

# CHAPTER 2

## Response to Comments

California Code of Regulations Title 14 (State CEQA Guidelines) Section 15088(a) states, “The lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response. The lead agency shall respond to comments that were received during the noticed comment period.” In accordance with these requirements, this chapter contains the comment letters received on the Draft PEIR and provides responses to each of the written comments received during the public review period for the Draft PEIR, which began on June 27, 2024, and ended August 12, 2024. A virtual public meeting to discuss the Project was held on July 18, 2024.

**Table 2-1, *Comment Letters Received on the Draft PEIR***, provides a list of public agencies and the organization that submitted written comments on the Draft PEIR during the public review period. Several oral questions regarding the Draft PEIR were received during the virtual public meeting held on July 18, 2024. These questions/comments and responses are provided below in **Table 2-2, *Questions and Comments from the Virtual Public Meeting***.

Each written comment letter has been assigned an alphabetical designation (A through I). Each comment within each letter has been assigned a numerical designation so that each comment could be cross-referenced with an individual response. As shown in **Table 2-1, *Comment Letters Received on the Draft PEIR***, nine written comment letters were received by the County.

**TABLE 2-1  
COMMENT LETTERS RECEIVED ON THE DRAFT PEIR**

| <b>Letter #</b> | <b>Commenter</b>  | <b>Date Received</b> |
|-----------------|---|----------------------|
| A               | Department of Toxic Substances Control, Dave Kereazis, Associate Environmental Planner, HWMP Permitting Division, CEQA Unit | 07/10/2024           |
| B               | Endangered Habitats League, Dan Silver, Executive Director  | 07/29/2024           |
| C               | Los Angeles County Sanitation Districts, Patricia Horsley, Environmental Planner, Facilities Planning Department            | 08/06/2024           |
| D               | M. Calvert  | 08/07/2024           |
| E               | City of Temple City, Tony Bu, Community Development Supervisor  | 08/12/2024           |
| F               | Los Angeles County Sheriff's Department, Robert G. Luna, Sheriff  | 08/12/2024           |
| G               | Manatt, Phelps & Phillips, LLP on behalf of Enoteca, LLC  | 08/12/2024           |
| H               | Susan Maunu   | 08/12/2024           |
| I               | Dale Matsuda  | 08/13/2024           |

**TABLE 2-2  
QUESTIONS AND COMMENTS FROM THE VIRTUAL PUBLIC MEETING**

| <b>Commenter</b>   | <b>Summary of Comments/Questions</b>  | <b>Responses/Answers</b>  |
|--------------------|---|---|
| Melanie M.         | What are the “threshold” levels based on for the EIR?   | As stated within Chapter 4, Environmental Analysis, of the Draft PEIR, each impact area provides a threshold of significance within their respective section, which provides criteria for determining the significance of Project impacts. Each environmental analysis section explains what the threshold levels are based on.   |
| Sarah W.           | How are thresholds determined?  | According to Section 15064 of the CEQA Guidelines, a threshold of significance is an identifiable quantitative, qualitative or performance level of a particular environmental effect, non-compliance with which means the effect will normally be determined to be significant by the agency and compliance with which means the effect normally will be determined to be less than significant. Each public agency is encouraged to develop and publish thresholds of significance that the agency uses in the determination of the significance of environmental effects. The County of Los Angeles utilizes the State CEQA Guidelines Appendix G as its thresholds. Chapter 4, Environmental Analysis, of the Draft PEIR includes a Methodology section and a Significance Thresholds section for each resource area, detailing the significance thresholds of that chapter.  |
| Robert S.          | In the draft EIR, under what topic are impacts to night lighting covered?   | Night lighting is analyzed within Section 4.1, Aesthetics, of the Draft PEIR.   |
| Lisa M.            | Why are Wildfires considered in the No Impact or Less than Significant Impact category?   | Please refer to Section 4.20, Wildfire, of the Draft PEIR, which includes an analysis on wildfire impacts and why they were determined to be less than significant.   |
| Anonymous Attendee | How do you plan to address the public safety issues? The area is already understaffed with police or firefighters.  | Public safety is analyzed within Section 4.15, Public Services, of the Draft PEIR. Impacts to fire and police protection are analyzed in detail within this section.  |
| Melanie C.         | Isn't it true that total vehicle miles traveled are higher with the WSGVP?<br>Isn't it true that growth would be slower and add fewer residents and housing units with No Project?<br><br>If volatile organic compounds (VOCs) increase with WSGVP, doesn't this increase ozone levels when the VOC(s) combine with nitrogen?                 | Vehicle miles traveled (VMT) are analyzed within Section 4.17, Transportation, of the Draft PEIR. As shown in Table 4.17-5 within the Draft PEIR, VMT is higher in both the 2045 No Project scenario and the 2045 with Project scenario compared to VMT in 2024. However, the 2045 with Project scenario results in less total VMT per service population than the 2045 No Project scenario.<br><br>Growth would be slower and add fewer residents and housing units under the No Project Alternative, which is analyzed in Section 5, Alternatives, of the Draft PEIR. This is because the No Project Alternative would not implement the County's Updated Housing Element, which established the number of housing units the WSGV Planning Area needs to add through General Plan Amendments and Zone Changes.<br><br>VOCs and ozone are analyzed within Section 4.3, Air Quality, of the Draft PEIR. As discussed in Section 4.3, ozone is formed by the chemical reaction of VOCs and nitrogen oxides in the presence of sunlight. As detailed in Table 4.3-2 in the Draft PEIR, the Air Basin is designated as extreme non-attainment for ozone. |
| Susan M.           | Can you describe in greater detail what anticipated projects might result in Less than Significant w/Mitigation and Potentially Significant/Unavoidable Impact.<br><br>What areas of the WSGVAP do you anticipate these measures apply? Will these significant unavoidable impacts be more applicable to areas with infill or more generally? | The Draft PEIR analyzes the WSGVAP, a policy document that does not include or propose any site-specific development. Analysis at a parcel or site-specific level was not conducted, because the specific location, timing, and type of future projects proposed to be developed under the WSGVAP are unknown at this time. Future projects developed under the WSGVAP would be subject to subsequent planning and environmental review in accordance with County requirements and CEQA, which would evaluate future projects' impacts on a project-by-project basis.   |
| Lori P.            | How does this General Plan update factor in reduced availability of water, now and as water supplies from the Colorado River and our local mountains continue to decline due to climate change and prolonged droughts?  | Water availability is analyzed within Section 4.19, Utilities and Service Systems, of the Draft PEIR.   |



**Yana Garcia**  
Secretary for  
Environmental Protection



## Department of Toxic Substances Control

Meredith Williams, Ph.D., Director  
8800 Cal Center Drive  
Sacramento, California 95826-3200



**Gavin Newsom**  
Governor

### SENT VIA ELECTRONIC MAIL

July 10, 2024

Evan Sensibile  
Regional Planner  
County of Los Angeles, Department of Regional Planning  
320 West Temple Street, Room 1362  
Los Angeles, CA 90012  
[esensibile@planning.lacounty.gov](mailto:esensibile@planning.lacounty.gov)

RE: DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE WEST SAN GABRIEL VALLEY AREA PLAN, DATED JUNE 27, 2024 STATE CLEARINGHOUSE  
# [2023110351](#)

Dear Evan Sensibile,

The Department of Toxic Substances Control (DTSC) received a Draft Environmental Impact Report (DEIR) for the West San Gabriel Valley Area Plan (Plan). The Plan is community based and focuses on land use and policy issues that are specific to the unique characteristics and needs of the planning area and its communities. The Plan is intended to guide long-term growth within the planning area by encouraging development of housing options, preserving/sustaining open space, protecting community health, safety, and general welfare, increasing access to community amenities, and promoting areas suitable for growth. The Plan will include a general plan amendment and changes to land use and zoning designations to accommodate target growth. DTSC has identified that this plan may impact multiple sites within its boundaries therefore, we request the consideration of the following comments:

1. The Plan encompasses multiple active and nonactive mitigation and clean-up sites where DTSC has conducted oversight that may be impacted as a result of

A-1

A-2

Evan Sensibile  
July 10, 2024  
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this Plan. This may restrict what construction activities are permissible in the proposed areas in order to avoid any impacts to human health and the environment.

2. Due to the broad scope of the proposed Plan, DTSC is unable to determine all of the locations of the proposed Plan sites, whether they are listed as having documented contamination, land use restrictions, or whether there is potential for these sites to be included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, DTSC recommends providing further information on these sites and areas that may fall under DTSC's oversight within the DEIR. Please review the Plan area in [EnviroStor](#); DTSC's public-facing database.

DTSC believes the County of Los Angeles, Department of Regional Planning must address these comments to determine if any significant impacts under the California Environmental Quality Act (CEQA) will occur and, if necessary, avoid significant impacts under CEQA. DTSC recommends the department connect with our unit if any hazardous waste projects managed or overseen by DTSC are discovered.

DTSC appreciates the opportunity to comment on DEIR for the West San Gabriel Valley Area Plan. Thank you for your assistance in protecting California's people and environment from the harmful effects of toxic substances. If you have any questions or would like any clarification on DTSC's comments, please respond to this letter or via [email](#) for additional guidance.

Sincerely,



Dave Kereazis  
Associate Environmental Planner  
HWMP - Permitting Division – CEQA Unit  
Department of Toxic Substances Control  
[Dave.Kereazis@dtsc.ca.gov](mailto:Dave.Kereazis@dtsc.ca.gov)

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A-2  
cont.  
A-3  
A-4  
A-5



Evan Sensibile  
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cc: (via email)

Governor's Office of Planning and  
Research State Clearinghouse  
[State.Clearinghouse@opr.ca.gov](mailto:State.Clearinghouse@opr.ca.gov)

Tamara Purvis  
Associate Environmental Planner  
HWMP – Permitting Division - CEQA Unit  
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HWMP – Permitting Division - CEQA Unit  
Department of Toxic Substances Control  
[Scott.Wiley@dtsc.ca.gov](mailto:Scott.Wiley@dtsc.ca.gov)

### **Response to Comment A-1**

This comment is introductory in nature, indicating that the Department of Toxic Substances Control (DTSC) received the Draft PEIR, and gave a general overview of the WSGVAP. Since this comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

### **Response to Comment A-2**

This comment states that the WSGVAP encompasses multiple active and non-active sites where DTSC has conducted oversight, and this may restrict which construction activities are permissible. These sites are discussed within Section 4.9, Hazards and Hazardous Materials, of the Draft PEIR, and it was concluded that any development on a contaminated site would be required to comply with mandatory regulations, which would ensure that the development does not create a significant hazard to the public or the environment. Since this comment does not raise an issue regarding the adequacy of the Draft PEIR, no further response is required.

### **Response to Comment A-3**

This comment states that the DTSC was unable to determine all of the locations of the WSGVAP sites and whether or not there is a potential for these sites to be included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5, and requests that the WSGV Planning Area be reviewed in EnviroStor. Table 4.9-1, *EnviroStor Sites in the WSGV Planning Area*, within Section 4.9, Hazards and Hazardous Materials, of the Draft PEIR lists all of the DTSC sites within the communities within the WSGV Planning Area. Impact 4.9-4 within Section 4.9, Hazards and Hazardous Materials, of the Draft PEIR states that there are a total of eight sites on DTSC's EnviroStor that are located in the WSGV Planning Area. The Draft PEIR states that any development on a contaminated site would be required to comply with mandatory regulations, including the DTSC requirements, which would ensure that any future development under the WSGVAP would not create a significant hazard to the public or the environment. Therefore, this request of the DTSC has already been addressed within the Draft PEIR, and no further response is required.

### **Response to Comment A-4**

This comment states that DTSC must address Comments A-2 and A-3 to determine if any significant impacts would occur. Refer to Response to Comments A-2 and A-3 for detailed responses. As determined in Section 4.9, Hazards and Hazardous Materials, of the Draft PEIR, all impacts related to hazards and hazardous materials would be less than significant, and no significant impacts would occur.

### **Response to Comment A-5**

This comment provides a conclusion to the comment letter. The County acknowledges the appropriate contact person at DTSC for future reference during the environmental review process. Since this comment does not raise a substantive issue regarding the adequacy of the information presented in the Draft PEIR, no further response is required.

# ENDANGERED HABITATS LEAGUE

DEDICATED TO ECOSYSTEM PROTECTION AND SUSTAINABLE LAND USE



July 29, 2024

*VIA ELECTRONIC MAIL*

Evan Sensible, Regional Planner  
Dept. of Regional Planning  
Los Angeles County  
320 W Temple St, 13<sup>th</sup> Floor  
Los Angeles CA 90012

**RE: West San Gabriel Valley Area Plan and DEIR**

Dear Mr. Sensible:

Endangered Habitats League (EHL) appreciates the opportunity to comment on the draft West San Gabriel Valley Area Plan (WSGVAP) and associated DEIR. For your reference, EHL is a Southern California conservation group dedicated to ecosystem protection and sustainable land use. We have been active participants in many County planning initiatives, including the General Plan 2035 Update, SEA Ordinance, and Climate Action Plan.

B-1

The draft Area Plan and the various community plans contain well-considered strategies, goals, policies, and objectives for “smart growth,” community development, transportation, natural resource conservation and protection, and hazard avoidance. *EHL supports these meritorious components and measures.*

While mostly already developed, the remaining natural areas are very important. These include the Whittier Narrows and the Altadena Foothills and Arroyos Significant Ecological Area (SEA). The Altadena SEA contains rare and important biological resources, as described in Appendix E of the General Plan Conservation and Natural Resources Element Resources.

Here one finds the biotic communities of the mountains meeting the communities of the coastal plain areas, combining with the organisms that are only found at the junction. The natural habitats of this kind of biological area are fast dwindling as urban communities expand to the limits of easily buildable space.

B-2

The SEA contains prime examples of coastal sage scrub and other kinds of chaparral, riparian oaks, woodlands of the canyon oak of the mountains, woodlands of the coast live oak, which occurs both in the lower mountains and the valleys, good stands of the San Gabriel endemic oak (*Quercus dumosa* var. *gabrielensis*), diverse and beautiful flora characteristic of the continually

changing beds of the mountain streams, both perennial and intermittent, and the wildlife that reside in these various habitats.

The SEA provides a low-elevation constrained corridor. The SEA serves as the only corridor to provide interacting component habitat areas for species to feed, rest, and migrate from low basin and foothill elevations to the sub-alpine elevations of the high San Gabriel Mountains.

Areas encompassed within the SEA represent the only remaining stands of low-elevation foothill scrub, chaparral, and canyon woodland communities within the north San Gabriel Valley. These communities once extended throughout what are now the communities of the north San Gabriel Valley, bridging the transition between high chaparral on the southern slope of the San Gabriel Mountains to the alluvial fans extending beneath the mountains to the coastal basin.

Another important characteristic of these lands is fire hazard. The foothills adjacent to the National Forest, such as in Altadena and La Crescenta-Montrose, are in a Very High Fire Hazard Severity Zone.

General Plan policies must be applied to the WSGVAP. Some of the relevant policies for natural resources and land use are as follows:

Policy LU 3.1: Encourage the protection and conservation of areas with natural resources, and SEAs.

Policy LU 3.2: Discourage development in areas with high environmental resources and/or severe safety hazards.

Policy C/NR 1.2: Protect and conserve natural resources, natural areas, and available open spaces.

Policy C/NR 3.1: Conserve and enhance the ecological function of diverse natural habitats and biological resources.

Policy C/NR 3.5: Ensure compatibility of development in the National Forests in conjunction with the U.S. Forest Service Land and Resource Management Plan.

The current land use designations for the Altadena foothills (e.g., R1 or H9) are *inconsistent* with the General Plan on several levels. They would allow extensive subdivision and development, particularly estate lots, in these biologically sensitive lands. This subdivision would fragment the SEA, destroy wildlife values, create “edge” effects, and block wildlife movement. The SEA would be severely degraded. For these reasons, *and to be consistent with the planning accomplished for other SEAs in the County*, the Altadena foothills must be downplanned as part of the Area Plan process. As biological impacts will persist with any level of development, downplanning should

B-2  
cont.

B-3

B-4

B-5

proceed as much as possible given pre-existing parcelization and available General Plan land use designations.

B-5  
cont.

The current Altadena density designations would also create new development at the Wildland-Urban Interface, or WUI. According to the General Plan:

Development in the WUI is broken down into two classes: interface and intermix. Interface represents relatively dense development adjacent to wildlands, with a clear boundary between them. Intermix represents less dense, or sparse, development interspersed within wildland areas.

Development within the WUI and VHFHSZ increases the likelihood of fire spreading between developed and undeveloped areas. Particularly within a densely populated area such as Los Angeles County, wildfire ignitions often start near development and can rapidly spread into nearby wildlands. Conflagrations can then spread through vegetated areas and threaten multiple communities over a wide geographical area. As communities grow further out into undeveloped areas, the ability for fire protection agencies to protect homes is diminished and the resources to maintain adequate infrastructure required for evacuation and emergency response is stretched thin. This results in greater risk to communities and increased costs for residents and agencies for fire protection.

B-6

New development would also further stress evacuation routes, jeopardizing existing communities.

For the above reasons, and to protect public safety, the General Plan Safety Element contains this policy:

Policy S 4.1: Prohibit new subdivisions in VHFHSZs unless: (1) the new subdivision is generally surrounded by existing or entitled development or is located in an existing approved specific plan or is within the boundaries of a communities facility district adopted by the County prior to January 1, 2022, including any improvement areas and future annexation areas identified in the County resolution approving such district; (2) the County determines there is sufficient secondary egress; and (3) the County determines the adjoining major highways and street networks are sufficient for evacuation as well as safe access for emergency responders under a range of emergency scenarios, as determined by the County. Discourage new subdivisions in all other FHSZs.

B-7

Because the Altadena foothills are not surrounded by existing development, but rather border the National Forest, compliance with this policy means that lands within the VHFSV must be downplanned to prevent future subdivision, as low as RL40 where possible. This is consistent with the VHFSZ in Kinneloa Mesa, which is already RL 20 and not proposed for change.

B-8

If there are inholdings within the National Forest within the Area Plan, these should also be downplanned to RL40, due to similar biological and fire hazard issues.

*In summary, EHL strongly supports the proposed downplanning of the Altadena foothills to protect Significant Ecological Area biological resources and to improve fire safety for current and future residents.*

As a complement to downplanning in natural resource and hazard locations, the WSGVAP implements the Housing Element and RHNA targets through upplanning of appropriate locations near services and infrastructure. EHL supports this strategy. Also, to increase affordability, there should be incremental and sensitive placement of small-scale (duplex, fourplex, courtyard, etc.) multifamily housing in residential zones, but excluding historic districts. These housing types have extensive historical precedent in our region.

Yours truly,



Dan Silver  
Executive Director



B-8  
cont.

B-9

### **Response to Comment B-1**

This comment is introductory in nature, introducing the Endangered Habitats League (EHL) as an active participant in many County planning initiatives. This comment also provides a brief summary of the WSGVAP. Since this comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

### **Response to Comment B-2**

This comment discusses the Whittier Narrows and the Altadena Foothills and Arroyos Significant Ecological Area (SEA). This comment describes the flora and fauna within the SEA, and how the SEA provides a low-elevation constrained corridor. These details provided within the comment are also discussed within Section 4.4, Biological Resources, of the Draft PEIR. Since this comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

### **Response to Comment B-3**

This comment states that the foothills are adjacent to the National Forest and are in a Very High Fire Hazard Severity Zones (VHFHSZ). VHFHSZs within the WSGV Planning Area are discussed within Section 4.20, Wildfire, of the Draft PEIR. Since this comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

### **Response to Comment B-4**

This comment lists Policies LU 3.1, LU 3.2, C/NR 1.2, C/NR 3.1 and C/NR 3.5 from the County's General Plan, and states that these policies must be applied to the WSGVAP. The Project's computability with Policies LU 3.1 and LU 3.2 are analyzed within Table 4.11-2 in Chapter 4.11, Land Use, of the Draft PEIR. Policies C/NR 1.2 and C/NR 3.1 are included within Section 4.4, Biological Resources, of the Draft PEIR. The Project does not propose any changes within the National Forests; therefore, Policy C/NR 3.5 is not applicable to the Project. Since this comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

### **Response to Comment B-5**

This comment states that the current land use designations for the Altadena foothills would allow for extensive subdivision and development in biologically sensitive lands, which would degrade and fragment the SEA. This comment also requests that the Altadena foothills be down planned.

As discussed in Chapter 3, Project Description, of the Draft PEIR, the WSGVAP proposes to decrease densities in hazard areas, WUI areas, and areas within or adjacent to natural resource areas. The WSGVAP also includes policies that discourage development within SEAs and requires natural habitat buffers to separate development areas from SEAs. Since this comment does not raise an issue regarding the adequacy of the Draft PEIR, no further response is required.

### **Response to Comment B-6**

This comment states that the current Altadena density designations would create new development at the Wildland-Urban Interface (WUI), and provides information regarding the WUI from the County's General Plan. As discussed in Chapter 3, Project Description, of the Draft PEIR, the WSGVAP proposes

to decrease densities in hazard areas, WUI areas, and areas within or adjacent to natural resource areas. Therefore, the current density designations at the WUI would be higher than the densities proposed in WUI areas under the WSGVAP. Please refer to Section 4.20, Wildfire, of the Draft PEIR, which includes an analysis on wildfire impacts, which were determined to be less than significant.

### **Response to Comment B-7**

This comment states that new development would stress evacuation routes, and provides a copy of the County's General Plan Element Policy S 4.1. Evacuation routes are evaluated within Section 4.9, 4.17, and 4.20 of the Draft PEIR, Hazards and Hazardous Materials, Transportation, and Wildfire sections, respectively. The WSGVAP also proposes policies that would ensure efficient evacuation would be maintained during hazard events. The General Plan Safety Element Policy S 4.1 is discussed in detail within Sections 4.9 and 4.20 of the Draft PEIR. Since this comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

### **Response to Comment B-8**

This comment states that lands in Altadena within VHFHSZ should be down planned, similar to Kinneloa Mesa, to prevent biological and fire hazard issues. As discussed in Chapter 3, Project Description, of the Draft PEIR, the WSGVAP proposes to decrease densities in hazard areas, which includes areas within a VHFHSZ. Since this comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

### **Response to Comment B-9**

This comment expresses support for the WSGVAP and serves as the conclusion to the letter. This comment also suggests there should be incremental and sensitive placement of small scale multifamily housing in residential zones, excluding historic districts. No further response is required.





**LOS ANGELES COUNTY  
SANITATION DISTRICTS**  
*Converting Waste Into Resources*

**Robert C. Ferrante**  
Chief Engineer and General Manager

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August 6, 2024

Ref. DOC 7258412

VIA EMAIL [wsgvap@planning.lacounty.gov](mailto:wsgvap@planning.lacounty.gov)

Mr. Evan Sensibile, Regional Planner  
County of Los Angeles  
Department of Regional Planning  
320 West Temple Street, 13<sup>th</sup> Floor  
Los Angeles, CA 90012

Dear Mr. Sensibile:

**NOA Response to West San Gabriel Valley Area Plan**

The Los Angeles County Sanitation Districts (Districts) received a Notice of Availability (NOA) of a Draft Program Environmental Impact Report (DPEIR) for the subject project located in the unincorporated communities in West San Gabriel Valley of Los Angeles County (unincorporated communities) on July 1, 2024. The proposed project is located within the jurisdictional boundaries of Districts Nos. 2, 15, 16, 17 and 22. We offer the following comments regarding sewerage service:

C-1

1. The majority of the La Crescenta-Montrose unincorporated community is located outside the sphere of influence of the Districts, as adopted by the Local Agency Formation Commission (LAFCO). Therefore, until the current sphere of influence for the appropriate Sanitation District has been amended by LAFCO to include this area, the Districts will be unable to annex the area and provide sewerage service.

C-2

2. A portion of the Kinneloa Mesa unincorporated community is located outside the jurisdictional boundaries of the Districts and will require annexation into District No. 16 before sewerage service can be provided to the proposed development. A copy of the Districts' Annexation Information and Processing Fee sheets can be found on our website at [Annexation Program](#). For more specific information regarding the annexation procedure and fees, please contact Ms. Shirly Wang at (562) 908-4288, extension 2708.

C-3

3. The Districts own, operate, and maintain the large trunk sewers that form the backbone of the regional wastewater conveyance system. Local collectors 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 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 Los Angeles County Department of Public Works' Consolidated Sewer Maintenance District, which owns and maintains local sewers in unincorporated areas.

C-4

- 4. The Districts own and operate two wastewater treatment plants, the Whittier Narrows Water Reclamation Plant (WNWRP) and the San Jose Creek Water Reclamation Plant (SJCWRP), within the proposed project area. The WNWRP is located on an easement in the Whittier Narrows Flood Control Basin property, which is owned by the Federal Government. The SJCWRP is located on property owned by the Districts. The DPEIR should consider and evaluate, if necessary, any potential impacts by the WNWRP and SJCWRP on the proposed project. Additionally, any amendments to the General Plan or updates to the zoning map that arise from this project should in no way limit or alter the Districts' rights or ability to safely and efficiently operate and maintain the WNWRP and SJCWRP, which are vital public facilities that ensure the health and safety of the communities they serve. C-5
  
- 5. The wastewater generated by the unincorporated communities will be treated at one or more of the following: the San Jose Creek WRP, which is located in an unincorporated area adjacent to the City of Industry and has a capacity of 100 million gallons per day (mgd) and currently processes an average wastewater flow of 60.0 mgd; the Whittier Narrows WRP, which is located in an unincorporated area near the City of South El Monte and has a capacity of 15 mgd and currently processes an average wastewater flow of 8.9 mgd; the Los Coyotes WRP, which is located in the City of Cerritos and has a capacity of 37.5 mgd and currently processes an average wastewater flow of 18.8 mgd; and/or the A.K. Warren Water Resource Facility (formerly known as the Joint Water Pollution Control Plant), which is located in the City of Carson and has a capacity of 400 mgd and currently processes an average wastewater flow of 247.2 mgd. C-6
  
- 6. Details for any particular development within the project area should be submitted to the Districts for review to determine whether or not sufficient trunk sewer capacity exists to serve each project and if Districts' facilities will be affected by the project. This is accomplished through the Districts' Will Serve Program, information for which can be found on our website at [Will Serve Program](#). C-7
  
- 7. In order to estimate the volume of wastewater that any particular development within the project area will generate, a copy of the Districts' average wastewater generation factors is available on our website at [Table 1, Loadings for Each Class of Land Use](#). C-8
  
- 8. 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](http://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, please contact the Districts' Wastewater Fee Public Counter at (562) 908-4288, extension 2727. C-9
  
- 9. 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 C-10



Mr. Evan Sensibile

3

August 6, 2024

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 2742, or [phorsley@lacsdsd.org](mailto:phorsley@lacsdsd.org).

Very truly yours,

*Patricia Horsley*

Patricia Horsley  
Environmental Planner  
Facilities Planning Department

PLH:plh

cc: S. Wang

↑  
C-10  
cont.

C-11

### **Response to Comment C-1**

This comment is introductory in nature, identifying that the Los Angeles County Sanitation Districts (Districts) received the Notice of Availability for the Project's Draft PEIR, and states the Project is within the jurisdictional boundaries of Districts No. 2, 15, 16, 17 and 22. Since this comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

### **Response to Comment C-2**

This comment states that the majority of the La Crescenta-Montrose unincorporated community is located out of the sphere of influence of the Districts, and until the Local Agency Formation Commission amends the sphere of influence, the Districts will be unable to annex the area and provide sewer service. This information has been noted, as the Project does not propose annexation at this time. Since this comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

### **Response to Comment C-3**

This comment states that a portion of the Kinneloa Mesa unincorporated community is located outside of the jurisdiction of the Districts and will require annexation into District No. 16 before sewer service can be provided. This information has been noted, as the Project does not propose annexation at this time. Since this comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

### **Response to Comment C-4**

This comment states that the Districts own, operate and maintain the large trunk sewers in the region, and at this time there are no deficiencies in the Districts' facilities that serve the unincorporated communities. This information has been noted. Since this comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

### **Response to Comment C-5**

The Districts provide information on the two wastewater treatment plants they operate in the Project area, the Whittier Narrows Water Reclamation Plant and the San Jose Creek Water Reclamation Plant. This comment also states that the Draft PEIR should consider and evaluate any potential impacts of the wastewater treatment plants on the Project. CEQA evaluates the Project's impact on the environment, not the environment's impact on the Project. Therefore, any potential impacts the existing wastewater treatment plants may have on the Project have not been evaluated within the Draft PEIR. However, the Draft PEIR evaluated the Project's potential impact on the wastewater treatment plants with Section 4.19, Utilities and Service Systems, in the Draft PEIR. Additionally, the comment states that any amendments to the General Plan or Zoning Map should not limit or alter the Districts' rights or ability to operate and maintain these wastewater treatment plants. There are no changes occurring at either wastewater treatment plant locations, and the Project would not limit or alter the Districts' rights or ability to operate and maintain the treatment plants.

### **Response to Comment C-6**

This comment provides information on various water reclamation plants, including the capacity and average rates of treatment. This information is consistent with what was analyzed within the Draft PEIR. Since this comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

### **Response to Comment C-7**

This comment states that details for any particular development within the Project area should be submitted to the Districts for review to determine whether or not sufficient trunk sewer capacity exists to serve each project and if Districts' facilities will be affected by the Project, and provide additional information on the Districts' Will Serve Program. This information has been noted, as the Project does not propose any development at this time. Since this comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

### **Response to Comment C-8**

This comment provides resources to estimate the volume of wastewater that any particular development within the Project area will generate. This information has been noted, as the Project does not propose any development at this time. Future projects developed under the WSGVAP would be subject to subsequent planning and environmental review in accordance with County requirements and CEQA, which would evaluate future projects' impacts on a project-by-project basis, including the estimation of wastewater. Since this comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

### **Response to Comment C-9**

This comment provides information regarding connection fees. This information has been noted, as the Project does not propose any development at this time. Future projects will be required to comply and pay connection fees, as appropriate. Since this comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

### **Response to Comment C-10**

This comment states that the capacity of the Districts' treatment facilities will be limited to levels associated with the approved growth identified by SCAG. This comment also states that this letter does not guarantee wastewater service but is to advise the developer that the Districts intend to provide this service up to the levels that are legally permitted. This information has been noted, as the Project does not propose any development at this time. Since this comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

### **Response to Comment C-11**

This comment provides contact information and serves as a conclusion to this letter. Since this comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

To: Los Angeles County Department of Regional Planning  
320 West Temple Street, 13<sup>th</sup> Floor  
Los Angeles, Ca. 90012

Attention: Evan Sensibile

Re: PROJECT NAME: West San Gabriel Valley Area Plan  
PROJECT/PERMIT NUMBERS: PRJ2023-003982  
ADVANCE PLANNING CASE NO. RPPL2023005880  
ENVIRONMENTAL ASSESSMENT NO. RPPL2023005884  
GENERAL PLAN AMENDMENT: RPPL2023005882  
ZONE CHANGE NO. RPPL2023005883  
ORDINANCE NO. RPPL2024002630  
STATE CLEARINGHOUSE NO. 2023110351

Dear Mr. Sensibile:

Attached you will find my comments and objections to the above project and PEIR. I sent the exhibits with supporting evidence to you on Monday, August 5, 2024.

I have a B.S. *cum laude* in biology from Vanderbilt University where I studied population biology, ecology, developmental biology and cellular biology. I also have a minor in chemistry including a course in organic chemistry. I graduated from George Washington Law School where I studied environmental law, toxic and hazardous waste, water rights and zoning law. I worked at Emory University in the fields of immunology and cancer markers.

I have forwarded the source documents referenced in my objections and comments including portions of Dr. Mack's text on Patterns of Malignant Disease in Los Angeles County, as well as the JPL Public Health Assessment that I obtained at the Superfund meeting in Altadena, many years ago.

Thank you.

Sincerely,

M. Calvert

D-1

To: Los Angeles County Department of Regional Planning, Evan Sensibile

From: M. Calvert

Date: August 4, 2024

Re: Objections and Comments to LA County (WSGVP) Draft PEIR, dated June 2024

These comments are written in response to the Draft PEIR, prepared by Environmental Science Associates (ESA) for the West San Gabriel Valley Planning Committee (“WSGVP”). I am a long-term resident of Altadena and I object to any and all plans, projects and/or construction whether proposed in the draft Plan Environmental Impact Report (“PEIR”) or not, as well as the proposed amendment of Title 22, for the reasons discussed in this Memorandum.

D-2

**Volatile Organic Compounds in the Soil, Water and Air Pose Significant Health Risks in the West San Gabriel Valley (“WSGV”)**

- All of the contemplated activities (excavation, grading, dewatering, removal of soil, creation of fugitive dust, removal of construction debris and other ground-disturbing activities) pose an unacceptable risk to residents’ health and safety from exposure to toxic volatile (vaporous) organic compounds in the soil and groundwater of Altadena.
- The consulting firm hired by Los Angeles County (ESA) recognized this issue in a Background Brief, dated December 2023: “Four major superfund sites are found within the WSGV and soil contamination from underground storage tanks is dispersed throughout the area.” (Emphasis provided). ESA Task B1 Background Brief at page 68.
- The Jet Propulsion Lab, located at Hahamonga Watershed near Altadena and La Canada Flintridge, is one of these four Superfund sites and has been designated as a National Priorities Site or one that the Environmental Protection Agency (EPA) deems to be most in need of clean-up due to risks to the public health and safety. (CERCLIS CA 9800013030, August 5, 1999).
- For fifteen years, from 1945-1960, toxic liquid and solid wastes were disposed into forty seepage pits and waste pits at the current site of JPL. (Supra at page 3).
- As a result, volatile organic compounds (VOC’s) were released into the soil and water. (Supra at page 1).
- These VOC’s traveled in an underground plume to drinking water wells in Altadena and Pasadena. (Supra at page 4).
- By 1980, two VOC’s (carbon tetrachloride and trichloroethylene) were identified in wells by the City of Pasadena. (Supra at page 4).
- Carbon tetrachloride may cause liver problems and increase the risk of cancer. [EPA list of drinking water contaminants and maximum contaminant levels (MCL’s)].
- Trichloroethylene may cause liver problems and increase the risk of cancer. [EPA list of drinking water contaminants and maximum contaminant levels (MCL’s)].
- The groundwater plume can change direction and even reverse for short periods of time. (CERCLIS CA 9800013030, August 5, 1999, at page 12).
- Around 1980, VOC’s were also detected in the wells of Lincoln Water, located in Altadena. (Supra at page 4)
- When the contaminant concentration exceeded drinking water standards in 1985, Pasadena closed two wells. (Supra at page 4)

D-3

D-4

D-5

- When the contaminant concentration exceeded drinking water standards in 1987, Lincoln Avenue (in Altadena) closed two wells. (Supra at page 4)
- When the contaminant concentration continued to exceed drinking water standards in 1989, Pasadena closed another two wells. (Supra at page 4)
- This was wide-spread contamination by the underground plume.
- In 1992, the EPA identified other VOC contaminants at the JPL/Hahamonga site: 1,1-dichloroethane and tetrachloroethylene. (Supra at page 4)
- 1,1 dichloroethane and 1,2 dichloroethane are associated with an increased risk of cancer and 1,1 dichloroethylene is associated with liver problems). [EPA list of drinking water contaminants and maximum contaminant levels (MCL's)].
- Tetrachloroethylene is associated with increased risk of cancer and liver problems. [EPA list of drinking water contaminants and maximum contaminant levels (MCL's)].
- A total of six Raymond Water Basin purveyors operate wells within four miles of the JPL/Hahamonga site. These include Rubio Canyon, Los Flores and Lincoln Avenue Water. The cities of Alhambra, Arcadia, La Canada-Flintridge, San Marino and Sierra Madre also received water from the Raymond Basin. (CERCLIS CA 9800013030, August 5, 1999, at page 8).
- This Raymond Groundwater Basin extends about 41 square miles. (PEIR at page 4.10-5)
- Groundwater extraction accounts for nearly one-third of the water usage in the unincorporated areas of Los Angeles County. (ESA Task B1 Background Brief at page 68, referencing LACounty Planning 2022a).
- VOC's can be easily vaporized or become gaseous. (CERCLIS CA 9800013030, August 5, 1999, at Appendix A-7).
- Routes for exposure can be inhalation, ingestion or by skin contact. (Supra at page A-7).
- Since the VOC's are in the soil and water of Altadena's area, activities that create disruption cause release into the air.
  - Take, for example, "pre-watering and de-watering" discussed in the PEIR. (At page 4.3-32 to 4.3-33; page 4.7-11; page 4.7-17; and page 4.9-17).
  - VOC-contaminated water can evaporate into the air creating a toxic environment for humans.
- The WSGVP's PEIR recognizes that soils can contain toxic contaminants that are released through particle emissions. (PEIR at page 4.3-53)
- In its background brief, the ESA firm, hired by the County, stated that the cancer rate in Altadena was 6%, or above average. This means that 2,559 of Altadena's current residents (42,658) have had cancer diagnoses.
- In 2004, Dr. Thomas Mack, Norris Cancer Center, analyzed cancer surveillance data from ten million people in Los Angeles County over a twenty-six (26) year period. Elsevier Academic Press published the first edition in 2004, entitled Cancers in the Urban Environment, Patterns of Malignant Disease in Los Angeles County and its Neighborhoods. Dr. Mack identified census tracts at high risk and adjusted for social class. There were at least six instances of nonrandom distribution that did not





conform to the pattern that would have been predicted by available knowledge. (Mack at page 645)

- The identified nonrandom cancers included oropharyngeal carcinoma, small cell carcinoma and adenocarcinoma of the lung, papillary carcinoma of the thyroid, squamous carcinoma of the bladder and diffuse mixed B-cell non-Hodgkin's lymphoma. (Mack at page 645):
  - For oropharyngeal carcinoma, there was a cancer cluster of female patients in Altadena and another cluster of males in Pasadena. (Mack at page 55).
  - For salivary gland malignancies, there was a cancer cluster of males in Altadena. (Mack at page 62).
  - For carcinoma of the larynx, there were cancer clusters of males in Pasadena and Altadena. (Mack at page 167)
  - For small cell carcinoma of the lung, there was a cancer cluster of males in Altadena. (Mack at page 197)
  - For adenocarcinoma of the lung and bronchi, there was a cancer cluster of females in La Canada Flintridge. (Mack at page 205)
  - For osteosarcoma, there was a cancer cluster of females in Altadena. (Mack at page 261-262)
  - For squamous carcinoma of the bladder, there was a cancer cluster of males near the Glendale and Altadena area. (Mack at page 352).
  - For brain malignancies (gliomas), there was a cancer cluster of females in Altadena. (Mack at page 379)
  - For papillary carcinoma of the thyroid, there was a large cancer cluster of females in La Canada-Flintridge. (Mack at page 412)
  - For nodular sclerosis Hodgkin's lymphoma, there was a large cancer cluster of males between Altadena and La Canada-Flintridge. (Mack at page 460)
  - For diffuse mixed B-cell non-Hodgkin's lymphoma, there were two male clusters, one in Pasadena and one in La Canada-Flintridge. (Mack at page 503).
  - For chronic lymphocytic leukemia, there was a large mixed gender cluster near La Canada-Flintridge. (Mack at 581)
  - For other leukemias, there were two clusters, one for females in Altadena and another for mixed genders in Pasadena. (Mack at page 609)
  - There was also a large cluster of malignancies in older children extending from Altadena to La Canada-Flintridge. (Mack at page 623)
  - Finally, there was also a large cluster of young adult females with malignancies in La Canada-Flintridge. (Mack at page 630)

- Future development would increase the number of residents (in Altadena) and would potentially increase the number of people exposed to toxic contaminants. (PEIR at page 4.9-25).
- It is reasonably foreseeable that future projects and/or natural disasters would release hazardous materials into the environment. (PEIR at page 4.9-27).
  - Although the ESA (WSGVP) adopts OSHA as its band aid fix, that is a statute designed to protect workers. OSHA remedial measures do not reduce the adverse impact to Altadena's residents.



