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San Gabriel Valley Task Force
March 24, 2020

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

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

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

Apr. 30, 2020

Dear Ms. Nelson:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Sincerely,
Joan Licari, D.Env.



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