
City of Bradbury
General Plan 2012-2030 Update
Environmental Impact Report
Addendum No. 1

This document is an addendum to the 1994 City of Bradbury General Plan Environmental Impact Report to satisfy California Environmental Quality Act (CEQA) compliance for the 2012-2030 City of Bradbury General Plan Update.

February 2014

City of Bradbury
600 Winston
Bradbury, CA 91008

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1. FINDINGS AND CONCLUSIONS

CEQA Guidelines Section 15164 allows a Lead Agency to prepare an Addendum to an Environmental Impact Report for a previously approved project if only minor technical changes or additions are necessary or if none of the conditions described in Section 15162 (a) and (b) have occurred. Although the addendum need not be circulated for public review, decision-makers must consider the addendum with the previously adopted environmental document prior to making a decision on the project. A brief summary explaining the Lead Agency decision to prepare an addendum is required.

Based on the information presented in Sections 3 and 4 of this document, the City of Bradbury, as Lead Agency, finds that the project, the 2012-2030 General Plan Update, does not propose substantial changes that would necessitate additional environmental review under Section 15162 of the CEQA Guidelines. As none of the conditions exist which would necessitate the use of a Subsequent or Supplemental EIR, an Addendum has been prepared.

In addition, the evaluation of impacts, as described in CEQA Guidelines Appendix G, has changed. However, based on the analysis in Section 4, the City concludes that the 1994 General Plan contained enough information about the community that with the exercise of reasonable diligence, information about these issues was readily available and would demonstrate that the impacts were less than significant. Consequently, the City finds that any potential impacts not previously analyzed in the 1994 General Plan EIR will be less than significant

1.1 CEQA Guidelines Section 15162 (a)(1) Substantial Project Changes

Substantial changes in the project are those that would require major revision of the previous environmental document due to the involvement of new significant environmental effects, or if a substantial increase in the severity of previously identified significant effects has occurred. When substantial changes are made to the project, a new EIR or MND must be prepared.

The effects resulting from future development in Bradbury were analyzed in the 1994 City of Bradbury General Plan EIR. While the current general plan update includes policy and program amendments applicable citywide, it does not propose any substantive changes in the existing land use or development pattern. A comparison between the old and the new plans is included in Appendix E – City of Bradbury General Plan Matrices. These matrices, City of Bradbury General Plan Comparison Matrix and City of Bradbury General Plan Goals and Objectives Comparison Matrix, demonstrate that the more recent documents provide an updated and expanded description of goals, objectives and policies. This is not considered a substantial change to the project.

1.2 CEQA Guidelines Section 15162 (a) (2) Substantial Changes in Circumstances

When substantial changes in the circumstances under which a project is undertaken occur, a new EIR or MND must be prepared. Substantial changes are defined as changes that would require major revisions of the previous environmental document in order to describe and analyze new significant environmental effects, or any changes that would cause a substantial increase in the severity of the previously identified significant effects.

The City of Bradbury is almost built-out. Few changes in the City, none of them substantial, have occurred since the adoption of the 1994 General Plan or its re-adoption in 2007. The 2012-2030 General Plan Update does not change the configuration of the City or existing land uses and will not result in new growth over what has previously been anticipated.

1.3 CEQA Guidelines Section 15162 (a) (3) (A) through (B) New Significant Effect

A Lead Agency cannot prepare an Addendum if information of substantial importance, which was not known and could have not been known, with the exercise of reasonable diligence at the time the previous environmental document was certified or adopted, shows:

- A. The project will have one or more significant effects not discussed in the previous environmental document;
- B. The significant effects previously examined will be substantially more severe than identified in the previous environmental document.

The previously certified EIR found that there were no significant effects that could not be mitigated to below a level of significance. In Section 4 of this Addendum each of the issues addressed in the previous environmental document, as well as each of the issues contained in the 2013 checklist are analyzed. Based on this analysis and the information contained herein, there is no evidence that the proposed project would have one or more significant new effects not analyzed in the previously prepared EIR. The analysis also demonstrates that there will be no substantial increase in the severity of impacts identified in the previously prepared environmental documents.

1.4 CEQA Guidelines Section 15162 (a) (3) (C) through (D) Changes in Mitigation Measures or Alternatives

A Lead Agency cannot prepare an Addendum if new information of substantial importance, which was not known and could have not been known, with the exercise of reasonable diligence at the time the previous environmental document was certified or adopted, shows:

- A. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponent declines to adopt the mitigation measures or alternatives; or

- B. Mitigation measures or alternatives that are considerably different from those analyzed in the previous environmental document would substantially reduce one or more significant effects on the environment, but the project proponent declines to adopt the mitigation measures or alternatives.

