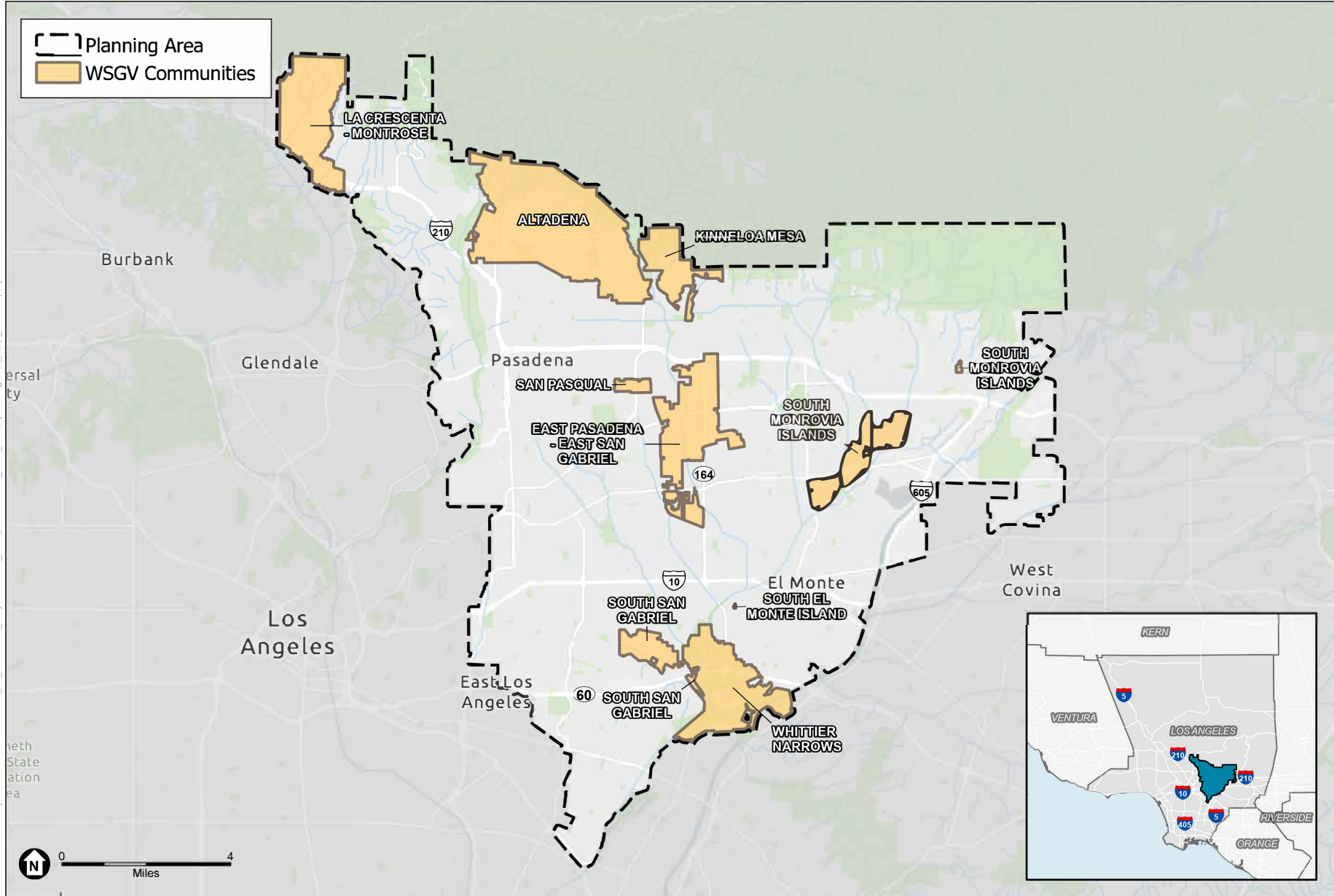
Thank you for your participation in the environmental review of this Project.

For more information about the West San Gabriel Valley Area Plan and Programmatic Environmental Impact Report (PEIR) visit: planning.lacounty.gov/long-range-planning/wsgvap/ or email wsgvap@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/long-range-planning/wsgvap/documents/ or planning.lacounty.gov/environmental-review/public-notice/.