D-11  
cont.

D-12

D-13

D-14

- Although the PEIR states that the WSGVP was required to consult the EPA National Priorities List and the EPA’s CERCLIS site, as well as archived sites, the ESA and the WSGVP “overlooked” the hazards site at JPL/Hahamonga Superfund site. (PEIR at page 4.9-2 to page 4.9-4). D-15
- Although the PEIR acknowledges that VOC’s, including tetrachloroethane, may be in the soil and groundwater throughout the Plan area and that soil vapor intrusion may occur, the impact of VOC’s on human health and safety is not mentioned. (PEIR at page 4.9-7, page 4.9-12, page 4.9-17) D-16
- Construction or redevelopment on contaminated properties could potentially generate vapors or fugitive dust containing contaminants that pose a health risk. (PEIR at page 4.9-27). D-17
  - As demonstrated in Dr. Mack’s book, above, the risk is significant and it is not limited to “sensitive receptors,” young children, persons with disabilities and older residents.
- The ESA (WSGVP) asserts that future projected growth would result in 25,954 new residents, 10,874 new jobs and 16,243 new housing units. This would increase the demand for water and pumping from groundwater wells. (PEIR at page 4.10-22). D-18
- It is not clear how many new residents would be added to Altadena’s current population of 43,344, as this section was conveniently omitted from the PEIR and Appendices. Altadena is only 8.5 square miles. (PEIR at page 4.11-2) D-19
- It is also not clear how many new housing units would be added to Altadena’s current total of 15,334, as this section was omitted from the PEIR and Appendices. The Regional Housing Needs Allocation assigned 4,479 new units to the entire WSGV. (PEIR at page 4.11-8). D-20
- Although the ESA (WSGVP) naively asserts that compliance with applicable environmental laws would protect the public from resulting contaminant exposure, causing serious health risks (PEIR at page 4.9-29), this is an overstatement. D-21
  - Take, for example, the history of the JPL/Hahamonga Superfund site on the National Priorities List. Carcinogenic volatile organic chemicals were allegedly first discovered in 1980. Almost twenty years later, the EPA and JPL published the CERCLIS report and held the required Superfund meeting to inform Altadena residents.
  - Another resounding example of government inaction is the Stringfellow Acid Pits in Jurupa. Toxic waste, including volatile organic compounds, spilled into groundwater in 1972. Toxins had been spilling into the nearby creek between 1969 and 1980. Litigation related to this site lasted three decades and involved the conviction of Rita LaVelle, then Director of Superfund, and the resignation of Anne Gorsuch Burford, then EPA administrator. Clean-up has



not been completed and will take five hundred (500) years. *Wikipedia, Stringfellow Acid Pits, Accessed July 28, 2024.*

D-21  
cont.

- Another questionable assumption in the ESA/WSGVP's PEIR is the use of the VOC maximum contaminant or significance levels established by the SCAQMD (South Coast Air Quality Management District). (PEIR at 4.3-34 to 3.4-35). They should have and could have used the VOC criteria significance levels established by the EPA for drinking water.

D-22

- Members of the AQMD are drawn from businesses (both small and large), labor organizations, law firms, the chamber of commerce, community environmental organizations and some government agencies. Other than JPL, discussed above, the member roster does not appear to include persons having scientific-based knowledge. AQMD.gov/home. See AQMD advisory group board, September 2023-September 2027, accessed July 27, 2024.

D-23

- The SCAQMD has arbitrarily determined the cancer burden without supporting empirical evidence, such as Dr. Mack's surveillance data, discussed above. (PEIR at page 4.3-37)

D-24

- Additionally, for criteria pollutants, the SCAQMD has used dated thresholds from 1993. (PEIR at page 4.3-43)

D-25

- The SCAQMD has also utilized an unsupported assumption that construction impacts are temporary. (PEIR 4.3-35). As demonstrated above, the health impacts are far from temporary.

D-26

- The WSGVP's PEIR marginalizes significant health risks from VOC's. Despite the known health risks of VOC's, the WSGVP states that it would like to use recycled water for landscape irrigation in County parks. (PEIR at page 4.3-31).

D-27

- Although the PEIR states a concern for water quality and aquatic resources, it allows project developers to simply purchase credits, in lieu of remediation, at an approved mitigation bank. (PEIR at page 4.4-34).

D-28

- Although there is a process for monitoring pollutant discharges, this process lies squarely in the hands of the developer or contractor under the Construction General Permit. (PEIR at pages 4.17-16 to 4.7-17). This questionable process seems to have little oversight by governmental authorities.

D-29

**Volatile Organic Compounds Combine with Nitrogen Oxide to Form Ozone, A Greenhouse Gas, That Causes Known and Significant Health Risks in the WSGV**

- When VOC's are released into the air, they combine with nitrogen oxides to form ozone. (PEIR at page 4.3-2 to 4.3-3). Ozone is a greenhouse gas and one that causes increased temperatures on Earth. *Wikipedia, Greenhouse Gas, Accessed 7/25/24.*

D-30

- Based on ambient air quality monitoring, Los Angeles County regularly exceeded the state’s one hour and federal eight hour ozone level within the last five years. (PEIR at page 4.3-9). This is considered extreme “non-attainment” in the PEIR. (Page 4.3-36)

D-31

- Ozone is a criteria pollutant and one which can lead to the following medical problems:

Breathing problems, such as asthma, emphysema and chronic bronchitis;

Inflammation and damage to airways;

Aggravation of lung diseases;

Susceptibility to lung infections;

Chronic obstructive pulmonary disease; and

Permanent lung damage. (PEIR at page 4.3-2 to 4.3-3).

D-32

- Ozone (made by the combination of VOC’s and nitrogen oxide, as noted in the WSGVP PEIR) creates risk to human health, particularly in older adults, children and outdoor workers (“sensitive receptors”). (PEIR at page 4.3-2 to 4.3-3).

D-33

- Altadena has 19.5% residents aged sixty-five and older. (ESA Background Brief).

**The WSGVP’s PEIR Contemplates the Release of Both Small and Large Particulate Matters that Cause Known and Significant Health Risks in WSGV.**

- Projects developed under the WSGVP would involve ground-disturbing activities during construction. (PEIR at page 4.5-24). Excavating, grading, handling, treating, stock-piling, transferring and removing soil, construction/demolition and travel of construction equipment may cause “fugitive dust emissions.” (PEIR at page 4.3-22 to 4.3-24).

D-34

- The topography of the San Gabriel Mountains rising to the north of Altadena is conducive to trapping of pollutants in the foothill communities.

D-35

Emissions may be downwind of sensitive receptors. One option is to cease all activities. (PEIR at page 4.3-22 to 4.3-24).

- Particulate matter (PM 10 micrometers and PM 2.5 micrometers) may be inhaled by residents.

- Particulate matter (PM 10 and PM 2.5) is deposited into the lungs and can cause tissue damage and lung inflammation. (PEIR page 4.3-5).

D-36

- PM 10 particles include dust from construction sites and landfills.

Despite the known risks from release of particulates, the WSGVP wants to recycle construction and demolition debris from construction sites. (PEIR at page 4.3-31)

D-37

- Sources of PM 2.5 particles arise from combustion of gasoline, oil and diesel.
  - Bulldozers, loaders, backhoes, cranes, excavators, forklifts and haul trucks are frequently diesel powered and emit criteria air pollution. (PEIR at page 4.3-15, page 4.3-32).
  - Although idling at construction sites is purportedly limited to five minutes, the equipment fleet has not been fully replaced by new emissions-controlled fleets. (PEIR at page 4.3-15 to page 4.3-16)
- Based on ambient air quality monitoring, Los Angeles County regularly exceeded the state and federal PM10 and PM2.5 standards within the last five years. (PEIR at page 4.3-9). This is considered “non-attainment” status. (PEIR at page 4.3-42 to page 4.3-43)

D-38

D-39

**The Scope of the WSGVP is Very Large, Impacting Many Residents, Many of Whom Did Not Receive Notice From Los Angeles County’s Department of Regional Planning.**

D-40

- The scope of the proposed Plan is very large, impacting many residents and areas of Los Angeles County, including Altadena.
- Most residents did not receive notice of the NOP or scoping in November-December 2023. This author received no notice until Spring 2024.
- In Spring 2024, a few residents attended the meeting at the Altadena library, and two subsequent Zoom meetings. The initial meeting was cast as proposed “administrative corrections” of zoning to reflect how properties were actually being utilized in Altadena.
- At the Altadena library meeting, residents were asked to complete a forced choice survey to rank their preferences. Question No. 7 asked residents to rank what they would like to see more of in their community. Question No. 9 asked residents to rank the issues they would like to see “managed” in their community. Question 12 asked residents to select the “housing types” that could fit into their community.

D-41

D-42

Many of these questions were economically divisive, pitting citizens of West Altadena against those in East Altadena. This perpetrated a historical racial and socio-economic division within Altadena.

The survey had few open-ended questions on whether residents were satisfied with their community and whether they wanted additional development.

In the survey, there was no explanation of the broad intended scope of the WSGVP.



At the Altadena library meeting, the development maps were taped to the wall, had glare and could not be seen at eye level. Even the smaller paper maps placed on the tables were not fully legible in terms of streets.

D-42  
cont.

- When the draft PEIR was released in June 2024, most residents were on summer vacations. By including boilerplate recitation of laws and regulations (without much discussion of applicability to the facts), the WSGVP has made the PEIR into eight hundred, ten (810) pages. The sheer length of the PEIR imposes an impediment to transparency.
- Although the WSGVP PEIR references the County General Plan, by incorporation, the author did not receive notice of the EIR for the County General Plan and cannot compare the two documents.
- When the WSGVP ultimately sent post cards, with QR codes, to each resident, the post card did not inform residents of the extent of the plan, or projects, with the dates of hearings and matters to be addressed. It was purposefully designed to look like a throw-away piece of mail. Most residents do not know what the County envisions for their community. Many residents and businesses believed that the development was limited to the former location of Webster’s Pharmacy.

D-43

D-44

D-45

**Altadena is Unique in Several Important Ways. In the Spirit of Self-Determination, Altadena Should Keep Its Own Community Standards (“CSD’s”)**

- In June 2024, the draft PEIR laid out the vast extent of the development plan and used a process called “tiering.” The process of “tiering,” or assuming that all unincorporated areas of Los Angeles are the same in enough ways that they should be included within the rubric of one single Plan, the WSGVP, is not well-taken.
- After the WSGVP PEIR was drafted, the San Gabriel Mountains were designated as a federal National Monument. The foothills in Altadena are immediately south of, and directly abut, this National Monument. The WSGVP’s PEIR does not consider the designation.
- A stated goal of the WSGVP is to reduce wildfire hazards and to preserve biological resources by decreasing density in areas adjacent to natural resources. (PEIR at page 4.7-19). Altadena is directly adjacent to the natural resources in the San Gabriel Mountains. Density should not be increased by any new development in Altadena.
- The San Gabriel Mountains’ designation causes more traffic in Altadena’s limited north-south roads and increases the Vehicle Miles Traveled (VMT’s) beyond that contemplated by the WSGVP’s PEIR.
- The only freeway that runs near Altadena, but not necessarily through Altadena, is the 210 Freeway. By framing the geographic area more broadly, the WSGVP has misstated the extent of freeway access.

D-46

D-47

D-48

D-49

D-50

To access Altadena for evacuation purposes, there are no north-south “highways.” However, there are several secondary roads, running north-south: Lake, Allen, Hill, Lincoln, Los Robles, Altadena Drive and Fair Oaks. Many of these roads have traffic choke-points due to drive-through establishments and commercial build-out near Pasadena.

D-51

The other unincorporated areas of Los Angeles County have more freeway access: the 60 Freeway, the 10 Freeway, the 605 Freeway, the 2 Freeway, the 5 Freeway and the 105 Freeway. These are the more reasonable choices for new growth.

D-52

- The hilly topography of Altadena is not conducive to walking, riding bicycles or razor scooters unless one plans a one-way trip, downhill. The buses that run from the Lake Avenue Metro Station are infrequent and take a long time.

D-53

- In Altadena, there are “areas with underlying materials that include undocumented fills, soft compressible deposits or loose debris that could be inadequate to support development” especially of multi-story buildings. (PEIR at page 4.7-25). This is another reason to keep height and set-back limits in Altadena’s own CSD.

D-54

- Altadena is an historic area that should be preserved. More than one hundred and ninety (190) homes in Altadena were built in Jane’s Village between 1924 and 1926. There are eighty (80) additional Jane’s homes outside the Village area and in Altadena.

D-55

A Jane’s home could be purchased for as little as \$ 7,950-\$11,000 with as little as \$ 500 down payment and monthly payments of only \$100.

The Jane’s homes are recognized in the PEIR as “Altadena Heritage” homes but dismissively referred to as having no “legally binding” protection. (PEIR at page 4.5-8)

- The WSGVP would like to take Altadena’s Community Standards (“CSD”) and fold it into a “one-size fits all” area Plan or PASD, despite the differences between Altadena and the other three unincorporated areas of Los Angeles County. (PEIR at page 4.4-31).
- “Local land use plans and policies... are not required to be consistent with either the Regional Transportation Plan or the Sustainable Communities Strategy.” (PEIR at page 4.6-9). Altadena should keep its self-determined CSD.

D-56

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**What is the Extent of Development and Displacement Contemplated by the WSGVP for Altadena’s 8.5 Square Miles?**

- Superficially, the WSGVP wants to increase “development” intensity along commercial corridors and in “select” areas near commercial corridors and transit with low existing residential density. (PEIR at page 4.3-32)
- The WSGVP wants to concentrate growth within one mile from major transit stops, one-half mile from high quality transit corridors and one quarter mile from commercial corridors and commercial areas where there is access to existing or *proposed* transit. (PEIR at page 4.11-16)

D-57

To change the growth pattern, all the planners have to do is propose new transit in an area of Altadena.

D-58

- The WSGVP wants to increase population density over and beyond that contemplated by the Regional Housing Element Regional Allocation. (PEIR at page 5-39).
- The WSGVP contemplates infill development and re-development on “underutilized” sites, as well as “adaptive reuse” of “underutilized structures,” “appropriate residential density” along transit corridors, “encouragement of sustainable subdivisions” and “acquisition” of resource-sensitive lands. (PEIR at page 4.3-29 to page 4.3-30; page 4.4-25).

D-59

D-60

If we look at the context of “appropriate residential density,” the WSGVP disfavors existing single family homes in Altadena (referred to as “aging stock”) and favors mixed use, multi-story residences that concededly block scenic views and full enjoyment of a National Monument, the San Gabriel Mountains.

D-61

- The WSGVP PEIR states that they want to utilize anti-displacement measures, so “existing community members can remain in ...their neighborhoods, while accepting new residents through more compact, mixed use development.” (PEIR at page 4.8-36).

D-62

The WSGVP has identified no site(s) for new residents and no sites for multi-density complexes. Vulnerable elderly people, people of color and people with limited economic means would be systemically displaced from their homes. See, for example, the historic seizure of Chavez Ravine in Los Angeles or the large scale razing of homes in Capetown, South Africa.

D-63

In Altadena, 19.5% of residents are 65 years or older and 74% of all residents are home owners. Many residents are retired, living on fixed income. If these home owners had to transition to rentals in Altadena, they would likely have to pay more than their mortgage. Currently, the average rental in Altadena is \$ 1,626. (ESA Background Brief).

D-64







“Relocation assistance” is not adequate to compensate the susceptible elderly for the disruption and health risks near the end of life.

D-64  
cont.

Displacement of elderly people also imposes a burden on inter-generational transfer of wealth in Altadena, a neighborhood that was historically favored by African-Americans.

Vulnerable older individuals in R-1 housing would be disfavored to the advantage of younger residents with families. Younger newlyweds and families resent not being able to buy a home. Older residents just want to live their lives in peace, without the noise and nuisance of nearby construction. The WSGVP creates division.

D-65

Although there are needs for affordable housing, builders would not be required to offer affordable housing in Altadena. Mr. Drevno, one of the planners, stated that all units could be offered at market rates in Altadena. The background brief prepared by the ESA consulting firm also stated that Altadena was not eligible for market incentives due to the residents’ higher income.

**The WSGVP’s PEIR is Defective Due to Vagueness, Inconsistencies and Omissions of Significant Impacts on Human Health and Safety.**

- The WSGVP does not propose any site-specific development because “specific location, timing and type of future projects proposed to be developed are unknown,” detailed analysis would be speculative and beyond the scope of this PEIR. (PEIR at page 4.3-32, page 4.3-46, page 4.4-20, page 4.7-19).

D-66

- Although the PEIR acknowledges a potential increase in cancer, acute or chronic risk from exposure to toxic air contaminants based on the nature and extent of future projects under the WSGVP, it states: “Since the exact nature, location and operation of future developments are unknown”...quantification of health risks from toxic air contaminants “would be speculative.” (PEIR at page 4.3-53, page 4.3-34).

D-67

- Although the PEIR stated that the quantification of the health risks from toxic air contaminants is considered speculative, it also stated that the health risk is considered significant and unavoidable. (PEIR at page 4.3-53 and page 4.3-50)

D-68

The PEIR considered only the health impact on “sensitive receptors.” (PEIR at page 4.3-53)

The draft PEIR states that “construction of future projects developed under the Plan (WSGVP) would be consistent with AQMD.” (PEIR at page 4.3-43).

Only one page later, the draft PEIR states “all future projects would be required to demonstrate compliance with air quality on a project-by-project basis.” (PEIR at page 4.3-45).

D-69

“Impacts related to criteria pollutants associated with future projects developed under the Plan (WSGVP) are considered significant and unavoidable. (PEIR at page 4.3-47).

D-70

Fortunately, a table explains that mobile emissions, only, under the Plan (WSGVP) would exceed threshold for *all* criteria pollutants by 2045, as opposed to “No Project” by 2045. (PEIR at page 4.3-48).

**The WSGVP Does Not Achieve Many of its Ostensible Goals.**

- One stated goal of the WSGVP is to reduce VMT’s or vehicle miles traveled. (PEIR at page 4.3-29). The PEIR does not achieve its goal. The total VMT’s are increased by implementation of the WSGVP. (PEIR at page 4.6-21; page 4.8-48 to 4.8-49)

D-71

By increasing the population of residents or denominator, the WSGVP plays a numbers game by arguing that the VMT per service population is lower. (PEIR at page 4.6-21) This is disingenuous.

D-72

- Although another stated goal of the WSGVP is to reduce greenhouse gases, the planned construction increases ozone, a greenhouse gas.
- Construction of future projects under the WSGVP would have the potential to further increase GHG emissions through the use of heavy duty equipment such as excavators, cranes, forklifts and haul trucks. (PEIR at page 4.8-39)

D-73

The WSGVP increases the mobile source of GHG as opposed to the “No Project” alternative. (PEIR at page 4.8-48)

D-74

- Fuel consumption, a primary source of greenhouse gas, is greater under the WSGVP than the “No Project” alternative. (PEIR at page 4.6-20)
- The “Cap and Trade” program sets an overall limit on greenhouse gas emissions for covered entities. It does not guarantee reductions in any discrete location or by any source. Reductions are only guaranteed on a state-wide basis. This program allows covered facilities to trade permits to emit GHG. (PEIR at pages 4.8-23 to 4.8-24).
  - This is an easy escape for prolific polluters who use diesel-powered bulldozers, loaders, backhoes and forklifts. (PEIR at page 4.8-25)

D-75

**The WSGVP believes that Alternative # 3, Housing Element, Regional Housing Needs, Is the Superior Plan. (PEIR at page 5-44).**

- The WSGVP wants to cram an additional 25,954 residents into WSGV.

D-76

The Regional Housing Needs Allocation Plan wants to add only 17,875 new residents into WSGV. (PEIR at page 5-31)

- The WSGVP wants to crowd an additional 16,243 new housing units into WSGV.

D-77



The Regional Housing Needs Allocation Plan wants to add only 7,875 new housing units into WSGV. (PEIR at page 5-31)

D-77  
cont.

- The Regional Housing Needs Allocation Plan could satisfy its vision for WGSV by building new units in the other unincorporated areas of Los Angeles County.

D-78

The WSGVP's concerns for wildfire hazard and wildlife can be mitigated by imposing a moratorium on new building in and near the San Gabriel Mountains, a newly designated federal national monument.

Due to pandemic-related remote work, there are many vacant and unused commercial buildings in downtown Los Angeles and Pasadena.

Increase the number of emissions-free vehicle charging stations in these areas. New zero-emission car sales grew from less than 8% in 2020 to more than 25% in the third quarter of 2023. (PEIR at page 4.6-3)

D-79

Increase parking and charging stations near Metro stations.

Make Metro safe again with enhanced police and safety presence.

To further reduce greenhouse gas, mandate electric leaf-blowers throughout the County and give gardeners a tax incentive for buying them.

Another step would be providing education on the benefits of green waste recycling.

- Under the alternatives presented in the WSGVP summary (PEIR at page 5-45), the WSGVP concedes that its own Plan's impacts to aesthetics, air quality, biological resources, cultural resources, noise and transportation are significant and unavoidable.
  - Development and construction vibration also pose risks to existing structures in Altadena and risks to residents' health from the increased noise.

D-80

**The Risks to and Burden on Residents' Health Outweigh Benefits of Earth-disturbing Activities in Altadena**

- Minimize the health risks from VOC's, ozone and particulate matter by minimizing earth-disturbing construction in Altadena.
  - Vision a sustainable world where old buildings are re-purposed into wine bars, restaurants and small retail stores. This has happened naturally on Mariposa and Lake without new construction, whole scale demolition and zoning changes.

D-81

D-82

- The risks of serious adverse health consequences from construction activities outweigh the benefits of the WSGVP’s vision of cohesiveness, pedestrian-friendly and green areas, creation of jobs in one sector (construction/infrastructure) and planning consistency in building design and zoning.

To iterate, the health risks to Altadena residents involve cancer, liver damage, breathing problems, inflammation and damage to airways, aggravation of lung diseases, susceptibility to lung infections, chronic obstructive pulmonary disease, permanent lung damage and lung inflammation.

To iterate, the environmental burdens from the WSGVP involve an increase in volatile organic compounds, ozone, exposure from toxic water, soil and air quality, increase in particulate matter(s), an increase in total vehicle miles traveled and an increase in greenhouse gas(es).

To iterate, the social burdens from the WSGVP involve aggravation of racial, age and socio-economic divisions in Altadena.

The risk of wildfire and interference with wild land preservation may be minimized by a moratorium on new development in Altadena. Altadena’s 8.5 square miles are near and abut the San Gabriel Mountains, a protected National Monument. Los Angeles County’s need for additional housing can be directed to areas that have little to no risks of this nature.

D-83

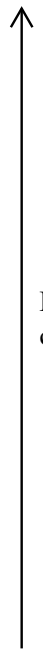
### **Preliminary Objections to Title 22**

- The objections to amendment of Title 22 are:
  - There is no zoning protection for the many religious entities or churches in Altadena. (Free Exercise Clause of both federal and California Constitutions);
  - The proposed rezoning to commercial (C-3) or mixed use, with the proposed amendment of Title 22, allows buildings with a height of 50 feet. This may undermine the full enjoyment of scenic views of National Monuments, such as the San Gabriel Mountains;
  - A buffer zone of only 5 feet between a commercial zone and a residence is not enough for harmonious relations;
  - Altadena has chosen its own Community Standards District and should reject the PASD;
  - Yards, exteriors, fences, walls and driveways are regulated under the proposed PASD regulations; These regulations can easily be used to strong-arm or displace current non-compliant residents whose properties stand in the way of developers.

D-84

- Under the proposed PASD, there are restrictions on renovations, remodeling, the number of windows, parking, floor area and even restoration after damage. This is a possible deprivation of property rights without due process.
- Although the proposed Title 22 references the Lake Avenue, Mixed Use Center at the end of this Chapter, it is missing. (Pages 136-137). In any event, the proposed amendment previously suggested that a building in this area may be 35-45 feet high. Again, this proposed height restricts enjoyment of the scenic San Gabriel Mountains.

I reserve the right to further comment on the proposed amendments to Title 2 and Title 22 in the “Tune-Up 003 Ordinance” by September 5, 2024. Of particular concern, based on headings, are Numbers 9, 10, 12 and 13 in the e-mail dated July 31, 2024.



D-84  
cont.

CANCERS  
— *in the* —  
URBAN  
ENVIRONMENT



*Patterns of Malignant Disease in Los Angeles County  
and its Neighborhoods*

THOMAS M. MACK, M.D., M.P.H.

Department of Preventive Medicine  
Keck School of Medicine  
Norris Comprehensive Cancer Center  
University of Southern California  
Los Angeles, California



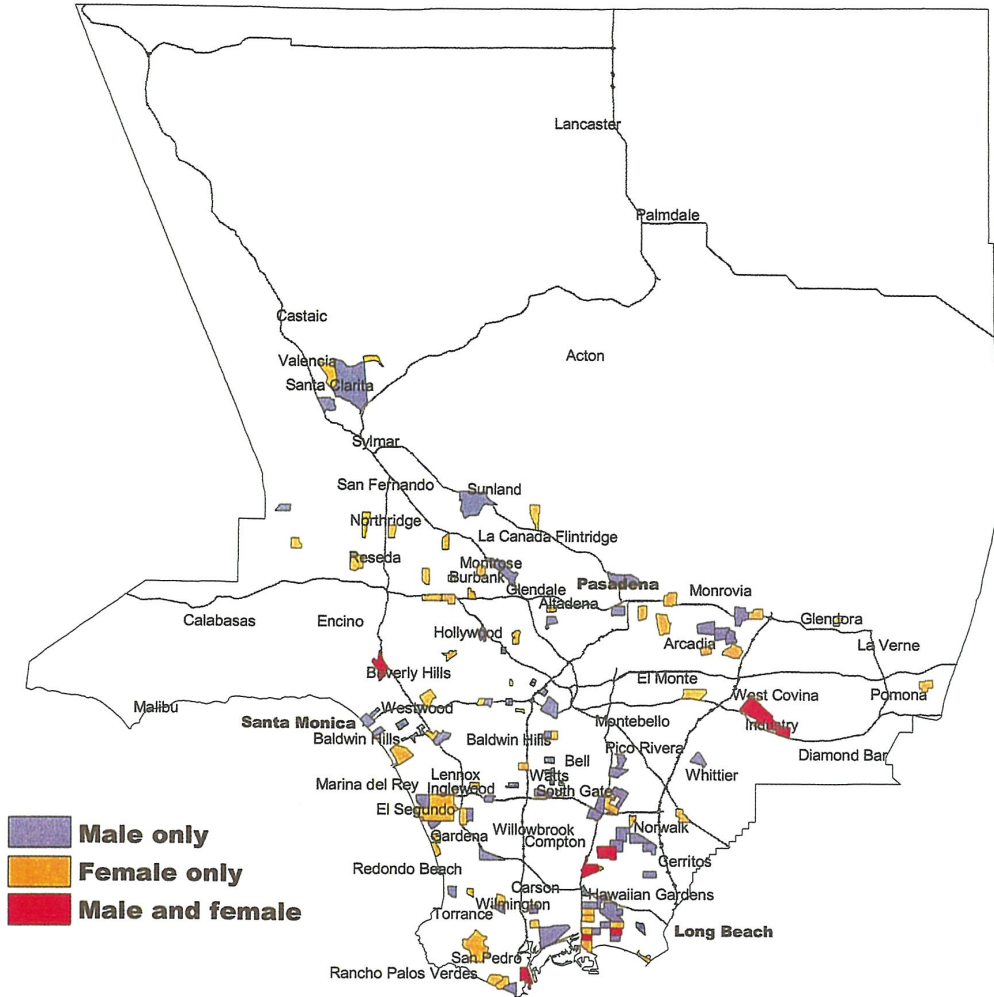
AMSTERDAM • BOSTON • HEIDELBERG • LONDON  
NEW YORK • OXFORD • PARIS • SAN DIEGO  
SAN FRANCISCO • SINGAPORE • SYDNEY • TOKYO

D-85



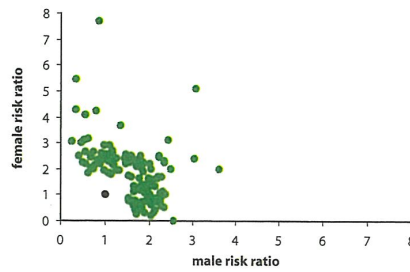
## *Oropharyngeal Carcinoma*

**Figure 11:** Map of census tracts at high risk, adjusted for social class.



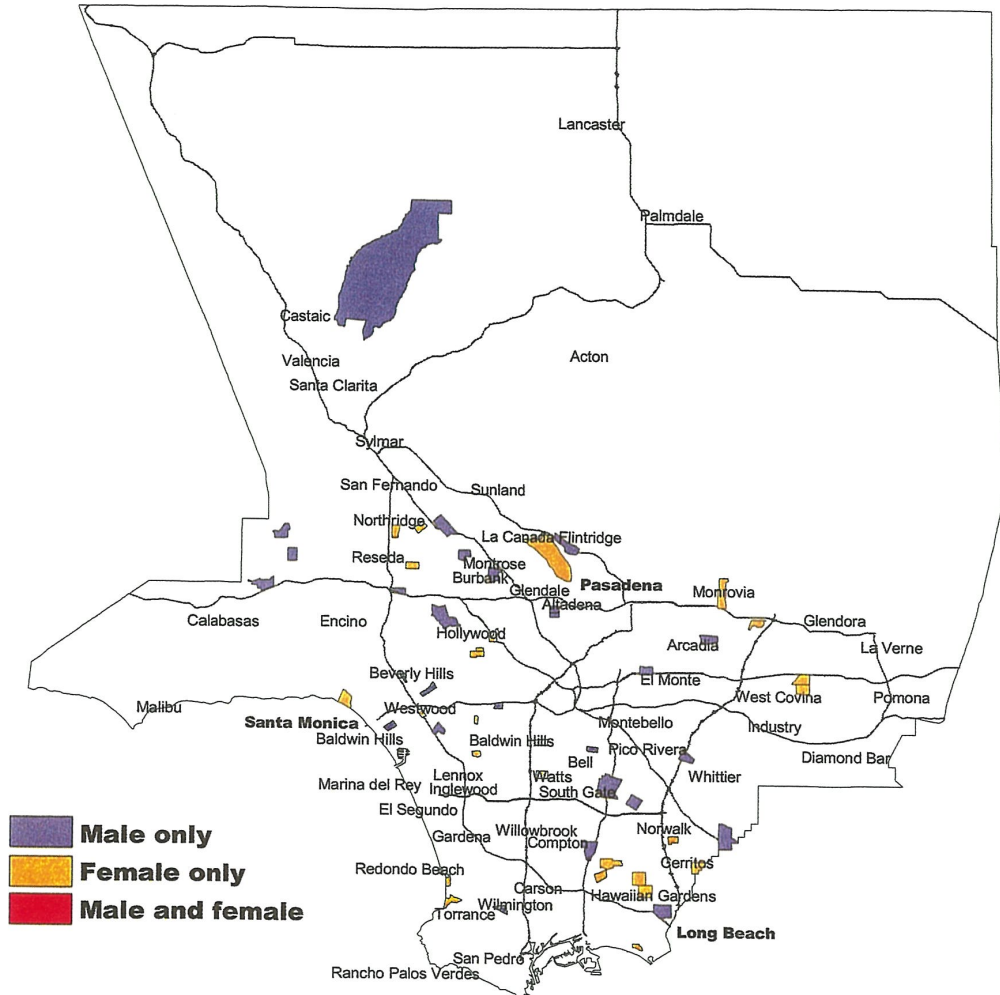
D-85  
cont.

**Figure 12:** Male-female correlation between the relative risks for high-risk census tracts, adjusted for social class.



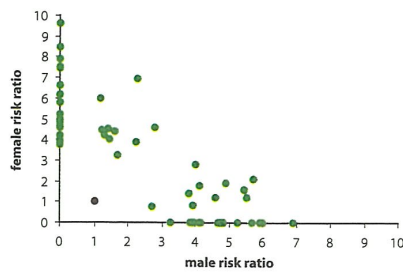
## *Salivary Gland Malignancies*

**Figure 11:** Map of census tracts at high risk, adjusted for social class.



D-85  
cont.

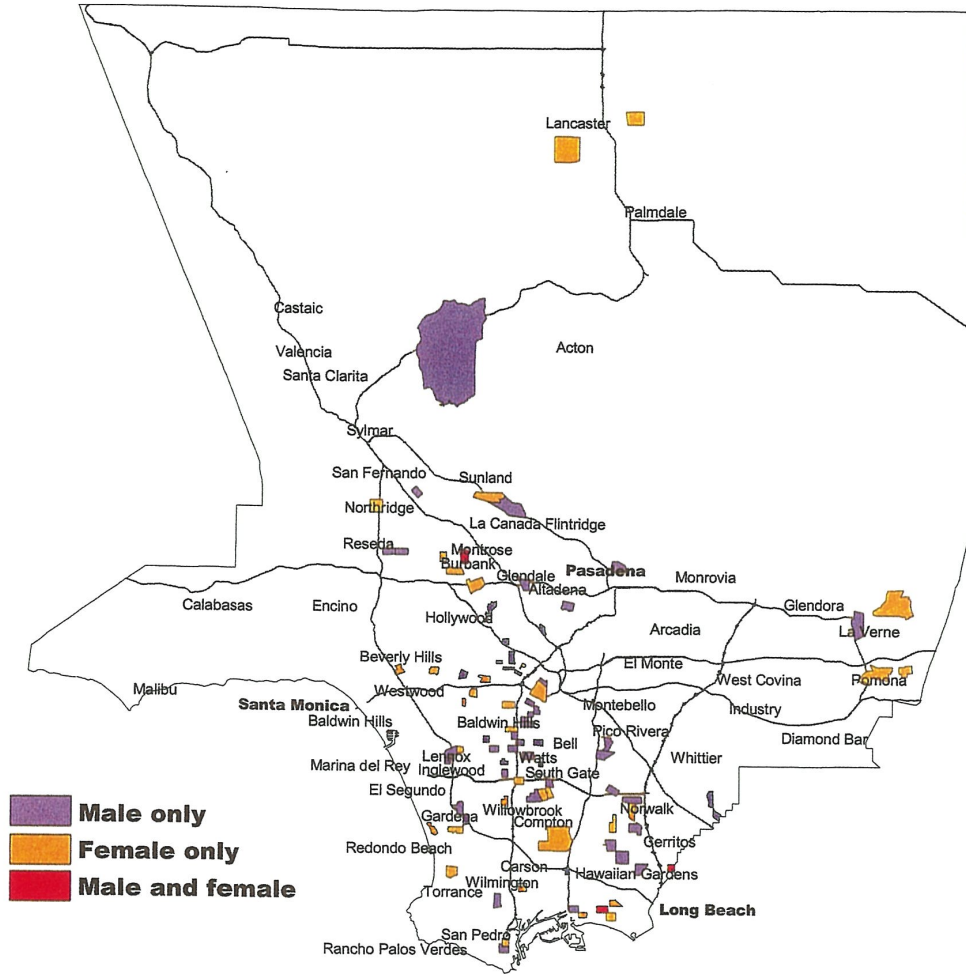
**Figure 12:** Male-female correlation between the relative risks for high-risk census tracts, adjusted for social class.





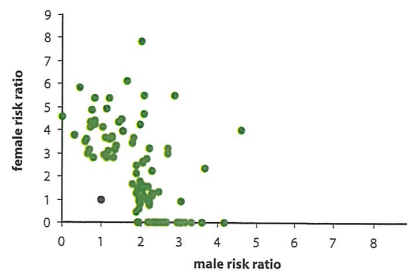
## *Carcinoma of the Larynx*

**Figure 9:** Map of census tracts at high risk.



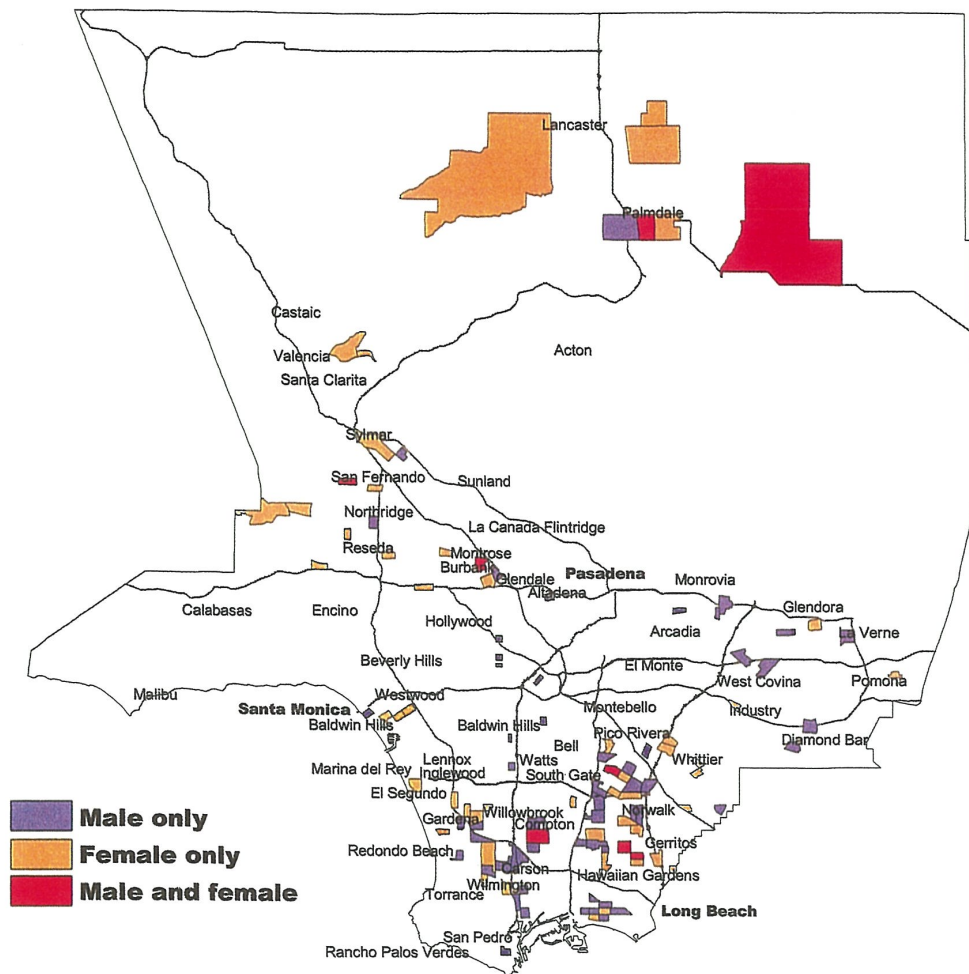
D-85  
cont.