In Section 4 of this Addendum each of the issues addressed in the previous environmental document, as well as each of the issues contained in the 2013 checklist are analyzed. Since all impacts were reduced to below a level of significance, it is assumed that no new mitigation measures would substantially reduce significant effects on the environment.

2. INTRODUCTION

2.1 PURPOSE AND SCOPE

This document, City of Bradbury 2012-2030 General Plan Update Environmental Impact Report Addendum No. 1, is an addendum to the previously adopted general plan EIR which analyzed the potential environmental impacts resulting from the 1994 City of Bradbury General Plan adoption and implementation. The 1994 General Plan was readopted in 2007 without change. This addendum analyzes the potential impacts associated with adoption and implementation of the City of Bradbury General Plan 2012-2030 Update.

2.2 PREVIOUS ENVIRONMENTAL DOCUMENTATION

The Environmental Impact Report for the 1994 Bradbury General Plan addressed environmental impacts associated with future development as permitted under the Land Use Element. The EIR identified as less than significant impacts to land use, population and housing, earth and geology, water, air quality, traffic and circulation, plant and animal life, energy and mineral resources, risk of upset/human health, noise public services, utilities aesthetics, cultural resources and recreation. Impacts to aesthetics, air quality, biological resources, cultural resources, hydrology and water quality and utilities were able to be mitigated to a level of less than significant through recommended mitigation measures. Although currently required by the 2013 CEQA Statute and Guidelines, the regulations in effect when the EIR was certified did not require impacts to forestry resources or impacts resulting from greenhouse gas emissions to be analyzed. Therefore, they were not analyzed in the previously prepared environmental document. Recent revisions to the CEQA checklist also modified the analysis, although traffic was analyzed in the 1994 General Plan EIR, it was not consistent with the current checklist. The traffic analysis was updated to ensure that the evaluation of environmental impacts was consistent with the most recent version of the checklist.

2.3 LIMITED FOCUS OF ADDENDUM

In preparing an addendum, the Lead Agency's environmental review of the proposed project is limited to examining the environmental effects associated with the changes between the previously adopted EIR and the potential impacts which may result from implementation of the proposed project. This Addendum will consider the potential impacts resulting from adoption and implementation of the City of Bradbury General Plan 2012-2030 Update.

The 1994 General Plan and the 2007 General Plan projected a population of 1,500 and 501 dwelling units at full build-out. Similarly, the 2012-2030 General Plan Update estimates a population of 1,540 and 497 dwelling units at build-out. There are eight large parcels of land comprising approximately 302 acres which are located in the northern portion of the City. Since 1994 existing zoning and 2007 general plan designations would permit these privately owned parcels to be developed with one main dwelling unit and one accessory dwelling unit per parcel.

These same land use regulations would allow additional development of the area through the adoption of a specific plan.

A traffic study was conducted as part of the 2012-2030 General Plan Update to determine if the local and regional circulation and transportation systems were adequate to handle existing and projected demand and traffic volumes. The systems were deemed adequate. Based on recent traffic analysis, air quality, greenhouse gas emissions and noise were analyzed. No new significant impacts were identified. In addition, the biological survey was updated. Similarly, the biological survey found no new significant impacts with the 2012-2030 General Plan Update. The City of Bradbury prepared comparison matrices which identify differences and similarities between the 1994 and 2007 General Plans and the 2012-2030 General Plan Update. The matrices are included in Appendix E.

2.4 DOCUMENTS INCORPORATED BY REFERENCE

Section 15150 of the State CEQA Guidelines permits an environmental document to incorporate by reference other documents that provide relevant data. The documents outlined in this section are hereby incorporated by reference, and the pertinent material is summarized throughout this Addendum, where that information is relevant to the analysis of impacts of the project. Any document incorporated by reference is available for review at City of Bradbury Planning Division offices, located at 600 Winston Ave., Bradbury, CA 91008.