Si desea conocer más información sobre el Plan del Área Oeste del Valle de San Gabriel y sobre el Informe Programático de Impacto Ambiental (PEIR, por sus siglas en inglés) visite la página web: planning.lacounty.gov/long-range-planning/wsgvap/, envíe un correo electrónico a wsgvap@planning.lacounty.gov o llame al (213) 974-6427 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/long-range-planning/wsgvap/documents/ o planning.lacounty.gov/environmental-review/public-notice/.

如需 West 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/long-range-planning/wsgvap/、傳送電郵至 wsgvap@planning.lacounty.gov 或致電(213)974-6427 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/long-range-planning/wsgvap/documents/ 或 planning.lacounty.gov/environmental-review/public-notice/。

ATTACHMENTS: **Figure 1: Regional Location with WSGVAP Communities**



SOURCE: Los Angeles DPR, 2023; ESA, 2023.

West San Gabriel Valley Area Plan

Regional Location with WSGVAP Communities





COUNTY OF LOS ANGELES
DEPARTMENT OF PARKS AND RECREATION

"Parks Make Life Better!"

Norma E. García-González, Director

Alina Bokde, Chief Deputy Director

December 22, 2023

TO: Evan Sensibile
Department of Regional Planning

FROM: Jui Ing Chien *JIC*
Planning and CEQA Section

SUBJECT: **WEST SAN GABRIEL VALLEY AREA PLAN
NOTICE OF PREPARATION OF A DRAFT PROGRAM
ENVIRONMENTAL IMPACT REPORT**

The Notice of Preparation of the draft Program Environmental Impact Report (PEIR) for the West San Gabriel Valley Area Plan (WSGV) has been reviewed for potential impacts on the facilities of the Los Angeles County Department of Parks and Recreation (DPR). Our understanding is that the Project will provide a new community-based plan to guide long-term growth within the WSGV Planning Area by encouraging development of housing options and affordability, preserving/sustaining open space, protecting community health, safety, and general welfare, increasing access to community amenities, and promoting areas suitable for growth. Please find below DPR's comments to inform the development of the draft PEIR for the Project:

Zone Change No. RPPL2023005883

The proposed Project would incorporate the proposed rezoning as identified in the Housing Element to satisfy the regional housing needs for the County, as well as rezoning certain agricultural parcels to residential uses and rezoning certain areas for growth along major corridors and transit stops. In accordance with the 2016 Los Angeles Countywide Park Needs Assessment (PNA), certain study areas in the WSGV have high levels of park need, and the impact of the proposed project should take this into account in the PEIR analysis. As shown in the following table, the WSGV includes unincorporated communities which correspond to various study areas established as part of the 2016 PNA.

West San Gabriel Valley Community	PNA Study Area	Park Need Level	Park Acres per 1,000	Park Accessibility (% of population living within 1/2 mile of a park)	DPR Facilities located within the Community
Altadena	Unincorporated Altadena	Low	0.9	32	<ul style="list-style-type: none"> • Charles S. Farnsworth Park • Charles white Park