**Figure 10:** Male-female correlation between the relative risks for high-risk census tracts.



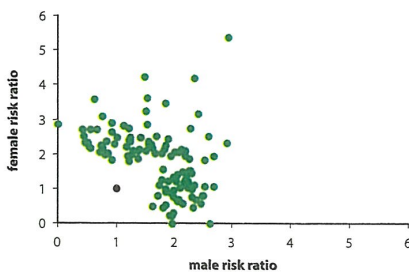
## *Small Cell Carcinoma of the Lung and Bronchus*

**Figure 9:** Map of census tracts at high risk.



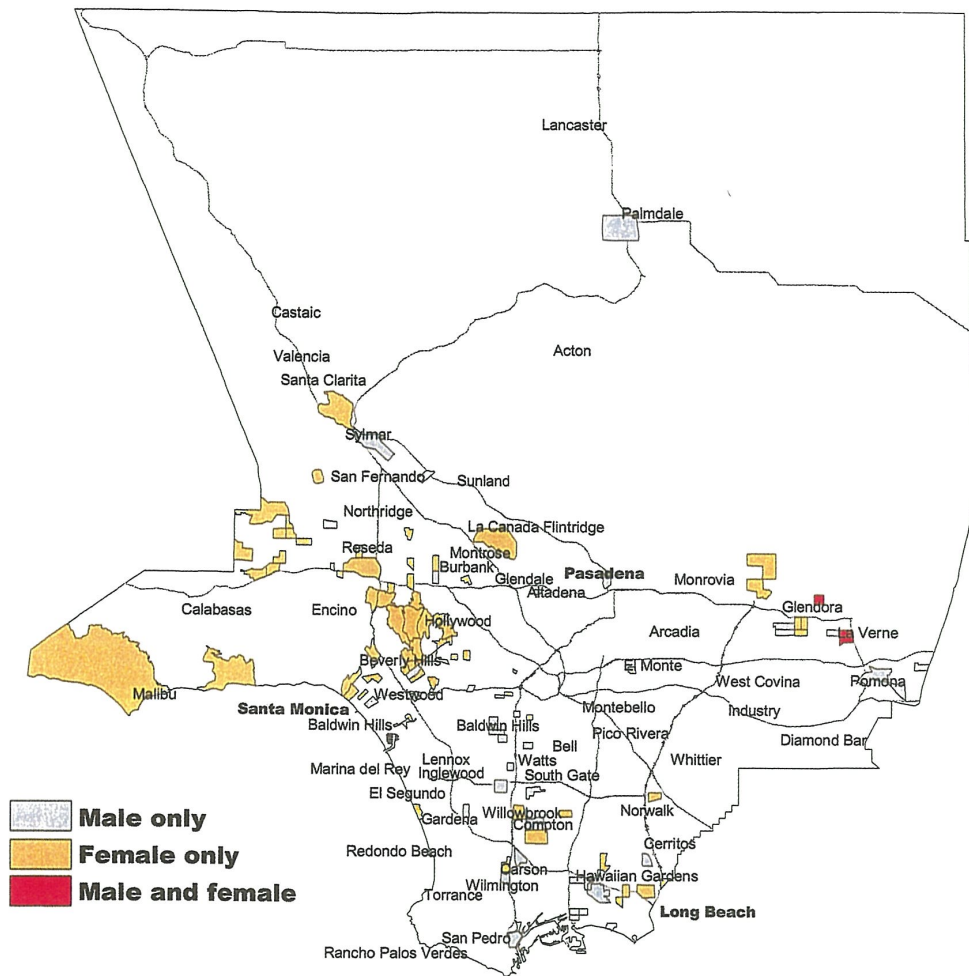
D-85  
cont.

**Figure 10:** Male-female correlation between the relative risks for high-risk census tracts.

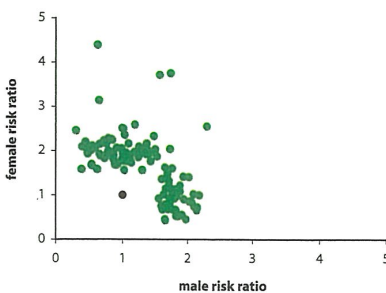


## *Adenocarcinoma of the Lung and Bronchus*

**Figure 9:** Map of census tracts at high risk.



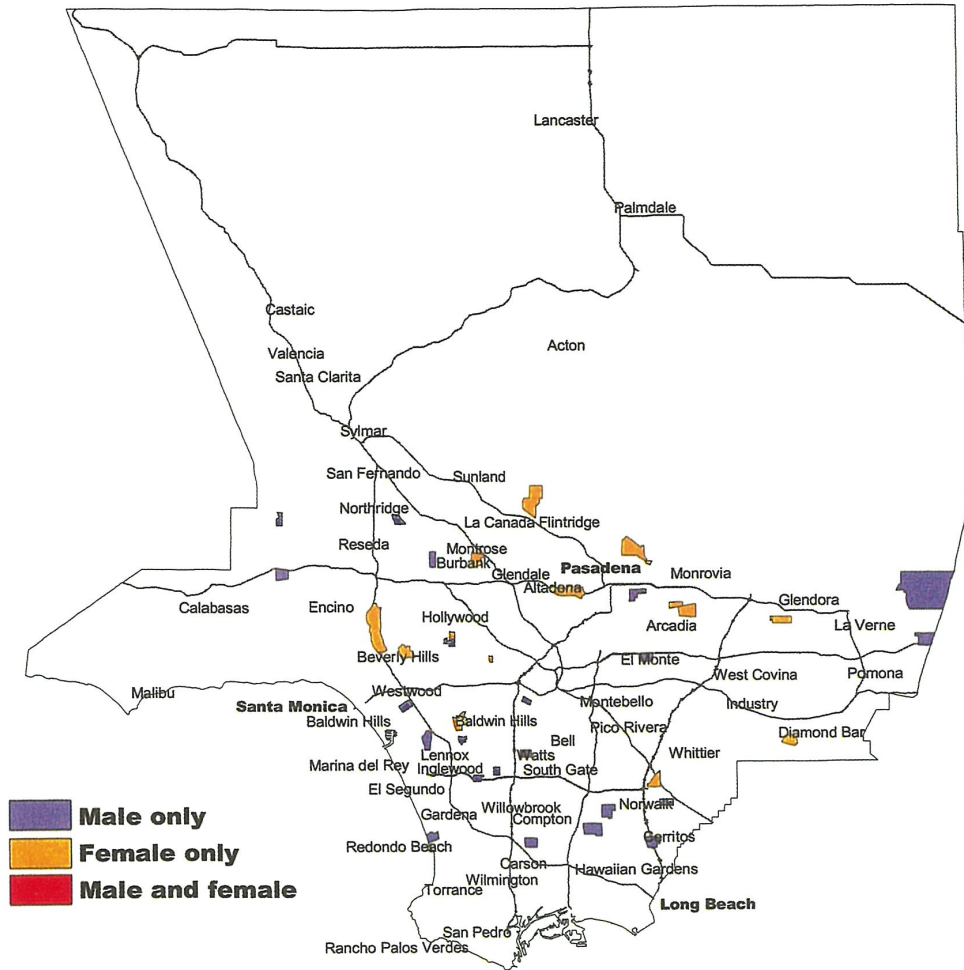
**Figure 10:** Male-female correlation between the relative risks for high-risk census tracts.



D-85  
cont.

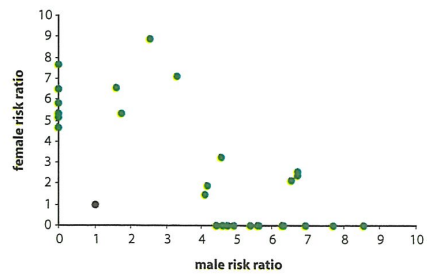
# Osteosarcoma

**Figure 9:** Map of census tracts at high risk.



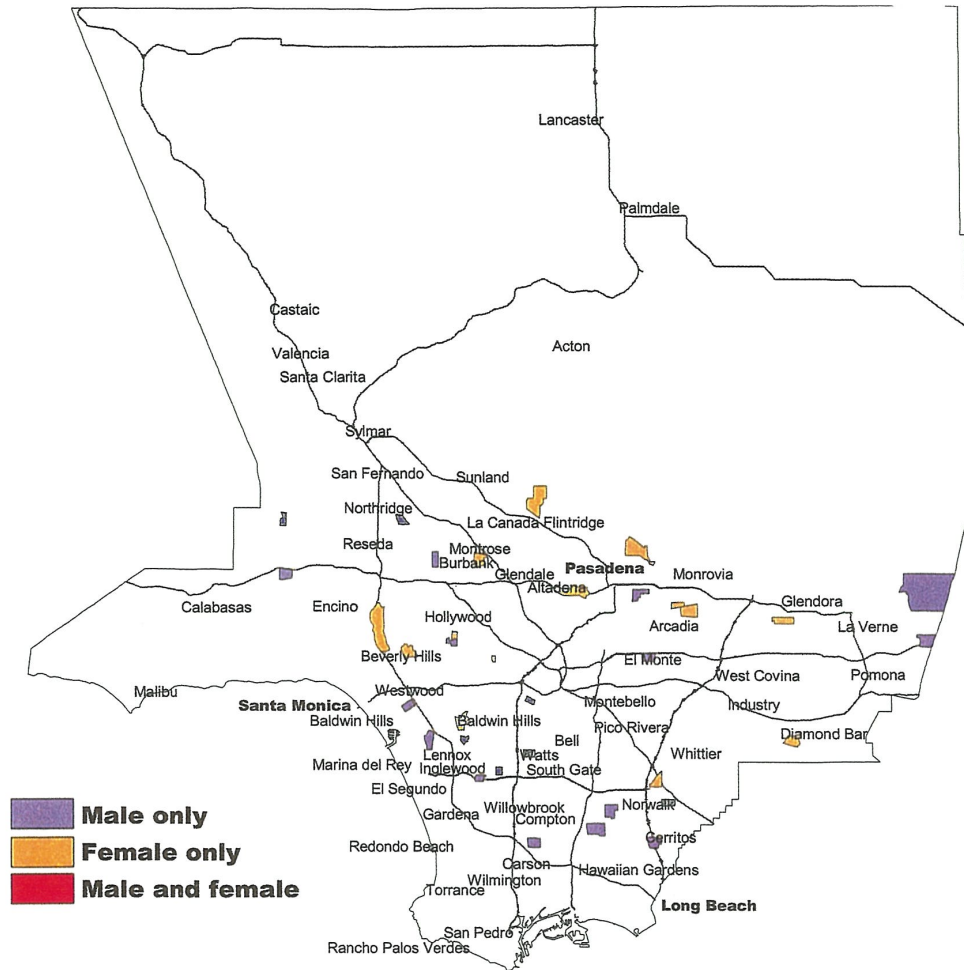
D-85  
cont.

**Figure 10:** Male-female correlation between the relative risks for high-risk census tracts.



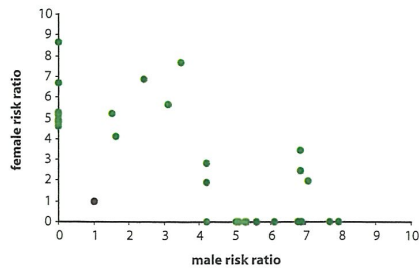
## *Osteosarcoma*

**Figure 11:** Map of census tracts at high risk, adjusted for social class.



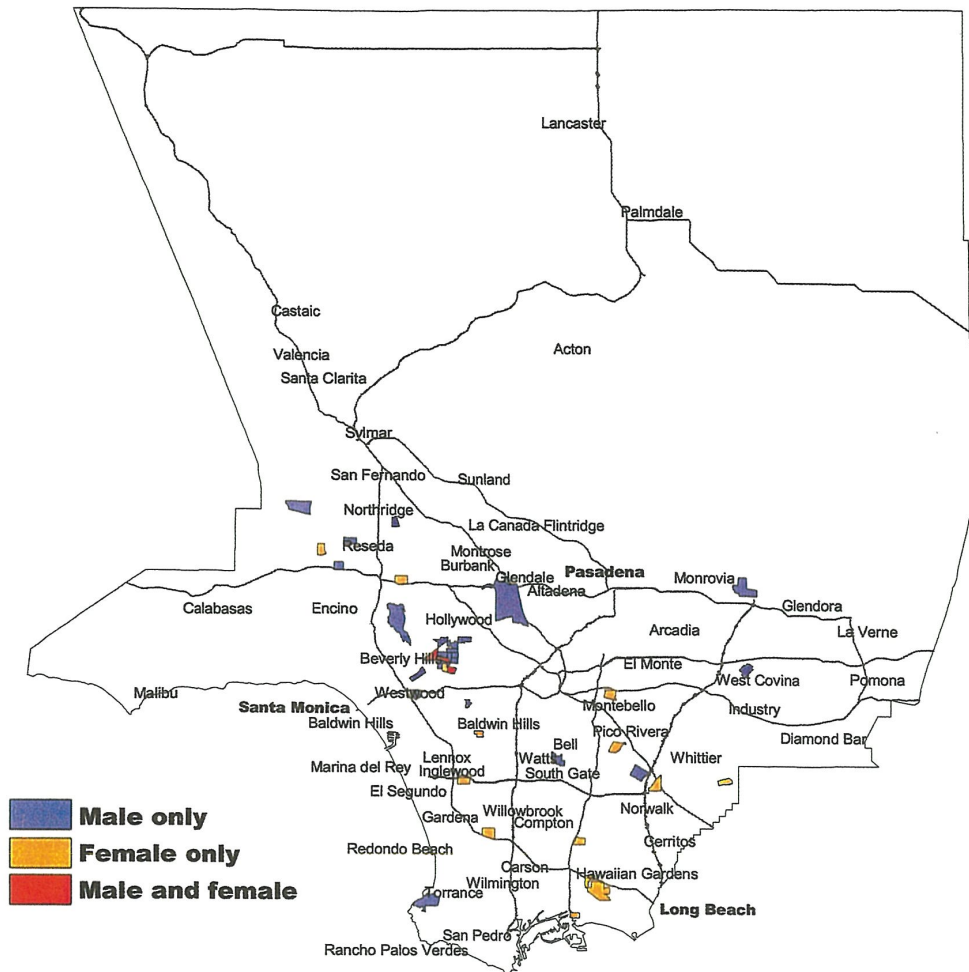
D-85  
cont.

**Figure 12:** Male-female correlation between the relative risks for high-risk census tracts, adjusted for social class.



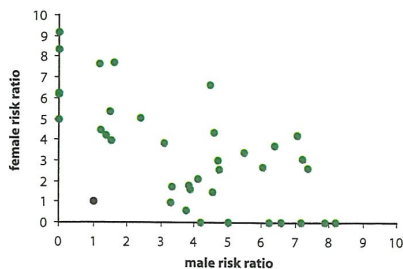
## *Squamous Bladder Carcinoma*

**Figure 11:** Map of census tracts at high risk, adjusted for social class.



D-85  
cont.

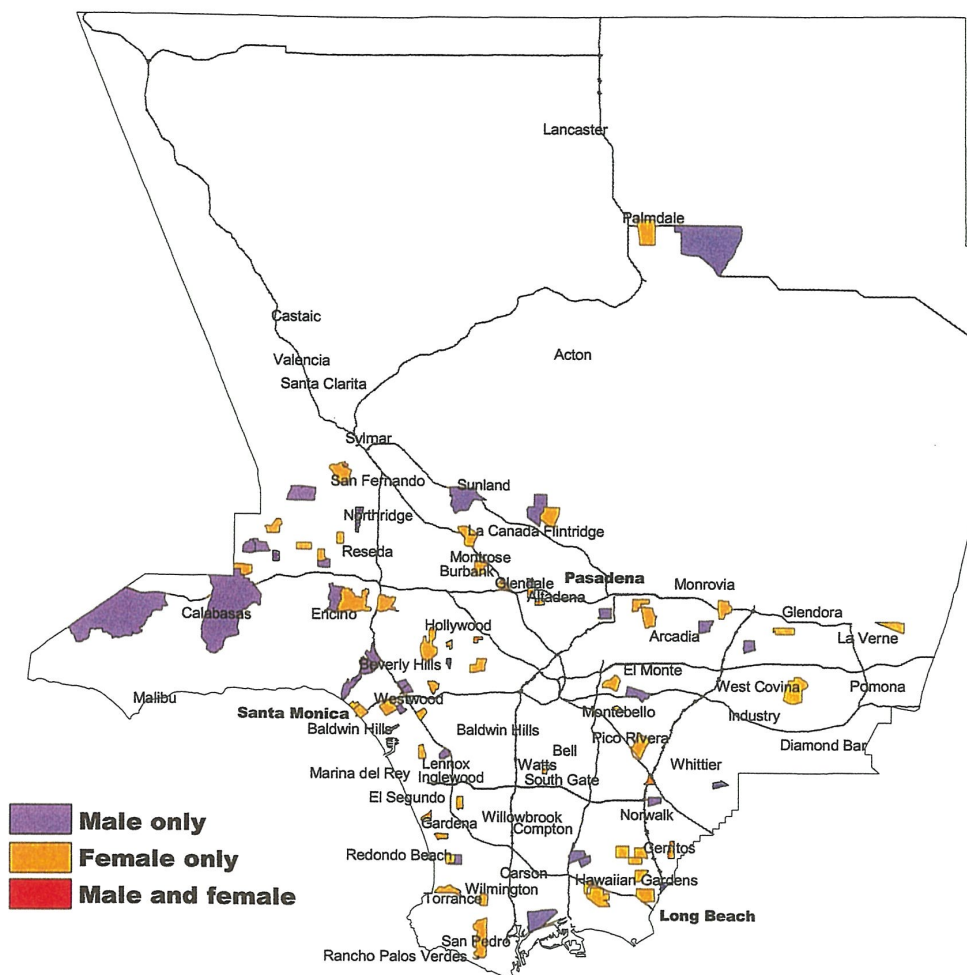
**Figure 12:** Male-female correlation between the relative risks for high-risk census tracts, adjusted for social class.





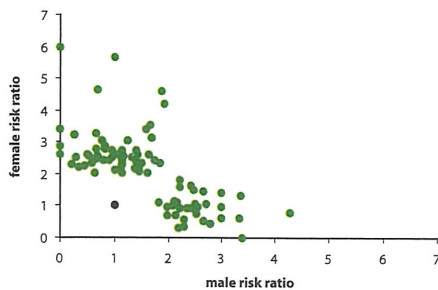
## Brain Malignancies (Gliomas)

**Figure 9:** Map of census tracts at high risk.



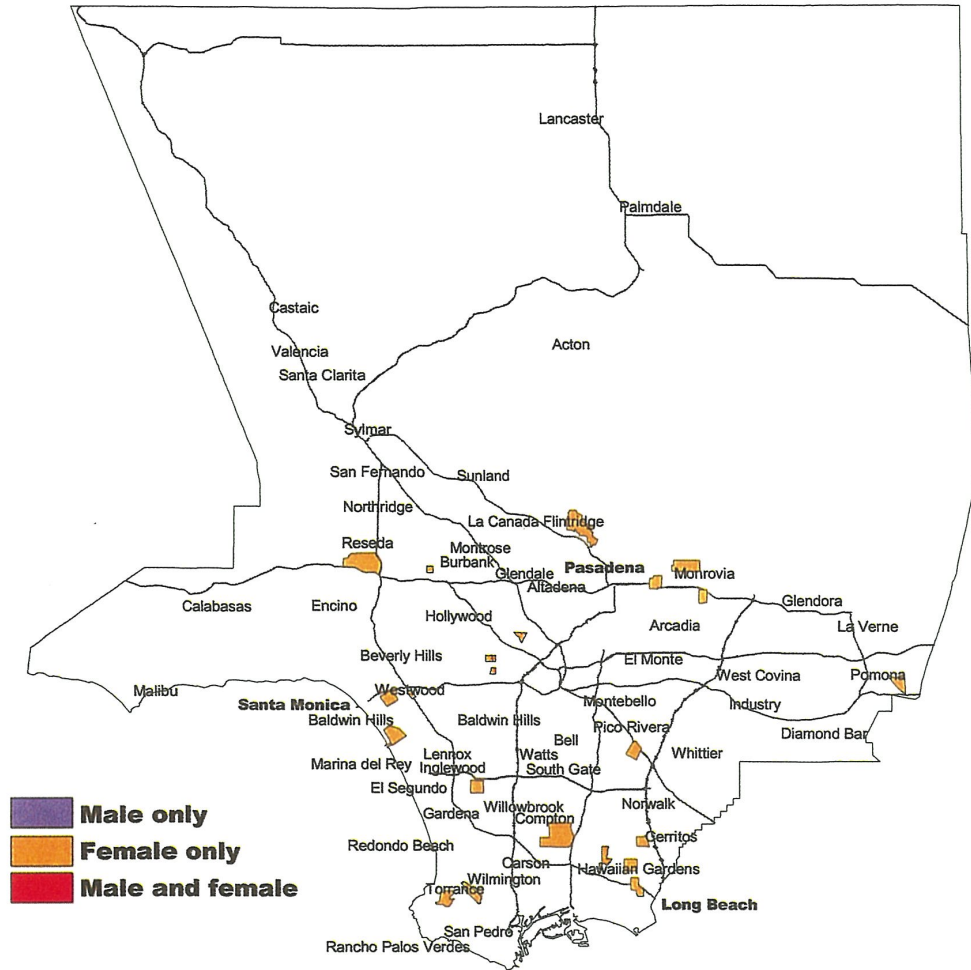
D-85  
cont.

**Figure 10:** Male-female correlation between the relative risks for high-risk census tracts.



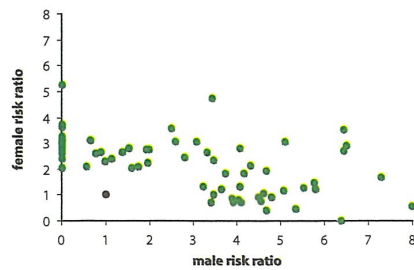
## *Papillary Carcinoma of the Thyroid*

**Figure 11:** Map of census tracts at high risk, adjusted for social class.



D-85  
cont.

**Figure 12:** Male-female correlation between the relative risks for high-risk census tracts, adjusted for social class.

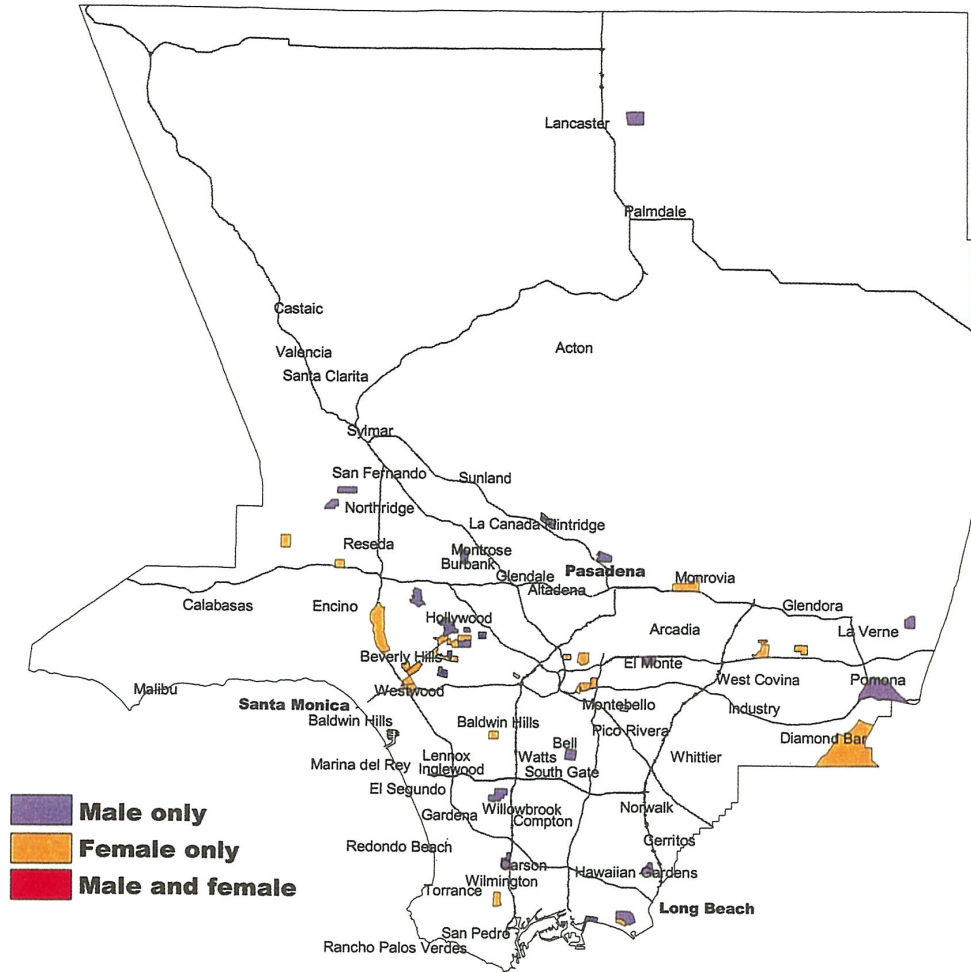






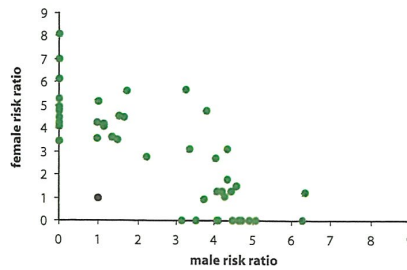
## *Diffuse Mixed B-Cell Non-Hodgkin Lymphoma*

**Figure 11:** Map of census tracts at high risk, adjusted for social class.



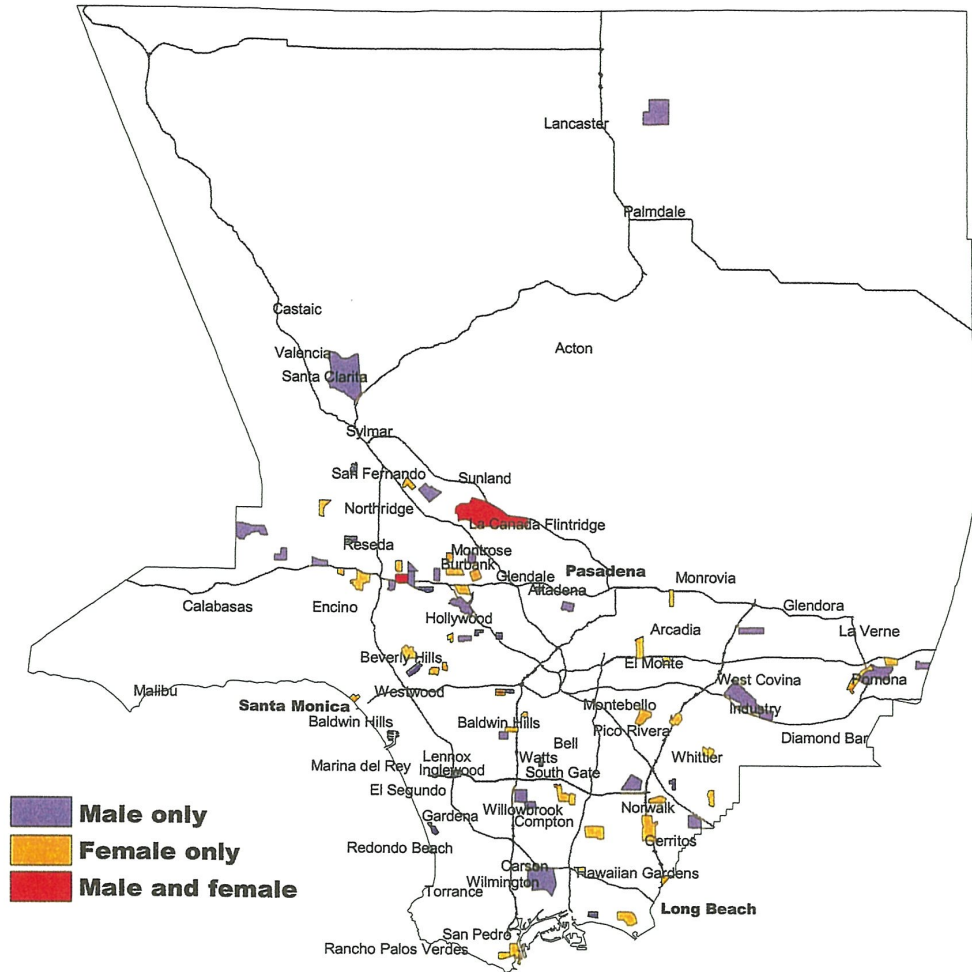
D-85  
cont.

**Figure 12:** Male-female correlation between the relative risks for high-risk census tracts, adjusted for social class.



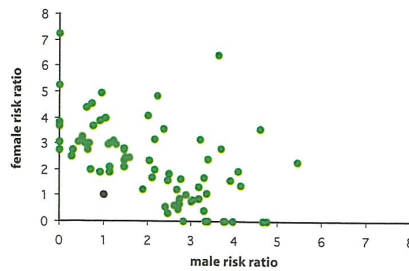
## *Chronic Lymphocytic Leukemia*

**Figure 11:** Map of census tracts at high risk, adjusted for social class.



D-85  
cont.

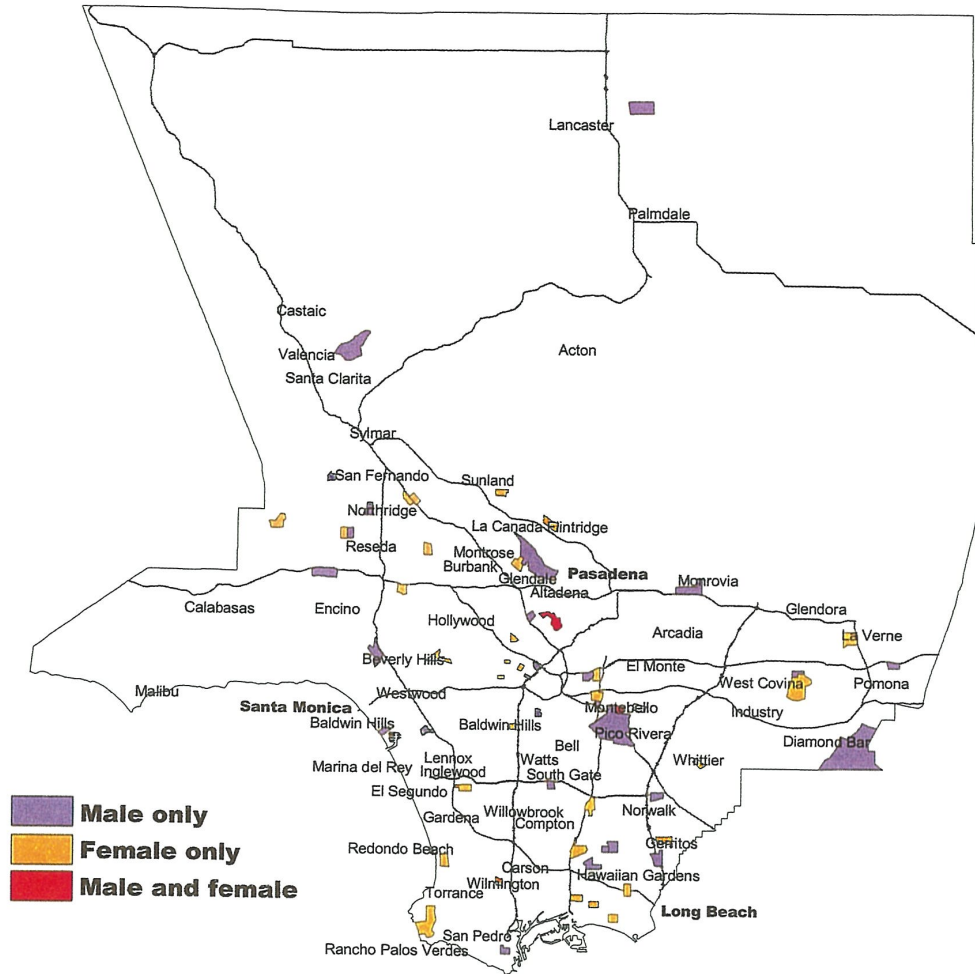
**Figure 12:** Male-female correlation between the relative risks for high-risk census tracts, adjusted for social class.





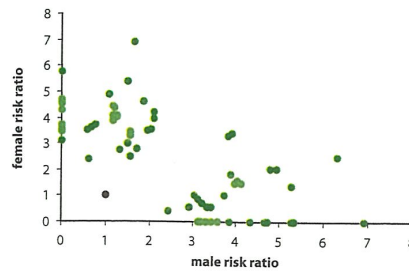
*All Malignancies of Older Children*

**Figure 11:** Map of census tracts at high risk, adjusted for social class.



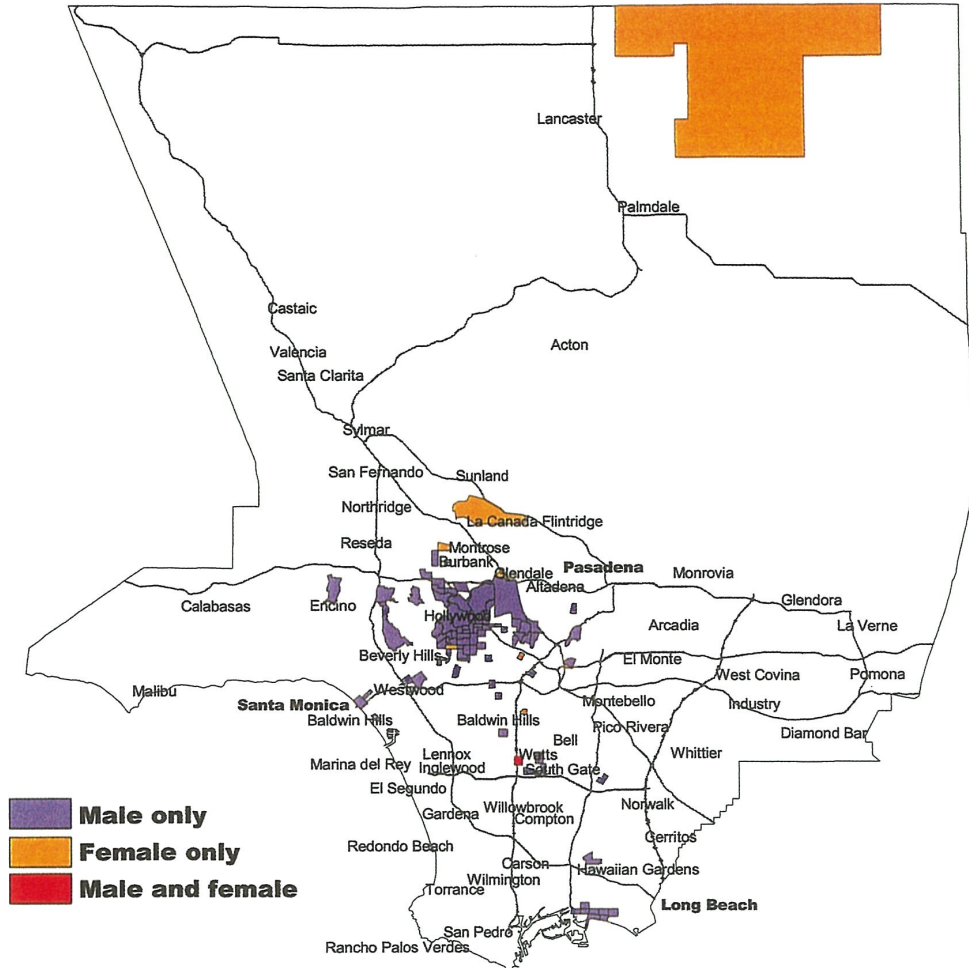
D-85  
cont.

**Figure 12:** Male-female correlation between the relative risks for high-risk census tracts, adjusted for social class.



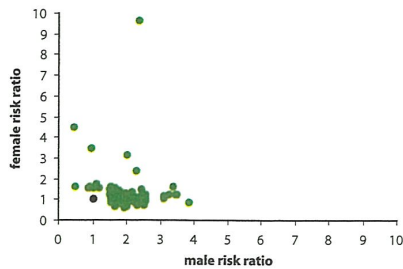
## *All Malignancies of Young Adults*

**Figure 11:** Map of census tracts at high risk, adjusted for social class.



D-85  
cont.

**Figure 12:** Male-female correlation between the relative risks for high-risk census tracts, adjusted for social class.





## Overall Summary

By describing the patterns of occurrence of malignancies in Los Angeles County, we have demonstrated that “cancer” is not a single disease, but a collection of many different diseases, each occurring because a different type of cell has grown out of control. We have tried to acquaint readers with the factors, notably chance and bias, which make it difficult to verify a local increase in incidence. We have explained that dramatic nonrandom patterns of occurrence sometimes are produced by exposures that are very personal and have nothing to do with pollution. Malignancies with different patterns of occurrence can be safely assumed to have different causes, whether or not the latter are all known.


A total of 72 different malignancies plus 12 combinations have been examined in the various ways permitted by available information. Excluding geographical considerations, every malignancy in some way or other gives evidence of occurring in a systematic, that is a nonrandom, pattern, although in the case of a few very rare malignancies the number of cases is too small to be completely certain. In general, the degree of variability in risk goes far beyond age differences. In most cases, there are differences between persons according to sex, race/ethnicity, or social class, all indicating

some form of personal or environmental factor.

In many cases there are characteristic trends over time, and about half the individual malignancies also provide evidence of some degree of systematic, i.e., nonrandom, geographic variation, thus indicating that factors other than chance determine the pattern of community incidence. Among the factors known to be responsible are personal experiences, such as occupational exposures, habits, recreational preferences, past reproductive and medical events, and genetic inheritance.

In at least six instances in this book the geographic distribution of high risk of disease was clearly nonrandom, but did not conform to the pattern that would have been predicted by available knowledge. The malignancies in question include oropharyngeal carcinoma, small cell carcinoma and adenocarcinoma of the lung, papillary carcinoma of the thyroid, squamous carcinoma of the bladder, and diffuse mixed B-cell non-Hodgkin lymphoma. The true explanation for none of these patterns is currently known, although educated guesses provide tentative hypotheses that are currently under evaluation. As of this writing, no evidence of a malignancy caused by a strictly environmental carcinogen has yet been confirmed.

D-85  
cont.

 An official website of the United States government



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## Drinking Water Requirements for States and Public Water Systems

CONTACT US <<https://epa.gov/dwreginfo/forms/contact-us-about-drinking-water-requirements-states-and-public-water-systems>>

# Chemical Contaminant Rules

### On this page:

- Rule Summary
- Rule History
- Compliance

## Rule Summary

The chemical contaminants were promulgated in phases collectively called the Phase II/V Rules or the Chemical Contaminant Rules. These rules regulate over 65 contaminants in three contaminant groups:

- Inorganic Contaminants (IOCs) (including nitrate and arsenic),
- Volatile Organic Contaminants (VOCs), and
- Synthetic Organic Contaminants (SOCs).