- ***Final Environmental Impact Report for City of Bradbury General Plan***, 1994. This document examines the potential environmental impacts resulting from adoption and implementation of the 1994 General Plan.
- ***City of Bradbury General Plan***, 1994. This document guides future conservation, enhancement and development in the City. It provides a framework for managing the City's environmental and economic resources.
- ***City of Bradbury General Plan***, 2007. In 2007, the City reviewed the 1994 general plan and readopted it without change.
- ***City of Bradbury General Plan Update Traffic Evaluation***, January 2014. The objectives of this study included evaluating key roadways that provide access into the City. The following conditions were analyzed: Existing Traffic and Future Conditions. A revised noise contour map was also prepared based on recent traffic volumes.
- ***City of Bradbury General Plan Update Air Quality and Greenhouse Gas Evaluations***, January 2014. The purpose of this evaluation was to determine the air quality and greenhouse gas impacts associated with the implementation of the City of Bradbury's General Plan update.
- ***City of Bradbury Noise Contours***, January 2014. The purpose of this evaluation was to evaluate noise impacts associated with the implementation of the City of Bradbury's General Plan update.
- ***City of Bradbury California Natural Diversity Data Base (CNDDB) Survey***, January 2014. The purpose of this evaluation was to provide information on biological resources in the City of Bradbury's general plan study area.

2.5 CONTACT PERSON

The Lead Agency for the Addendum for the proposed project is the City of Bradbury. Any questions about the preparation of this Addendum, its assumptions, or its conclusions should be referred to:

Michelle Keith, City Manager and/or
Anne Browning McIntosh, AICP, City Planner
City of Bradbury
600 Winston Avenue, Bradbury, CA 91008

3. CEQA ENVIRONMENTAL CHECKLIST

2013 CEQA Environmental Checklist

PROJECT DESCRIPTION AND BACKGROUND

1. **Project Title:** City of Bradbury General Plan Update 2012-2030
2. **Lead agency name and address:**
City of Bradbury, 600 Winston Avenue, Bradbury, CA 91008
3. **Contact person and phone number:**
4. Michelle Keith, City Manager, (626) 358-3218
Ann Browning McIntosh, AICP, City Planner; (626) 358-3218
5. **Project Location:**
City of Bradbury, County of Los Angeles, 34 degrees 8'58"N 117 degrees 58'28"W
6. **Project Sponsor's Name and Address:**
City of Bradbury, 600 Winston Avenue, Bradbury, CA 91008
7. **General Plan Designation:**
The land use designations in the City of Bradbury General Plan will remain substantively unchanged as part of this project. However, eight (8) parcels comprising 302 acres in the northern hillside area is renamed from "Estate Five Acres/Hillside Overlay" to "Open Space, Privately Owned Undeveloped."
8. **Zoning:**
The zoning designations as set forth on the City of Bradbury Zoning Map will remain unchanged as part of this project.
9. **Description of Project:**
The project involves adopting an updated General Plan that includes the following elements: Land Use, Circulation-Transportation, Community Resources (combines the mandated Open Space and Conservation Elements), Health and Safety (combines the mandated Noise and Safety Elements), and Climate Action Plan. While policy and program amendments apply to the City as a whole, they do not contemplate substantive changes in the pattern of land uses established in the existing General Plan including land use designations, development envelopes, street infrastructure, or increased traffic. No development projects are contemplated at this time. Full copies of the amended General Plan Update 2012-2030 are available at the City Clerk's office located at 600 Winston Avenue, Bradbury, CA 91008. The Housing Element will be adopted separately and is not a part of this project.

General Plan Update 2012-2030 reflects input by the General Plan Steering Committee at numerous meetings and by the community workshops.¹ The Mission Statement, Vision Statement, goals, policies, and the action program included in this General Plan Update are a direct result from the Steering Committee meetings and the community workshops. To the greatest extent possible the committee recommendations that best reflect the community desires were used to form the revised goals, policies and action items. The community agreed the following goals and policies from the 1994 and 2007 General Plans should be retained:

1. Provide a comprehensive policy for future planning in the City.
2. Promote growth management and the preservation and maintenance of important resources.
3. Meet the needs and reflect the goals of its citizens; and
4. Improve the living environment.

The community offered the following additional goals:

1. Financial sustainability.
2. Independent local government.
3. Local responsive and responsible governance.
4. Safe living environment for existing and future residents.
5. Compatibility between rural agriculture and residential estate development.
6. Peaceful community.
7. Balance the City's rural character, including agricultural opportunities, preservation of open-space and natural topography, with residential necessities such as traditional municipal services and utilities.
8. Living/housing opportunities for all ages and economic levels.
9. Services for residents that encompass and are sensitive to an aging population and cultural diversity.

The committee used these overarching goals to develop goals, objectives, and policies for each element. As part of the 2012-2030 General Plan Update, the City prepared a matrix comparing the goals, policies and objectives of the 1994 and 2007 General Plans with those included in the General Plan Update. This matrix is included in Appendix E – City of Bradbury General Plan Comparison Matrices.

Land Use Goals

Goal 1: The Land Use Element maintains the existing rural residential character of the City. The element designates the general location, distribution, and extent of existing and permitted development.