West San Gabriel Valley Community	PNA Study Area	Park Need Level	Park Acres per 1,000	Park Accessibility (% of population living within 1/2 mile of a park)	DPR Facilities located within the Community
					<ul style="list-style-type: none"> • Loma Alta Park • Loma Alta Park Staging Area and Trailhead • Altadena Crest Trail • Altadena Triangle Park • Altadena Golf Course
East Pasadena-East San Gabriel	Unincorporated San Pasqual/ Unincorporated East Pasadena	Very Low	0.8	28	<ul style="list-style-type: none"> • Michillinda Park
	Unincorporated East San Gabriel/ Unincorporated Arcadia	Very High	0.1	15	<ul style="list-style-type: none"> • Michillinda Park
Kinneloa Mesa	City of Pasadena - Eastside / Unincorporated Kinneloa Mesa	Moderate	1.4	51	<ul style="list-style-type: none"> • Eaton Canyon Natural Area and Nature Center • Eaton Canyon Equestrian Park • Eaton Canyon Trailhead • Eaton Canyon Golf Course • Eaton Canyon Trail • Hastings Debris Basin Trail
La Crescenta-Montrose	Unincorporated La Crescenta - Montrose	Very Low	2.3	18	<ul style="list-style-type: none"> • Two Strike County Park • Pickens Canyon Park
San Pasqual	Unincorporated San Pasqual/ Unincorporated East Pasadena	Very Low	0.8	28	<ul style="list-style-type: none"> • Michillinda Park
South Monrovia Islands	Unincorporated El Monte/ Unincorporated Monrovia	Low	0.2	56	<ul style="list-style-type: none"> • Pamela County Park • Santa Anita Wash Trail
South San Gabriel	Unincorporated Sunrise Village-South San Gabriel-Whittier Narrows	Low	5.7	19	<ul style="list-style-type: none"> • Whittier Narrows Recreation Area
Whittier Narrows	Unincorporated Sunrise Village-South San Gabriel-Whittier Narrows	Low	5.7	19	<ul style="list-style-type: none"> • Whittier Narrows Recreation Area • Rio Hondo River Trail • San Gabriel River Trail
South El Monte Island	City of South El Monte/ Unincorporated El Monte/ Unincorporated Whittier Narrows	Low	0.7	36	

The County General Plan establishes a goal of four (4) acres of local parkland per 1,000 residents of the population in the unincorporated areas and a goal of six (6) acres of regional parkland per 1,000 residents of the total population of Los Angeles County. In addition, pursuant to the Quimby Act and to the County's Subdivision Code, new

residential subdivisions must dedicate parkland or pay in-lieu fees (or both, in some circumstances) to enable the County to maintain a ratio of three (3) acres of local parkland for every 1,000 residents. Please note that the Quimby Act and the County's Subdivision Code only apply to residential subdivisions and therefore do not apply to non-subdivision residential projects, such as an apartment complex proposed on a single parcel of land.

Los Angeles Countywide Parks Needs Assessment

The PEIR should also consider the following DPR documents in the analysis:

- 2016 Los Angeles Countywide Parks Needs Assessment (PNA): Adopted by the Los Angeles County Board of Supervisors on July 5, 2016, the PNA is a comprehensive study of the diverse park and recreation needs in cities and unincorporated communities across the county. Prepared by DPR, the PNA gathered data to determine the scope, scale, and location of park need in Los Angeles County. Since its completion in 2016, the PNA has been invaluable in informing planning, decision-making, and resource allocation for parks and recreation. Please refer to the 2016 PNA final reports, that include park need data for the unincorporated communities within the West San Gabriel Valley Planning Area: <https://lacountyparkneeds.org/final-report/>
- 2022 Los Angeles Countywide Parks Needs Assessment Plus (PNA+): Adopted by the Board of Supervisors on December 6, 2022, the PNA+ complements and offers new information not previously included in the 2016 PNA. Specifically, PNA+ includes data about access to regional parks, open space, trails, beaches and lakes, and local parks in rural areas, as well as mapping and analyses related to population vulnerability, environmental benefits, environmental burdens, and priority areas for environmental. Please refer to Appendix A which contains specific report for the West San Gabriel Valley Study Area and incorporate relevant data and recommendations from the report: West San Gabriel Valley Area: https://lacountyparkneeds.org/wp-content/uploads/2023/03/AppA_RegionalProfiles_WestSanGabrielValley_Dec2022.pdf
- Puente Hills Landfill and Master Plan: Approved by the Los Angeles County Board of Supervisors on October 25, 2016, the Puente Hills Landfill Park Master Plan seeks to transform over 140 acres of the former landfill into a regional park. While not located within the WSGV Planning Area, the proposed park is just outside the boundary at the southeast corner. The regional park will be a "Park for All", offering recreational, educational, and cultural opportunities to a diverse audience. The plan is to ultimately develop a premiere destination park in the San Gabriel Valley that celebrates the site's unique history, technological innovation, urban-wildland location, scale, and topography. Located at the southern edge of the San Gabriel Valley, this future regional park will serve the residents across San Gabriel Valley and beyond. Please use the link to access project information: <https://puentehillslandfillpark.org/>

Mitigation Measures

To address potential significant impacts on existing recreational resources, the PEIR should include mitigation measures that would ensure that future impacts to parks, open space, and recreation lands are minimized. Project proponents must notify DPR in advance of the nature, extent, and duration of construction activities that may affect parks, trails, and other facilities operated and maintained by DPR.

