



City of Duarte

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April 22, 2020

-- REVISED --

Trayci Nelson
Project Manager City of Bradbury
Bradbury, CA 91008

Dear Ms. Nelson:

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

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

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

- **VIEWS AND AETHETICS**

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

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

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

- **BIOLOGICAL IMPACT**

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

- **GRADING IMPACTS**

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

- **WATER**

- Per the Initial Study, Cal American Water requires a well to be dug to serve the community, but the perspective well sites are within the City of Duarte and require approval from Duarte. P.3.2.1. The entitlement for the well site would require its own CEQA review. Please provide an analysis to determine if the water supply is sufficient to support this development.

- SEWAGE
 - Septic tanks are proposed instead of sewer connections for the development (IS P.3.2.1), but these are not the preferred environmental option. Furthermore, on page 4.7.4 of the Initial Study there is an acknowledgement that the soils may not be suitable for septic and further study is warranted. There should be an analysis undertaken to evaluate the environmental risks of expanding Bradbury's use of septic tanks for residential properties. The analysis should specifically evaluate the risk of ground water contamination from these tanks. If septic tanks are found not to be a suitable option for the development then installation of traditional sewer infrastructure must be analyzed as part of this Environmental Impact Report.

- FLOOD HAZARD
 - The initial Study concludes that there this development has no potential flood hazard impacts. Please explain how this could be possible considering that the secondary point of access to this development utilizes a LA Flood Control District road? In the event of a major rainfall event, this road could be prioritized for utility trucks servicing the debris basin and may be unsafe for use by the general public.

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

Sincerely,



Nick Baldwin, AICP
Associate Planner

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