Goal 2: Preserve the identity, image and environmental quality of the hillside and open space areas in perpetuity by enforcing the Hillside Development Standards

¹ 2012-2030 City of Bradbury General Plan Update, Introduction, p. 6-7.

Circulation-Transportation Goals

- Goal 1: The Circulation-Transportation Element seeks to maintain safe and efficient circulation systems that do not impact the rural residential character of the City.
- Goal 2: Maintain transit programs that do not exceed the City's annual transit funding allocation or budget.
- Goal 3: Inform residents of all available transit programs.
- Goal 4: Support regional rail services such as the METRO Gold Line light rail system.
- Goal 5: Promote traffic safety throughout the community.
- Goal 6: Promote a "Dark Sky" development concept for all circulation systems that is consistent with the City's rural character.

Open-Space Goals

- Goal 1: Protect and enhance Bradbury's Open-Space.
- Goal 2: To develop sufficient open-space and recreational-trail access to meet the needs of the community residents.
- Goal.3: To provide open-space and recreational opportunities to the greatest extent possible.

Conservation Goals

- Goal 1: Maintain a healthy and clean city.
- Goal 2: Ensure adequate and cost effective trash collection for Bradbury residents.
- Goal 3: Protect the valuable watershed and natural habitat areas.
- Goal 4: Protect and maintain the local water supply to ensure that the City's growing demand for water is properly accommodated.
- Goal 5: Protect Bradbury's environment through the use of renewable energy resources.
- Goal 6: Prolong the life and safety of landfills and find an environmentally safe alternative means for the disposal of solid waste.
- Goal 7: Restrict future surface streets from impacting natural open-space areas.

- Goal 8: Ensure that development in the steep foothill area is sensitive to the local environment.
- Goal 9: Maintain Land Use policies that have minimal impact on existing air quality.
- Goal 10: Maximize efforts to reduce air pollution from mobile sources.
- Goal 11: Strive to achieve ambient levels of particulate matter to meet State and Federal clean air standards.

Noise Goals

- Goal 1: Reduce noise impacts from transportation sources.
- Goal 2: Develop measures to address non-transportation noise impacts such as those that are generated from surrounding commercial and recreational activities (racetracks, etc.).
- Goal 3: Establish land uses which are compatible with existing noise levels within the community.
- Goal 4: Prevent and mitigate the adverse impacts of noise on City residents.

Safety Goals

- Goal 1: To protect the citizens, their property and public facilities from natural and man-made hazards.
- Goal 2: To establish, maintain, and develop awareness on the part of all residents of Bradbury as to how to react and protect themselves and each other, in the event of a natural or man-made hazard or disaster.
- Goal 3: To achieve a greater sense of citizen satisfaction with the safety services within the community, through constantly monitoring the effective and efficient staffing of safety service personnel.
- Goal 4: To minimize the risk to persons and property due to seismic activity.
- Goal 5: To minimize the risk to lives and property due to fire hazards.
- Goal 6: To minimize the risk to persons and property due to the use and storage of hazardous materials.
- Goal 7: Protect the community from floods and landslides.
- Goal 8: Assure that existing and new development addresses fire protection in a proactive and preventative way.

Climate Action Goals

- Goal 1: Preserve the energy efficiency of existing housing units within the community.
- Goal 2: Move toward net zero energy development to minimize additional energy demand within the community.
- Goal 3: Integrate innovative and cost effective water conservation efforts into new and existing development to conserve energy used to pump, treat, and convey water.
- Goal 4: Optimize shading and cooling to reduce community-wide energy demand.
- Goal 5: Conserve energy and limited fiscal resources through energy efficiency and conservation improvements at the Civic Center.

10. Location, Plan Area, and Regional Access. Briefly describe the project's surroundings:

The City of Bradbury is a small residential city located 22 miles northeast of downtown Los Angeles, in the San Gabriel Valley region of Los Angeles County. Bradbury encompasses an area of 1.9 square miles along the south facing foothills of the San Gabriel Mountains below the Angeles National Forest. The population has increased from 855 residents in 2000 to 1,074 residents in 2013².

Location: The City of Bradbury is bordered by the Angeles National Forest to the north, the City of Monrovia to the north, west and south, and the City of Duarte to the east and south. The City is located approximately one mile north of the I-210 freeway and less than a mile north of the terminus of the I-605 freeway.

Plan Area: The City of Bradbury was incorporated on July 26, 1957. The boundaries lie within the northern part of the Rancho Azusa de Duarte, originally a 6,596-acre Mexican Land Grant given in 1841 to Andres Duarte. The original rancho encompassed all of Bradbury and portions of the cities surrounding Bradbury. It was developed and subdivided into 40-acre parcels in the 1870's. Lewis Leonard Bradbury acquired 2,750 acres of the rancho around 1883, which comprises the present day cities of Bradbury and Duarte. The City adopted its first General Plan in 1972.