Open Space and Recreation Resources Map

The PEIR should include a map identifying the locations of all existing open space and recreation lands in the Project study area, including public parks, recreational facilities, and other open space and recreational areas owned/maintained by local, state, federal agencies, non-profit organizations, and other entities.

Thank you for including DPR in this environmental review process. If we may be of further assistance, please contact Ms. Jui Ing Chien, Park Planner, at (626) 588-5317 or by email at jchien@parks.lacounty.gov.



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:

December 22, 2023

wsgvap@planning.lacounty.gov

Evan Sensibile, Regional Planner
County of Los Angeles
Department of Regional Planning
320 West Temple Street, Room 1362
Los Angeles, CA 90012

Notice of Preparation of a Draft Program Environmental Impact Report for the West 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 (EIR). Please send a copy of the Draft Program EIR upon its completion and public release directly to South Coast AQMD as copies of the Draft Program EIR 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 (electronic versions of all emission calculation spreadsheets, 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

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>.

heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road 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.

In the event that implementation of the Proposed Project requires a permit from South Coast AQMD, South Coast AQMD should be identified as a Responsible Agency for the Proposed Project in the Draft EIR. The assumptions in the air quality analysis in the EIR will be the basis for evaluating the permit under CEQA and imposing permit conditions and limits. Questions on permits should be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385.

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 Handbook,⁹ South Coast AQMD's Mitigation Monitoring and Reporting Plan for the 2022 Air Quality Management Plan,¹⁰ and Southern California Association of

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 <https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>

¹⁰ South Coast AQMD's 2022 Air Quality Management Plan can be found at: <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan> (Chapter 4 - Control Strategy and Implementation).

Government's Mitigation Monitoring and Reporting Plan for the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy.¹¹.

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 swang1@aqmd.gov.

Sincerely,

Sam Wang

Sam Wang

Program Supervisor, CEQA IGR

Planning, Rule Development & Implementation

SW

LAC231115-04

Control Number

¹¹ 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.

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protecting, and
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ATTN: EVAN SENSIBLE
LOS ANGELES COUNTY
DEPARTMENT OF REGIONAL PLANNING
320 WEST TEMPLE ST.
LOS ANGELES, CA 90012

December 22nd, 2023

Los Angeles County West San Gabriel Valley Area Plan

Arroyos & Foothills Conservancy (AFC) appreciates the opportunity to provide comments on the LA County West San Gabriel Valley Area Plan (Plan). We like what we read and we comment in furtherance of its purposes and goals. The Plan touches on some of the points that follow but omits them in other places where it would be logical and informative to include them; otherwise they may be overlooked.

Our overarching mission of saving native habitat for wildlife is very much in alignment with the Plan's goals of preserving natural habitats and fostering wildlife connectivity. We would particularly like to direct attention to our regional initiative, the Hahamongna to Tujunga Wildlife Corridor (HTC), as an essential component in achieving these goals. The HTC is a recognized wildlife corridor and cited in authoritative publications (we will provide upon request). A map of the HTC is attached.

Hahamongna to Tujunga Wildlife Corridor Initiative

AFC works with urgency to create and enhance wildlife corridors, especially to counter the challenges faced by isolated species like mountain lions. The plight of mountain lions such as P-22 and P-41 highlights the need for safe passage between the isolated islands of natural habitat in our urban setting -- including without limitation the San Rafael Hills, Verdugo Mountains and Griffith Park -- and the San Gabriel Mountains. Wildlife corridors are required to connect these and smaller islands with a low elevation corridor along the frontage of the San Gabriels, including Altadena and La Crescenta-Montrose, via a combination of land and water routes.