In 2001, EPA adopted a lower standard for arsenic in drinking water that applies to both community water systems and non-transient non-community water systems. The new arsenic standard of 10 parts per billion (ppb) replaces the old standard of 50 ppb. Several useful reference materials are provided below:

- The *Technical Fact Sheet: Final Rule for Arsenic in Drinking Water* contains requirements and compliance dates, the health effects associated with exposure to arsenic, the costs, benefits, and number of systems affected by the rule. Read the Arsenic Rule Technical Fact Sheet (PDF)(6 pp, 347 K, About PDF <<https://epa.gov/home/pdf-files>>) EPA 815-F-00-016, January 2001
- The *Drinking Water Standard for Arsenic Fact Sheet* provides information on the potential health effects from exposure to arsenic, an overview of the Final Rule, and background information on the natural occurrence of arsenic. Read the Drinking Water Standard for Arsenic Fact Sheet (PDF)(2 pp, 140 K, About PDF <<https://epa.gov/home/pdf-files>>) EPA 815-F-00-015, January 2001

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## Rule History

### Background Information on the Chemical Contaminant Rules

The chemical contaminants were promulgated in phases collectively called the Phase II/V Rules or the Chemical Contaminant Rules. These rules regulate over 65 contaminants in three contaminant groups:

- Inorganic Contaminants (IOCs) (including arsenic and nitrate),

D-86



- Volatile Organic Contaminants (VOCs), and
- Synthetic Organic Contaminants (SOCs).

The rules apply to all public water systems (PWS). PWS type, size, and water source type determine which contaminants require monitoring for that system.

Over a five year period, EPA gathered and analyzed occurrence and health effects data. Through the Phase II/V Rules, EPA established:

- Maximum Contaminant Level Goals (MCLGs),
- Maximum Contaminant Levels (MCLs),
- Monitoring requirements, and
- Best available technologies for removal for 65 chemical contaminants.

The Chemical Contaminants Rules provide public health protection through the reduction of chronic, or long-term, risks from:

- Cancer,
- Organ damage,
- Circulatory system disorders,
- Nervous system disorders, and
- Reproductive system disorders.

There is an acute health risk from nitrate and nitrite. The regulations reduce the risk of Methemoglobinemia or "blue baby syndrome." Blue Baby Syndrome is caused from ingestion of high levels of nitrate or nitrite.

## Regulated Chemical Contaminants

EPA set a Maximum Contaminant Level Goal (MCLG) for each contaminant. The MCLG is the maximum level of a contaminant in drinking water at which no known or anticipated adverse effect on the health of persons would occur, and which allows an adequate margin of safety. MCLGs are not enforceable.

The MCLG is not a legal limit set for PWSs. It is based solely on human health. For known cancer-causing contaminants the MCLG is set at zero. This is because any chemical exposure could present a cancer risk.

The Chemical Contaminants Rules also set Maximum Contaminant Level (MCL) for each contaminant. EPA sets MCLs as close to the health goal as possible. The MCL weighs the technical and financial barriers with public health protection.

The following link is a table of all regulated drinking water contaminants:

- Contaminants with established MCLs and MCLGs <<https://epa.gov/your-drinking-water/table-regulated-drinking-water-contaminants>>

The following table details the VOCs, SOCs, and IOCs that are regulated in each phase of the Phase II/V Rules.

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cont.

| Phases of the Phase II/V Rules                            | VOC  | SOC  | IOC  |
|---|--|--|--|
| Phase I, July 7, 1987<br>(52 FR 25690)<br>Effective: 1989 | Benzene<br>Carbon tetrachloride<br>p-dichlorobenzene<br>Trichloroethylene<br>Vinyl chloride<br>1,1,1-trichloroethane<br>1,1-dichloroethylene<br>1,2-dichloroethane   |  |  |
| Phase II, January 1991<br>(56 FR 3526)<br>Effective: 1992 | cis-1,2-dichloroethylene<br>Ethylbenzene<br>Monochlorobenzene<br>(chlorobenzene)<br>o-dichlorobenzene<br>Styrene<br>Tetrachloroethylene<br>Toluene<br>Trans-1,2-Dichloroethylene<br>Xylenes<br>1,2-dichloropropane | Alachlor<br>Atrazine<br>Carbofuran<br>Chlordane<br>EDB (ethylene dibromide)<br>DBCP (1,2-dibromo-3-chloropropane)<br>Heptachlor<br>Heptachlor epoxide<br>Lindane<br>Methoxychlor<br>Toxaphene<br>PCBs<br>2,4-D<br>2,4,5-TP | Asbestos<br>Cadmium<br>Chromium<br>Fluoride<br>Mercury<br>Nitrate<br>Nitrite<br>Selenium |
| Phase IIB, July 1991<br>(56 FR 30266)<br>Effective: 1993  |  | Pentachlorophenol<br>Aldicarb <sup>1</sup><br>Aldicarb sulfone <sup>1</sup><br>Aldicarb sulfoxide <sup>1</sup>   | Barium   |

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cont.

| Phases of the Phase II/V Rules                         | VOC  | SOC   | IOC   |
|--|--|---|---|
| Phase V, July 1992<br>(57 FR 31776)<br>Effective: 1994 | Dichloromethane<br>1,1,2-trichloroethane<br>1,2,4-trichlorobenzene | Benzo(a)pyrene<br>Dalapon<br>Di(ethylhexyl)-adipate<br>Di(ethylhexyl)-phthalate<br>Dinoseb<br>Diquat<br>Endothall<br>Endrin<br>Glyphosate<br>Hexachlorobenzene<br>Hexachlorocyclo-pentadiene<br>Oxamyl<br>Picloram<br>Simazine<br>2,3,7,8-TCDD (dioxin) | Antimony<br>Beryllium<br>Cyanide<br>Nickel <sup>2</sup><br>Thallium |

<sup>1</sup>Aldicarb, aldicarb sulfone, and aldicarb sulfoxide are considered regulated chemicals. However their MCLs are stayed and no monitoring is required (57 FR 22178, May 27, 1992).

<sup>2</sup> The MCL for nickel was remanded in 1995 but PWSs are still required to monitor.

### Background Information on Arsenic

Arsenic is one of the inorganic contaminants regulated under the Phase II/V Rules. In 2001, under the Arsenic Rule, EPA adopted a lower standard for arsenic in drinking water. The lower standard of 10 parts per billion (ppb) replaced the prior standard of 50 ppb.

Arsenic is a semi-metal element in the periodic table. It is odorless and tasteless. It can enter drinking water supplies from natural deposits in the earth or from agricultural and industrial practices.

Non-cancer effects of arsenic can include:

- Thickening and discoloration of the skin,
- Stomach pain,
- Nausea,
- Vomiting,
- Diarrhea,
- Numbness in hands and feet,
- Partial paralysis, and
- Blindness.

Arsenic has been linked to a number of cancers. These include cancer of the bladder, lungs, skin, kidney, nasal passages, liver, and prostate.

EPA set the arsenic standard for drinking water at 10 ppb (or 0.010 parts per million). This protects consumers from the effects of long-term, chronic exposure to arsenic. PWSs had to comply with the lower standard by January 23, 2006.

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cont.

## Background Information on Nitrate and Nitrite

Nitrate and Nitrite are the only acute inorganic contaminants regulated under the Phase II/V Rules. The greatest use of nitrates is as a fertilizer.

Nitrates and nitrites are nitrogen-oxygen chemical units which combines with various organic and inorganic compounds. Once taken into the body, nitrates are converted into nitrites. High levels of nitrate and nitrite are most serious for infants.

The conversion of nitrate to nitrite by the body, can interfere with the oxygen-carrying capacity of the child's blood, sometimes called Blue Baby Syndrome. This acute condition can occur rapidly over a period of days. Symptoms include shortness of breath and blueness of the skin.

The standard for Nitrate is 10 mg/L or ppm and for Nitrite it is 1 mg/L or ppm.

### For more information, including federal register notices, use the links below:

- Chemical Contaminant: Phase II/V Rule Regulatory History <<https://epa.gov/dwreginfo/chemical-contaminant-phase-ii-v-rule-regulatory-history>>
- Phase II/V Rule Regulatory Corrections and Significant Rule Developments <<https://epa.gov/dwreginfo/chemical-contaminant-phase-ii-v-rule-regulatory-corrections-and-significant-rule>>
- Phase II/V Rules in the Code of Federal Regulations <<https://epa.gov/dwreginfo/chemical-contaminant-rule-phase-ii-v-rules-code-federal-regulations-0>>
- Arsenic Rule History <<https://epa.gov/dwreginfo/drinking-water-arsenic-rule-history>>

## Compliance

Compliance is key to public health protection. EPA and the state and tribal primacy agencies help to support compliance monitoring in public water systems. The following provide support for compliance assistance to both the co-regulators and the regulated community water systems:

- Chemical Contaminant Rule Compliance for Primacy Agencies <<https://epa.gov/dwreginfo/chemical-contaminant-rules-compliance-primacy-agencies-state-and-tribal-agencies>>
- Chemical Contaminant Rule Compliance for Community Water System Owners and Operators <<https://epa.gov/dwreginfo/chemical-contaminant-rules-compliance-community-water-system-owners-and-operators>>
- Arsenic Rule Compliance for Primacy Agencies <<https://epa.gov/dwreginfo/arsenic-rule-compliance-help-states>>
- Arsenic Rule Compliance for Community Water System Owners and Operators <<https://epa.gov/dwreginfo/arsenic-rule-compliance-community-water-system-owners-and-operators>>

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Contact Us <<https://epa.gov/dwreginfo/forms/contact-us-about-drinking-water-requirements-states-and-public-water-systems>> to ask a question, provide feedback, or report a problem.

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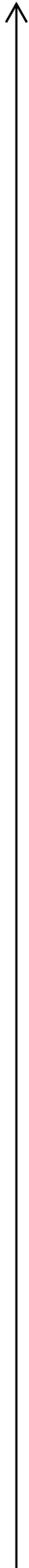
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### List of Drinking Water Contaminants & MCLs

#### National Primary Drinking Water Regulations

National Primary Drinking Water Regulations (NPDWRs or primary standards) are legally enforceable standards that apply to public water systems. Primary standards protect public health by limiting the levels of contaminants in drinking water. Visit the list of regulated contaminants with links for more details.



- [List of Contaminants & their Maximum Contaminant Level \(MCLs\)](#)
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- [EPA's Regulated Contaminant Timeline](#) (86 K PDF FILE, 1 pg) ([ALL ABOUT PDF FILES](#))
- [National Primary Drinking Water Regulations](#) [EXIT disclaimer](#) - The complete regulations regarding these contaminants available from the Code of Federal Regulations Website

#### National Secondary Drinking Water Regulations

National Secondary Drinking Water Regulations (NSDWRs or secondary standards) are non-enforceable guidelines regulating contaminants that may cause cosmetic effects (such as skin or tooth discoloration) or aesthetic effects (such as taste, odor, or color) in drinking water. EPA recommends secondary standards to water systems but does not require systems to comply. However, states may choose to adopt them as enforceable standards.

- [List of National Secondary Drinking Water Regulations](#)
- [National Secondary Drinking Water Regulations](#) [EXIT disclaimer](#) - The complete regulations regarding these contaminants available from the Code of Federal Regulations Web Site.

#### Unregulated Contaminants

This list of contaminants which, at the time of publication, are not subject to any proposed or promulgated national primary drinking water regulation (NPDWR), are known or anticipated to occur in public water systems, and may require regulations under SDWA. For more information check out the list, or visit the Drinking Water Contaminant Candidate List (CCL) web site.

- [List of Unregulated Contaminants](#)

blood; kidney, intestine, or liver problems  
 processing sites; discharge from electronics, glass, drug factories

**Organic Chemicals**

| Contaminant                  | MCLG <sup>1</sup><br>(mg/L) <sup>2</sup> | MCL or<br>TT <sup>1</sup><br>(mg/L) <sup>2</sup> | Potential<br>Health Effects<br>from<br>Ingestion of<br>Water            | Sources of<br>Contaminant<br>Drinking Water                          |
|------------------------------|--|--|---|--|
| <u>Acrylamide</u>            | zero                                     | TT <sup>9</sup>                                  | Nervous system or blood problems; increased risk of cancer              | Added to water during sewage/waste treatment                         |
| <u>Alachlor</u>              | zero                                     | 0.002  | Eye, liver, kidney or spleen problems; anemia; increased risk of cancer | Runoff from herbicide use on row crops                               |
| <u>Atrazine</u>              | 0.003                                    | 0.003  | Cardiovascular system or reproductive problems                          | Runoff from herbicide use on row crops                               |
| <u>Benzene</u>               | zero                                     | 0.005  | Anemia; decrease in blood platelets; increased risk of cancer           | Discharge from factories; leach from gas storage tanks and landfills |
| <u>Benzo(a)pyrene (PAHs)</u> | zero                                     | 0.0002   | Reproductive difficulties; increased risk of cancer                     | Leaching from linings of water storage tanks and distribution lines  |
| <u>Carbofuran</u>            | 0.04                                     | 0.04   | Problems with blood, nervous system, or reproductive system             | Leaching of soil fumigant used on rice and alfalfa                   |
| <u>Carbon tetrachloride</u>  | zero                                     | 0.005  | Liver problems; increased risk of cancer                                | Discharge from chemical plant and other industrial activities        |

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|  |       |        |   |  |
|--|-------|--------|---|--|
| <u>Chlordane</u>                               | zero  | 0.002  | Liver or nervous system problems; increased risk of cancer              | Residue of ba<br>termiticide   |
| <u>Chlorobenzene</u>                           | 0.1   | 0.1    | Liver or kidney problems  | Discharge fror<br>chemical and<br>agricultural<br>chemical facto                     |
| <u>2,4-D</u>                                   | 0.07  | 0.07   | Kidney, liver,<br>or adrenal<br>gland<br>problems                       | Runoff from<br>herbicide usec<br>row crops   |
| <u>Dalapon</u>                                 | 0.2   | 0.2    | Minor kidney<br>changes   | Runoff from<br>herbicide usec<br>rights of way                                       |
| <u>1,2-Dibromo-3-<br/>chloropropane (DBCP)</u> | zero  | 0.0002 | Reproductive<br>difficulties;<br>increased risk<br>of cancer            | Runoff/leachin<br>from soil fumig<br>used on soybe<br>cotton, pineap<br>and orchards |
| <u>o-Dichlorobenzene</u>                       | 0.6   | 0.6    | Liver, kidney,<br>or circulatory<br>system<br>problems                  | Discharge fror<br>industrial chen<br>factories                                       |
| <u>p-Dichlorobenzene</u>                       | 0.075 | 0.075  | Anemia; liver,<br>kidney or<br>spleen<br>damage;<br>changes in<br>blood | Discharge fror<br>industrial chen<br>factories                                       |
| DCA ***<br><u>1,2-Dichloroethane</u>           | zero  | 0.005  | Increased risk<br>of cancer   | Discharge fror<br>industrial chen<br>factories                                       |
| * <u>1,1-Dichloroethylene</u>                  | 0.007 | 0.007  | Liver problems  | Discharge fror<br>industrial chen<br>factories                                       |
| * <u>cis-1,2-Dichloroethylene</u>              | 0.07  | 0.07   | Liver problems  | Discharge fror<br>industrial chen<br>factories                                       |
| * <u>trans-1,2-Dichloroethylene</u>            | 0.1   | 0.1    | Liver problems  | Discharge fror<br>industrial chen<br>factories                                       |
| <u>Dichloromethane</u>                         | zero  | 0.005  | Liver<br>problems;<br>increased risk<br>of cancer                       | Discharge fror<br>drug and chen<br>factories   |

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|       |                               |       |       |   |
|-------|-------------------------------|-------|-------|---|
|       |                               |       | blood |   |
|       | <u>Styrene</u>                | 0.1   | 0.1   | Liver, kidney, or circulatory system problems<br>Discharge from rubber and plastic factories; leach from landfills          |
| PCE * | <u>Tetrachloroethylene</u>    | zero  | 0.005 | Liver problems; increased risk of cancer<br>Discharge from factories and cleaners   |
|       | <u>Toluene</u>                | 1     | 1     | Nervous system, kidney, or liver problems<br>Discharge from petroleum factories   |
|       | <u>Toxaphene</u>              | zero  | 0.003 | Kidney, liver, or thyroid problems; increased risk of cancer<br>Runoff/leaching from insecticides used on cotton and cattle |
|       | <u>2,4,5-TP (Silvex)</u>      | 0.05  | 0.05  | Liver problems<br>Residue of herbicide  |
|       | <u>1,2,4-Trichlorobenzene</u> | 0.07  | 0.07  | Changes in adrenal glands<br>Discharge from textile finishing factories   |
|       | <u>1,1,1-Trichloroethane</u>  | 0.20  | 0.2   | Liver, nervous system, or circulatory problems<br>Discharge from metal degreasing sites and other factories                 |
|       | <u>1,1,2-Trichloroethane</u>  | 0.003 | 0.005 | Liver, kidney, or immune system problems<br>Discharge from industrial chemical factories                                    |
| TCE   | <u>Trichloroethylene</u>      | zero  | 0.005 | Liver problems; increased risk of cancer<br>Discharge from metal degreasing sites and other factories                       |
|       | <u>Vinyl chloride</u>         | zero  | 0.002 | Increased risk of cancer<br>Leaching from pipes; discharge from plastic factories   |
|       | <u>Xylenes (total)</u>        | 10    | 10    | Nervous system damage<br>Discharge from petroleum factories; discharge from chemical factories                              |

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cont.

**Radionuclides**

ORIGINAL  
Public Health  
Assessment  
for

NAS7.000569  
NASA - JPL  
SSIC No. 9661

JET PROPULSION LABORATORY (NASA)  
PASADENA, LOS ANGELES COUNTY, CALIFORNIA  
CERCLIS NO. CA9800013030  
AUGUST 5, 1999

D-88

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES  
PUBLIC HEALTH SERVICE  
Agency for Toxic Substances and Disease Registry

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PUBLIC HEALTH ASSESSMENT

JET PROPULSION LABORATORY (NASA)  
PASADENA, LOS ANGELES COUNTY, CALIFORNIA

CERCLIS NO. CA9800013030

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cont.

Prepared by:

Federal Facilities Assessment Branch  
Division of Health Assessment and Consultation  
Agency for Toxic Substances and Disease Registry

## BACKGROUND

### Site Description and History

The National Aeronautics and Space Administration (NASA) Jet Propulsion Laboratory (JPL) is located in Pasadena, California, northeast of Interstate 210. JPL consists of approximately 155 buildings on a 176-acre campus situated on a foothill ridge of the San Gabriel Mountains (see Figure 1). The facility is located within the boundaries of the cities of Pasadena and La Cañada-Flintridge; residential areas of these cities and the community of Altadena are within 1 to 3 miles of JPL. JPL is bordered to the north by the Angeles National Forest; to the east by the Arroyo Secco (an intermittent stream bed) and spreading grounds (a series of man-made basins used to percolate runoff water to replenish the aquifer); to the west by a residential neighborhood; and to the south by an equestrian club, a fire station, a U.S. Forest Service Ranger Station, and the Hahamonga Community Watershed Park (formerly known as Oak Grove Park). Also located south of the facility are several schools and the Devil's Gate Reservoir.

In 1936, a group of researchers began experimenting with rocket fuels in Pasadena's Arroyo Secco area. The group was soon enlisted to conduct research for the U.S. military, and in 1945 the group was designated the Jet Propulsion Laboratory, under the jurisdiction of the U.S. Army. In 1958, the facility was transferred to NASA and assigned a mission of research and development in aeronautics, space technology, and space transportation (JPL, 1991b).

The California Institute of Technology is currently under contract with NASA to perform research and development at JPL, as well as to manage the facilities. NASA maintains a presence at the facility in a supervisory role only. Primary activities at JPL currently include automated exploration of the solar system and deep space (including the Mars Pathfinder mission) and design and operation of the Deep Space Network that tracks spacecraft.

In performing these tasks, support facilities and research and development laboratories at JPL have used a variety of chemicals, including chlorinated solvents, solid rocket fuel propellants, cooling tower chemicals, sulfuric acid, Freon, mercury, and various laboratory chemicals. From 1945 to 1960, JPL disposed of liquid and solid wastes, including chemical wastes, in over 40 seepage pits and waste pits on the facility grounds (JPL, 1991a). It is believed that the seepage pits were backfilled between 1960 and 1963, when JPL installed a sewer system (Ebasco, 1990a, 1993). Since there is very little undeveloped land on the facility grounds, these disposal areas are now located under buildings, retaining walls, parking lots, roads, and flower planters. JPL now transports all of its hazardous wastes off site for destruction, disposal, or recycling.

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### Remedial and Regulatory History

In 1980, the city of Pasadena detected volatile organic compounds (VOCs)—carbon tetrachloride (CTC) and trichloroethylene (TCE)—in municipal wells located in and east of the Arroyo Secco spreading grounds southeast of JPL. VOCs were also detected at around the same time in two drinking water wells operated by the Lincoln Avenue Water Company, which primarily supplies the community of Altadena. Although the detected VOC concentrations initially did not exceed California drinking water standards (5 parts per billion [ppb] for CTC and TCE) the contaminant levels gradually rose so that the contamination in these wells was eventually above state standards (JPL, 1997a, 1994). These elevated contaminant concentrations forced the temporary closure of two Pasadena municipal wells in 1985, followed by the temporary closure of the two Lincoln Avenue wells in 1987, and finally the remaining two Pasadena wells in 1989 (JPL, 1994).

Because JPL is the major industrial establishment near these wells, it was suspected to be the source of the groundwater contamination. JPL and the city of Pasadena conducted preliminary assessment (PA) activities in 1982, 1984, 1986, and 1987 to identify the source(s) of contamination (JPL, 1991a).

In 1990, NASA funded the construction of a water treatment plant for the four contaminated Pasadena municipal wells. This allowed the city of Pasadena to resume production of drinking water from these wells. Also in 1990, JPL removed a suspected contaminant source area consisting of a storm drain and 160 cubic yards of soil and sludge (JPL, 1994). The Lincoln Avenue Water Company built a water treatment system in 1992, which allowed them to reopen the two closed drinking water wells.

In 1992, following an expanded site inspection (ESI) that identified CTC, TCE, and 1,1-dichloroethane (DCA), and to a lesser extent tetrachloroethylene (PCE), above drinking water standards in on-site groundwater (Ebasco, 1990a), JPL was placed on the U.S. Environmental Protection Agency's (EPA's) National Priorities List (NPL). Later that year (December 1992), EPA, the state of California, and JPL negotiated a Federal Facilities Agreement specifying how investigation and cleanup work at the site would be conducted.

During the site investigation process, JPL was divided into three operable units (OUs) to facilitate characterization of the sources, nature, and extent of contamination at and around the installation and to enable the proper design of cleanup measures. At each OU, JPL is conducting both a remedial investigation (RI) to identify and characterize the contamination and a feasibility study (FS) to determine the best methods of remediation. For OUs 1 and 3, JPL anticipates completing

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Basin, an aquifer covering approximately 40 square miles which is replenished by water flows from the San Gabriel Mountains, including the Arroyo. The Raymond Basin is an important source of drinking water for many communities in the area including Alhambra, Altadena, Arcadia, La Cañada-Flintridge, Pasadena, San Marino, and Sierra Madre. Sixteen water purveyors, who are each allowed to pump a certain amount of water per year, supply groundwater from the Raymond Basin to the public. In 1944 the Superior Court of California approved the Raymond Basin Judgement, which adjudicated the rights to groundwater production to preserve the safe yield of the groundwater basin (Raymond Basin, 1998b). Under authority of a 1984 court order, the Raymond Basin Management Board, made up of representatives of the water purveyors, oversees the management and protection of the Raymond Basin (Raymond Basin, 1997a, 1997b). A total of six Raymond Basin water purveyors operate wells within 4 miles of JPL. The closest—within 2,500 feet of JPL—are four drinking water wells, directly east of the Arroyo Secco, that are operated by the city of Pasadena. Other nearby municipal wells are located in Altadena, La Cañada-Flintridge, and Pasadena (locations of nearby drinking water wells and monitoring wells are shown in Figure 3).

The climate in Pasadena is semiarid and is characterized by hot, dry summers and mild winters with intermittent rain. The average annual precipitation in the area is 22.5 inches. The local aquifer is recharged by both natural infiltration of precipitation and artificial recharge from spreading grounds located on the eastern edge of the Arroyo Secco. The spreading basins and the Arroyo Secco are used for flood control during rainy months (December to March), when the intermittent stream running through the arroyo reaches its highest levels. The arroyo drains into the Devil's Gate Reservoir located 1 mile south of JPL. The reservoir is formed by the Devil's Gate Dam, which is situated at the southern edge of the reservoir by Interstate 210. The level of the reservoir fluctuates during the year, with little or no standing water present during dry seasons. During major floods, water has risen over portions of Hahamonga Community Watershed Park to the west and the spreading basins to the east. The Devil's Gate Dam and Reservoir has undergone renovations that should result in a several-acre-large permanent pond. The level of this pond will be raised and lowered throughout the year to maintain proper flow downstream of the dam. There are no other lakes, ponds, or wetlands in the vicinity of JPL.

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#### **ATSDR Involvement**

ATSDR conducted initial site visits at JPL on August 12 and August 20, 1997, to meet with JPL environmental personnel and state public health and environmental officials and to gather information pertinent to the preparation of a public health assessment (PHA) for this site. On December 2 and 3, 1997, ATSDR conducted another site visit to collect further information for

Arroyo Secco, although the direction can change, and even reverse for short periods of time, depending on seasonal variations, pumping rates of the various supply wells in the area, and the quantity of infiltration of surface runoff water in the Arroyo Secco basins (Ebasco, 1993). Groundwater elevations at JPL are generally lower between July and December and higher between January and June.

Thrust faults in the vicinity of JPL include the Mount Lukens Thrust Fault, the south branch of the San Gabriel Thrust Fault, and the JPL Thrust Fault. These faults comprise part of the Sierra Madre Fault system that separates the San Gabriel Mountains from the Raymond Basin. The JPL Thrust Fault runs along the hillside at the uphill edge of the JPL campus, and creates an uplifted, or perched, aquifer that is separate from the larger regional aquifer (Ebasco, 1993).

### Groundwater Quality and Sources of Contamination

Through the RI and previous investigations, JPL has installed a total of 19 monitoring wells on site and in the adjacent Arroyo Secco to characterize contaminant concentrations in groundwater beneath source areas of the site, and to track contaminant movement (see Figure 3). There are a number of suspected contaminant source areas at JPL. Some of the source areas include seepage pits, waste pits, stormwater discharge points, and spill areas where hazardous waste may have been released indirectly to groundwater through the soil.

Many of these monitoring wells have screens at several different depths in the aquifer to provide information about the three-dimensional distribution of contaminants beneath JPL. Since August 1996, JPL has sampled its monitoring wells quarterly and analyzed the samples for VOCs and metals; JPL now analyzes these quarterly samples for perchlorate, as well (Foster Wheeler, 1997a, 1997b).

As part of the RI/FS, JPL has also installed five off-site monitoring wells to the south and east of the facility, in Altadena, Pasadena, and the Hahamonga Community Watershed Park (see Figure 3). These wells will help identify groundwater contamination that may have migrated from JPL and determine the horizontal and vertical extent of contamination. JPL also samples these wells quarterly.

The available data indicate that JPL is a source of VOC and perchlorate contamination in both on-site and off-site groundwater. Of the contaminants detected on site, TCE, CTC, 1,2-DCA, and perchlorate were detected most frequently and at concentrations above California maximum contaminant levels (MCLs) or action levels. The highest concentrations of these chemicals were

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found in the north-central portion of the site, just downgradient from the Liquid and Solid Propellant Laboratory and the Assembly Handling and Equipment and Shipping Facility.

Much lower concentrations of VOCs and perchlorate have migrated off site. Following the current direction of groundwater flow (southeastward), CTC, TCE, and perchlorate plumes have migrated approximately 2,500 feet downgradient toward the city of Pasadena and Lincoln Avenue Company production wells. (1,2-DCA has not been observed at any off-site well over the course of the RI groundwater monitoring.) While the highest levels of these VOCs were largely found in the upper layer of the aquifer, lower levels (0.5 to 5 ppb) had extended vertically to the deeper aquifer and laterally to the city of Pasadena wells. Concentrations and direction of contaminant flow can fluctuate in response to pumping of wells and seasonal variations in groundwater elevations. *Since 1996, however, the shapes of the plumes have stayed relatively stable, suggesting that widespread or higher levels of contaminants are not traveling further downgradient and in the direction of public water supply wells* (Foster Wheeler, 1998a).

Groundwater investigations performed by JPL indicate that VOC concentrations beneath JPL vary seasonally and may indicate the presence of an off-site sources in addition to on-site sources (JPL, 1997b). One such potential source of contamination is associated with the use of septic systems in La Cañada-Flintridge, an area without sewers. According to JPL and the Valley Water Company, citizens in these areas have often cleaned their plumbing pipes by pouring solvent down their drains (JPL, 1997a; Raymond Basin, 1997a).

The groundwater investigation conducted by JPL of Operable Units 1 and 3: on-site and off-site groundwater (Foster Wheeler, 1999) developed additional information on the configuration of the contaminated groundwater plumes and the distribution of contaminants within those plumes. Although not conclusive, the evidence gathered strongly suggests that potential additional sources of groundwater contamination lie upgradient to the west, in the direction of the Valley Water Company wells. Because VOCs are used in a wide variety of commercial application, many potential sources exist upgradient for those compounds. The injection of imported Colorado River water for aquifer recharge by Valley Water Company may be the source of additional perchlorate contamination detected in local municipal wells. The source of the perchlorate contamination (recently detected at levels as high as 16 ppb) in the water of the Colorado River may be traced to two sites near Henderson, Nevada associated with the manufacture of ammonium perchlorate.

D-88  
cont.



**Route of Exposure**

The way in which a person may contact a chemical substance. For example, drinking (ingestion) and bathing (skin contact) are two different *routes of exposure* to contaminants that may be found in water.

**Significant Health Risk**

Circumstances where people are being or could be exposed to hazardous substances at levels that pose an urgent public health hazard or a public health hazard; public health advisories are generally issued when urgent public health hazards have been identified.

**Superfund**

Another name for the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), which created ATSDR.

**Superfund Amendments and Reauthorization Act (SARA)**

The 1986 legislation that broadened ATSDR's responsibilities in the areas of public health assessments, establishment and maintenance of toxicologic databases, information dissemination, and medical education.

**Toxicological Profile**

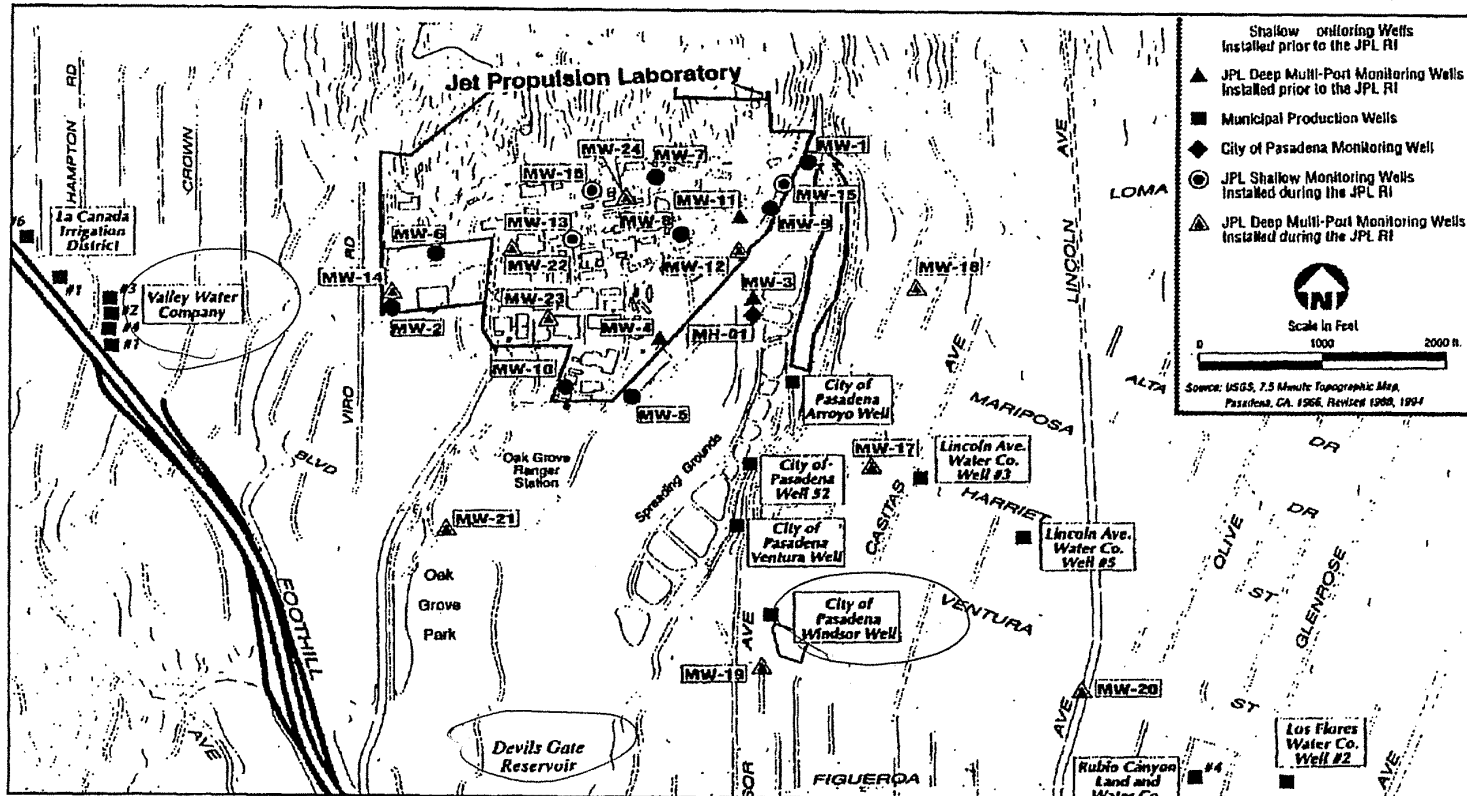
A document about a specific substance in which ATSDR scientists interpret all known information on the substance and specify the levels at which people may be harmed if exposed. The *toxicological profile* also identifies significant gaps in knowledge on the substance, and serves to initiate further research, where needed.

**Volatile organic compounds (VOCs)**

\* Substances containing carbon and different proportions of other elements such as hydrogen, oxygen, fluorine, chlorine, bromine, sulfur, or nitrogen; these substances easily become vapors or gases. A significant number of the *VOCs* are commonly used as solvents (paint thinners, lacquer thinner, degreasers, and dry cleaning fluids).

D-88  
cont.

Figure 3. Locations for JPL Groundwater Monitoring Wells and Nearby Municipal Production Wells



Source: Foster Wheeler, 1998a

## Response to Comment D-1

This comment is introductory in nature, indicating that M. Calvert submitted comments and objections to the proposed Project and Draft PEIR on Monday, August 5, 2024, as well as their educational background. This comment also notes that they have forwarded relevant source documents referenced within the letter, which have been included as Comments D-85 through D-88, below. Since this comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

## Response to Comment D-2

This comment is introductory in nature, provides an overview of the content of the comments provided in the comment letter and the commentors position that objects to all plans, projects, and/or construction, as well as proposed amendments of Title 22. The comment also notes the commentors background in relation to the Project. Since this comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

## Response to Comment D-3

This comment states that the anticipated construction activities pose an “unacceptable risk to resident’s health and safety” from exposure of [VOCs] in the soil and groundwater of Altadena.” This comment is speculative to the construction conditions of specific projects not included in the Draft PEIR. As discussed throughout the PEIR, the WSGVAP is a long-range program policy document and does not include any specific projects that are currently approved or proposed. Section 4.3, Air Quality, of the Draft PEIR, states that each future project developed under the WSGVAP would be subject to subsequent planning and environmental review in accordance with County requirements and CEQA, which would evaluate future projects’ air quality impacts on a project-by-project basis. Through each project’s individual environmental review process, localized emissions may be quantified and compared against project-specific thresholds. Individual projects that exceed the thresholds would normally be considered significant. Since future projects could occur close to existing sensitive receptors, the development that could be accommodated by implementing the WSGVAP has the potential to expose sensitive receptors to substantial pollutant concentrations. Construction equipment exhaust combined with fugitive particulate matter emissions has the potential to expose sensitive receptors to substantial concentrations of criteria air pollutant emissions or DPM. For these reasons, construction impacts are considered significant and unavoidable with the Draft PEIR. It is to be emphasized that future proposed projects would be required to undergo environmental review in accordance with CEQA, their impacts would be identified and mitigated as applicable. For this reason, no further environmental analysis is necessary.

## Response to Comment D-4

This comment identifies statements discussed in a Background Brief. The full text reads:

“Four major superfund sites are found in the vicinity of the WSGV, and soil contamination from underground storage tanks is dispersed throughout the area, particularly in the southeastern portion of the WSGV (SWRCB 2023)”

The comment identifies the Jet Propulsion Lab (JPL), which is included in the mentioned four superfund sites, as a National Priority Site under the EPA. The NASA Jet Propulsion Laboratory is not located

within the unincorporated communities of the WSGV Planning Area, and therefore, the Project proposes no changes to the NASA Jet Propulsion Laboratory location. This Superfund site was not included within the existing conditions discussion because it is not located within the WSGVAP. The WSGVAP is a program-level document and does not include specific projects within the region. Rather, the documents' objective is to guide long-term growth in the West San Gabriel Valley. Individual projects will be subject to environmental review and areas under the jurisdiction of the JPL Superfund site will be held to federal/CERCLA standards of remediation.

### **Response to Comment D-5**

This comment summarizes the JPL superfund site history and context in relation to environmental impacts to soil and groundwater. The scope of this information is outside of the WSGVAP and is subject to project level review under CERCLA. The NASA Jet Propulsion Laboratory is not located within the unincorporated communities of the WSGV Planning Area, and therefore, the Project proposes no changes to the NASA Jet Propulsion Laboratory location. This Superfund site was not included within the existing conditions discussion because it is not located within the WSGVAP.

### **Response to Comment D-6**

This comment reiterates statements made in the Draft PEIR regarding the Raymond Groundwater Basin and extraction amounts for the Basin. This comment emphasizes the scale and importance of the Basin for the region. The Draft PEIR acknowledges the Basin in Section 4.10, Hydrology and Water Quality. No further discussion is necessary.

### **Response to Comment D-7**

This comment describes the volatility of VOCs and routes of human exposure through inhalation, ingestion, and skin contact. This comment reiterates what is discussed in Section 4.3, Air Quality, of the Draft PEIR, regarding VOCs and their health impacts as framed by federal and state regulatory agencies. No further discussion is necessary.

### **Response to Comment D-8**

This comment expresses concern that activities that create disruption cause release of VOCs into the air. The WSGVAP is a program-level document and does not include specific projects within the region. Rather, the documents' objective is to guide long-term growth in the West San Gabriel Valley. Future projects developed under the WSGVAP would be subject to subsequent planning and environmental review in accordance with CEQA, which would evaluate future projects' impacts on a project-by-project basis.

### **Response to Comment D-9**

This comment provides a summary of statements made in the PEIR on Page 4.3-53, and does not provide any comment on these statements. For this reason, no further discussion is necessary.

### **Response to Comment D-10**

This comment reiterates statements made in the Background Brief regarding cancer rates in Altadena, CA. As discussed in the Draft PEIR, future proposed projects would be required to undergo

environmental review in accordance with CEQA, their impacts would be identified and mitigated as applicable. For this reason, no additional environmental analysis is necessary.