Regional Access: The City is served by I-210 freeway traversing east-west along the base of the San Gabriel Mountains connecting to Pasadena and

² California Department of Finance website accessed on July 24, 2013, <http://www.dof.ca.gov/research/demographic/>.

US-101 to Ventura and Santa Barbara and I-605 freeway connecting to Long Beach and the Los Angeles freeway system.

The principal east-west roadway serving Bradbury is Huntington Drive, located in the City of Duarte, one-quarter mile to the south. Huntington Drive is an improved four-lane arterial with raised, landscaped median and separate left-turn lanes.

Environmental Setting: The City is predominantly a single-family residential community with no multi-family units and no commercial or industrial development. The lower two-thirds of the City has been subdivided while the remaining one-third of the City to the north consists of hillsides. The areas of the City designated as residential have minimum lot sizes ranging in size from 7,500 sf to five acres. Approximately one-third of the streets are private with gated and controlled access. The old Bradbury homestead was developed as the Royal Oaks Manor (now called Be Royal Oaks), an elegant retirement community and skilled nursing facility on a 17-acre parcel of County land in the City's Sphere of Influence.³

Topography: The City of Bradbury is characterized by steep hillsides. Much of the City's northern boundary is shared with the Angeles National Forest. The mountain peaks range from 1,200 feet to 10,064 feet. To the north of Bradbury, Bliss Mountain rises 5,500 feet. Much of the forest is covered with dense chaparral that changes to pine and fir-covered slopes in the higher elevations.

Biological Resources: The City is located along the south facing slopes of the San Gabriel Mountains. Along the upper slopes grassland, coastal sage scrub, woodland, and forest communities are prevalent. As the foothills progress closer to the more dense development, the native vegetation becomes less dense. The southern portion of the city consists of previously disturbed and developed areas with ornamental vegetation, orchards, and equestrian facilities. Animal species known to occur within the City boundaries include a variety of mammals, birds, reptiles and invertebrates. Most prevalent among the mammals are deer, coyote, raccoon, skunk, rabbits mice rats, opossums and squirrels. Typical birds include varieties of scrub jay, Hummingbird, warbler, Wren and Sparrow. Typical reptiles found in hillside areas include lizards, rattlesnakes and garter snakes.⁴ The City may serve as a habitat for rare or endangered plant and animal species. Future development in the hillside areas will require the preservation of wildlife corridors and sensitive habitats.⁵

A California Natural Diversity Data Base (CNDDDB) Survey was completed for the City of Bradbury in January 2014. The survey found one CNDDDB-sensitive community, southern coast live oak riparian forest, documented in Bradbury and Bliss Canyons. No US Fish and Wildlife Service designated critical habit occurs in Bradbury. However, the survey found that 31 designated plant species and 32 wildlife species could potentially occur in the Bradbury General Plan Area.⁶

³ City of Bradbury 1994 General Plan Initial Study, p. 2-1, October 7, 1993.

⁴ City of Bradbury 1994 General Plan Final Environmental Impact Report, p. 3-41, November 19, 1993.

⁵ City of Bradbury 1994 General Plan Initial Study, p. 3-9, October 7, 1993.

⁶ CNDDDB search for the City of Bradbury General Plan Update, p. 2 January 17, 2014.

Faults: As with the entire Southern California region, the City of Bradbury is located in seismically active region and commonly experience seismic ground shaking along active faults. Active faults are defined as faults that have experienced movement in the last 11,000 years⁷. Potentially active faults are those that have experienced movement in the Quaternary period (last 1,600,000 years) during the Holocene period. Faults that have not experienced movement in the last two million years are generally considered inactive.

The City of Bradbury has two earthquake faults within the City limits.⁸ The Sierra Madre Fault, which extends through the major portion of Bradbury along the base of the San Gabriel Mountains and the Duarte Fault which extends across the southern portion of Bradbury. Other major faults within the vicinity of the City include the San Gabriel fault, approximately 12 miles north of the City, the Verdugo fault, approximately 12 miles to the west and the San Andreas fault, 24 miles to the northeast of the City.⁹

Water Resources: The California-American Water Company provides potable water to the City of Bradbury through groundwater sources from the main San Gabriel Basin.¹⁰ Chlorine addition is the only drinking water treatment used in the water system. Chlorine ensures disinfection and maintains the bacteriological water quality in the water system.