Wildlife

As stated in the Plan, "wildlife" includes all native wild life -- mammals, amphibians and reptiles, birds, butterflies, bees, insects, etc. and plants. All wildlife moves, and the Plan should adequately address movement by all species. Wildlife depends on native plant species. Native plants are the backbone for the presence and movement of wildlife, virtually everywhere.

Urban conservation and Wildlife Corridors

Within the WSGV natural habitat must not only be preserved but also enhanced. Connecting islands of habitat means passage has to be recreated in an urban setting, whether by land or water. Turn back the biological clock to reclaim the prevalence of native species by rewilding.

Wildlife movement in urban settings can be complex. There are not only roads, but houses, landscaping, fences, walls, patios, pools, dogs, artificial light, noise, kids playing and people walking and talking. Likely lacking are native habitat, cover and natural water sources. Animals are not calm but wary. They do not linger but keep moving. This is not inviting for kittens, cubs and fawn, nor conducive to bed down. Urban wildlife corridors and crossings reflect these realities, requiring remedial actions.

The definitions of Habitat Linkages and Wildlife Corridors under *Regional Habitat Linkages* at page 26 should encompass corridors in the confined urban setting.

Urban conservation happens with remnants -- with bits and pieces. High priority properties are valued for their impact, not their size. We stress the significance of urban conservation, and we advocate for the inclusion of language in the Plan to support the conservation of smaller urban parcels. This inclusion could aid AFC and others obtain funding for our urban land conservation initiatives.

Habitat

- We must enhance native habitat, and not just preserve what currently exists. See *Prevent Habitat and Biodiversity Loss* at page 38.
- Maximize all opportunities to increase the native plant palette everywhere, including residential areas. (Is the Plan advisory for the incorporated areas within the WSGV or does it have no relevance to them? Can the Plan be cited effectively when pursuing its goals in incorporated areas?) Native plants in the front yard support wildlife – birds, bees, butterflies, insects and urban mammals -- and their prevalence and movement. Suggest adding to Policy C/NR 3.9 at page 33; at the top of the list under *Urban Greening Program* at page 36; under *Habitat Fragmentation* on page 38, and elsewhere.
- Drought tolerant landscaping gets us half the way toward sustainability; natives landscaping gets us all the way.
- Prioritize native trees when we seek to enhance the canopy. See page 51 under *Our County...*, page 54 under *Heat Mitigation*.
- Remove invasive species, allow natives to repopulate, and revegetate with locally sourced native plants.
- Use ecologically sensitive vegetative management practices when modifying habitat. For legally required fire fuel reduction this means removing non-native species and encouraging suitable native plants. [Let us know if a definition of ESVMS would be helpful.] Suggest adding to *Fire Risk* section at page 27.
- Restoring waterways, whether by concrete removal in drainages or otherwise, should include habitat restoration. See references to modifying “channels” at page 39; top of page 67 under *Watershed Management*.
- Soil disturbance invites the intrusion of non-native plants. Minimize soil disturbance.
- All habitat restoration requires a sustained effort over multiple years to reestablish mature plant communities over invasive species.

Biodiversity

Consider defining the biodiversity challenge as preserving, restoring and enhancing native species.

We suggest the Plan cite and consider adopting and implementing the United Nations Convention on Biodiversity recommendations.

Lighting

Lighting has a profound impact on most wildlife. New projects should be designed with the impact of lighting on wildlife in mind. Mitigation should be considered for existing development where negative impacts exist. AFC would be happy to cite authorities; please advise if desired. See *Dark Skies* on page 37.

SEAs

The San Rafael Hills should be considered for an SEA.

Collaboration

AFC has the knowledge and tools to contribute to baseline biological surveys and long-term conservation plans. AFC currently collaborates with regional jurisdictions and conservation organizations to achieve regional conservation goals and is committed to the same with LA County.

Sincerely,

A handwritten signature in black ink that reads "John". The signature is written in a cursive, flowing style.

John Howell
CEO, Arroyos & Foothills Conservancy

From: [Tim Martinez](#)
To: [West SGV Area Plan](#)
Subject: West San Gabriel Valley Area Plan Comments
Date: Friday, December 22, 2023 3:22:16 PM

CAUTION: External Email. Proceed Responsibly.