### **Response to Comment D-11**

This comment summarizes information and provides notes from an attachment to the comment letter, included as Comment D-85, below. Information cited from the attachment include statistics of the health demographic in areas within the Los Angeles County and surrounding neighborhoods. Since this comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

### **Response to Comment D-12**

This comment paraphrases a discussion from the Draft PEIR stating that future development would increase the number of residents in Altadena, and would potentially increase the number of people exposed to toxic contaminants. The full discussion from Section 4.9, Hazards and Hazardous Materials, of the Draft PEIR states:

“Future development facilitated by the WSGVAP would increase the number of residents and businesses within the WSGV Planning Area, primarily focused along commercial corridors and major roadways, resulting in an increase in the amount of hazardous materials being transported, used, and stored during operation and the potential number of people being exposed to these materials. The use, storage, transport, and disposal of hazardous materials by residents and commercial and industrial businesses of development under the Project would be required to comply with mandatory regulations for hazardous materials adopted by USEPA, OSHA, USDOT, DTSC, Caltrans, CHP, Los Angeles County CUPA, and SCAQMD as described above in *Regulatory Framework* during operation. Compliance with applicable laws and regulations governing the use, storage, and transportation of hazardous materials would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts to occur.”

This discussion was referring to the WSGV Planning Area as a whole, not specifically Altadena. Based on Section 4.9, Hazards and Hazardous Materials, of the Draft PEIR, impacts were determined to be less than significant.

### **Response to Comment D-13**

This comment paraphrases a discussion from the Draft PEIR stating that it is reasonably foreseeable that future projects and/or natural disasters would release hazardous materials into the environment. The full discussion from Section 4.9, Hazards and Hazardous Materials, of the Draft PEIR states:

“Future projects developed under the WSGVAP would increase the number of residents and businesses within the WSGV Planning Area, resulting in an increase in hazards to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials or waste into the environment. In addition, seismic activity, flooding, and fires could result in hazardous materials being released onto land or into the air and water, contaminating the environment and endangering public safety. However, future projects developed under the WSGVAP would comply with Cal/OSHA regulations concerning the use of hazardous materials, including

requirements for safety training, exposure warnings, availability of safety equipment, and preparation of emergency action/prevention plans. All contaminated waste would be collected and disposed of at an appropriately licensed disposal or treatment facility.”

Future projects developed under the WSGVAP would be subject to subsequent planning and environmental review in accordance with CEQA, which would evaluate future projects’ impacts on a project-by-project basis. Based on Section 4.9, Hazards and Hazardous Materials, of the Draft PEIR, impacts were determined to be less than significant.

### **Response to Comment D-14**

This comment states that while the WSGVAP would implement OSHA standards, OSHA remedial measures do not reduce the adverse impact to Altadena’s residents. The federal Occupational Safety and Health Administration (OSHA) provides standards for general industry and construction industry on hazardous waste operations and emergency response. OSHA’s standards are one of many laws, regulations, and policies that must be followed by the Project. All of these standards are provided within the Regulatory Setting discussion in Section 4.9, Hazards and Hazardous Materials, of the Draft PEIR. Future development under the WSGVAP would be required to comply with the requirements and regulations set forth by the County, US EPA, OSHA, USDOT, DTSC, Caltrans, CHP, Los Angeles County CUPA, the County’s OAERP and All-Hazard Mitigation Plan and SCAQMD.

### **Response to Comment D-15**

This comment states that the WSGVAP overlooked the hazards site at JPL/Hahamonga Superfund site. The NASA Jet Propulsion Laboratory is not located within the unincorporated communities of the WSGV Planning Area, and therefore, the Project proposes no changes to the NASA Jet Propulsion Laboratory location. This Superfund site was not included within the existing conditions discussion because it is not located within the WSGVAP. Since this comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

### **Response to Comment D-16**

This comment states that VOCs in soil and groundwater is discussed within the Draft PEIR, but that the impact of VOCs on human health is not mentioned. The Project impact on VOCs is discussed within Section 4.3, Air Quality of the Draft PEIR. The impact of the existing groundwater quality on residents is not discussed within the Draft PEIR as it is not required to be analyzed under CEQA. However, as discussed within Section 4.10, Hydrology and Water Quality, of the Draft PEIR the Project would not violate any water quality standards that would degrade groundwater quality.

### **Response to Comment D-17**

This comment provides quotes related to vapors and fugitive dust from the Draft PEIR and from Dr. Mack’s book (Comment D-85). Since this comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

### **Response to Comment D-18**

This comment states that the future projected growth would increase the demand for water and pumping from groundwater wells. Groundwater is discussed in detail within Section 4.10, Hydrology and Water

Quality, of the Draft PEIR. Additionally, water supply is discussed within Section 4.19, Utilities and Service Systems, of the Draft PEIR. As discussed in Section 4.10, Hydrology and Water Quality, of the Draft PEIR, the two groundwater basins that underlie the Plan Area are considered very low priority groundwater basins as a result of less than 9,500 AFY being pumped annually. Implementation of the WSGVAP would not preclude groundwater recharge within the two underlying groundwater basins, and impacts would be less than significant. As discussed in Section 4.19, Utilities and Service Systems, of the Draft PEIR, the region has a surplus of water supply compared to the water demand, which would be used to supply the growth under the WSGVAP. As a result, sufficient water supplies would be available to serve reasonably foreseeable future development during normal, dry, and multiple-dry years.

### **Response to Comment D-19**

This comment states that it is not clear how many new residents would be added to Altadena because this section was omitted from the Draft PEIR and appendices, and states that Altadena is only 8.5 square miles. As discussed in Section 4.14, Population and Housing, of the Draft PEIR, implementation of the WSGVAP is projected to result in an additional 16,061 residents in the WSGV Planning Area compared to existing projections. The projected growth under the WSGVAP would occur within the nine unincorporated WSGV communities. Compared to existing projections, implementation of the WSGVAP is anticipated to increase population by 1.5 percent. These calculations were done for the WSGV Planning Area as a whole, and were not calculated individually by unincorporated community. Therefore, the future buildout information on Altadena specifically is not available.

### **Response to Comment D-20**

This comment states that it is not clear how many new housing units would be added to Altadena because this section was omitted from the Draft PEIR and appendices. As discussed in Section 4.14, Population and Housing, of the Draft PEIR, implementation of the WSGVAP is projected to result in an additional 14,707 housing units in the WSGV Planning Area compared to existing projections. The projected growth under the WSGVAP would occur within the nine unincorporated WSGV communities. Compared to existing projections, implementation of the WSGVAP is anticipated to increase the number of housing units by 3percent. These calculations were done for the WSGV Planning Area as a whole, and were not calculated individually by unincorporated community. Therefore, the future buildout information on Altadena specifically is not available.

### **Response to Comment D-21**

This comment claims that compliance with applicable environmental laws would not be enough to protect the public from health risks, and cites two examples of the JPL/Hahamonga Superfund site and the Stringfellow Acid Pits. The Draft PEIR assumes that all applicable regulatory requirements would be followed, as required by law. Since this comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

### **Response to Comment D-22**

This comment criticizes the significance thresholds used within Section 4.3, Air Quality, of the Draft PEIR for VOC. Significance thresholds for ambient air for CEQA are based on the requirements of the appropriate air district, in this case, South Coast Air Quality Management District (SCAQMD). The

commentor recommends using VOC significance criteria levels established by the EPA for drinking water. Using a threshold established for water quality to analyze air quality would be an inappropriate use of the EPA drinking water threshold.

### **Response to Comment D-23**

This comment voices opinion on the credentials of the SCAQMD advisory group board members, citing no “scientific-based knowledge.” This comment is outside of the scope of the Draft PEIR and does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response required.

### **Response to Comment D-24**

This comment critiques the determined SCAQMD’s cancer burden as defined under Rule 1401 and Rule 212. The analysis of health risk is discussed qualitatively with Section 4.3, Air Quality, of the Draft PEIR, because there are no specific future developments identified in the WSGVAP, the location of the development projects, and the exact nature of the development are unknown, therefore, determining health risk as this time is speculative. This comment is outside of the scope of the Draft PEIR and does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response required.

### **Response to Comment D-25**

This comment critiques the determined SCAQMD’s criteria pollutant significance thresholds as being “dated” from 1993. The SCAQMD Air Quality Significance Thresholds have most recently been revised as of March 2023. The Draft PEIR cites the most up to date published thresholds in the regulatory framework in Section 4.3, Air Quality, of the Draft PEIR.

### **Response to Comment D-26**

The comment argues that the SCAQMD and Draft PEIR assumption that construction impacts are temporary is a false claim based on long-term health impacts of pollutants in the region. Construction emissions are assumed to be transitory in nature in relation to the life of a project, however, construction emissions are still assessed based on SCAQMD, as discussed in Section 4.3, Air Quality, of the Draft PEIR. The WSGVAP is a program-level document and does not include specific projects within the region. Rather, the documents’ objective is to guide long-term growth in the West San Gabriel Valley. Individual proposed projects under the WSGVAP would be required to undergo environmental review in accordance with CEQA, their impacts would be identified and mitigated as applicable. For this reason, no further environmental analysis is necessary at this time.

### **Response to Comment D-27**

This comment states that the Draft PEIR marginalizes significant health risks from VOCs by using recycled water for landscape irrigation in County parks. Water conservation efforts are mandated by the State, as discussed in Section 4.19, Utilities and Services Systems, of the Draft PEIR. Respiratory risks of VOC are discussed in Section 4.3, Air Quality, of the Draft PEIR.

### **Response to Comment D-28**

This comment states that project developers are allowed to purchase credits at an approved mitigation bank in lieu of remediation, referring to Mitigation Measure 4.4-1, Aquatic Resources, of the Draft PEIR.



Compensatory mitigation shall ensure no net loss of wetlands if impacts to wetlands are unavoidable, which is an allowable form of mitigation as determined by USACE and CDFW.

### **Response to Comment D-29**

This comment states that the process for monitoring pollutant discharged under the Construction General Permit seems questionable and seems to have little oversight by government authorities.

As discussed in Section 4.7, Geology and Soils, of the Draft PEIR, this process was established by Section 402 of the Clean Water Act. The State Water Resources Control Board (SWRCB) adopted the original Construction General Permit for Stormwater Discharges from Construction Activities on September 2, 2009 (Order No. 2009-0009-DWQ, General NPDES Permit No. CAS000002) and recently adopted the updated Construction General Permit on September 8, 2022 (Order No. 2022-0057-DWQ). To obtain coverage under the Construction General Permit, a developer is required to file a Notice of Intent (NOI) with the appropriate Regional Water Quality Control Board (RWQCB) and provide proof of the NOI prior to applying for a grading or building permit from the local jurisdiction and must prepare a State SWPPP that incorporates the minimum best management practices (BMPs) required under the permit as well as appropriate project specific BMPs. The SWPPP must be completed and certified by the developer, and BMPs must be implemented prior to the commencement of construction and may require modification during the course of construction as conditions warrant. When project construction is complete, the developer is required to file a Notice of Termination with the RWQCB certifying that all the conditions of the Construction General permit, including conditions necessary for termination, have been met.

### **Response to Comment D-30**

This comment summarizes criteria pollutant discussion in Section 4.3, Air Quality, of the Draft PEIR, and makes a statement about VOC's and nitrogen oxides being precursors to ozone. The SCAQMD considers the significant thresholds of ozone and its precursors (VOCs and NO<sub>2</sub>) as set in the *South Coast AQMD Air Quality Significance Thresholds*.

### **Response to Comment D-31**

This comment reiterates the “non-attainment” status of the CAAQS 1-hour and NAAQS 8-hour ozone thresholds of Los Angeles County as published by CARB and EPA and mentioned in the Draft PEIR Section 4.3, Air Quality. Since this comment does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

### **Response to Comment D-32**

This comment reiterates the health impacts of ozone as a criteria pollutant as summarized in Section 4.3, Air Quality, of the Draft PEIR. Since this comment does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

### **Response to Comment D-33**

This comment reiterates the formation of ozone from precursors and demographic of sensitive populations as mentioned in Section 4.3, Air Quality, of the Draft PEIR and ESA Background Brief.

Sensitive populations are considered in CEQA review. Sensitive receptors, as defined by SCAQMD, are analyzed with respect to individual projects that undergo a separate review process.

### **Response to Comment D-34**

This comment reiterates statements made throughout the Draft PEIR that individual projects developed under the WSGVAP would involve ground-disturbing activities during construction and may cause fugitive dust emissions. Projects, during the construction phase, may include different components such as demolition, grading, architectural coating, and paving. It is to be emphasized that future proposed projects, both construction and operation components, would be required to undergo environmental review in accordance with CEQA, their impacts would be identified and mitigated as applicable. For this reason, no further environmental analysis is necessary at this time.

### **Response to Comment D-35**

This comment reiterates statements contained in the discussion of the environmental setting of the WSGVAP in Section 4.3, Air Quality, of the Draft PEIR, that details the topography and metrological condition of the region. The governing body of the air district considers the environmental setting of the AQMD and considers this is the development of its rules and regulations. Since this comment is a summary of statements from the Draft PEIR and does not raise an issue regarding the adequacy of the Draft PEIR, no further response is required.

### **Response to Comment D-36**

This comment summarizes the health impacts of PM10 and PM2.5 as discussed in Section 4.3, Air Quality, of the Draft PEIR. Since this comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

### **Response to Comment D-37**

This comment critiques the WSGVAP recommendation to recycle the construction and demolition debris from construction sites, as discussed in Section 4.3, Air Quality, of the Draft PEIR, despite the particulate matter from these activities. Any future construction facilitated by the WSGVAP would be required to comply with SCAQMD Rule 403 to control dust emissions during any dust-generating activities. Individual projects will undergo separate CEQA review and their impacts in regard to particulate matter be governed by SCAQMD rules and regulations. Additionally, the recycling of construction and demolition debris is required by the County's Municipal Code, Chapter 20.87, Construction and Demolition Debris Recycling and Reuse).

### **Response to Comment D-38**

This comment reiterates the statement from Section 4.3 of the Draft PEIR regarding PM2.5 sources from the combustion of fossil fuels and how off-road construction equipment emit criteria pollutants. Since this comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

This comment also reiterates the SCAQMD policy concerning efficiency of off-road equipment. It is a conservative assumption that off-road equipment will be more efficient in the future, as current policy

requires fleets to continually upgrade equipment that meet federal, state, and local standards. For this reason, no further environmental analysis is necessary.

### **Response to Comment D-39**

This comment reiterates the “non-attainment” status of the CAAQS and NAAQS PM10 and PM2.5 thresholds of Los Angeles County as published by CARB and EPA and mentioned in the Draft PEIR Section 4.3-36. Since this comment does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

### **Response to Comment D-40**

This comment claims most residents did not receive notice of the WSGVAP NOP or scoping meetings. As discussed in Section 1, Introduction, of the Draft PEIR, the NOP was sent to the State Clearinghouse, public agencies, special districts, responsible and trustee agencies, and other interested parties, and posted on the County’s website for a 39-day public review period that began on November 14, 2023 and ended on December 22, 2023. The NOP was published in the following regional newspapers on November 14, 2023: Crescenta Valley Weekly, Monrovia Weekly, Pasadena Star News, San Gabriel Valley Tribune, and La Opinión. In addition, the County hosted a virtual scoping meeting on Thursday, December 14, 2023 at 6:30 p.m. The scoping meeting date and instructions on how to attend the meeting was advertised within the NOP and registration was made available through the County’s website. Attendees of the webinar were able to provide comments and questions about the WSGVAP to County staff and the project consultants during the question and answer portion of the meeting.

### **Response to Comment D-41**

This comment claims that most residents did not receive notice of the NOP in November of 2023. Please refer above to Response to Comment D-40.

### **Response to Comment D-42**

The comment discusses a public meeting conducted by the County to gather public input on the Project. This public meeting was not part of the CEQA process. Since this comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

### **Response to Comment D-43**

This comment states that the time of publication of the Draft PEIR during summer, and the length of the Draft PEIR imposes an impediment to transparency. The CEQA Guidelines do not preclude lead agencies from publishing a Draft EIR during the summer months. Additionally, the Draft PEIR has been prepared in conformance with the CEQA statute (California Public Resources Code Section 2100, et seq.), its implementing guidelines (14 CCR 15000 et seq., hereinafter “CEQA Guidelines”), and the County Environmental Document Reporting Procedures and Guidelines (hereinafter “County Guidelines”).

### **Response to Comment D-44**

This comment states that the Draft PEIR references the County General Plan, but the commenter did not receive notice of the County General Plan’s EIR and cannot compare the two documents. Section 1, Introduction, of the Draft PEIR provides a link to the County’s documents and provides contact

information in case members of the public need assistance locating the documents. The County's General Plan was adopted in 2015, therefore, noticing of availability of the County's General Plan EIR would not be appropriate at this time, as noticing for the County's General Plan would have already occurred prior to adoption.

### **Response to Comment D-45**

This comment states that post cards with QR codes were sent to each resident, which did not inform residents of the extent of the WSGVAP, and many believed the post cards were related to a specific project's development at the former location of Webster's Pharmacy. As discussed in Section 1, Introduction, of the Draft PEIR, a notice announcing the Notice of Availability of the Draft PEIR was published in the following local newspapers: Crescenta Valley Weekly, La Opinión, Los Angeles Sentinel, Monrovia Weekly, Pasadena Star News, and San Gabriel Valley Tribune. According to the CEQA Guidelines Section 150(a)(1), noticing in a newspaper of general circulation is an allowable method of notifying the public regarding the public review of a Draft EIR.

### **Response to Comment D-46**

This comment states that the process of tiering assumes that all unincorporated areas of Los Angeles are the same, and the commenter expresses opposition to the WSGVAP. The Draft PEIR is a Programmatic EIR, meaning that site specific CEQA analyses for future development of the WSGVAP area, including the City of Altadena, may tier off this document in the future. As discussed in Section 1, Introduction, of the Draft PEIR, the Project involves the implementation of an areawide plan, which serves as a policy document for the WSGV Planning Area. If future development is consistent with the WSGVAP PEIR, that development would incorporate feasible mitigation measures from the PEIR. If future activities would have effects that were not examined in the PEIR, a new CEQA document would be prepared. The tiering process is related to the type of CEQA document that has been prepared for this Project, not the grouping of unincorporated areas.

### **Response to Comment D-47**

This comment states that after the Draft PEIR was drafted, the San Gabriel Mountains were designated as a federal National Monument, and the Draft PEIR does not consider that the foothills of Altadena directly abuts the National Monument. The San Gabriel Mountains National Monument was expanded to border the WSGVAP on May 2, 2024. According to the CEQA Guidelines Section 15125 (a)(1), "the lead agency should describe physical environmental conditions as they exist at the time the notice of preparation is published." The notice of preparation (NOP) for the Project was published on November 14, 2023. Therefore, this expansion of the San Gabriel Mountains National Monument was not captured in the Draft PEIR, consistent with the CEQA Guidelines, because this expansion happened approximately 6 months after the publication of the NOP. Additionally, Policy LU-2.3 in the WSGVAP would ensure that future growth and development would be directed away from wildland/urban interface areas along the San Gabriel Mountains and foothills. While the Draft PEIR does not discuss the fact that the San Gabriel Mountains were recently designated as a federal National Monument, the Draft PEIR discussed potential impacts to the San Gabriel Mountains throughout the document.

## Response to Comment D-48

This comment states that a goal of the WSGVAP is to reduce wildfire hazards and preserve biological resources, and states that density should not be increased in Altadena because Altadena is directly adjacent to the natural resources in the San Gabriel Mountains. Density is being decreased in areas of Altadena within wildfire hazard zones and adjacent to biological resources, while also being increased in commercial areas. Since this comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

## Response to Comment D-49

This comment claims that the National Monument designation of the San Gabriel Mountains causes more traffic and VMT than what is analyzed within the Draft PEIR. As discussed in Section 4.17, Transportation, of the Draft PEIR, VMT is influenced by the households, population, and employment densities within the WSGV Planning Area. The San Gabriel Mountains are not within the WSGV Planning Area, and therefore, the expansion of the National Monument would not have an impact on the VMT analyzed for the Project.

## Response to Comment D-50

This comment states that the only freeway that runs near Altadena is the I-210, and by framing the geographic area more broadly, the WSGVAP has misstated the extend of freeway access. The Draft PEIR encompasses nine unincorporated communities within the WSGV Planning Area, which includes but is not limited to Altadena. Discussions of the I-210 within the Draft PEIR are mostly centered around the unincorporated community of La Crescenta-Montrose. Since this comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

## Response to Comment D-51

This comment states that Altadena has no north-south highways for evacuation purposes and lists many secondary roads that run north-south. This comment also mentions there is traffic along many of these listed secondary roads. Evacuation routes are evaluated within Section 4.9, 4.17, and 4.20 of the Draft PEIR, Hazards and Hazardous Materials, Transportation, and Wildfire, respectively, and impacts were determined to be less than significant. As discussed in Section 4.20, Wildfire, of the Draft PEIR, future projects developed under the WSGVAP would primarily be infill development, located along major roadways and commercial corridors and within select areas near commercial corridors and transit with low existing residential densities, with existing access to the regional circulation system. As part of subsequent planning and environmental review, individual projects proposed under the WSGVAP would be reviewed by the County and LACoFD prior to the obtaining project approval and relevant permits to ensure that projects do not interfere with applicable emergency response plans or evacuation plans, including the County's OAERP and All-Hazard Mitigation Plan. In addition, WSGVAP Policy LU-2.4 would ensure that any new development is designed to be accessible from existing public roads and provides direct access to multiple primary roads to support safety and aid in efficient evacuation during hazard events.

## Response to Comment D-52

This comment refers to various freeways within Los Angeles County, and states that these areas are more reasonable choices for new growth. One of the purposes of the WSGVAP is to implement the rezoning recommendations from the County's Housing Element Update, which includes targeted changes to zoning and/or land use policies to accommodate development of approximately 7,479 additional dwelling units in the nine unincorporated communities of the West San Gabriel Valley. This commenter's suggestion of developing additional housing elsewhere would hinder the County's ability to meet the RHNA goal in unincorporated areas of the County, which has been defined in the County's Housing Element Update. In addition, some of the freeways mentioned by the commenter are not located in the WSGV Planning Area. Since this comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

## Response to Comment D-53

This comment states that the hilly topography of Altadena is not conducive to walking, riding bicycles or scooters, and also states that the buses that run from the Lake Avenue Metro Station are infrequent. This comment has to do with topography and public transportation, independent of the Draft PEIR. Since this comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

## Response to Comment D-54

This comment paraphrases a discussion from the Draft PEIR stating that there are areas within Altadena with underlying materials that include undocumented fills, soft compressible deposits or loose debris that could be inadequate to support development, especially of multi-story buildings, and that is a reason to keep height and set-back limits in Altadena's own CSD. This discussion regarding undocumented fills was in Section 4.7, Geology and Soils. The full quote states:

“Future projects developed under the WSGVAP could be located on geologic units or soils that are unstable, or that could become unstable, and result in geologic hazards if not addressed appropriately. Areas with underlying materials that include undocumented fills, soft compressible deposits, or loose debris could be inadequate to support development, especially multi-story buildings.”

In the next paragraph on page 4.7-25 of the Draft PEIR, it is explained that “potential hazards of unstable soil or geologic units would be addressed largely through the integration of geotechnical information in the subsequent planning and design process for future projects developed under the WSGVAP to determine the local soil suitability for specific projects in accordance with standard industry practices and State-provided requirements, such as CBC requirements that are used to minimize the risk associated with these hazards.” This discussion was referring to the WSGV Planning Area as a whole, not specifically Altadena. The discussion regarding the Altadena CSD is not an environmental issue analyzed under CEQA.

## Response to Comment D-55

This comment discusses the historic significance of Jane's Village homes and paraphrases the Draft PEIR claiming the homes were dismissively referred to as having no legally binding protection. The discussion regarding no legally binding protection to Jane's Village homes was provided within Section 4.5, Cultural

Resources, of the Draft PEIR. The full quote states, “In 2002, Altadena Heritage designated Janes Village, a neighborhood located in the northwest portion of Altadena, which is comprised of Tudor Revival homes designed and built by Elisha Janes from 1926 to 1926, as a “Altadena Heritage Area.” While this does not offer legally binding protections, it represents the local community’s support of continued historic preservation.” This statement was within a section discussing background information for Altadena historic resources, and was not an impact analysis on the historical significance of the Jane’s Village homes.

### **Response to Comment D-56**

This comment claims that the WSGVAP is taking the Altadena’s Community Standards District and folding it into the WSGVAP despite the differences between Altadena and other unincorporated areas. This comment also paraphrases a discussion from the Draft PEIR stating that local land use plans and policies are not required to be consistent with the SCAG RTP/SCS.

The discussion regarding the Altadena CSD is not an environmental issue analyzed under CEQA. However, it should be noted that the WSGVAP includes community-specific policies for Altadena. Since this comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

The discussion regarding local land use plans was in Section 4.6, Energy, of the Draft PEIR within a discussion related to SB 375. The full quote states, “Certain transportation planning and programming activities would then need to be consistent with the SCS; however, SB 375 expressly provides that the SCS does not regulate the use of land, and further provides that local land use plans and policies (e.g., general plans and zoning codes) are not required to be consistent with either the RTP or SCS.” However, as outlined within Section 4.11, Land Use and Planning, of the Draft PEIR, the growth areas proposed as part of the WSGVAP were informed by SCAG Connect SoCal 2020 (the formal name of SCAG’s 2020 RTP/SCS). In addition, relevant goals, policies, and actions were informed by the SCS of the Connect SoCal 2020 plan. Consistency between the WSGVAP and SCAG Connect SoCal 2020 and 2024 plans are also provided in Section 4.3, Air Quality, and Section 4.8, Greenhouse Gas Emissions, of the Draft PEIR. Therefore, while SB 375 expresses that local land use plans and policies are not required to be consistent with the RTP or SCS, the WSGVAP demonstrates consistency with SCAG’s 2020 RTP/SCS throughout the Draft PEIR.

### **Response to Comment D-57**

This comment correctly references a quote from the Draft PEIR stating the WSGVAP wants to increase development intensity along commercial corridors and wants to concentrate growth near transit corridors, transit stops, and commercial areas. Since this comment provides a direct quote from the Draft PEIR and does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

### **Response to Comment D-58**

This comment provides a suggestion that planners could propose new transit in an area of Altadena to change the growth pattern. This comment does not comment on the Draft PEIR, but provides a suggestion to propose new transit within Altadena. Since this comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

### **Response to Comment D-59**

This comment paraphrases a discussion from the Draft PEIR stating that the WSGVAP wants to increase population density over and beyond that is contemplated by the RHNA. The quote the commenter is referring to comes from Chapter 5, Alternatives, of the Draft PEIR. Within Chapter 5, it is explained that the WSGVAP is planning for a buildout year of 2045, while the RHNA has a buildout year of 2029. Therefore, the WSGVAP is planning for a longer range, and is including more housing units so the WSGVAP would not have to make multiple revisions to accommodate every new 4-year RHNA cycle until the cycle reaches a buildout year of 2045.

### **Response to Comment D-60**

This comment correctly references a quote from the Draft PEIR stating the WSGVAP contemplates infill development and redevelopment of underutilized sites. Since this comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

### **Response to Comment D-61**

This comment states that the WSGVAP disfavors existing single-family homes in Altadena, and favors mixed use residences that block scenic views of the San Gabriel Mountains. As discussed in Section 4.1, Aesthetics, of the Draft PEIR, future projects developed under the WSGVAP would be clustered primarily along targeted commercial corridors and major roadways with limited development allowed only in a select few existing low-density residential areas near commercial corridors and transit stops. The proposed increase in building heights and massing in those areas may be noticeable as part of larger scenic vistas. However, policies included in the WSGVAP and the County's General Plan, as well as amendments to Title 22, would guide the design of future development in these areas to the extent that such development would be integrated into the existing character of those communities, would have gradual transitions between areas of differing density, and would not have an adverse impact to existing views of the West San Gabriel Valley area from elevated vantage points. The WSGVAP is not proposing development at this time, and therefore, would not displace existing single-family homes.

### **Response to Comment D-62**

This comment provides a quote from the Draft PEIR stating that the plan wants to utilize anti-displacement measures. Since this comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

### **Response to Comment D-63**

This comment states that the WSGVAP has not identified sites for new residents or multi-density complexes, and claims that vulnerable residents would be displaced from their homes. As stated in the introduction within the Executive Summary of the Draft PEIR, the WSGVAP does not identify sites for new residents because this programmatic document is a 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. The Project does not propose any specific development; therefore, no sites have been identified for new development. Specifically, the WSGVAP proposes land use and zoning modifications to increase land use and zoning densities and development intensity primarily along commercial corridors and major roadways as well as within a select few areas near commercial corridors and transit with



existing low residential density. In addition, the WSGVAP proposes to decrease densities in hazard areas, WUI areas, and areas within or adjacent to natural resource areas. The WSGVAP goals and policies combined with the County's recent housing initiatives related to inclusionary housing and interim and supportive housing would minimize the potential for exclusionary displacement and displacement pressures. The WSGVAP contains goals and policies that protect residents from physical displacement and encourages a diverse housing mix to ensure communities retain their character, amenities, and access to services and infrastructure while providing housing for all socioeconomic levels.

### **Response to Comment D-64**

This comment discusses the ages of homeowners and average prices of rental units in Altadena. These topics are not environmental issues analyzed under CEQA. In addition, the WSGVAP contains goals and policies that protect residents from physical displacement and encourages a diverse housing mix to ensure communities retain their character, amenities, and access to services and infrastructure while providing housing for all socioeconomic levels. Since this comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

### **Response to Comment D-65**

This comment discusses the ages of homeowners and affordable housing. These topics are not environmental issues analyzed under CEQA. Since this comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

### **Response to Comment D-66**

This comment correctly provides a quote from the Draft PEIR stating that the WSGVAP does not propose any site-specific development at this time. As described in Chapter 3, Project Description, of the Draft PEIR, the WSGVAP is a policy document that does not include or propose any site-specific development that could directly result in construction or operational impacts to the environment. Therefore, the Draft PEIR does not assess the site-specific construction and operation details of each future development within the WSGV Planning Area. Rather, it assesses the impacts associated with the proposed modifications to existing land uses and zoning and the associated overall effects of buildout of the WSGVAP through 2045.

### **Response to Comment D-67**

This comment critiques the qualitative nature of TAC emissions in Section 4.3, Air Quality, of the Draft PEIR. The WSGVAP is a program-level document and does not include specific projects within the region. As such, there is no quantitative data to model the overall impact of the program and would be speculative at best. As stated in Section 4.3, Air Quality, of the Draft EIR, the SCAQMD submitted an amicus brief that indicates it is not feasible to quantify program-level health impacts based on the available modeling tools.<sup>1</sup> Therefore, the analysis of health risk is discussed qualitatively in the analysis based on the potential for TAC emissions to exceed threshold values in the context of development

<sup>1</sup> SCAQMD, 2015. Brief of Amicus Curiae in Support of Neither Party. *Sierra Club v. County of Fresno*. Case No. S219783. April 13, 2015. Available at: <https://www.courts.ca.gov/documents/9-s219783-ac-south-coast-air-quality-mgt-dist-041315.pdf>. Accessed March 2024.

intensity, proximity to sensitive receptors, and compliance with regulatory emissions standards. Based on this qualitative analysis, impacts were determined to be significant and unavoidable.

Future projects developed under the WSGVAP would be subject to subsequent planning and environmental review in accordance with County requirements and CEQA, which would evaluate future projects' air quality impacts on a project-by-project basis. Through each project's individual environmental review process, potential impacts would be identified and compared against relevant thresholds.

### **Response to Comment D-68**

This comment critiques the reasoning of qualitative assessment of TACs and conclusion of significant and unavoidable risk. It is recommended by the SCAQMD to use locations of sensitive receptors as localized significant thresholds to compare project emissions. As stated in Section 4.3, Air Quality, of the Draft EIR, the SCAQMD submitted an amicus brief that indicates it is not feasible to quantify program-level health impacts based on the available modeling tools.<sup>2</sup> Therefore, the analysis of health risk is discussed qualitatively in the analysis based on the potential for TAC emissions to exceed threshold values in the context of development intensity, proximity to sensitive receptors, and compliance with regulatory emissions standards. Future projects developed under the WSGVAP would be subject to subsequent planning and environmental review in accordance with County requirements and CEQA, which would evaluate future projects' air quality impacts on a project-by-project basis. Through each project's individual environmental review process, potential impacts would be identified and compared against relevant thresholds.

### **Response to Comment D-69**

This comment quotes the Draft PEIR Section 4.3 regarding the environmental review of individual projects developed under the WSGVAP. Both cited quotes are consistent in stating that future project-level developments would be subject to their own CEQA review to ensure compliance with federal, state, and local regulation and control strategies.

### **Response to Comment D-70**

This comment quotes the statements for the Draft PEIR that "Impacts related to criteria pollutants associated with future projects developed under the Plan (WSGVP) are considered significant and unavoidable. (PEIR at Section 4.3-47)" and compares this conclusion to the "No Project" alternative. As discussed in Chapter 5, Project Alternatives, of the Draft PEIR, development under Alternative 1 (the No Project Alternative) would occur in the same areas as the Project but would be in accordance with existing zoning and land use designations as the WSGVAP would not be adopted. Even though future development would be consistent with the existing land use and zoning designations, future projects' potential to impact air quality would be determined on a site-by-site basis and would be evaluated during their individual environmental review process in accordance with CEQA. Impacts to air quality under Alternative 1 would remain significant and unavoidable, similar to those identified for the Project.

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<sup>2</sup> SCAQMD, 2015. Brief of Amicus Curiae in Support of Neither Party. *Sierra Club v. County of Fresno*. Case No. S219783. April 13, 2015. Available at: <https://www.courts.ca.gov/documents/9-s219783-ac-south-coast-air-quality-mgt-dist-041315.pdf>. Accessed March 2024.

### **Response to Comment D-71**

This comment claims that reducing VMT is a goal of the WSGVAP, and claims this goal is not met. This comment also says that VMT will be increased by implementation of the WSGVAP. The goal that the commenter is referring to is a goal of the County's General Plan, not the WSGVAP. As shown in Table 4.17-5 within the Draft PEIR, VMT is higher in both the 2045 No Project scenario and the 2045 with Project scenario compared to VMT in 2024. However, the 2045 with Project scenario results in less total VMT per service population than the 2045 No Project scenario.

### **Response to Comment D-72**

This comment claims that the Draft PEIR's conclusion that the VMT per service population is lower under the WSGVAP is disingenuous. The commenter does not elaborate on why they believe the analysis is flawed. As discussed in Section 4.17, Transportation, of the Draft PEIR, the WSGVAP Land Use and Mobility Elements, and the 2023 Active Transportation Strategic Plan include policies to focus growth within a mile from major transit stops, encourage transit-oriented development, expand multi-modal facilities, improve access to transit, and coordinate mobility investments. Through implementation of the WSGVAP, the County would work to implement these policies in coordination with State, regional, and local agencies to ensure projects throughout the WSGV Planning Area contribute to the region achieving a substantial reduction in VMT.

### **Response to Comment D-73**

This comment states that a stated goal of the WSGVAP is to reduce greenhouse gases and also mentioned that the construction of future projects under the WSGVAP would have the potential to further increase GHG emissions. The commenter does not cite where this goal was referenced in the Draft PEIR. Reducing greenhouse gas emissions is not a Project objective of the WSGVAP. However, as stated in Section 4.8, Greenhouse Gas Emissions, of the Draft PEIR, the WSGVAP policies would reduce potential GHG emissions from future new development and would be consistent with GHG-reduction 2045 CAP strategies.

### **Response to Comment D-74**

This comment states that the WSGVAP increases greenhouse gas emissions through mobile sources and fuel consumption compared to the "No Project" alternative. As discussed in Section 4.8, Greenhouse Gas Emissions, of the Draft PEIR, the WSGVAP Future Development, 2024 analysis year, mobile sources are estimated to emit 56,817 CO<sub>2</sub>e more annually compared to the "No Project" alternative.

### **Response to Comment D-75**

This comment summarizes the California Air Resource Board's (CARB) Cap and Trade Program. As discussed in Section 4.8, Greenhouse Gas Emissions, the CARB Cap and Trade Program is a key strategy for California to achieve its GHG reduction targets by reducing capped sector emissions over time. The Cap and Trade Program is significant in the State regulation framework pertaining to GHG emission reduction. The commenter also questions the effectiveness of the program in reducing the emissions from heavy-duty off-road heavy-duty vehicles, such as "diesel-powered bulldozers, loaders, backhoes and forklifts." The Cap and Trade Program is enforced and managed by CARB, and these pollution sources under the Cap and Trade Program should follow CARB Cap and Trade guidance. Diesel-powered

vehicles are also regulated by other programs other than the Cap and Trade, such as In-Use Off-Road Diesel-Fueled Fleets Regulation and Low Carbon Fuel Standard, which are discussed in Section 4.8. Since this comment does not raise an issue regarding the adequacy of the Draft PEIR, no further response is required.

### **Response to Comment D-76**

This comment voices opinion in favor of WSGVAP Alternative 3, Housing Element/RHNA Only Alternative, which is described in Chapter 5, Project Alternatives. The commentor is in favor of less additional residences in the WSGV. This comment also states that the RHNA only proposes to add 17,875 new residents to the WSGV, while the WSGVAP proposes to add 25,954 residents. Within Chapter 5, it is explained that the WSGVAP is planning for a buildout year of 2045, while the RHNA has a buildout year of 2029. Therefore, the WSGVAP is planning for a longer range, and is including more housing units so the WSGVAP would not have to make multiple revisions to accommodate every new 4-year RHNA cycle until the cycle reaches a buildout year of 2045. Since this comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

### **Response to Comment D-77**

This comment voices opinion in favor of WSGVAP Alternative 3, Housing Element/RHNA Only Alternative, which is described in Chapter 5, Project Alternatives. The commentor is in favor of less additional residences in the WSGV. This comment also states that the RHNA only proposes to add 7,875 new housing units in the WSGV, while the WSGVAP proposes to add 16,243 new housing units. Within Chapter 5, it is explained that the WSGVAP is planning for a buildout year of 2045, while the RHNA has a buildout year of 2029. Therefore, the WSGVAP is planning for a longer range, and is including more housing units so the WSGVAP would not have to make multiple revisions to accommodate every new 4-year RHNA cycle until the cycle reaches a buildout year of 2045. Since this comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

### **Response to Comment D-78**

This comment states that the RHNA could be satisfied by adding new units in other unincorporated areas of Los Angeles County. As discussed within the footnote of Table 4.14-4 of Section 4.14, Population and Housing, of the Draft PEIR, the County's Housing Element determined the RHNA allocation for each Planning Area based on SCAG's allocation for unincorporated Los Angeles. SCAG did not provide a RHNA allocation specifically for the WSGV Planning Area. Therefore, in order for the WSGVAP to be consistent with the County's Housing Element, 7,479 housing units need to be added to the unincorporated WSGV Planning Area and cannot be transferred elsewhere.