The University of Southern California estimates that the average household in Southern California uses 436 gallons of water per day or 110,000 gallons per year.

Land Use: The City of Bradbury is a single-family residential community comprised of 1,216 acres of land.¹¹ The City is nearly fully developed with a variety of single-family detached residential dwelling units and accessory buildings and structures. To implement the community's desire to retain its rural, low-density single-family residential character, the entire City of Bradbury is zoned for single-family detached residential development and Open-Space. Areas designated as Open-Space include flood control areas, public facilities and privately owned open-space areas that have either been dedicated as permanent open space or are currently underdeveloped and provide for limited development opportunities.

Traffic: Primary access to Bradbury is from two nearby freeways: the San Gabriel River Freeway (I-605) and the Foothill Freeway (I-210) with an on-ramp at Mount Olive and Huntington Drive to the I-605/I-210 freeways. An additional nearby freeway access is available at Buena Vista Street and Mountain Avenue off-ramps to the I-210 freeway.

Bradbury is almost entirely built out and a substantial increase of traffic generated from within the community would not be expected. In 2010, the

⁷ Website accessed on July 25, 2013. <http://www.conservation.ca.gov/cgs/rghm/ap/Pages/main.aspx>.

⁸ 2012-2030 City of Bradbury General Plan Update, Health and Safety Element, p. 20-21.

⁹ City of Bradbury 1994 General Plan Initial Study, p. 3-3, October 7, 1993.

¹⁰ City of Bradbury 1994 General Plan Final Environmental Impact Report, p. 3-24, November 19, 1993.

¹¹ 2012-2030 City of Bradbury General Plan Update, Land Use Element, p. 3.

average vehicle mile traveled (VMT) was 4,191 miles per year per service population.

11. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.)

Approving Agency: Bradbury City Council

The City of Bradbury is the approving agency and is responsible for all permits and approvals. No other agency approvals are required.

Reviewing Agencies: During the general plan updating process, drafts of the plan were referred to the agencies specified by the State Planning Law Government Code Section 65351 through Section 65352.5. All appropriate agencies were consulted and their comments were coordinated with the local planning aspirations.

The following agencies will be sent a copy of this document as a courtesy: Air Resources Board, California Highway Patrol, Caltrans District 7, Department of Conservation, Department of Education, Energy Commission, Department of Fish and Game, Region 5, Integrated Waste Management Board, Native American Heritage Commission, Office of Emergency Service, Office of Historic Preservation, Department of Parks and Recreation, Public utilities Commission, Regional Water Quality Control Board, Region 4, Santa Monica Mountains Conservancy, State Regional Water Resources Control Board, Department of Toxic Substance, Department of Water Resources, District 7, Cal Fire.

SUMMARY OF EVALUATION OF ENVIRONMENTAL IMPACTS:

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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I. AESTHETICS: Would the project:

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|--------------------------|
| a) Have a substantial adverse effect on a scenic vista? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | X |
| b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | X |
| c) Substantially degrade the existing visual character or quality of the site and its surroundings? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | X |
| d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area? | <input type="checkbox"/> | <input type="checkbox"/> | X | <input type="checkbox"/> |

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

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|---|
| a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | X |
|--|--------------------------|--------------------------|--------------------------|---|

- b) Conflict with existing zoning for agricultural use, or a Williamson Act contract? X
- c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))? X
- d) Result in the loss of forest land or conversion of forest land to non-forest use? X
- e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use? X

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

- a) Conflict with or obstruct implementation of the applicable air quality plan? X
- b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation? X
- c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)? X

- d) Expose sensitive receptors to substantial pollutant concentrations? X
- e) Create objectionable odors affecting a substantial number of people? X

IV. BIOLOGICAL RESOURCES: Would the project:

- a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? X
- b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service? X
- c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? X
- d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? X
- e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? X
- f) Conflict with the provisions of an adopted Habitat Conservation plan, Natural Community Conservation plan, or other approved local, regional, or state habitat Conservation plan? X

V. CULTURAL RESOURCES: Would the project:

- | | | | | |
|---|--------------------------|--------------------------|---|--------------------------|
| a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5? | <input type="checkbox"/> | <input type="checkbox"/> | X | <input type="checkbox"/> |
| b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5? | <input type="checkbox"/> | <input type="checkbox"/> | X | <input type="checkbox"/> |
| c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? | <input type="checkbox"/> | <input type="checkbox"/> | X | <input type="checkbox"/> |
| d) Disturb any human remains, including those interred outside of formal cemeteries? | <input type="checkbox"/> | <input type="checkbox"/> | X | <input type="checkbox"/> |