Hello,

My comments are in regard to the following parts of the WSGVAP:

"The Los Angeles County Urban Agriculture Incentive Zone (UAIZ) Program aims to put into action the UAIZ Act from the California Government Code. The goal is to boost urban agriculture by encouraging property owners in the County's urban areas to use their vacant or undeveloped land for small-scale farming" (Page 5)

Policy C/NR 9.4: Support countywide community garden and urban farming programs.

Action 130: Support the use of public and private land for urban and peri-urban agriculture, such as community gardens, by measures such as identifying available public parcels, streamlining permitting and leasing processes, and incentivizing the conversion of vacant property to agricultural use.

My comments:

Please consider how to facilitate the types of activities listed as permitted under the [Urban Agriculture Incentive Zone Program](#):

"Community gardens, nurseries, agricultural education centers, small-scale crops, and animal husbandry are just a few examples that are permitted. In limited cases, tool sheds, greenhouses, produce stands, and **instructional spaces** are acceptable structures for use with an agricultural land use under this program."

Yurts, shipping containers, and other temporary or semi-permanent structures would be ideal instructional spaces, but in my previous correspondence with the County, they have said that yurts are "not accessory to agriculture" because they are considered "habitable structures". To qualify for the Urban Agriculture Incentive Zone (UAIZ) program, the land must be vacant, and have no "habitable structures".

We cannot live in yurts in LA County, so how are these tents considered "habitable"? People have them in their backyards...

Here are a couple of County resources which refer to yurts as "temporary structures". This would indicate to me that they are not "habitable structures" as the County informed me:

"Fees will be based on the intended use of the structure, including permanently designated sites for tents, **yurts**, trailers, modulars, **and similar temporary structures.**"

https://library.municode.com/ca/los_angeles_county/codes/code_of_ordinances?nodeId=TIT32FICO_4906.3.4FUMOPLREFESC

"What types of units do not qualify for STR use? • Motorhomes, cars, or other types of

recreational vehicles; • Boats; • ADUs or any other type of habitable accessory structures;
• **Temporary or semi-permanent structures such as tents or yurts**" <https://tcc.lacounty.gov/wp-content/uploads/2021/10/Proposed%20STR%20FAQ%2010.01.21.pdf>

This is what the County wrote to me previously:

"Furthermore, please note that UAIZ is required to be on vacant land. That means absolutely NO habitable structures, and a yurt by definition is habitable. A classroom or education space can be allowed in a UAIZ project, but it should be outdoors supported by some type of shade structure rather than inside a yurt.

Also, Building and Safety requires needs building permits for any yurt structures. Anything other than storage structure is considered habitable and would need B&S permits. If the property is in any kind of fire hazard area, the Fire Department would have some requirements for a tentlike structure (onsite water tanks available for fighting fire, good access to the property, etc.) if Fire allows them at all."

If yurts are temporary structures, is the County correct in saying they would require building permits? Is the County correct that they cannot be used as an instructional space?

The UAIZ program has been a big failure. Elliott Kuhn of Cottonwood Urban Farm - a recipient of the UAIZ tax incentive, doesn't earn income from what he grows, but rather from what he knows:

"The narrow vision of urban agriculture — growing food in the city: That's not how I earn my income. I had to lean into what I know..."

[This article](#), which quotes the Los Angeles Food Policy Council, illustrates perfectly how educational programs, instructional spaces and community building are desperately needed components that should be considered if we are really trying to promote the feasibility of urban agriculture, and the other laudable goals of the County and of the UAIZ program.

I recommend the streamlining and facilitation of permitting in the County's zoning/regulations for the type of outdoor kitchens, outdoor ovens, instructional spaces such as yurts, shipping containers, and other infrastructure that can facilitate educational programs instructional spaces, and community building related to the farm or garden. Relying on "what you know" rather than "what you grow" is essential for the success of urban agriculture.

Thank you,

Tim Martinez
1404 Chamberlain Road
Pasadena, CA 91103