### **Response to Comment D-79**

This comment provides suggestions related to electric vehicles, parking, vacant office buildings due to remote work, green waste recycling, and electric leaf blowers, and a moratorium of building in and near the San Gabriel Mountains. Various goals and policies of the WSGVAP are consistent with these suggestions. Policy LU-2.3 of the WSGVAP aims to direct future growth and development away from the San Gabriel Mountains. Policy LU-3.5 aim to revitalize underutilized spaces, which could include vacant office buildings. Policy COS-6.3 would help protect scenic hillsides and significant ridgelines in the San

Gabriel Mountains. Since this comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

### **Response to Comment D-80**

This comment summarizes the impacts that were determined to be significant and unavoidable within the Draft PEIR. This comment also mentions that vibration impacts pose risks to existing structures and risks to residents' health from increased noise. Vibration impacts to existing structures is discussed within Section 4.5, Cultural Resources, and noise impacts are discussed in Section 4.13, Noise, of the Draft PEIR.

### **Response to Comment D-81**

This comment proposes to minimize earth-disturbing construction in Altadena, in order to minimize health risk from VOC's, ozone, and particulate matter. All proposed projects under the WSGVAP will undergo individual analysis and approval under CEQA, including appropriate air quality assessments as deemed necessary by the local air district, in order to minimize project health risks from air pollutants.

### **Response to Comment D-82**

This comment provides an idea of repurposing old buildings into new uses. Since this comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

### **Response to Comment D-83**

This comment summarizes previous comments and serves as a conclusion to the comment letter. Refer to Response to Comments above for detailed responses. No further response is required.

### **Response to Comment D-84**

This comment provides objections to the amendment of Title 22, mostly consisting of objections to the modification to development standards. Since this comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

### **Response to Comment D-85**

This comment is an attachment to the comment letter. The comment provides scanned pages from Cancers in the Urban Environment by Thomas M. Mack, M.D., M.P.H. Since this comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

### **Response to Comment D-86**

This comment is an attachment to the comment letter. The comment provides scanned pages from "Chemical Contaminant Rules" from the U.S. EPA website. Since this comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

### **Response to Comment D-87**

This comment is an attachment to the comment letter. The comment provides scanned pages from “List of Drinking Water Contaminants & MCLs” from the U.S. EPA website. Since this comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

### **Response to Comment D-88**

This comment is an attachment to the comment letter. The comment provides scanned pages from the Public Health Assessment of the Jet Propulsion Laboratory (NASA), prepared by the Federal Facilities Assessment Branch, Division of Health Assessment and Consultation, Agency for Toxic Substances and Disease Registry. Since this comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.



# COMMUNITY ENHANCEMENT-PLANNING

CITY OF TEMPLE CITY 9701 LAS TUNAS DR. TEMPLE CITY, CA 91780 (626) 285-2171

August 12, 2024

Evan Sensibile, Regional Planner  
County of LA Department of Regional Planning  
320 West Temple Street, 13<sup>th</sup> Floor  
Los Angeles, CA 90012

**Re: Comments for Draft Program Environmental Impact Report (EIR) for the West San Gabriel Valley (WSGV) Area Plan**

Dear Evan Sensibile,

Thank you for including the City of Temple City in the review process for the Draft Program EIR for the WSGV Area Plan. Based on our review of the public review documents, the planning areas that are within close proximity and would potentially affect the City of Temple City are the "East Pasadena–East San Gabriel" and "South Monrovia Islands". Upon review of the proposed zoning changes for these areas, the following comments have been prepared for your response:

E-1

1. Community Standards Districts. It appears that specific community development standards (also known as "Community Standards Districts" or CSDs) were previously established exclusively for the following planning areas: Altadena, East Pasadena – East San Gabriel, La Crescenta-Montrose, South San Gabriel, and Chapman Woods. As such, the Draft Area Plan Ordinance proposes to amend various sections of the CSDs for these planning areas and area-wide development standards have been proposed that would establish general development standards for the entire WSGV planning area. Please confirm that this is the intention and that the South Monrovia Islands would only need to follow the area-wide development standards.

E-2

2. Allowed Density. The East Pasadena–East San Gabriel and South Monrovia Islands areas include proposals to re-zone properties to allow "Mixed Use Development" that would be reclassified as "MXD". Please confirm what the maximum allowable density will be for the MXD zone within the East Pasadena–East San Gabriel area and for the South Monrovia Islands area. In addition, provide an explanation on how to calculate the allowable densities (e.g., based on lot size). Also, please provide the exact reference document(s) and section(s) that stipulate such allowed densities.

E-3

E-4

3. Public Noticing. For proposed projects within the East Pasadena-East San Gabriel and South Monrovia Islands areas in the MXD zone, please confirm the type of projects that require public noticing. Also, provide the exact reference document(s) and section(s) that stipulate such public noticing requirements.

E-5

Your detailed response to the comments listed above is much appreciated. Should you have any questions regarding this letter, please feel free to contact me at [tbu@templecity.us](mailto:tbu@templecity.us) or (626) 285-2171 ext. 4328.

Thank you,

E-6

Tony Bu, Community Development Supervisor  
CC: Scott Reimers, Community Development Director

## Response to Comment E-1

This comment serves as an introduction, and notes that the unincorporated communities of East Pasadena–East San Gabriel the South Monrovia Islands are in proximity to the City of Temple City. Since this comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

## Response to Comment E-2

This comment asks for confirmation that the East Pasadena–East San Gabriel CSD would be amended and that the South Monrovia Islands would only need to follow the area-wide development standards. Future development in East Pasadena-East San Gabriel would comply with the amended CSD and the area-wide development standards, while future development in South Monrovia Islands would only need to comply with the area-wide development standards since there is no CSD for the community. Since this comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

## Response to Comment E-3

This comment asks for confirmation as to what the maximum allowable density will be for the MXD zone within the East Pasadena–East San Gabriel and the South Monrovia Islands areas. The maximum allowable density under the MXD zone would depend on the underlying land use policy, which would either be MU (Mixed-Use) or CG (General Commercial). Please refer to Table 6.2, Land Use Designations, in the County’s General Plan Land Use Element for more information on these land use policy categories.<sup>3</sup> Since this comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

## Response to Comment E-4

This comment asks how to calculate allowable densities in the MXD zone, and the exact reference documents and sections that stipulate such allowed densities. The maximum allowable density under the MXD zone would depend on the underlying land use policy, which would either be MU (Mixed-Use) or CG (General Commercial). Please refer to Table 6.2, Land Use Designations, in the County’s General Plan Land Use Element for more information on these land use policy categories.<sup>4</sup> Since this comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

## Response to Comment E-5

This comment asks for confirmation as to which type of projects within the East Pasadena-East San Gabriel and South Monrovia Islands areas in the MXD zone require public noticing, and also ask for the exact reference documents and sections that stipulate such public noticing requirements. Future projects developed under the WSGVAP would be subject to subsequent planning and environmental review in accordance with County requirements and CEQA, which would provide public noticing on a project-by-

<sup>3</sup> County of Los Angeles, 2022. County of Los Angeles General Plan 2035, last updated July 14, 2022, [https://planning.lacounty.gov/wp-content/uploads/2024/07/GP\\_Chapter6\\_052024.pdf](https://planning.lacounty.gov/wp-content/uploads/2024/07/GP_Chapter6_052024.pdf)

<sup>4</sup> County of Los Angeles, 2022. County of Los Angeles General Plan 2035, last updated July 14, 2022, [https://planning.lacounty.gov/wp-content/uploads/2024/07/GP\\_Chapter6\\_052024.pdf](https://planning.lacounty.gov/wp-content/uploads/2024/07/GP_Chapter6_052024.pdf).



project basis. For uses subject to a public hearing, please refer to Section 22.222.120 of the Los Angeles County Planning and Zoning Code <sup>5</sup>. Since this comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

### **Response to Comment E-6**

This comment serves as the conclusion to the letter and provides contact information. Since this comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

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<sup>5</sup> County of Los Angeles, 2024, Los Angeles County Planning and Zoning Code. Last updated August 2, 2024.  
[https://library.municode.com/ca/los\\_angeles\\_county/codes/code\\_of\\_ordinances?nodeId=TIT22PLZO\\_DIV9AD\\_CH22.222A\\_DPR\\_22.222.120PUHEPR](https://library.municode.com/ca/los_angeles_county/codes/code_of_ordinances?nodeId=TIT22PLZO_DIV9AD_CH22.222A_DPR_22.222.120PUHEPR)



# OFFICE OF THE SHERIFF

COUNTY OF LOS ANGELES

HALL OF JUSTICE

ROBERT G. LUNA, SHERIFF



August 12, 2024

Mr. Evan Sensibile, Planner  
County of Los Angeles  
Department of Regional Planning  
Community Studies East Area  
320 West Temple Street  
Los Angeles, California 90012

Dear Mr. Sensibile:

**WEST SAN GABRIEL VALLEY AREA PLAN  
NOTICE OF AVAILABILITY OF  
DRAFT ENVIROMENTAL IMPACT R.E.P.O.R.T  
BACK CHECK REVIEW COMMENTS**

Thank you for inviting the Los Angeles County Sheriff's Department (Department) to review and comment on the June 2024 Notice of Availability of Draft Program Environmental Impact Report (NOA DPEIR), for the proposed West San Gabriel Valley Area Plan (WSGVAP). The proposed WSGVAP would be implemented in the following nine unincorporated areas of Los Angeles County (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. These nine communities in the WSGVAP make up approximately 23 square miles and are primarily single-family residential, with some commercial corridors and concentrated areas of open space.

F-1

As mentioned in the previous departmental review comments, the law enforcement service ratio noted in the Sheriff Protection Services section of the DPEIR (page 4.15-3 and page 4.15-22) is considered an inaccurate statement due to continuous change in communities. The Sheriff's Department does not have a standardized law enforcement service ratio at the present time, as staffing needs vary significantly between Stations. The appropriate service ratio should be based on the patrol personnel at the corresponding Sheriff Station relative to the factors that influence these needs, including the volume

F-2

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*A Tradition of Service*  
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Mr. Sensibile

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and nature of service calls, patrol and response times based on priority, personnel workload, performance metrics, and the modeling of service call patterns.

Beyond population and housing, the proposed policies for expanding community recreation, parks, open spaces, and trails on pages 2-12 of the Area Plan will result in the growth of daytime and evening population within the servicing Patrol Stations and Parks Bureau. It will generate an increased demand for law enforcement services, which have not been addressed in the cumulative impacts.

F-3

The Department expects future environmental documents for individual projects to be considered to describe potential impacts in order for decision-makers to identify additional funding resources to support increased patrol operations. The Department's Contract Law Enforcement Bureau shall be informed during the planning phases so that potential impacts and their cost implications to our resources, operations, and law enforcement services may be properly re-evaluated and amended as necessary.

F-4

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


F-5

Attention: Planning Section

Should you have any questions regarding this matter, please contact me at (323) 526-5657, or your staff may contact Ms. Yu Chun Teresa Ou of my staff, at (323) 526-5568.

Sincerely,

ROBERT G. LUNA, SHERIFF

  
Tracey Jue, Bureau Director  
Facilities Planning Bureau

### **Response to Comment F-1**

This comment serves as an introduction and summarizes unincorporated areas that make up the WSGV Planning Area. Since this comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

### **Response to Comment F-2**

This comment raises concern that the analysis contained within the Draft PEIR is based on a standardized law enforcement service ratio that does not exist, and states that the appropriate service ratio should be based on the patrol personnel at the corresponding Sheriff Station relative to many factors that influence these needs. The service ratio used in the Draft PEIR was established in the County's General Plan EIR. However, as stated in Section 4.15, Public Services, of the Draft PEIR, "As future projects are developed under the WSGVAP, tax revenues from property and sales taxes would be generated and deposited in the County's General Fund and the State Treasury. A portion of these revenues would be allocated to the LASD during the County's annual budgeting process, as is the case in current conditions, to address staffing and equipment needs to serve the communities, including WSGV Planning Area. Development, population and law enforcement demands are all considered when determining funding, which would ensure that each County department has the necessary resources to provide sufficient services." Therefore, as future projects facilitated by the Project are required to undergo environmental review in accordance with CEQA, impacts to LASD resources and operations would be identified and mitigated, as needed.

### **Response to Comment F-3**

This comment claims that the increased demand on law enforcement activities from the combination of population with expanding parks, open spaces, and trails has not been addressed in the cumulative impacts. As stated in Section 4.15, Public Services, of the Draft PEIR, "Cumulative development in the County would incrementally increase the demand for law enforcement services to serve new population and development." While the WSGVAP itself does not include any physical development, future projects developed under the WSGVAP could increase population growth within the WSGV Planning Area. The impact analyses contained within the Draft PEIR, including cumulative analyses, consider the whole of the Project.

### **Response to Comment F-4**

This comment states that the Sheriff's Department expects future environmental documents to describe potential impacts in order to identify additional funding resources and inform the Department's Contract Law Enforcement Bureau during the planning process. As stated in Section 4.15, Public Services, of the Draft PEIR, individual projects proposed under the WSGVAP would be reviewed by County and LASD staff prior to obtaining project approval and relevant permits. Additionally, all future projects developed under the WSGVAP would be required to pay all applicable developer fees and comply with relevant federal, State, and local laws and regulations to minimize impacts related to Sheriff's services.

### **Response to Comment F-5**

This comment serves as the conclusion to the letter and provides contact information. Since this comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

manatt

August 12, 2024

VIA EMAIL (wsgvap@planning.lacounty.gov)

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

**Re: West San Gabriel Valley Area Plan – Comments on Draft Program Environmental Impact Report, Project No. PRJ2023-003982; Environmental Assessment No. RPPL2023005884; Advance Planning Case No. RPPL2023005880; General Plan Amendment No. RPPL2023005882; Zone Change No. RPPL2023005883; Ordinance No. RPPL2024002630; State Clearinghouse No. 2023110351**

Dear Mr. Sensibile:

This firm represents Enoteca, LLC (“Enoteca”), a small, family-run business that owns real property that will be **significantly downzoned** by and through the County of Los Angeles’ (“County”) adoption of West San Gabriel Valley Area Plan (“WSGVAP”). Specifically, Enoteca owns approximately 52 acres of real property<sup>1</sup> within the unincorporated community of Altadena herein referred to as the “Enoteca Property.” The County’s existing land use regulatory framework for the Enoteca Property permits the development of up to approximately **52 homes**. Under the WSGVAP, this allowance would be reduced to **a mere two homes**.

For obvious reasons, Enoteca strongly objects to adoption of the WSGVAP as proposed because it would completely extinguish Enoteca’s redevelopment rights in the Enoteca Property. However, Enoteca also objects to adoption of the WSGVAP on grounds that the environmental review document prepared to analyze the potential significant impacts of the WSGVAP fails to meet the procedural and substantive mandates of the California Environmental Quality Act (Pub. Resources Code, § 21000 *et seq.*) (“CEQA”) and the State CEQA Guidelines (Cal. Code Regs., tit. 14, § 15000 *et seq.*). Thus, we request that the County include this comment letter in the record of proceedings for Draft Program Environmental Impact Report (“Draft PEIR”), Project No. PRJ2023-003982; Environmental Assessment No. RPPL2023005884; Advance Planning Case No. RPPL2023005880; General Plan Amendment No. RPPL2023005882; Zone Change No. RPPL2023005883; and Ordinance No. RPPL2024002630.

Furthermore, we are compelled to point out that the County’s persistence in drastically downzoning entire communities without involving those communities and land owner stakeholders is procedurally and constitutionally improper. We note that the Draft PEIR, Section

<sup>1</sup> This real property is identified as Assessor’s Parcel Number 5862-011-001.

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ES.7, “Areas of Controversy,” offers a highly misleading discussion of “the primary areas of controversy known to the County” and the County’s purported community engagement efforts when the County commenced environmental review in November 2023. The Draft PEIR states that, “Prior to preparation of this Draft PEIR, the County circulated a Notice of Preparation (NOP) . . . Comments on the NOP were received from two agencies, one group, and one individual . . .” (Draft PEIR ES-7.) From that incredibly small set of responses, the County concluded that “The primary areas of controversy known to the County” included impacts to lighting and dark skies, facilitation of urban farming and the Urban Agriculture Incentive Zone Program, wildlife movement, lighting impacts to wildlife, how to best analyze air quality and greenhouse gas emissions, and unspecified “guidance” on “park and recreation facilities.” (Draft PEIR ES-8.)

G-2  
cont.

Without question, the draconian downzoning of numerous properties across the lands encompassed by the WSGVAP is an “area of controversy,” and the impacted stakeholders would have made the County aware of this fact had the County meaningfully engaged those stakeholders. As discussed below, there are numerous legal issues implicated by the planned downzoning, none of which have been addressed by the County, let alone resolved. Given the County utter failure to include those community members most directly harmed by the WSGVAP as currently proposed, the WSGVAP can hardly be described as a “community-based plan” as the Draft PEIR does throughout.

G-3

Finally, on behalf of Enoteca and similarly situated land owners in the community who have found their property suddenly stripped of its development potential, we strongly urge the County to consider adoption of “Alternative 2: Dispersed Growth Alternative.” As discussed more fully below, Alternative 2: Dispersed Growth Alternative, allows for the County to grow in ways that will accommodate its housing needs, assure the development of new housing stock (which in turn will reduce housing costs for County residents), and provide a better diversity of housing options *all without stripping existing property owners of their rights*. Alternative 2 is good planning policy and is much more likely than the proposed WSGVAP to result in increased housing development. As discussed below in regards to the Draft PEIR’s flawed analysis of land use and planning and population and housing impacts, downzoning Enoteca’s property slashes its development potential from more than 50 dwelling units to a mere two units—an action that directly obstructs the community’s ability to address ongoing issues such as aging housing stock and high housing costs. Downzoning available and primarily vacant developable land results in *less* housing construction and *higher* housing costs. Further, the WSGVAP is a suburban area—increasing land use designation densities *on paper* on property that is already developed (even if that development is low and not high density residential) is not likely to actually result in new housing construction. Alternative 2: Dispersed Growth Alternative, addresses this flaw.

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## I. CEQA STANDARD OF REVIEW

Public agency determinations as to the cause, effect, and significance of environmental impacts must be supported by substantial evidence. (Pub. Resources Code, §21168.) A public agency abuses its discretion and fails to proceed in the manner required by law when its actions or decisions do not substantially comply with the requirements of CEQA. (Pub. Resources Code, §§ 21168, 21168.5.) An agency’s application of an erroneous legal standard in making a CEQA determination also constitutes a failure to proceed as required by law. (*City of San Diego v. Board of Trustees of Cal. State University* (2015) 61 Cal.4th 945, 956.) Whether an environmental impact report (“EIR”) fails to include the information necessary for an adequate analysis of an environmental issue is a question of law, and when reviewed by the courts, the courts do not defer to an agency’s determinations. (*Madera Oversight Coalition, Inc. v. County of Madera* (2011) 199 Cal.App.4th 48, 102 [“whether an EIR is sufficient as an informational document is a question of law subject to independent review by the courts”].) Failure to comply with the basic substantive requirements of CEQA is necessarily prejudicial error, requiring the decertification of any EIR and vacation of any project approvals adopted in reliance upon the same. (*North Coast Rivers Alliance v. Kawamura* (20 1 5) 243 Cal.App.4th 647, 67 1 .)

G-7

While program EIRs are necessarily broader in scope than project-level EIRs, they must still adhere to CEQA’s requirements; significance determinations must still be supported by substantial evidence, program EIRs must still apply the correct legal standard to CEQA determinations, and program EIRs must still include all information necessary for an adequate analysis of environmental effects. (*Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 431.) Use of a program EIR does not permit a lead agency to defer an analysis of reasonably foreseeable significant environmental impacts to a later stage of review to avoid addressing those impacts in the program EIR itself. (State CEQA Guidelines, § 15152(b).) “The ‘foremost principle’ in interpreting CEQA is that the Legislature intended the act to be read so as to afford the fullest possible protection to the environment within the reasonable scope of the statutory language.” (*Communities for a Better Environment v. California Resources Agency* (2002) 103 Cal.App.4th 98, 109.)

## II. CEQA COMMENTS

### A. Unclear and Indecipherable Project Description

EIR project descriptions must be accurate, stable and complete, including all components of a proposed project, and include all foreseeable future activities that are consequences of the project being approved. (*County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 199.) However, here, the maps presented in the Draft PEIR are very small in scale and depicted in unclear colors, making it nearly impossible for an individual property owner to understand how

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the WSGVAP will affect his or her property. This is especially inequitable where the County is proposing to drastically downzone property.

**B. Aesthetics**

The Draft PEIR summarily concludes that impacts to scenic vistas, visual character and public views will be significant and unavoidable. Yet the Draft PEIR fails to analyze these impacts with any particularity and fails to identify any mitigation measures that could reduce these impacts. Instead, the Draft PEIR merely lists a handful of policies that offer *generic and permissive* suggestion about how to maintain aesthetic quality. The efficacy and enforceability of these policies is utterly speculative. By way of example, see the Draft PEIR’s assertion that a land use policy that “encourages new and existing development to use locally native species in landscaping” will function as feasible, *enforceable* mitigation for impacts to visual resources. (Draft PEIR at 4.1-17.)

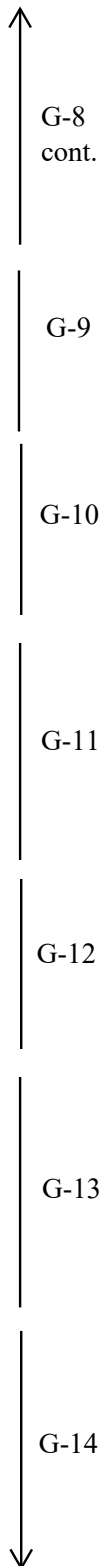
With respect to impacts to views from bike trails, multi-use trails and hiking trails, the Draft PEIR concludes that impacts will be less than significant because it *assumes* that such trails exist exclusively in open spaces. However, the Draft PEIR offers zero evidence to support that conclusion. (Draft PEIR 4.1-18 – 4.1-19 “However, the proposed focused densification that would occur under the WSGVAP is not anticipated to occur in proximity to regional riding, hiking, or multi-use trails, which are understood to primarily exist in open space areas.”)

Similarly, the Draft PEIR offers no evidence to support its conclusion that impacts to scenic highways will be less than significant. The Draft PEIR merely asserts that “intervening topography and soundwalls” will screen future development from view. There is no evidence presented to demonstrate that planned, future multi-story development will not be readily visible from scenic highways. (Draft PEIR 4.1-19.)

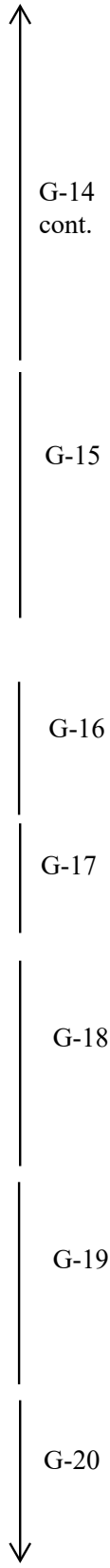
Finally, the Draft PEIR’s conclusion that there will be no significant impacts associated with the new sources of shadow, light and glare created by future development also fails to meet CEQA’s legal requirements. The Draft PEIR acknowledges that new sources of light, shadow and glare will be generated, but dismisses the relative significance of those new sources because they will be generated “within an urban setting.” The Draft PEIR simply dismisses the impacts because the receptors are in an urban setting. (Draft PEIR 4.1-21.)

**C. Agriculture and Forestry Resources**

The Draft PEIR discloses that important farmland exists near San Gabriel and Rosemead and that “there are approximately 218 acres of Unique Farmland and 51 acres of Prime Farmland within the approximately 14,848-acre Plan Area.” (Draft PEIR 4.2-10.) The Draft PEIR then concludes, without any further elaboration, that impacts to agricultural lands will be







insignificant because: (1) any agricultural lands that will be converted to other uses under the WSGVAP “are not currently being utilized for agricultural purposes”; and (2) “future projects developed under the WSGVAP would be required to preserve agricultural areas” in order to be consistent with WSGVAP Policy LU-5.14. These two assertions cannot be reconciled. On the one hand, the Draft PEIR asserts agricultural lands will be converted, but assures the public and decision makers that such conversion “is fine” because those lands are not being used for agricultural purposes anyway. On the other hand, the Draft PEIR asserts that agricultural lands will not be converted because Policy LU-5.14 will prevent such conversion. Policy LU-5.14 in no way prevents such conversion. (Draft PEIR 4.2-9 quoting Policy LU-5.14 “Support preservation of nurseries and other agricultural uses located on utility easements in the WSGV[AP] for agricultural and open space uses.”) For the above reasons, the DEIR’s significance conclusion regarding Impact 4.2-4 is also legally infirm.

**D. Air Quality**

The Draft PEIR identifies several significant and unavoidable impacts associated with the emission of air pollutants. However, throughout the analysis, the Draft PEIR fails to analyze these impacts with any particularity and fails to identify any mitigation measures that could reduce these emissions to a level of less than significant. In nearly every instance, the Draft PEIR punts any analysis and mitigation to future projects, but the County cannot avoid CEQA review simply because it is proceeding with a program-level, as opposed to a project-level, environmental review document.

Impacts associated with air quality management plan consistency are potentially significant, yet the Draft PEIR does not identify any mitigation measures. The Draft PEIR concludes that the WSGVAP is consistent with the South Coast Air Quality Management District’s (“South Coast AQMD”) 2022 Air Quality Management Plan (“AQMP”), but the analysis is perfunctory and conclusory. The analysis focuses on the consistency between the 2022 AQMP and the Connect SoCal 2020, which is the Southern California Association of Governments’ (“SCAG”) plan and not the WSGVAP. The Draft PEIR attempts to avoid any and all analysis of the WSGVAP’s impacts with generalized statements such as the WSGVAP’s “aim [is] to create more defined community centers” and a desire for future residents to “be able to easily access commercial, retail, and community-serving uses” but there is nothing in the Draft PEIR explaining how the WSGVAP will achieve these broad goals. These generic statements are not enough to show, with substantial evidence, that the WSGVAP “would be consistent with the AQMP” and thus impacts would be less than significant.

Furthermore, the Draft PEIR concludes, somehow, that the WSGVAP “is considered to be generally consistent with SCAG’s regional projections” despite the fact that just one sentence earlier, the PEIR admits that the anticipated growth under the WSGVAP *will be greater* than SCAG’s Connect SoCal 2020 projections. Given that, as the Draft PEIR states, a project might

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be in conflict with the AQMP if the development is greater than that anticipated in the SCAG’s growth projections, the Draft PEIR fails to explain how the greater growth here is “generally consistent” such that impacts associated with conflicts with the growth projections is less than significant. The Draft PEIR fails to identify any applicable significance threshold above which growth is significant and below which growth is less than significant, let alone support that threshold with substantial evidence.

G-20  
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Next, the Draft PEIR concludes that because “all future projects developed under the WSGVAP would be subject to subsequent planning and environmental review” any inconsistencies with the 2022 AQMP can be overlooked. But this is false—the WSGVAP is not being approved in a vacuum, and also includes a myriad of zoning code amendments with the potential to offer future developers the opportunity to develop by-right, and/or tier from the WSGVAP Draft PEIR. The promise of “future environmental review” cannot be a basis for excusing a failure to provide adequate environmental review now, before the WSGVAP and its numerous implementation actions are adopted.

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Finally, the Draft PEIR states, without any analysis or quantification, that a small selection of WSGVAP policies “would potentially reduce emissions, which would address potential impacts related to conflicts with an applicable air plan. Therefore, impacts are considered less than significant.” CEQA requires more than conclusory statements to support an EIR’s significance determinations.

G-22

The Draft PEIR determines emissions of criteria air pollutants is significant, yet puts no effort into identifying feasible mitigation measures, or even explaining why such measures would be infeasible. The Draft PEIR concludes that emissions of ozone, PM10, and PM2.5 will be significant and unavoidable, but simultaneously notes that analysis of the quantity or effects of such emissions “would be speculative at best.” The Draft PEIR once again punts even the most basic impacts analysis to future projects undergoing environmental review, arguing that at that point the County might quantify emissions and identify mitigation measures. However, just because this is a program and not project-level EIR does not allow the County to avoid any attempt to comply with CEQA today. Furthermore, as discussed above, the promise of “future environmental review” is specious at best, considering the implementation actions that are being proposed alongside adoption of the WSGVAP.

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The Draft PEIR relies on unspecified “transportation policies” in making an unsubstantiated conclusion that the WSGVAP “would further help to reduce VMT.” Instead of identifying concrete mitigation measures that would reduce the admittedly significant impacts associated with criteria air pollutants, the Draft PEIR makes a passing reference to the WSGVAP’s transportation policies and concludes that these policies would reduce VMT and therefore reduce air pollutant emissions. But there is absolutely no analysis of what these policies are, whether they are *feasible*, where they will be implemented, and how and to what

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extent emissions will be reduced. There are feasible mitigation measures available, such as requiring future projects within the WSGVAP to be conditioned on the incorporation and implementation of specific policies. However, the Draft PEIR fails to even consider such measures.

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Despite a clear warning from the South Coast AQMD, the Draft PEIR does not contain a Health Risk Assessment. In its December 22, 2023 comment letter on the NOP, the South Coast AQMD noted: “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 assessment.” The Draft PEIR references the air district’s recommendation in its analysis of impacts associated with exposing sensitive receptors to substantial pollutant concentrations. Yet, once again, instead of performing the analysis, the Draft PEIR merely punts to future projects, again arguing that “future project[s] developed under the WSGVAP would be subject to subsequent planning and environmental review.” For all the reasons addressed above, this cannot absolve the County from performing the necessary environmental analysis now.

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#### **E. Biological Resources**

The Draft PEIR identifies several significant and unavoidable impacts associated with biological resources (*see* Impact 4.4-1, 4.4-2). However, throughout the analysis, the Draft PEIR fails to analyze these impacts with any particularity and fails to identify any mitigation measures that could reduce these impacts to a level of less than significant. Instead, the Draft PEIR punts any analysis and mitigation to future projects, but the County cannot avoid CEQA review simply because it is proceeding with a program-level, as opposed to a project-level, environmental review document. The Draft PEIR suffers from the same legal infirmity in concluding that impacts to wetlands would be less than significant (*see* Impact 4.4-3).

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#### **F. Energy**

The Draft PEIR concludes that wasteful or inefficient energy consumption associated with buildout (construction) of the WSGVAP will be insignificant, but fails to support that conclusion with any evidence. (Draft PEIR 4.6-18 – 4.6-19.) The WSGVAP envisions densification and intensification of residential and commercial uses over the decades-long life of the WSGVAP. This means that there will be major construction activities taking place over many years within the WSGVAP. Nevertheless, the Draft PEIR concludes that *none* of these future construction activities will rise to a level of significance in terms of energy consumption because: (1) construction equipment will be powered off when not in use; (2) natural gas typically isn’t used in construction activities; and (3) domestic transportation fuel supplies for construction vehicles are adequate to serve construction needs over the life of the WSGVAP. None of this amounts to evidence supporting the Draft PEIR’s significance conclusion. The Draft

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PEIR’s significance conclusion regarding operational energy consumption is equally unsupported.

**G. Greenhouse Gas Emissions**

The Draft PEIR finds that the WSGVAP will not result in any greenhouse gas emissions-related impacts, even without the imposition of any mitigation measures. The Draft PEIR’s conclusion is based in substantial part on the fallacy that “[t]he WSGVAP is a long-range policy document, the approval of which would not directly result in the development of land uses and would not directly result in GHG emissions.” However, as the Draft PEIR admits, adoption of the WSGVAP “would increase land use and zoning densities and development intensity” in many areas.

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With no explanation whatsoever as to how emissions were calculated, the Draft PEIR asserts that future development under the WSGVAP would result in an additional 56,817 metric tons per year of greenhouse gas emissions. Yet, despite the admitted emission of this significant amount of emissions, the Draft PEIR does not provide any significance threshold against which to compare this amount. The analysis then pivots, once again, to its reiteration that future projects will undergo separate CEQA review, and thus, no review is required today.

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The Draft PEIR’s greenhouse gas emissions analysis concludes by describing the State’s mandated GHG emissions target of reducing Statewide emissions to 40 percent below 1990 levels by 2023, and achieving carbon neutrality no later than 2045. Yet, again, buildout of the WSGVAP will *increase* emissions by 56,817 metric tons per year, which is the antithesis of consistency with California’s statewide emissions reductions targets. There is no explanation provided of how *this increase* is consistent with goals and policies mandating *reductions*.

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**H. Hazards and Hazardous Materials**

With respect to the WSGVAP’s impact on emergency response plan or evacuation plan (*see* Impact 4.9-6), the Draft PEIR concedes that the WSGVAP will introduce new development that could impede or impair emergency response and evacuation. Nevertheless, the Draft PEIR once again punts on addressing this impact with mitigation measures and insists that this impact will be addressed at some point on the future when development proposals come forward. This is improper under CEQA.

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**I. Hydrology and Water Quality**

The Draft PEIR’s conclusion that buildout of the WSGVAP will not deplete groundwater supplies is not supported, and is arguably undermined by the what little discussion on this topic is contained in the Draft PEIR. Per the Draft PEIR, the WSGVAP will “result in approximately

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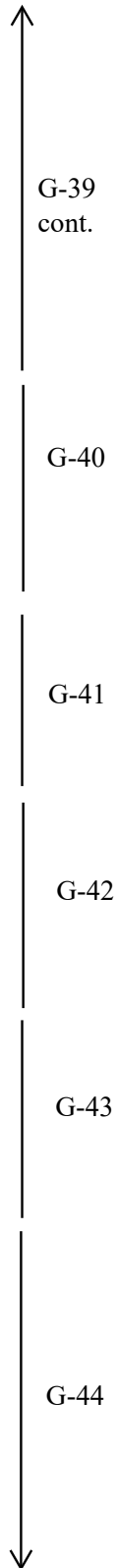
25,954 new residents, 10,874 new jobs, and 16,243 new housing units, which would increase the demand for water, which in turn could lead to groundwater pumping.” (Draft PEIR 4.10-22.) The Draft PEIR then seems to argue that this clear increase in water demand will somehow not impact water supply because the County does not control groundwater pumping. (*Id.*) Whether or not groundwater pumping is controlled by the County is irrelevant. Under CEQA, the County cannot conclude that groundwater supply impacts will be less than significant if it does not show that increase in groundwater consumption can be offset by groundwater replenishment. The Draft PEIR does not make this showing. Additionally, the Draft PEIR concedes that buildout of the WSGVAP could impede implementation of a groundwater plan due to increased use of groundwater, but nevertheless concludes that impacts will be insignificant without any basis for that conclusion.

#### J. Land Use and Planning

The Draft PEIR’s analysis of and land use and planning impacts fails to note the inconsistencies between the WSGVAP’s downzoning of significant swaths of property that, today, could be developed with housing, and the ongoing issues that the WSGVAP identifies as needed to be addressed within the Area Plan bounds. Specifically, the WSGVAP and Draft PEIR acknowledge that the communities within the proposed WSGVAP struggles with aging housing stock, high housing costs, and lack of housing diversity. (See, e.g., Draft PEIR, p. 2-1.) Yet, at the same time, the WSGVAP downzones Enoteca’s property such that its housing development potential falls from more than 50 *to a mere two units*—an action that directly obstructs the community’s ability to address ongoing issues such as aging housing stock and high costs. If anything, downzoning results in *less* housing construction and *higher* housing costs. Further, in suburban areas, such as the WSGVAP, increasing land use designation densities *on paper* likely will do nothing to increase development, or the density of development, even in those areas that the WSGVAP purports to concentrate density. So, in the end, the WSGVAP loses development potential on those parcels that it downzones, but will likely never realize a gain in units and density elsewhere, ending up with a net loss of buildable units.

The severe downzoning proposed in the WSGVAP also results in internal inconsistencies between the WSGVAP’s proposed land use designation changes and the Area Plan’s own goals, policies, and objections. Specifically, downzoning property so significantly in the Altadena community conflicts with at least the following:

- WSGVAP Policy LU-1.2: Increase Land Diversity. Enable a diverse land use pattern to meet the needs of residents and employees, including increased proximity between housing and commercial uses, job centers, parks and open spaces, and community services and amenities to support the well-being of the community.



- WSGVAP Policy LU-3.1: Promote diverse housing options. Promote development of duplex, fourplex, accessory dwelling units and cottage court housing in low-density housing areas.
- WSGVAP Policy LU-3.2: Allow compatible uses in residential neighborhoods. Allow compatible uses on or near the edges of residential neighborhoods that bring amenities closer to homes, such as child and adult day-care centers, educational facilities, cultural facilities, and corner markets.
- WSGVAP Policy LU-11.1: Ensure equitable and accessible community engagement. Expand community engagement efforts to people who otherwise might not participate, including working parents, people with disabilities, and people of color.
- WSGVAP Policy LU-11.2: Encourage collaboration with community partners. Partner with community groups, local community-based organizations, and public agencies to increase participation in the planning process and foster collaboration.

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cont.

We find the inconsistency with the last two of the above policies, “ensure equitable and accessible community engagement” and “encourage collaboration with community partners” to be especially egregious. The land use decision to downzone Enoteca’s property, and reduce its development potential by nearly 100 percent without any engagement or collaboration with the property owner is the absolute opposite of “equitable and accessible community engagement” or “collaboration with community partners.”

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### K. Mineral Resources

Here, the Draft PEIR once again concludes that WSGVAP implementation will have no impact on “known mineral resources” within the communities of East San Gabriel, South Monrovia Islands, Altadena, and Kinneloa Mesa because “there are no active sand or gravel mines within any of these unincorporated WSGV[AP] communities.” (Draft PEIR at 4.12-7.) Whether or not such resources are actively being extracted is not the CEQA question. The required analysis here is to disclose where the mineral resources are located and analyze whether new development under the WSGVAP will impair *access to and recovery of* those mineral resources. The Draft PEIR fails to do this.

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### L. Population and Housing

Like the Draft PEIR’s land use analysis, the analysis of population and housing-related impacts is based on the fallacy that by wiping out nearly all development potential on currently vacant or underdeveloped property (like Enoteca’s) and increasing (paper) density “along commercial corridors and major roadways through infill development and redevelopment as well as within a select few areas near commercial corridors and transit with low existing residential density” will ultimately result in an increase in actual, built dwelling units. The County is ignoring the fact that is highly likely that *vacant* and *underdeveloped* property will be converted

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G-49  
cont.

into new housing, while *existing low density housing* will likely not be razed and replaced with high density development merely because a planner at the County decided to change the shades on a land use map one day.

Again, the WSGVAP downzones Enoteca’s property such that its housing development potential falls approximately 96 percent, from more than 50 homes to only two. Downzoning of primarily vacant, developable land results in less housing construction, higher housing costs, and lack of housing diversity. At the same time, increasing the density of *existing low density residential development*, like the WSGVAP proposes to do, is not likely to result in an increase in actual development. The result in that the WSGVAP loses development potential, rather than gaining it. These factors are wholly ignored by the Draft PEIR’s analysis of population and housing impacts, which tout growth projects that are unmoored from reality.

G-50

**M. Public Services**

Once again the Draft PEIR reaches a conclusion without evidence to support it when it asserts that impacts to fire, emergency and law enforcement services will be insignificant. The Draft PEIR recognizes that “approximately 25,954 new residents” will move into the WSGVAP, but simply chooses to ignore the additional burden those residents will place on these critical services. Instead, the Draft PEIR alternatively relies on: (1) the bare assertion that future projects developed under the WSGVAP would be required to demonstrate consistency with the goals and policies of the General Plan related to such services (*see* Draft PEIR at 4.15-21, 4.15-23); and (2) the assumption that these impacts will be addressed in subsequent CEQA review. (*Id.*) This is improper. The number of residents that will burden these service providers is known now, and mitigation for the impacts those known residents will generate must be mitigated now. For the same reasons the Draft EIR’s conclusions regarding school and library impacts are likewise legally infirm.