VI. GEOLOGY AND SOILS: Would the project:

- | | | | | |
|--|--------------------------|--------------------------|---|--------------------------|
| a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: | <input type="checkbox"/> | <input type="checkbox"/> | X | <input type="checkbox"/> |
| i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42? | | | | |
| ii) Strong seismic ground shaking? | <input type="checkbox"/> | <input type="checkbox"/> | X | <input type="checkbox"/> |
| iii) Seismic-related ground failure, including liquefaction? | <input type="checkbox"/> | <input type="checkbox"/> | X | <input type="checkbox"/> |
| iv) Landslides? | <input type="checkbox"/> | <input type="checkbox"/> | X | <input type="checkbox"/> |
| b) Result in substantial soil erosion or the loss of topsoil? | <input type="checkbox"/> | <input type="checkbox"/> | X | <input type="checkbox"/> |
| c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse? | <input type="checkbox"/> | <input type="checkbox"/> | X | <input type="checkbox"/> |

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

e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water? X

VII. GREENHOUSE GAS EMISSIONS: Would the project:

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

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

VIII. HAZARDS AND HAZARDOUS MATERIALS: Would the project:

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

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

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? X

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

- e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area? X
- f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area? X
- g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? X
- h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands? X

IX. HYDROLOGY AND WATER QUALITY: Would the project:

- a) Violate any water quality standards or waste discharge requirements? X
- b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)? X
- c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on- or off-site? X

- | | | | | |
|---|--------------------------|--------------------------|---|--------------------------|
| d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site? | <input type="checkbox"/> | <input type="checkbox"/> | X | <input type="checkbox"/> |
| e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff? | <input type="checkbox"/> | <input type="checkbox"/> | X | <input type="checkbox"/> |
| f) Otherwise substantially degrade water quality? | <input type="checkbox"/> | <input type="checkbox"/> | X | <input type="checkbox"/> |
| g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map? | <input type="checkbox"/> | <input type="checkbox"/> | X | <input type="checkbox"/> |
| h) Place within a 100-year flood hazard area structures, which would impede or redirect flood flows? | <input type="checkbox"/> | <input type="checkbox"/> | X | <input type="checkbox"/> |
| i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam? | <input type="checkbox"/> | <input type="checkbox"/> | X | <input type="checkbox"/> |
| j) Inundation by seiche, tsunami, or mudflow? | <input type="checkbox"/> | <input type="checkbox"/> | X | <input type="checkbox"/> |

X. LAND USE AND PLANNING: Would the project:

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|---|
| a) Physically divide an established community? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | X |
| b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | X |

c) Conflict with any applicable habitat Conservation plan or natural community Conservation plan? X

XI. MINERAL RESOURCES: Would the project:

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

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

XII. NOISE: Would the project result in:

a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? X

b) Exposure of persons to or generation of excessive ground borne vibration or ground borne noise levels? X

c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project? X

d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project? X

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

f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels? X

XIII. POPULATION AND HOUSING: Would the project:

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

b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere? X

c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere? X

XIV. PUBLIC SERVICES:

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

Fire protection? X

Police protection? X

Schools? X

Parks? X

Other public facilities? X

XV. RECREATION:

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? X

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment? X

XVI. TRANSPORTATION/TRAFFIC: Would the project:

a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit? X

b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways? X

c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks? X

d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? X

e) Result in inadequate emergency access? X

f) Conflict with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities? X

XVII. UTILITIES AND SERVICE SYSTEMS:
Would the project:

a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board? X

b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? X

c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? X

d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed? X

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

f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs? X

g) Comply with federal, state, and local statutes and regulations related to solid waste? X

XVIII. MANDATORY FINDINGS OF SIGNIFICANCE

a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? X

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

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

4. ENVIRONMENTAL IMPACTS EXPLAINED

ENVIRONMENTAL IMPACTS EXPLAINED

I. AESTHETICS: Would the project:

(a) Have a substantial adverse effect on a scenic vista?

Views of the San Gabriel Mountains, as well as views along tree-lined streets provide scenic vistas in the City of Bradbury.¹ After analyzing potential impacts on scenic resources, the 1994 General Plan EIR found that with implementation of the General Plan land use and open space policies, there would be no significant adverse impacts.²

The 2012-2030 City of Bradbury General Plan Update proposes no substantive changes to existing land use classifications or development envelopes. Views of the foothills and the City and the street-lined residential streets continue to create scenic vistas, frame scenic resources and define the visual character of the community. The following goals, objectives and policies protecting environmental resources and community character ensure there will be **no impacts on scenic vistas**.