G-51

G-52

**N. Recreation**

Once again the Draft PEIR reaches a conclusion without evidence to support it when it asserts that recreational facilities will not substantially deteriorate or deteriorate at an accelerated rate due to increased use. The Draft PEIR recognizes that “approximately 25,954 new residents” will move into the WSGVAP. Those new residents will use the available recreational facilities within the WSGVAP, which is an increase in the use of those facilities compared to current conditions. Yet the Draft PEIR provides no analysis or explanation as to why those additional people will not cause the existing recreational facilities to deteriorate at an increased rate. (Draft PEIR 4.16-20). Instead, the Draft PEIR simply asserts that population growth will not be “unplanned” and because the growth is not unplanned, recreational facilities will not be affected. (*Id.*)

G-53

**O. Transportation**

The Draft PEIR determines that implementation of the WSGVAP will result in significant and unavoidable direct and cumulative impacts relating to vehicle miles traveled (“VMT”). The Draft PEIR identifies two ineffective mitigation measures that fail to reduce these impacts to a level of less than significant.

G-54

The Draft PEIR admits that the WSGVAP falls far short in meeting the County’s threshold of significance for VMT. For impacts to be less than significant, the WSGVAP would have to result in VMT of no greater than 25.3 daily total VMT, a mark the WSVAP misses by 17.1 percent. Yet, instead of identifying measures that would actually reduce VMT, the Draft PEIR again kicks the can down the road with the pointedly indeterminate statement that, in the future, “the County would work to implement [VMT reduction] policies in coordination with State, regional and local agencies to ensure projects throughout the WSGV Planning Area contribute to the region achieving a substantial reduction in VMT.” This statement is so vague and non-committal as to be meaningless. Similarly, the Draft PEIR directs future project applications “to *consider* a menu of [transportation demand management] strategies that *could* be implemented” at some point in the future. (Emphasis added.)

G-55

G-56

The Draft PEIR identifies a short menu of strategies for reducing VMT in Mitigation Measures 4.17-1 and 4.17-2, but does little to analyze the effectiveness of these strategies except to say that that many “would only have a marginal effect” on overall VMT. The Draft PEIR admits that the “predominantly suburban land use context of the West San Gabriel Valley may limit the effectiveness” of any strategy the County may employ. Yet, if that is truly the case, then it begs the question of why the County is building up land use density in some areas of the this Area Plan at all. If, overall, the WSGVAP is too suburban to contribute to a County-wide reduction in VMT, perhaps the County should be focusing its planning efforts elsewhere, and leave the WSGVAP land use designations where they stand.

G-57

G-58

G-59

**P. Utilities and Service Systems**

Once again the Draft PEIR reaches a conclusion without evidence to support it when it asserts that impacts to utilities and service systems will be insignificant. As discussed above, the increase in users of services within the WSGVAP is known, and the impacts those users have on water supply, wastewater treatment, solid waste, solid waste disposal and the facilities that provide these service must be evaluated now. The Draft PEIR improperly fails to undertake this analysis and, once again offers the unsupported assertion that any impacts to utilities and service systems will be addressed through some unknown level of future CEQA review. (Draft PEIR at 4.19-20, 4.19-21, 4.19-22, 4.19-25.)

G-60



The Draft PEIR’s assessment of water supply is also legally infirm due to its failure to show that there is, in fact, sufficient water to meet the needs of the WSGVAP buildout. The Draft PEIR expressly admits that it is unknown at this time whether water needs can be met if the WSGVAP is adopted. (Draft PEIR at 4.19-22 “growth under the WSGVAP was not specifically accounted for in MWD’s 2020 UWMP, MWD would be required to account for this projected growth during the next UWMP update cycle in 2025.”) The County cannot adopt a project absent a showing that there is actual water available to serve that project. (*See Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova* (2007) 40 Cal.4th 412.)

G-61

G-62

**Q. Wildfire**

In purporting to consider and evaluate wildfire risks, the Draft PEIR once again asserts, without proper basis, that such risks will be less than significant. As to impairing an emergency response plan or evacuation plan, the Draft PEIR states “[t]he General Plan also includes goals and policies that ensure that emergency response and evacuation is not impaired or interfered with by new development.” (Draft PEIR 4.20-12.) As to exacerbating wildfire risks, the Draft PEIR also generally punts to County general plan policies that may or may not actually address this risk. (Draft PEIR 4.20-14.) As to the installation of WSGVAP infrastructure that could exacerbate wildfire risk, the Draft PEIR defers consideration to some future date when some level of CEQA review may be undertaken. (Draft PEIR 4.20-15.) The foregoing does not meet CEQA’s requirements.

G-63

G-64

**R. Alternatives**

The Draft PEIR identifies just two project alternatives aside from the mandatory “No Project Alternative.” The first, the “Dispersed Growth Alternative” proposes the same amount of potential growth as the proposed WSGVAP, but would not locate the additional growth “primarily along commercial corridors and major roadways” and would instead more equitably disperse the additional density “throughout the nine WSGV communities.”

G-65

Enoteca **strongly** supports the approval of Alternative 2 over the WSGVAP as it is currently proposed. Because Alternative 2 would not modify land use density (i.e., longstanding, existing development potential) on entire Altadena neighborhoods, Alternative 2 is more equitable and in line with the WSGVAP’s purported goals and policies of “ensur[ing] equitable and accessible community engagement” and “encourag[ing] collaboration with community partners.” Selection of Alternative 2 over the WSGVAP avoids one of the central defects associated with the WSGVAP—the fact that the WSGVAP’s proposed land use designation changes remove vacant and developable land and does not replace it anywhere else within the plan’s boundaries. As discussed at length above, the supposed densification in already-built-out locations within the plan will likely never happen. If anything, downzoning available and vacant developable land (like Enoteca’s property) results in **less** housing construction and **higher**

G-66

G-67



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housing costs. Because the WSGVAP is a suburban area, increasing land use designation densities *on paper* on property that is already developed with commercial or lower density residential is not likely to result in actual new housing construction.

G-67  
cont.

The Draft PEIR’s conclusion that Alternative 2 will result in greater impacts than the WSGVAP is not based on substantial evidence; that conclusion relies on the fallacy reiterated throughout the EIR that the paper upzoning of already developed property along existing commercial corridors will somehow result in significant redevelopment and substantial numbers of new housing units being constructed. But, as discussed above, the WSGVAP downzones swaths of developable property—the property most likely to be developed with new homes. Alternative 2 will have impacts similar to the proposed Project—not greater impacts.

G-68

G-69

Finally, Table 5-2, “Ability of Alternatives to Meet Project Objectives” belies the fact that the WSGVAP’s objectives are either too narrowly drafted or too narrowly interpreted. Per Table 5-2, not a single project objective is met by a single one of the analyzed alternatives. CEQA requires that the County identify alternatives to the proposed Project in good faith. That fact that not one objective is (in the County’s view) achieved by any of the analyzed alternatives indicates that the County did not adequately identify a reasonable range of alternatives, or drafted too narrow a set of Project objectives as to leave County decision makers no true choice.

G-70

### S. Cumulative Impacts

The Draft PEIR’s cumulative impacts analyses are flawed for the same reasons the analyses addressed above are flawed. Unless and until the direct impacts of the WSGVAP are adequately analyzed—and, as detailed above, they are not—the Draft PEIR’s cumulative impacts analyses are similarly inadequate.

G-71

### III. CONCLUSION

We appreciate your consideration and attention to these CEQA comments. We are available to discuss these matters further, and we wish to work with the County to resolve these matters. Please contact Jennifer Lynch [JLynch@manatt.com](mailto:JLynch@manatt.com) or Sigrid Waggener [SWaggener@manatt.com](mailto:SWaggener@manatt.com).

G-72

Sincerely,  
MANATT, PHELPS & PHILLIPS, LLP  
on behalf of Enoteca, LLC

## Response to Comment G-1

This comment serves as an introduction and explains that Enoteca, who is being represented by Manatt, owns 52 acres of property within the WSGV Planning Area, and objects to the Project due to the downzoning that would occur to Enoteca's property under the WSGVAP. Since this comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

## Response to Comment G-2

This comment states that downzoning entire communities without involving those communities and stakeholders is procedurally and constitutionally improper. This comment also summarizes the Areas of Controversy section contained within the Executive Summary of the Draft PEIR, and that this is misleading due to the small set of responses. The environmental topics documented in the Areas of Controversy section of the Draft PEIR are topics that were discussed within comments made on the Notice of Preparation. As discussed in Section 1, Introduction, of the Draft PEIR, the NOP was sent to the State Clearinghouse, public agencies, special districts, responsible and trustee agencies, and other interested parties, and posted on the County's website for a 39-day public review period that began on November 14, 2023 and ended on December 22, 2023. The NOP was published in the following regional newspapers on November 14, 2023: Crescenta Valley Weekly, Monrovia Weekly, Pasadena Star News, San Gabriel Valley Tribune, and La Opinión. In addition, the County hosted a virtual scoping meeting on Thursday, December 14, 2023 at 6:30 p.m. The scoping meeting date and instructions on how to attend the meeting was advertised within the NOP and registration was made available through the County's website. Attendees of the webinar were able to provide comments and questions about the WSGVAP to County staff and the project consultants during the question and answer portion of the meeting. Response to Comment G-3

This comment states that the downzoning of properties is an area of controversy, and claims there are numerous legal issues implicated by the planned downzoning. The commenter does not further explain what these specific legal issues are. Since this comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

## Response to Comment G-4

This comment expresses support for the Draft PEIR's Alternative 2, Dispersed Growth Alternative. Since this comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

## Response to Comment G-5

This comment states that the WSGVAP would reduce this property's development potential due to downzoning, and that downzoning this developable land would result in less housing construction and higher housing costs. As discussed in Chapter 3, Project Description, of the Draft PEIR, a goal of the WSGVAP is to preserve areas within or adjacent to natural resources or hazard areas and in the wildland-urban interface by decreasing land use densities and development intensities. This land may be vacant, but development of this land would potentially increase environmental impacts as a result of being developed. In addition, the WSGVAP would increase land use and zoning densities and development intensity primarily along commercial corridors and major roadways through infill development and

redevelopment as well as within a select few existing low-density residential areas near commercial corridors and transit. Since this comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

### **Response to Comment G-6**

This comment states that increasing land use designation densities in areas that are already developed will not result in new housing construction, and Alternative 2 would address this flaw. Since this comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

### **Response to Comment G-7**

This comment provides CEQA case law regarding EIRs and Program EIRs. Since this comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

### **Response to Comment G-8**

This comment states that EIR project descriptions must be accurate, stable and complete, and states that the maps within the Draft PEIR are very small in scale, making it nearly impossible for a property owner to understand how the WSGVAP will affect their property. As stated in Chapter 3, Project Description, of the Draft PEIR, maps depicting proposed land use and zoning changes are included within Appendix C of the Draft PEIR, *WSGV Planning Area Communities: Land Use and Zoning Modification Maps*. The Draft PEIR predominantly includes figures showing the entire regional setting of the WSGVAP, as this PEIR covers a large area of land. Therefore, no revisions are required.

### **Response to Comment G-9**

This comment states that impacts to scenic vistas will be significant and unavoidable, but states that the Draft PEIR failed to analyze these impacts with particularity and fails to identify mitigation measures to reduce this impact. As stated in Section 4.1, Aesthetics, of the Draft PEIR, while future projects developed under the WSGVAP would be primarily focused along commercial corridors and major roadways, implementation of the WSGVAP could result in significant impacts to scenic vistas if new development were to obscure views of such vistas. Given that the WSGVAP plans for higher density development than what currently exists in the Plan Area, no feasible mitigation measures are available to reduce this impact. The Draft PEIR is unable to go into any further detail regarding the future development because the WSGVAP is a policy document that does not include or propose any site-specific development that could directly result in construction or operational impacts to the environment. Analysis at a parcel or site-specific level was not conducted, because the specific location, timing, and type of future projects proposed to be developed under the WSGVAP are unknown at this time, where detailed analysis would be speculative and, therefore, beyond the scope of this Draft PEIR.

### **Response to Comment G-10**

This comment states that the enforceability of the policies mentioned is speculative, and claims that the Draft PEIR asserts that land use policies will function as enforceable mitigation for impacts to visual resources. As stated in Section 4.1, Aesthetics, of the Draft PEIR, given that the WSGVAP plans for higher density development than what currently exists in the Plan Area, no feasible mitigation measures

are available to reduce this impact. However, since the WSGVAP is a policy document, the Draft PEIR includes a discussion related to the proposed policies under the WSGVAP that would help preserve scenic vistas within the Plan Area and minimize the visual impact of new development constructed under the WSGVAP. These policies are not mitigation measures, but the addition of these policies as part of the WSGVAP is relevant to the discussion of Aesthetics within the PEIR.

### **Response to Comment G-11**

This comment states that the Draft PEIR concludes that impacts to views from bike trails, multi-use trails and hiking trails will be less than significant with zero evidence. As stated in Section 4.1, Aesthetics, of the Draft PEIR, future projects developed under the WSGVAP would be primarily focused along targeted commercial corridors and major roadways with limited development in a select few existing low-density residential areas near commercial corridors and transit stops. Views from bike trails, multi-use trails and hiking trails in the Plan Area primarily exist in open space areas. All future projects developed under the WSGVAP would occur within the existing urban setting and would not represent a visually conspicuous feature of the long-range view field available from regional trails in the Plan Area.

### **Response to Comment G-12**

This comment states that the Draft PEIR offers no evidence to support the conclusion that impacts to scenic highways will be less than significant. This comment also summarizes the statement made in the Draft PEIR that intervening topography and soundwalls will screen future development from view, and states that there is no evidence presented to support this claim. As discussed in Section 4.1, Aesthetics, of the Draft PEIR, there is only one designated scenic highway located in the WSGV Planning Area, and the designated portion of SR-2 is not located within one of the nine unincorporated WSGV communities. The commenter is referring to a discussion related I-210, which is identified by Caltrans as being eligible for designation as a state scenic highway. Due to intervening topography and soundwalls along the I-210, future development along Foothill Boulevard would not be visible from this eligible portion of the I-210.

### **Response to Comment G-13**

This comment claims that the Draft PEIR acknowledged that new sources of light, shadow and glare will be generated, but dismissed the relative significance of those new sources because they will be generated within an urban setting. As discussed in Section 4.1, Aesthetics, of the Draft PEIR, all exterior lighting would comply with the light shielding and orientation requirements established in Title 22, Planning and Zoning, of the County's Code in order to minimize light pollution and spillover effects. The proposed WSGVAP PASD would also include new development standards on shielding exterior lighting, including for La Crescenta-Montrose, to minimize effects exterior lighting on surrounding uses. It is also noted in Section 4.1 of the Draft PEIR that future project would be located within an urban setting where street lighting, parking area lighting, and auto traffic are typical and therefore their implementation would not substantially change ambient nighttime light conditions in the Plan Area.

### **Response to Comment G-14**

This comment claims that the Draft PEIR discloses that important farmland exists near San Gabriel and Rosemead, and then concludes, without any further elaboration, that impacts to agricultural lands will be insignificant because any agricultural lands that will be converted to other uses under the WSGVAP are

not currently being utilized for agricultural purposes and future projects developed under the WSGVAP would be required to preserve agricultural areas. As stated in Section 4.2, Agriculture and Forestry Resources, of the Draft PEIR, “future projects developed under the WSGVAP would be located within the urban environment on proposed redesignated parcels as shown in the land use policy and zone change maps proposed for the unincorporated WSGV communities.” Although the WSGVAP is rezoning 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), these areas are not currently being utilized for agricultural purposes and rezoning is not anticipated to result in the loss of existing agricultural uses.

### **Response to Comment G-15**

This comment claims that the Draft PEIR asserted agricultural lands will be converted, but claims that such conversion is fine because those lands are not being used for agricultural purposes. This comment states that the Draft PEIR asserts that agricultural lands will not be converted because Policy LU-5.14 will prevent such conversion. This comment concludes by stating Impact 4.2-4 is legally infirm for the same reason. This comment is very similar to Comment G-14. Refer to Response to Comment G-14 for a detailed response.

### **Response to Comment G-16**

This comment states that the Draft PEIR identified several significant and unavoidable air quality impacts, but the analysis is without any particularity and does not identify any mitigation measures that can reduce these impacts. As discussed in Section 4.3, Air Quality, of the Draft PEIR, the WSGVAP is a policy document that does not include or propose any site-specific development that could directly result in construction or operational impacts to the environment. However, implementation of the WSGVAP would encourage development in a manner consistent with the Area Plan, which would facilitate additional future development. Therefore, this Draft PEIR does not assess the site-specific construction and operation details of each future development within the WSGV Planning Area. Since the timing and location of these future projects are unknown at this time, it would be speculative to determine if site-specific mitigation measures are feasible and/or are able to reduce significant impacts to a less than significant level.

### **Response to Comment G-17**

This comment states that the Draft PEIR punts any analysis and mitigation to future projects, and claims that the County is trying to avoid CEQA review because this is a program level document. Section 4.3, Air Quality, of the Draft PEIR, contains analysis and modeling. Overall, the Draft PEIR proposes many mitigation measures.

As discussed in Section 4.3, Air Quality, of the Draft PEIR, the WSGVAP is a policy document that does not include or propose any site-specific development that could directly result in construction or operational impacts to the environment. However, implementation of the WSGVAP would encourage development in a manner consistent with the Area Plan, which would facilitate additional future development. It assesses the impacts associated with the proposed modifications to existing land uses and zoning and the associated overall effects of buildout of the WSGVAP through 2045. Analysis at a parcel or site-specific level was not conducted, because the specific location, timing, and type of future projects

proposed to be developed under the WSGVAP are unknown at this time, where detailed analysis would be speculative and, therefore, beyond the scope of this Draft PEIR.

### **Response to Comment G-18**

This comment states that the Draft PEIR concludes impacts associated with air quality management plan consistency are potentially significant, but does not identify any mitigation measures. This comment also states that the analysis focuses on the consistency between the 2022 AQMP and the Connect SoCal 2020, which is the Southern California Association of Governments' (SCAG) plan and not the WSGVAP. The first statement in the comment is incorrect, the Draft PEIR concluded that impacts were less than significant, and did not state that impacts associated with air quality management plan consistency are potentially significant. Therefore, no mitigation measures are required. The analysis of air quality management plan consistency does not include consistency between the WSGVAP and the Project because the Project is the WSGVAP. Therefore, the analysis focuses on the consistency between WSGVAP and the 2022 AQMP and the Connect SoCal 2020, and does not include a consistency between the WSGVAP and the Project.

### **Response to Comment G-19**

This comment states that the Draft PEIR attempts to avoid any and all analysis of the WSGVAP's impacts with generalized statements and provides policies of the WSGVAP as an example. As discussed in Section 4.3, Air Quality, of the Draft PEIR, "the WSGVAP is a long-range policy document, and, as such, there are no specific projects, project construction dates, or specific construction plans identified. Thus, quantification of emissions associated with buildout cannot be specifically determined at this time. Therefore, the analysis will be based on the potential for construction emissions to exceed threshold values in the context of development intensity and compliance with regulatory emissions standards." As previously stated, the WSGVAP is a policy document, therefore, the analysis the commenter is referring to provides policies of the WSGVAP that demonstrates how the WSGVAP would be consistent with the AQMP.

### **Response to Comment G-20**

This comment states that the Draft PEIR admits that the anticipated growth under the WSGVAP will be greater than SCAG's Connect SoCal 2020 projections, which is deemed to be generally consistent, but does not explain how the growth is generally consistent. This comment also states that the Draft PEIR fails to identify any applicable significance threshold above which growth is significant and below which growth is less than significant supported with substantial evidence. As described in Section 4.3, Air Quality, of the Draft PEIR, which this comment is specifically referring to, the anticipated growth under the WSGVAP is discussed in greater detail in Section 4.14, Population and Housing, of the Draft PEIR. As discussed throughout the Draft PEIR, the difference in growth between SCAG's forecasts and the WSGVAP would be approximately 1.5 percent, which is not considered substantial; therefore, the anticipated growth under the WSGVAP is considered generally consistent with SCAG's regional population forecasts. The Draft PEIR did not establish specific thresholds for growth because implementation of the WSGVAP would not require new construction or expansion of existing roadway infrastructure. Indirect growth impacts were determined to be less than significant because compared to existing projections for the nine unincorporated communities under SCAG, implementation of the WSGVAP is anticipated to increase population by 1.5 percent over SCAG's projections. Due to this small

percentage, it was determined in Section 4.14, Population and Housing, of the Draft PEIR, that implementation of the WSGVAP would not substantially increase growth compared to existing projections for the WSGV Planning Area.

### **Response to Comment G-21**

This comment claims that the Draft PEIR concluded because all future projects developed under the WSGVAP would be subject to subsequent planning and environmental review any inconsistencies with the 2022 AQMP can be overlooked. This comment also states that the promise of future environmental review cannot be a basis for excusing a failure to provide adequate environmental review now, before the WSGVAP and its numerous implementation actions are adopted. The first statement made by the commenter is untrue. As stated in Section 4.3, Air Quality, of the Draft PEIR, “However, all future projects developed under the WSGVAP would be subject to subsequent planning and environmental review in accordance with County requirements and CEQA, where projects would be required to demonstrate compliance with the AQMP and SCAQMD’s rules and regulations governing air quality on a project-by-project basis.” This statement was made in the Draft PEIR after analysis of WSGVAP was conducted using two consistency indicators: control strategies and growth projections. CEQA requires that general plans be evaluated for consistency with the AQMP. Because the AQMP strategy is based on projections from local general plans, only new or amended general plan elements, specific plans, or individual projects under the general plan need to undergo a consistency review. Projects considered consistent with the local general plan are consistent with the air quality-related regional plan. Therefore, the analysis provided in the Draft PEIR was consistent with the requirements of CEQA.

### **Response to Comment G-22**

This comment claims that the Draft PEIR listed a small selection of WSGVAP policies in order to reach the conclusions that conflicts with an applicable air plan would be less than significant. This statement is untrue. Section 4.3, Air Quality, of the Draft PEIR, analyzed control strategies and growth projections for construction and operation of future projects under the WSGVAP in order to conclude impacts with an applicable air plan would be less than significant. Since the WSGVAP is a policy document, the discussion of how policies would be consistent with the AQMP was part of the analysis, but the entire analysis was not solely based on the policies of the WSGVAP.

### **Response to Comment G-23**

This comment claims that the Draft PEIR put no effort into identifying mitigation measures to reduce emissions of criteria air pollutants, and claims that the Draft PEIR did not explain why mitigation measures would be infeasible. It should be noted that the SCAQMD thresholds for criteria air pollutants were specifically developed for use in determining significance for individual projects and not for program-level documents, such as the WSGVAP. In Section 4.3, Air Quality, of the Draft PEIR, it is explained that without knowing the exact specifications for future projects that may be developed under the WSGVAP, there is no way to accurately calculate the construction impacts and the potential for health impacts from the WSGVAP. Therefore, it would be speculative to determine if site-specific mitigation measures are feasible and/or are able to reduce potentially significant impacts to a less-than-significant level.



## Response to Comment G-24

This comment states that the Draft PEIR calculates emissions but notes that emissions would be speculative. This comment also claims that the Draft PEIR punts the most basic impact analysis to future projects, and reiterates comments made within Comment G-17. Refer to Response to Comment G-17 for a response related to the claim that the County is trying to avoid CEQA review because this is a program level document. As explained within Section 4.3, Air Quality, of the Draft PEIR, the SCAQMD thresholds for criteria air pollutants were specifically developed for use in determining significance for individual projects and not for program-level documents, such as the WSGVAP. Therefore, while operational emissions were calculated within the Draft PEIR, the WSGVAP is a policy document with no specific projects identified. Quantification of operational emissions associated with energy and area sources cannot be specifically determined at this time, and only mobile source emissions were able to be calculated at this time. This is the reason why the calculated emissions would be speculative. With the exception of mobile source emissions, qualitative analysis was used instead of quantitative.

## Response to Comment G-25

This comment claims that the Draft PEIR relies on unspecified transportation policies in making an unsubstantiated conclusion that the WSGVAP would further help to reduce VMT. As stated in Section 4.17, Transportation, “the WSGVAP Land Use and Mobility Elements, and the 2023 Active Transportation Strategic Plan include policies to focus growth within a mile from major transit stops, encourage transit-oriented development, expand multi-modal facilities, improve access to transit, and coordinate mobility investments. Through implementation of the WSGVAP, the County would work to implement these policies in coordination with State, regional, and local agencies to ensure projects throughout the WSGV Planning Area contribute to the region achieving a substantial reduction in VMT. In addition, Mitigation Measure 4.17-1 ensures the County’s commitment to exploring the feasibility of future VMT mitigation program concepts, such as VMT fees, to continue striving to reach the County’s reduction targets.” The applicable WSGVAP policies are provided in Section 4.17, Transportation, of the Draft PEIR. In addition, Tables 4.17-4 and 4.17-5 of the Draft PEIR provides a VMT summary for the Project-level and cumulative-level. As shown in Table 4.17-5 within the Draft PEIR, VMT is higher in both the 2045 No Project scenario and the 2045 with Project scenario compared to VMT in 2024. However, the 2045 with Project scenario results in less total VMT per service population than the 2045 No Project scenario.

## Response to Comment G-26

This comment states that the Draft PEIR did not provide a detailed analysis of how transportation policies from the WSGVAP will reduce air pollutant emissions. This comment suggests that the Draft PEIR should consider mitigation measures to reduce impacts related to criteria air pollutants. The applicable policies from the WSGVAP are provided in Section 4.3, Air Quality, of the Draft PEIR under *Proposed Project Characteristics and Relevant WSGVAP Goal and Policies*. Since the applicable WSGVAP goals and policies are provided earlier in the section, they are not restated within the Impact Analysis section. Table 4.3-6 of the Draft PEIR quantified regional mobile source emissions but did not include implementation of the WSGVAP transportation policies for a conservative analysis. However, the discussion of the transportation policies are still relevant in the context of air quality due to the focused growth under the WSGVAP primarily around commercial corridors, high-quality transit corridors, and major roadways in proximity to existing and future transit stops and services.

## Response to Comment G-27

This comment states that the comment letter on the NOP from the South Coast Air Quality Management District (SCAQMD) noted that projects that generate diesel emissions from construction or attracts diesel-fueled vehicular trips, it is recommended that a mobile source health risk assessment is performed. This comment also notes that the Draft PEIR referenced SCAQMD's recommendation in the analysis of impacts associated with exposing sensitive receptors to substantial pollutant concentrations. This information serves as context for Comment G-28. Refer to Response to Comment G-28 for a detailed response.

## Response to Comment G-28

This comment states that instead of performing the health risk assessment analysis, the Draft PEIR punts this analysis to future projects. As stated in Section 4.3, Air Quality, of the Draft EIR, the SCAQMD submitted an amicus brief that indicates it is not feasible to quantify program-level health impacts based on the available modeling tools.<sup>6</sup> Furthermore, without knowing the exact specifications for future projects that may be developed under the WSGVAP, including specific buildings and facilities proposed to be constructed, construction schedules, quantities of grading, and other information that would be required in order to provide a meaningful estimate of emissions, there is no way to accurately calculate the potential for health impacts from the WSGVAP.

## Response to Comment G-29

This comment states that the Draft PEIR identifies several significant and unavoidable impacts associated with biological resources, but fails to analyze these impacts with any particularity and fails to identify any mitigation measures that could reduce these impacts to a level of less than significant. This comment also claims that the Draft PEIR punts any analysis to future project and the County is trying to avoid CEQA review because this is a program level document. As explained within Section 4.4, Biological Resources, of the Draft PEIR, analysis at a parcel or site-specific level was not conducted, because the specific location, timing, and type of future projects proposed to be developed under the WSGVAP are unknown at this time, where detailed analysis would be speculative and, therefore, beyond the scope of this Draft PEIR. Impact 4.4-1 of the Draft PEIR identified 25 plant and 31 wildlife species of special concern, including 14 State and/or federally listed candidate, threatened, and/or endangered species have been identified as occurring or potentially occurring in the Plan Area. Impact 4.4-2 identified the following sensitive natural communities present within the WSGV Planning Area: California Walnut Woodland, Open Engelmann Oak Woodland, Riversidian Alluvial Fan Sage Scrub, Southern Coast Live Oak Riparian Forest, and Southern Sycamore Alder Riparian Woodland. However, it would be speculative to determine if site-specific mitigation measures are feasible and/or are able to reduce significant impacts to a less than significant level because no development is proposed at this time, therefore, impacts are considered to be significant and unavoidable.

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<sup>6</sup> SCAQMD, 2015. Brief of Amicus Curiae in Support of Neither Party. *Sierra Club v. County of Fresno*. Case No. S219783. April 13, 2015. Available at: <https://www.courts.ca.gov/documents/9-s219783-ac-south-coast-air-quality-mgt-dist-041315.pdf>. Accessed March 2024.

### **Response to Comment G-30**

This comment states that the Draft PEIR suffers from the same legal infirmity in concluding that impacts to wetlands would be less than significant. As explained within Section 4.4, Biological Resources, of the Draft PEIR, water bodies and drainages and their associated wetland habitats are protected aquatic resources that, if impacted, may require permits from federal and/or state resources agencies such as the USACE, Los Angeles RWQCB, and CDFW. Additionally, implementation of Mitigation Measure 4.4-1 would require future projects developed under the WSGVAP that are subject to the jurisdiction of USACE, Los Angeles RWQCB, and/or CDFW to identify state and federally protected wetlands and waters, implement avoidance and/or minimization measures, obtain necessary permits, and implement compensatory mitigation for projects that would result in the direct removal, filling, or other alteration of protected aquatic resources.

### **Response to Comment G-31**

This comment states that the WSGVAP envisions densification and intensification of residential and commercial uses, which will result in major construction activities taking place over many years. This comment also claims that the Draft PEIR concluded that wasteful or inefficient energy consumption associated with buildout (construction) of the WSGVAP will be insignificant without any evidence to support that conclusion. As explained under Methodology within Section 4.6, Energy, of the Draft PEIR, the WSGVAP is a planning-level document, and, as such, there are no specific projects, project construction dates, or specific construction plans identified. Therefore, quantification of energy consumption associated with buildout cannot be specifically determined at this time. Therefore, this analysis is based on the potential for construction energy from future projects developed under the WSGVAP to result in adverse impacts relative to the significance thresholds in the context of development intensity and compliance with regulatory plans, policies, standards, and regulations.

The conclusion that energy impacts would be less than significant during construction was based on the assumption that electricity use from construction activities would be short-term, limited to working hours, and only used for necessary construction-related activities. When not in use, electric equipment would be powered off to avoid unnecessary energy consumption. For transportation energy during construction, fuel-efficient equipment would be used, consistent with federal and State regulations, such as the fuel efficiency regulations in accordance with the new CAFE standards and Advanced Clean Truck Program. Construction equipment and vehicles would also be required to comply with anti-idling regulations in accordance with Section 2485 in Title 13 of the CCR, and fuel requirements in accordance with Section 93115 in Title 17 of the CCR. Compliance with these requirements would ensure that the WSGVAP would not result in the wasteful, inefficient, and unnecessary consumption of energy.

### **Response to Comment G-32**

This comment summarizes portions of the impact analysis within the Draft PEIR. A more complete summary of the analysis contained within Section 4.6, Energy, of the Draft PEIR, is provided within Response to Comment G-31.

### Response to Comment G-33

This comment states that the Draft PEIR's significance conclusion regarding operational energy consumption is unsupported. As explained under Methodology within Section 4.6, Energy, of the Draft PEIR, operation of future projects developed under the WSGVAP would require energy in the form of electricity and natural gas for building heating, cooling, cooking, lighting, water demand and wastewater treatment, consumer electronics, and other energy needs, and transportation-fuels, primarily gasoline, for vehicles traveling to, from, and within the County. However, as mentioned previously, the WSGVAP is a planning-level document, and, as such, there are no specific projects identified. Therefore, quantification of energy consumption associated with electricity and natural gas consumption cannot be specifically determined at this time. Therefore, the operational analysis in the Draft PEIR is based on the potential for operational energy from future projects developed under the WSGVAP to result in adverse impacts relative to the significance thresholds in the context of development intensity and compliance with regulatory plans, policies, standards, and regulations. Transportation energy was quantified within the Draft PEIR in Table 4.6-2.

The conclusion that energy impacts would be less than significant during operation was based on the assumption that future projects developed under the WSGVAP would be required to comply with the applicable provisions of Title 24 and the CALGreen Code in effect at the time of building permit issuance to minimize demand for electricity and natural gas. Compliance with these requirements would ensure that the WSGVAP would not result in the wasteful, inefficient, and unnecessary consumption of energy. For transportation energy during operation, fuel consumption at full buildout of the WSGVAP would be greater than that of the No Project scenario primarily due to the focus of the WSGVAP to support higher land use intensities within the WSGV Planning Area. However, it should be noted that traffic reduction policies within the WSGVAP's Mobility Element may not be fully reflected in the VMT and transportation fuel consumption estimates. Therefore, estimated mobile source transportation fuel consumption are conservatively higher. Additionally, future projects developed under the WSGVAP would minimize operational transportation fuel demand in line with state, regional, and County goals.

### Response to Comment G-34

This comment states that the Draft PEIR concluded that GHG impacts would be less than significant without mitigation measures. This comment claims that this conclusion is based on the incorrect assumption that the WSGVAP, being a long-term policy document, will not directly lead to land development or GHG emissions, which is a contraction to the fact that the WSGVAP will increase land use and zoning densities. As discussed within Methodology of Section 4.8, Greenhouse Gas Emissions, of the Draft PEIR, the WSGVAP is a long-range policy document and does not include quantification of any specific projects that may be developed under the WSGVAP. The Climate Action Registry General Reporting Protocol provides procedures and guidelines for calculating and reporting GHG emissions from general and industry-specific activities. Although no numerical thresholds of significance have been adopted, and no specific protocols are available for land use projects, the General Reporting Protocol provides a framework for calculating and reporting GHG emissions. The GHG emissions provided in this report are consistent with the General Reporting Protocol framework. For the purposes of this Draft PEIR, estimated GHG emissions from the operation of future projects developed under the WSGVAP are not quantified with the exception of mobile emissions, which would contribute the largest GHG emissions.

The Draft PEIR acknowledges that GHG emissions would occur under the WSGVAP, but based on the analysis contained within the Draft PEIR, impacts would be less than significant. It is also noted that operational mobile source GHG emissions from the WSGVAP Future Development (2045) scenario would be greater compared to the No Project (2045) scenario conditions primarily due to the focus of the WSGVAP to increase employment opportunities close to future and existing housing. However, while the operational mobile GHG emissions would increase under the WSGVAP, the Area Plan's land use and growth strategy and transportation policies would help in reducing vehicle trips within the WSGV Planning Area. The WSGVAP proposes land use and zoning modifications that would focus growth primarily around commercial corridors, high-quality transit corridors, and major roadways in proximity to existing and future transit stops and services.

### **Response to Comment G-35**

This comment states that the Draft PEIR did not explain how greenhouse gas emissions were calculated within the Draft PEIR, and provides the quantitative amount of greenhouse gas emissions that was provided within the Draft PEIR. The methodology for how emissions were calculated is provided under Methodology in Section 4.8, Greenhouse Gas Emissions, of the Draft PEIR. As stated in the Draft PEIR, construction emissions associated with future projects developed under the WSGVAP cannot be specifically determined at this time. Operational emissions were calculated using a representative motor vehicle fleet mix for the region based on the CARB EMFAC2021 model and default fuel type. This calculation did not take traffic reduction policies into account, therefore, estimated mobile source emissions are conservatively higher. No revisions are required.

### **Response to Comment G-36**

This comment states that the Draft PEIR does not provide a significant threshold for greenhouse gas emissions, and reiterates that future projects will undergo separate CEQA review. As stated under Thresholds of Significance in Section 4.8, Greenhouse Gas Emissions, of the Draft PEIR, "Although GHG emissions can be quantified, CARB, SCAQMD, and the County have not adopted quantitative project-level significance thresholds for GHG emissions that apply to the Project." Therefore, no quantitative significance threshold was provided for greenhouse gas emissions. GHG impacts are evaluated by assessing whether the WSGVAP conflicts with applicable GHG reduction strategies and local actions approved or adopted by CARB, SCAG, and the County. No revisions are required.

### **Response to Comment G-37**

This comment states that the Draft PEIR highlights California's GHG reduction goals but fails to address how the WSGVAP's increase of 56,817 metric tons per year aligns with these goals. As explained under Methodology within Section 4.8, Greenhouse Gas Emissions, of the Draft PEIR, Section 15183.5 of the CEQA Guidelines states that a lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project complies with the requirements in a previously adopted mitigation program, or plan for the reduction of GHG emissions. GHG impacts are evaluated by assessing whether the WSGVAP conflicts with applicable GHG reduction strategies and local actions approved or adopted by CARB, SCAG, and the County. The 2022 Scoping Plan, SCAG's Connect SoCal 2024, and County General Plan policies and goals all apply to the WSGVAP and all are intended to reduce GHG emissions to meet the Statewide targets. Thus, the significance of future projects developed under the WSGVAP GHG emissions is evaluated consistent with CEQA Guidelines Section

15064.4(b)(2) by considering whether the WSGVAP would conflict with applicable plans, policies, regulations adopted for the purpose of reducing GHG emissions, including CARB's 2022 Scoping Plan, SB 37 and E-3-05, SCAG's Connect SoCal 2024, 2045 CAP, OurCounty Sustainability Plan, CALGreen Code, and County Green Building Codes.

### **Response to Comment G-38**

This comment claims that the Draft PEIR concluded that the WSGVAP will introduce new development that could impede or impair emergency response and evacuation, does not propose mitigation, and this impact would be addressed in the future under other projects. As described in Section 4.9, Hazards and Hazardous Materials, of the Draft PEIR, future projects developed under the WSGVAP would primarily be infill development along major roadways and commercial corridors with existing access to the regional circulation system. However, continued growth and development associated with implementation of the WSGVAP has the potential to strain the emergency response and recovery capabilities of federal, State, and local governments. The impact analysis then goes on to list relevant plans and policies that future development would have to adhere to, including but not limited to, the County's OAERP, the County's All-Hazard Mitigation Plan, the County's General Plan goals and policies related to emergency response and evacuation, and policies proposed under the WSGVAP. Compliance with existing laws and regulations and consistency with the goals and policies contained in the General Plan and the WSGVAP would ensure that impacts would be less than significant. No revisions are required.

### **Response to Comment G-39**

This comment expresses concern regarding the groundwater supply analysis provided in the Draft PEIR. While the commenter is correct that the County does not control groundwater pumping, this is regulated by SGMA as well as individual basin plans. As such, as discussed in Section 4.10.2 of the Draft PEIR, while the County is not in control over the sources of its water supply provided by MWD, the groundwater basins pumped by water agencies are regulated by the SGMA as well as individual basin plans, as applicable. Since the groundwater supply used by both of this water provider is regulated, there are limits on the amount of groundwater each provider can pump for potable use and for this reason, the potential for overdraft is limited. Additionally, this water provider does not rely solely on groundwater to service the WSGV Planning Area and would be able to utilize other sources of potable water to supplemental a decrease in the amount of available groundwater, if needed. Therefore, implementation of the WSGVAP is not anticipated to deplete groundwater supplies.

### **Response to Comment G-40**

This comment argues that the Draft PEIR fails to justify its conclusion that the WSGVAP's increased groundwater use will have insignificant impacts, despite acknowledging that buildout could hinder the implementation of a groundwater plan. The Draft PEIR does not state that the WSGVAP could impede implementation of a groundwater plan. As described in Section 4.10.2 of the Draft PEIR, no GSPs has been prepared for the San Gabriel Valley or Raymond groundwater basins.

### **Response to Comment G-41**

This comment expresses concern that the Draft PEIR fails to note the inconsistencies between the WSGVAP's downsizing of significant swaths of property that could be developed with housing. As

discussed in Section 4.14.2 of the Draft PEIR, implementation of the WSGVAP would increase land use and zoning densities and development intensity primarily along commercial corridors and major roadways through infill development and redevelopment as well as within a select few areas near commercial corridors and transit with low existing residential density. The updates to land use designations associated with the WSGVAP are based on a comprehensive analysis of current and projected housing needs, environmental constraints, and infrastructure capacity.

The reduction in land use intensity in the San Gabriel Mountain foothills is consistent with the General Plan's guiding principles, goals, and policies.<sup>7</sup> In addition, the reduction in land use intensity in the San Gabriel Mountain foothills is consistent with the proposed WSGVAP's principles, goals, and policies related to smart growth, which prioritize infill areas for housing growth; direct future housing and development away from hazard, natural resource, and WUI areas; prioritize areas with transit access; and reduce potential development densities in areas without existing infrastructure to support such densities. Therefore, the Project is not inconsistent, but rather implements and aligns with existing and proposed policies. Specifically, and as further discussed in Section 4.11.2 of the Draft EIR, the WSGVAP is consistent with and supports General Plan Goals 2, 3, and 4, and associated policies.

## Response to Comment G-42

This comment expresses concern regarding the downzoning of Enoteca's property under the WSGVAP and its potential impact on housing issues within the community. The WSGVAP aims to address a range of community issues, including the need for diverse, affordable housing options, while also considering the preservation of community character, environmental sustainability, and infrastructure capacity. The Plan is designed to balance growth with these broader goals, and the land use changes proposed, including the downzoning of certain properties, reflect a strategic approach to achieving this balance. In addition, the County acknowledges the challenges mentioned by the commenter, including aging housing stock, high housing costs, and a lack of housing diversity. The WSGVAP aims to address these issues through a variety of strategies, not solely by maximizing density on every available property. The WSGVAP promotes housing diversity by identifying areas where higher-density, affordable, and diverse housing types can be developed, particularly in areas near commercial corridors and transit that are better suited to accommodate such growth. This targeted approach is intended to foster sustainable development patterns. Regarding the commenter's concern that the WSGVAP would result in less housing construction and higher housing costs, it should be noted that housing costs and construction rates are influenced by a variety of factors, including market conditions, developer interest, and availability of infrastructure. The WSGVAP seeks to create a regulatory environment that encourages the development of a range of housing types across the Plan Area, addressing housing affordability and diversity in a manner consistent with community goals and environmental considerations. Additionally, it should be noted that the mere change in land use designation under the WSGVAP does not automatically result in immediate development. Instead, the WSGVAP sets the framework for future development, which will be subject to further project-specific CEQA review and community input.

The comment claims that the property's development potential falls from more than 50 units to two units. The current land use designation for the Enoteca property, which is Non-Urban per the Altadena

<sup>7</sup> County of Los Angeles, General Plan 2035, Updated July 14, 2022, <https://planning.lacounty.gov/long-range-planning/general-plan/general-plan-elements/>.

Community Plan, provides a range of housing density allowed. Given the current constraints on the property, including topography, SEA, Hillside Management, very high fire hazard, and National Forest, achieving the maximum development allowed per the current land use designation is speculative and not likely achievable. Additionally, the property has limited ingress/egress access for emergency evacuation. An exact number for the reduction in potential development density is not realistic given a subdivision application that demonstrated the number of units achievable on that property given the significant land constraints and current regulations was never submitted. The property's land use designation is proposed to change from Non-Urban in the Altadena Community Plan to Rural Land 20 (RL 20) with the WSGVAP. The Non-Urban designation has variable allowances for density depending on slope, from 1du/acre to 1 du/20 acres. The vast majority of the land has slopes greater than 25%, which would allow a possible range of densities depending on the severity of the slope from 1 du/2 acres to 1du/20 acres. The WSGVAP proposes a potential reduction in the maximum allowable density of the property. Given the existing Hillside Management, SEA, and hazard constraints, as well as being located in the Angeles National Forest, it would likely not be possible for the commenter to achieve the maximum density claimed in this letter, even per the existing regulations.

### **Response to Comment G-43**

This comment expresses concern that increasing land use designation densities in suburban areas like those covered by the WSGVAP would not result in actual increases in development or density, and that downzoning certain parcels may lead to a net loss in buildable units. The commenter is correct that the mere change in land use designation under the WSGVAP does not automatically result in immediate development. While it is true that land use designation changes alone do not guarantee immediate development, the WSGVAP is designed to create the conditions under which such development can occur. The purpose of the WSVAP is to strategically guide future growth and development within the Plan Area. More specifically, the WSGVAP is intended to respond to local planning issues, guide long-term development, foster harmonious and coordinated growth balanced with natural resources conservation, improve connectivity and walkability, generate a thriving business friendly region while enhancing sustainability in the built and natural environments, and ensure equitable decision-making throughout the Plan Area. The commenter's concern about a net loss of buildable units is addressed by the WSGVAP's comprehensive approach to land use planning. The WSGVAP does not rely solely on increased density in specific areas but also incorporates policies and programs to encourage a diverse range of housing types, support affordable housing development, and revitalize aging housing stock. These efforts are intended to ensure that the WSGVAP meets its housing objectives while preserving sensitive natural resources and large open spaces, reducing development in areas with geologic hazards, and decreasing development in the WUI to reduce wildfire risks.

### **Response to Comment G-44**

This comment expresses concern regarding inconsistencies between the WSGVAP and its proposed downzoning of property in the Altadena community, specifically the Enoteca property. More specifically, the commenter expresses concerns regarding inconsistencies with WSGVAP's Policies LU-1.2, LU-3.1, LU-3.2, LU-11.1, and LU-11.2. The WSGVAP's consistency with supporting General Plan Goals/Policies is outlined in Table 4.11-2, Matrix of WSGVAP Land Use Goals and Policies Consistency, of the Draft PEIR. Table 4.11-2 outlines consistency with Policies LU-1.2, LU-3.1, LU-3.2, LU-11.1, and LU-11.2, mentioned by the commenter. The downzoning of the Enoteca property and



similar parcels within the Altadena community was carefully considered within the context of the WSGVAP's overall goals and policies. More specifically, the Enoteca property would experience a reduction in potential land use density but the property's zoning would largely remain the same. The current zone of the property is A-1-10,000 and it is proposed to be A-1 under the WSGVAP. The property's land use designation is changing from Non-Urban in the Altadena Community Plan to Rural Land 20 (RL 20) with the WSGVAP. The designation has variable allowances for density depending on slope, from 1du/acre to 1 du/20 acres. The vast majority of the land has slopes greater than 25%, which would allow a possible range of densities depending on the severity of the slope from 1 du/2 ac to 1du/20 ac. The reduction in density does not inherently conflict with the Plan's policies but rather supports a strategic approach to land use planning. While the reduction in density of certain properties like the Enoteca site reduces the intensity of development in specific areas, the Plan promotes diverse land uses in other parts of the community, particularly in areas more suitable for higher-density development. Lastly, the purpose of the WSVAP is to strategically guide future growth and development within the Plan Area. Therefore, it should be noted that the mere change in land use designation under the WSGVAP does not automatically result in immediate redevelopment.

### **Response to Comment G-45**

This comment expresses concern regarding the WSGVAP's inconsistency with Policies LU-11.1 and LU-11.2, as it relates to equitable community engagement and collaboration with the community, and the decision to downzone the Enoteca property. The development of the WSGVAP included numerous opportunities for public participation, including public meetings, workshops, and written comment periods, which were designed to reach a diverse cross-section of the community, including property owners, residents, and local stakeholders. Staff used various digital platforms and tools to engage and inform a wider audience who may not have been able to attend the in-person or live online events, including a website, blog, email notifications, and social media posts. More specifically, as discussed in Section 1, Introduction, of the Draft PEIR, public engagement efforts consisted of publication in the following local newspapers: Crescenta Valley Weekly, La Opinión, , Monrovia Weekly, Pasadena Star News, and San Gabriel Valley Tribune. Notices were provided in traditional Chinese and Spanish, with some language access provided for Armenian, Korean, and Vietnamese speakers. According to the CEQA Guidelines Section 150(a)(1), noticing in a newspaper of general circulation is an allowable method of notifying the public regarding the public review of a Draft EIR. Lastly, regarding the comment's concern associated with downzoning the Enoteca property, please refer to Response to Comment G-42, G-43, and G-44, above.

### **Response to Comment G-46**

This comment expresses concern that the mineral resources analysis only based its no impact determination on the fact that no active sand or gravel mines are located within unincorporated WSGVAP communities. As discussed in Section 4.12.2 of the Draft PEIR, while there are portions of East Pasadena – East San Gabriel, South Monrovia Islands, Altadena, and Kinneloa Mesa designated as MRZ-2, the WSGVAP does not propose to modify any existing land use or zoning designations for mineral resource extraction uses or activities within the WSGV Planning Area. Future development associated with the implementation of the WSGVAP would primarily be infill development along major roadways and commercial corridors within existing urban environments, which currently don't support any mineral resource recovery sites delineated in the General Plan or any other land use plans. Therefore,

implementation of the WSGVAP would not result in the loss of availability of a locally important mineral resource recovery site as delineated on a general plan, specific plan, or local land use plan and impacts to aggregate mineral resources from implementation of the WSGVAP would be less than significant. As outlined in Section 4.12.2 and the thresholds for mineral resources in Appendix G of the State CEQA Guidelines, a significant impact would occur if a project would result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state or 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 no known mineral resource that would be of value to the region and the residents or locally important mineral resources are present within the WSGVAP area, impacts would be less than significant.

### **Response to Comment G-47**

This comment states that the analysis of mineral resources in the Draft PEIR must disclose where the mineral resources are located and analyze whether new development under the WSGVAP will impair access to and recovery of those mineral resources. As discussed in Section 4.12.2 of the Draft PEIR, portions of East Pasadena – East San Gabriel, South Monrovia Islands, Altadena, and Kinneloa Mesa are designated as MRZ-2, which indicate areas that contain known mineral resources. However, as further discussed in this analysis, the WSGVAP does not propose to modify any existing land use or zoning designations for mineral resource extraction uses or activities within the WSGV Planning Area. Therefore, impacts to these existing mineral resource sites would be less than significant.

### **Response to Comment G-48**

This comment expresses concern that the analysis of population and housing-related impacts is based on the fallacy that by wiping out nearly all development potential on currently vacant or underdeveloped property (like Enoteca's) and increasing (paper) density "along commercial corridors and major roadways through infill development and redevelopment as well as within a select few areas near commercial corridors and transit with low existing residential density" will ultimately result in an increase in actual, built dwelling units. As discussed in Section 4.14.2 of the Draft PEIR, implementation of the WSGVAP would increase land use and zoning densities and development intensity primarily along commercial corridors and major roadways through infill development and redevelopment as well as within a select few areas near commercial corridors and transit with low existing residential density. These land use and zoning modifications would help in achieving the WSVG Planning Area and the County's RHNA's by allowing higher residential densities, which would encourage increased housing development through the buildout horizon. The vast majority of the land in the areas proposed for reductions in maximum allowable density have considerable existing constraints including large areas in Hillside Management with slopes greater than 25%, Very High Fire Hazard Severity Zone, and designated SEAs, as well as land within the Angeles National Forest. These constraints would severely limit the development potential of these properties, and even under existing regulations, they would likely not be able to achieve the maximum density allowed on paper per the Altadena Community Plan. As such, the County has proposed a potential reduction in the maximum allowable density of these properties, consistent with the County's General Plan and proposed WSGVAP in consideration of the significant existing land constraints.

## Response to Comment G-49

This comment expresses concern regarding the potential for vacant and underdeveloped property to be converted into new housing and that existing low-density housing will likely not be replaced with high-density development. The updates to land use designations associated with the WSGVAP are based on a comprehensive analysis of current and projected housing needs, environmental constraints, and infrastructure capacity, rather than arbitrary decisions. The proposed land use designations reflect areas where higher-density development is more feasible and sustainable, particularly in relation to proximity to services, transportation, and other amenities. In addition, the Draft PEIR acknowledges that the mere change in land use designation does not automatically result in immediate development. Instead, the WSGVAP sets the framework for future development, which will be subject to further project-specific CEQA review and community input.

## Response to Comment G-50

This comment expresses concern regarding the downzoning of Enoteca's property and its implications for housing development potential under the WSGVAP. While the comment suggests that downzoning leads to reduced housing construction, higher housing costs, and a lack of housing diversity, it is important to recognize that the WSGVAP aims to achieve a balanced approach to growth. The WSGVAP promotes a mix of housing types and densities across the WSGVAP Area, strategically locating higher-density development near transit, services, and infrastructure, while preserving lower-density areas where appropriate. This approach supports housing diversity and affordability by directing growth to areas where it can be most effectively supported.

The Draft PEIR's analysis of population and housing impacts is presented in Section 4.14.2 of the and considers the potential outcomes of the WSGVAP. As discussed in this section, the primary land use strategy of the WSGVAP is to increase land use and zoning densities and development intensity primarily along commercial corridors and major roadways through infill development and redevelopment as well as within a select few areas near commercial corridors and transit with low existing residential density. The analysis accounts for the anticipated distribution of growth across the WSGVAP Area, recognizing that not all areas will develop at the same rate or density. In addition, the Draft PEIR acknowledges that the mere change in land use designation does not automatically result in immediate development. Instead, the WSGVAP sets the framework for future development, which will be subject to further project-specific CEQA review and community input.

The current land use designation for the Enoteca property, which is Non-Urban per the Altadena Community Plan, provides a range of housing density allowed. Given the current constraints on the property, including topography, SEA, Hillside Management, very high fire hazard, and National Forest, achieving the maximum development allowed per the current land use designation is speculative and not likely achievable. Additionally, the property has limited ingress/egress access for emergency evacuation. An exact number for the reduction in potential development density is not realistic given a subdivision application that demonstrated the number of units achievable on that property given the significant land constraints and current regulations was never submitted.

The property's land use designation is proposed to change from Non-Urban in the Altadena Community Plan to Rural Land 20 (RL 20) with the WSGVAP. The Non-Urban designation has variable allowances

for density depending on slope, from 1 du/acre to 1 du/20 acres. The vast majority of the land has slopes greater than 25%, which would allow a possible range of densities depending on the severity of the slope from 1 du/2 acres to 1 du/20 acres. The WSGVAP proposes a potential reduction in the maximum allowable density of the property. Given the existing Hillside Management, SEA, and hazard constraints, as well as being located in the Angeles National Forest, it would likely not be possible for the commenter to achieve the maximum density claimed in this letter, even per the existing regulations.

### **Response to Comment G-51**

This comment expresses concern that the new addition of approximately 25,954 residents associated with the WSGVAP was not accounted for in the public services analysis and defers the analysis to future CEQA projects. As discussed in Section 4.15.2 of the Draft PEIR, the areas identified for growth under the WSGVAP are already in urban, developed areas that are served by the LACoFD and would not extend its service area. In addition, the WSGVAP would also reduce land use intensities in areas with hazards or within or adjacent to natural resources and in WUI areas, which would help to reduce demand for LACoFD and CAL FIRE services in the more remote, fringe areas of the WSGV Planning.

### **Response to Comment G-52**

The commenter expresses concern regarding the need for immediate mitigation for impacts on public services, as the number of residents introduced as a part of the WSGVAP are known now. As described in Chapter 3, Project Description, and Section 4.15.2 of this Draft PEIR, the WSGVAP is a policy document that does not include or propose any site-specific development that could directly result in construction or operational impacts to the environment. However, implementation of the WSGVAP would encourage development in a manner consistent with the Area Plan, which would facilitate additional future development. Therefore, this Draft PEIR does not assess the site-specific construction and operation details of each future development within the WSGV Planning Area. Rather, it assesses the impacts associated with the proposed modifications to existing land uses and zoning and the associated overall effects of buildout of the WSGVAP through 2045. Analysis at a parcel or site-specific level was not conducted, because the specific location, timing, and type of future projects proposed to be developed under the WSGVAP are unknown at this time, where detailed analysis would be speculative and, therefore, beyond the scope of this Draft PEIR. All future projects would be required to pay the applicable fee at the time of project approval to ensure impacts to public services would be less than significant.

### **Response to Comment G-53**

This comment expresses concern regarding the potential for the project to deteriorate existing recreational facilities and notes that the Draft PEIR simply asserts that population growth will not be “unplanned” and because the growth is not unplanned, recreational facilities will not be affected. Section 4.16.2 of the Draft PEIR provides additional reasons why the Project would result in less-than-significant impacts to parks and recreation. Generally, adoption of the WSGVAP would increase land use and zoning densities and development intensity primarily along commercial corridors and major roadways through infill development and redevelopment, as well as within a select few areas near commercial corridors and transit with low existing residential density. The areas identified for growth under the WSGVAP are already in urban, developed areas that are served by a range of neighborhood and regional parks and other recreational facilities.

In addition, the PNA+ identified that the majority of the nine unincorporated WSGV communities are not currently meeting the County's parkland standard, with the exception of the unincorporated WSGV communities of South San Gabriel and Whittier Narrows (which is a recreational area itself). Together, the nine unincorporated WSGV communities would need an additional 376.1 acres of parkland to meet the County's parkland standard. The majority of the nine unincorporated WSGV communities have very little to no vacant land that could be developed as parkland in the future to accommodate the projected growth under the WSGVAP and to help meet the County's parkland requirement. While many of the unincorporated communities within the WSGV Planning Area may not have a significant number of parks and recreational resources within their community boundaries, residents of these communities would also be served by parks and recreational facilities in adjacent cities and jurisdictions, as well as the County's regional parks within the larger WSGV Planning Area.

While there is limited potential to create new parks or recreational facilities within the nine unincorporated WSGV communities, future residential subdivisions developed under the WSGVAP would be required to contribute to the maintenance and expansion of the County's parks and recreational facilities through dedication of parkland, in-lieu fees, or both, as required by County Code Sections 21.24.340 and 21.28.140. In accordance with the Quimby Act (Government Code Section 66477), the County can require parkland dedication or payment of in-lieu fees as a condition of approval of residential subdivisions. The Quimby Act specifies acceptable uses and expenditures of such funds, such as allowing developers to set aside land, donate conservation easements, or pay direct fees for park improvements. This ensures that when new residential subdivisions are developed, there is an increase in parkland and/or funding for park improvement and/or development proportional to increases in population. Additionally, future residential subdivisions proposed under the WSGVAP would be required to comply with the requirements of Section 21.24.340 and Section 21.28.140 of the County Code (see Section 4.16.2 of the Draft PEIR for details).

Additionally, the project proposes rezoning of some commercial corridors to the MXD zone, which contains requirements for recreational spaces to be incorporated into multifamily mixed-use and residential developments. Further, the WSGVAP contains policies supportive of multi-benefit, multi-functional spaces, such as green streets and recreation associated with water resources projects which are widespread in the Plan Area, as well as joint-use facilities, co-location of recreational facilities with other public facilities, and improved access to regional parks providing enhanced access to and integrating the provision of recreation facilities into neighborhoods.

### **Response to Comment G-54**

This comment accurately describes that, with implementation of two mitigation measures (Mitigation Measures 4.17-1 and 4.17-2, as described in Section 4.17.2 of the Draft PEIR), impacts associated with vehicle miles traveled would remain significant and unavoidable. Since this comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

### **Response to Comment G-55**

This comment accurately describes the analysis presented in Section 4.17.2 of the Draft PEIR. As described in that section, in order to mitigate the total VMT per service population impact to a less-than-

significant level, the proposed Area Plan's 29.62 total daily VMT per service population would need to be reduced by 17.1 percent to be lower than 25.3 total daily VMT per service population.

The comment expresses concern that VMT-reduction mitigation measures are kicked down the road. As discussed in Section 4.17.2 of the Draft PEIR, Mitigation Measure 4.17-1 ensures the County's commitment to exploring the feasibility of future VMT mitigation program concepts, such as VMT fees, to continue striving to reach the County's reduction targets. Mitigation Measure 4.17-2 requires all future implementing agencies and project applicants to consider a menu of TDM strategies that could be implemented to achieve a reduction in project-generated trips and employee commute trips until a formal TDM ordinance is adopted. As discussed in Draft PEIR section 4.17.2, analysis at a parcel or site-specific level was not conducted, because the specific location, timing, and type of future projects proposed to be developed under the WSGVAP are unknown at this time, where detailed analysis would be speculative and, therefore, beyond the scope of this Draft PEIR. As site-specific information is not available at this time, more specific information regarding VMT mitigation cannot be accurately and comprehensively provided. In addition, as discussed in Section 4.17.2 of the Draft PEIR, future plans and programs implemented by cities within the WSGV Planning Area would also be subject to the State and regional policies that encourage or require similar improvements and reductions in VMT per capita and per service population. However, if these programs and policies are not implemented by the agencies with the responsibility to do so, the cumulative transportation and traffic impacts would remain significant and unavoidable. Therefore, even with implementation of mitigation measures, impacts would remain significant and unavoidable.

### **Response to Comment G-56**

This comment expresses concern regarding the language that directs future project applications "to consider a menu of [transportation demand management] strategies that could be implemented" at some point in the future. The specific language found on page 4.17-27 of the Draft PEIR states that "Mitigation Measure 4.17-2 requires all future implementing agencies and project applicants to consider a menu of TDM strategies that could be implemented to achieve a reduction in project-generated trips and employee commute trips until a formal TDM ordinance is adopted." As discussed in Draft PEIR Section 4.17.2, analysis at a parcel or site-specific level was not conducted, because the specific location, timing, and type of future projects proposed to be developed under the WSGVAP are unknown at this time, where detailed analysis would be speculative and, therefore, beyond the scope of this Draft PEIR. As site-specific information is not available at this time, more specific information regarding VMT mitigation cannot be provided.

### **Response to Comment G-57**

This comment expresses concern that Draft PEIR identifies a short menu of strategies for reducing VMT in Mitigation Measures 4.17-1 and 4.17-2 but does little to analyze the effectiveness of these strategies except to say that that many "would only have a marginal effect" on overall VMT. The specific language found on page 4.17-27 of the Draft PEIR states that strategies encouraging walking, biking, and transit, for example, would only have a marginal effect because the destinations are still too far to effectively reach in a reasonable time by means other than driving. The effectiveness of proposed VMT mitigation is more quantitatively analyzed on page 4.17-26 of the Draft PEIR, which explains that in order to mitigate the total VMT per service population impact to a less-than-significant level, the proposed Area Plan's

29.62 total daily VMT per service population would need to be reduced by 17.1 percent to be lower than 25.3 total daily VMT per service population. Nonetheless, although VMT per capita would be reduced with implementation of the WSGVAP, with Mitigation Measures 4.17-1 and 4.17-2 incorporated, impacts related to VMT per service population would still remain significant and unavoidable.

### **Response to Comment G-58**

This comment expresses concern that the predominantly suburban land use context of the West San Gabriel Valley may limit the effectiveness of any VMT strategy the County may employ and, given this, why is the County building up land use density in some areas of the Plan at all. As discussed in Section 3.4.1 of the Draft PEIR, the WSGVAP proposes land use and zoning modifications to increase land use and zoning densities and development intensity primarily along commercial corridors and major roadways, as well as within a select few areas near commercial corridors and transit with existing low residential density. In addition, the WSGVAP proposes to decrease densities in hazard areas, WUI areas, and areas within or adjacent to natural resource areas.

### **Response to Comment G-59**

This comment questions the County's planning efforts and asks why the County does not leave the WSGVAP land use designations where they currently stand. As discussed in Draft PEIR Section 3.2.1, the WSGVAP is intended to respond to local planning issues, guide long-term development, foster harmonious and coordinated growth balanced with natural resources conservation, improve connectivity and walkability, generate a thriving business-friendly region while enhancing sustainability in the built and natural environments, and ensure equitable decision-making throughout the WSGV Planning Area. One of the purposes of the WSGVAP is to implement the rezoning recommendations from the County's Housing Element Update, which includes targeted changes to zoning and/or land use policy to accommodate development of approximately 7,479 additional dwelling units in the nine unincorporated communities of the West San Gabriel Valley. The WSGVAP would also implement changes for consistency to correct inconsistencies between land use and zoning and clean up split zoning within a property throughout the WSGV Planning Area. This comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

### **Response to Comment G-60**

The comment expresses concern that the Draft PEIR fails to properly address impacts to utilities and service systems and improperly defers impacts to future CEQA analysis. As discussed in Section 4.19.2 of the Draft PEIR, analysis at a parcel or site-specific level was not conducted, because the specific location, timing, and type of future projects proposed to be developed under the WSGVAP are unknown at this time, where detailed analysis would be speculative and, therefore, beyond the scope of this Draft PEIR. Therefore, the evaluation of impacts related to utilities and service systems is based on a review of existing conditions in the WSGV Planning Area, the anticipated physical effects that would occur with implementation of the WSGVAP, and applicable regulations and policies that govern utilities and service systems. As described in State CEQA Guidelines Section 15168(c), later activities in the program must be examined in the light of the Program EIR to determine whether an additional environmental document must be prepared. If a later activity would have effects that were not examined in this Program EIR, a new Initial Study would need to be prepared leading to either another EIR or a Negative Declaration. That

later analysis may tier from the Program EIR, as provided in Section 15152. Therefore, the analysis presented in the Draft PEIR appropriately addresses impacts to utilities and service systems.

### **Response to Comment G-61**

This comment expresses concern that the water supply analysis presented in the Draft PEIR is legally infirm due to its failure to show that there is, in fact, sufficient water to meet the needs of the WSGVAP buildout. The comment inaccurately states that the Draft PEIR admits that it is unknown at this time whether water needs can be met if the WSGVAP is adopted. As discussed in Section 4.19.2 of the Draft PEIR, Metropolitan Water District's (MWD) 2020 Urban Water Management Plan (UWMP) projects sufficient water supply availability under normal, single dry and multiple dry years through 2045. While growth under the WSGVAP was not specifically accounted for in MWD's 2020 UWMP, MWD would be required to account for this projected growth during the next UWMP update cycle in 2025. Thus, MWD's UWMP would account for future development in the WSGV Planning Area through the water management planning process prior to the WSGVAP's buildout horizon year of 2045. In addition, as shown in Tables 4.19-1 and 4.19-5, the region has a surplus of water supply compared to the water demand, which would be used to supply any growth that occurs under the WSGVAP. As a result, sufficient water supplies would be available to serve reasonably foreseeable future development during normal, dry, and multiple dry years consistent with local UWMP projections. In the event of a water supply shortage as described in the MWD's 2020 UWMP and 2021 WSCP, MWD would implement its response actions to six water shortage stages, which correspond to progressively severe water shortage conditions as compared to the normal reliability condition. Implementation of the WSCP strategies would ensure adequate water supply even during water shortages. In addition to the MWD's 2020 UWMP, the County's IRWMP identifies the Upper Los Angeles River Subregion, the Upper San Gabriel and Rio Hondo Subregion, and the Lower San Gabriel and Los Angeles Rivers Subregion as water sources for the WSGV Planning Area. According to the water supply and demand projections in IRWMPs, which are compiled from UWMPs for water wholesalers and water purveyors within each IRWM subregion, the Upper Los Angeles River Subregion, the Upper San Gabriel and Rio Hondo Subregion, and the Lower San Gabriel and Los Angeles Rivers Subregion would have sufficient water supplies to meet projected regional demands through 2035. All of the water purveyors that provide water supplies to the unincorporated communities within the WSGV Planning Area forecasted water demand within their service areas for the year 2035 within the IRWMPs.

### **Response to Comment G-62**

This comment reiterates language included on page 4.19-22 of the Draft PEIR, stating that "growth under the WSGVAP was not specifically accounted for in MWD's 2020 UWMP, MWD would be required to account for this projected growth during the next UWMP update cycle in 2025." The comment also expresses concern that the County cannot adopt a project absent a showing that there is actual water available to serve that project and cites *Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova (2007)* 40 Cal.4th 412. Also as discussed on page 4.19-22 of the Draft PEIR, MWD's UWMP would be required to account for future development in the WSGV Planning Area through the water management planning process prior to the WSGVAP's buildout horizon year of 2045.



### **Response to Comment G-63**

This comment expresses concern regarding wildfire risks, emergency response plans, and evacuation plans and states that the Draft PEIR punts these issues to the County's General Plan for impact analysis. Please see Section 4.20.2 of the Draft PEIR regarding the basis for a less-than-significant determination for wildfire impacts. Regarding emergency response and evacuation specifically, in addition to plans and policies incorporated into the WSGVAP to reduce impacts, the analysis provided in Draft PEIR Section 4.20.2 also includes a discussion regarding the Operational Area Emergency Response Plan (OAERP), which identifies various emergency management phases, incident management systems, and identifies operational priorities. In addition, the County's All-Hazard Mitigation Plan establishes mitigation responsibilities of the various County departments and unincorporated communities, including the WSGV Planning Area. Approval of the WSGVAP itself, as a policy document, would not change these regulations. Rather, the WSGVAP includes policies that support and enhance existing emergency systems. For these reasons, and for reasons further outlined in Section 4.20.3 of the Draft PEIR, impacts related to impairment of an adopted emergency response plan or emergency evacuation plan are considered less than significant.

### **Response to Comment G-64**

This comment states that installation of infrastructure could exacerbate wildfire risks and expresses concern that deferring analysis to a future date does not meet CEQA requirements. As described in State CEQA Guidelines Section 15168(c), later activities in the program must be examined in the light of the Program EIR to determine whether an additional environmental document must be prepared. If a later activity would have effects that were not examined in this Program EIR, a new Initial Study would need to be prepared leading to either another EIR or a Negative Declaration. That later analysis may tier from the Program EIR, as provided in Section 15152. Therefore, as discussed in Draft PEIR Section 4.20.2, as part of subsequent planning and environmental review, individual projects proposed under the WSGVAP would be reviewed by the County and LACoFD prior to the obtaining project approval and/or relevant permits to ensure that projects prepare and incorporate all applicable project-specific wildfire plans and protection measures, including fire prevention infrastructure, such as fuel breaks and emergency water sources, in order to minimize wildfire risks. In addition, impacts related to wildfire and fire prevention infrastructure would be evaluated on a project-by-project basis and mitigated to the greatest extent feasible, as necessary. Therefore, subsequent planning and environmental review by the County and LACoFD prior to obtaining project approval and relevant permits would ensure that any potential impacts associated with fire prevention infrastructure are minimized.

### **Response to Comment G-65**

This comment accurately describes Alternative 2 of the project, described in Section 5.5.2 of the PEIR. Since this comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

### **Response to Comment G-66**

This comment expresses support for the Draft PEIR's Alternative 2, Dispersed Growth Alternative. Since this comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

## **Response to Comment G-67**

This comment seems to prefer the selection of Alternative 2 over the WSGVAP as it avoids removal of vacant and developable land and expresses concerns regarding the impact that downzoning leads to reduced housing construction and higher housing costs. The WSGVAP promotes a mix of housing types and densities across the WSGVAP Area, strategically locating higher-density development near transit, services, and infrastructure, while preserving lower-density areas where appropriate. This approach supports housing diversity and affordability by directing growth to areas where it can be most effectively supported. The commenter is correct that the mere change in land use designation under the WSGVAP would not automatically result in immediate housing development. While it is true that land use designation changes alone do not guarantee immediate development, the WSGVAP is designed to create the conditions under which such development can occur, which would be subject to further project-specific CEQA review. The purpose of the WSVAP is to strategically guide future growth and development within the Plan Area. More specifically, the WSGVAP is intended to respond to local planning issues, guide long-term development, foster harmonious and coordinated growth balanced with natural resources conservation, improve connectivity and walkability, generate a thriving business friendly region while enhancing sustainability in the built and natural environments, and ensure equitable decision-making throughout the Plan Area.

## **Response to Comment G-68**

This comment states that the conclusion that Alternative 2 would result in greater impacts than the WSGVAP is based on the fallacy that upzoning of already-developed property along existing commercial corridors will result in significant redevelopment and substantial numbers of new housing. The analysis provided in the DEIR states that Alternative 2 would still result in the same number of allowable units and potential population increase; however, under Alternative 2 development would be more dispersed, resulting in increased impacts to air quality, biological resources, energy, geology and soils, GHG emissions, hazards and hazardous materials, land use and planning, mineral resources, transportation, and wildlife.

## **Response to Comment G-69**

This comment states that the WSGVAP proposes to downzone vacant, developable property that is most likely to be developed with new homes. The reduction in density of the Enoteca property and similar parcels within the Altadena community was carefully considered within the context of the WSGVAP's overall goals and policies. The reduction in density does not inherently conflict with the Plan's policies but rather supports a strategic approach to land use planning. Please refer to Response to Comments G-44, G-48 and G-50, above.

In addition, the commenter expresses the opinion that Alternative 2 would result in similar impacts to the project. Please refer to Response to Comment G-68, above.

## **Response to Comment G-70**

As discussed in CEQA Guidelines Section 15126.6(a), Consideration and Discussion of Alternatives to the Proposed Project, "an EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would

avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.” Alternatives 2 and 3 partially meet Objective 2, as shown in Table 5-2, Ability of Alternatives to Meet Project Objectives. This reflects the inherent trade-offs associated with balancing diverse goals, such as housing needs, sustainable growth, connectivity and walkability, and environmental protection.

### **Response to Comment G-71**

This comment expresses concern that the cumulative impact analysis presented in the Draft PEIR are flawed as they do not identify direct impacts. As discussed in Draft PEIR Section 1.3, this Draft PEIR is intended to serve as a Program EIR under CEQA. Although the legally required contents of a Program EIR are the same as those of a Project EIR, Program EIRs are typically more conceptual and may contain a more general or qualitative discussion of impacts, alternatives, and mitigation measures than a Project EIR. As provided in CEQA Guidelines Section 15168, a Program EIR may be prepared on a series of actions that may be characterized as one large project. Use of a Program EIR provides the County (as lead agency) with the opportunity to consider broad policy alternatives and program wide mitigation measures and provides the County with greater flexibility to address project-specific and cumulative environmental impacts on a comprehensive basis. Similar to analysis of other issue areas, analysis of the WSGVAP was performed at the program level, consistent with CEQA Guidelines Section 15168.

Program EIR As described in CEQA Guidelines Section 15168(c), later activities in the program must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared. If a later activity would have effects that were not examined in the program EIR, a new Initial Study would need to be prepared leading to either an EIR or a Negative Declaration. That later analysis may tier from the program EIR as provided in Section 15152.

### **Response to Comment G-72**

This comment serves as the conclusion to the letter and provides contact information. Since this comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

**FW: DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT FOR THE WEST SAN GABRIEL VALLEY AREA PLAN PROJECT NO. PRJ2023-003982**

West SGV Area Plan <wsgvap@planning.lacounty.gov>

Mon 8/12/2024 5:23 PM

To: Evan Sensibile <ESensibile@planning.lacounty.gov>

FYI, see below.

**JAMES DREVNO** (he/him/his)

**SENIOR PLANNER, Community Studies – East**

Office: (213) 974-6425 • Direct: (213) 893-7034

Email: [jdrevno@planning.lacounty.gov](mailto:jdrevno@planning.lacounty.gov)

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**From:** Susan Maunu <smaunu3@gmail.com>

**Sent:** Monday, August 12, 2024 4:19 PM

**To:** West SGV Area Plan <wsgvap@planning.lacounty.gov>

**Subject:** DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT FOR THE WEST SAN GABRIEL VALLEY AREA PLAN PROJECT NO. PRJ2023-003982

**CAUTION:** External Email. Proceed Responsibly.

Dear Evan and WSGVAP Team,

I support approval of the WSGVAP PEIR and adoption of the WSGVAP. In particular, I support the Plan’s objectives to direct future development away from the urban-wildland interface's Significant Ecological Areas, Hillside Management Areas, Fire Hazard Zones and other environmentally sensitive areas. The Plan’s sustainable development measures (including prohibiting use intensifications in hazard areas, and implementing down-zoning for parcels within the urban-wildlife interface and hazard areas) are critical planning tools for protecting open space and natural resources in and adjacent to the San Gabriel Mountains and Angeles National Forest.

The WSGVAP provides a firm foundation for a harmonious balance of growth and preservation for decades to come. Thank you, WSGVAP Team, for your hard work and diligence in preparing this forward-thinking Area Plan.

Sincerely,

Susan Maunu  
Altadena, California

H-1

## **Response to Comment H-1**

This comment provides support for the WSGVAP and Draft PEIR. This commenter states that they particularly support the objective to preserve areas within or adjacent to natural resources or hazard areas and in the wildland-urban interface by decreasing land use densities and development intensities. Since this comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

## FW: West San Gabriel Valley Area Plan

West SGV Area Plan <wsgvap@planning.lacounty.gov>

Tue 8/13/2024 10:50 AM

To:Evan Sensibile <ESensibile@planning.lacounty.gov>

**EVAN SENSIBILE** (he/him/his)

**PLANNER, Community Studies East**

Office: (213) 974-6425 • Direct: (213) 893-1093

Email: [esensibile@planning.lacounty.gov](mailto:esensibile@planning.lacounty.gov)

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**From:** dale matsuda <dalexcski@hotmail.com>  
**Sent:** Saturday, July 20, 2024 10:35 AM  
**To:** West SGV Area Plan <wsgvap@planning.lacounty.gov>  
**Subject:** West San Gabriel Valley Area Plan

**CAUTION: External Email. Proceed Responsibly.**

Hello LA County Planners:

I live in Altadena, CA. Please be mindful of:

- **Minimize and reduce regulations to preserve individual liberty**, as long as it does not infringe upon others people's liberties.
  -
- **Protect low density single family residential character of Altadena (ie peace and quiet)**:
  - Limit multi-family housing, businesses and and other non-single family residential activities to commercial corridors or major roadways
  - Restrict development to reduce traffic, noise and pollution

I-1

I-2

Dale

### **Response to Comment I-1**

This comment lists multiple requests of the Project, including reducing regulations to preserve individual liberties and limiting non-single family uses to commercial corridors or major roadways. Since this comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

### **Response to Comment I-2**

This comment requests that development is restricted to reduce traffic, noise, and pollution. As discussed in Chapter 3, Project Description, of the Draft PEIR, the WSGVAP is a policy document that does not include or propose any site-specific development that could directly result in construction or operational impacts to the environment. Impacts related to traffic, noise, and air pollution are discussed in Sections 4.17, 4.13, and 4.3 of the Draft PEIR, respectively. Since this comment does not raise an environmental issue regarding the adequacy of the Draft PEIR, no further response is required.

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