Land Use Goal 1 – The Land Use Element maintains the existing rural residential character of the City. The element designates the general location, distribution, and extent of existing and permitted development.

Land Use Goal 2 – Preserve the identity, image and environmental quality of the hillside and open space areas in perpetuity by enforcing the Hillside Development Standards.

Land Use Objective 1- To maintain the existing character of the community and to preserve those environmental resources and amenities that make the City of Bradbury a desirable place to live.

Land Use Policy 1- The residential character of the community and environmental resources important to the City will be maintained.

Open Space Goal 1 – Protect and enhance Bradbury’s open space.

Open Space Policy 1 – Protect and preserve oak woodlands and mandate replacement planting of native oaks where oak woodlands are proposed for alteration.

Open Space Policy 3 – Mandatory replacement planting of native trees and oaks.

Open Space Policy 6 – Preservation of historically or culturally significant sites.

Open Space Policy 10 – Protect areas of outstanding scenic beauty.

¹ City of Bradbury 1994 General Plan Initial Study, p. 3-14.

² City of Bradbury 1994 General Plan Environmental Impact Report, p. 3-60.

Conservation Goal 8 – Ensure that development in the steep foothill area is sensitive to the local environment.

Conservation Policy 19 – Protect natural resources.

(b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Refer to response to I(a). There will be *no impacts on scenic resources*.

(c) Substantially degrade the existing visual character or quality of the site and its surroundings?

Refer to response to I(a). There will be *no impacts on visual character*.

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

The 1994 General Plan EIR stated that light and glare were site specific issues and did not require citywide programs. However, with the implementation of policies and programs stated in the General Plan, the desirable aesthetic environment would be promoted. Impacts associated with light and glare would be eliminated through administration of zoning and building codes. The 1994 General Plan EIR identified no significant adverse impacts with the incorporation of these policies and programs.³

The 2012-2030 City of Bradbury General Plan Update proposes no changes to existing land use classifications or development envelopes that would create additional light or glare. Most of the City is built-out, with low density residential uses. Sources of light and glare include street lights, security lights, automobile headlights, sport court lights, pool lights, and equestrian facilities. The City Municipal Code requires shielding of all lights and light must be contained within the property boundaries. The following goals, objectives and policies will ensure that impacts resulting from light and glare *will be less than significant*.

Land Use Goal 1 – The Land Use Element maintains the existing rural residential character of the City. The element designates the general location, distribution, and extent of existing and permitted development.

Land Use Objective 1 – To maintain the existing character of the community and to preserve those environmental resources and amenities that make the City of Bradbury a desirable place to live.

Land Use Policy 1 – The residential character of the community and environmental resources important to the City will be maintained.

³ City of Bradbury 1994 General Plan Environmental Impact Report, p. 3-61.

Open Space Policy 10 – Protect areas of outstanding scenic beauty.

Circulation-Transportation Goal 6 – Promote a “Dark Sky” development concept for all circulation systems that is consistent with the City’s rural character.

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

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

Over the past few decades the development trend in the City has included the removal of citrus and avocado orchards. Large estate type dwellings and accessory structures have replaced the once quaint ranch houses. A few small farms and ranches remain. The water purveyor has made recent changes to abandon the agricultural water irrigation system that once served the community. The cost of water once used to irrigate orchards has rapidly increased and has put many of the existing farm operations in jeopardy. The success of agriculture is dependent on large lots served by affordable irrigation water. During times of drought when water is scarce, limitations are frequently placed on agricultural irrigation, which leads to the decay and removal of groves and a severe reduction of production⁴

They City Council adopted Chapter 9.06.090 of the Bradbury Development Code to protect existing groves and orchards, as well as heritage trees. Chapter 9.06.090, “Tree Preservation and Protection,” provides regulations governing the removal, replacement and maintenance of trees. Permits are required to remove prominent, native and orchard trees.⁵

The Initial Study prepared for the 1994 General Plan EIR stated that the undeveloped portions of the City consist of steep slopes and canyons and are not presently involved in agricultural production. However, some of the large single-family residential uses include orchards and would be maintained under the General Plan. The 1994 General Plan Initial Study found no potential impacts on agricultural resources or farmlands.⁶

⁴ 2012-2030 City of Bradbury General Plan Update, Community Resources Element, p. 2-3.

⁵ 2012-2030 City of Bradbury General Plan Update, Community Resources Element, p. 3.

⁶ City of Bradbury 1994 General Plan Initial Study, p. 3-1.

The 2012-2030 General Plan Update proposes no substantive changes to existing land use classifications that would affect agricultural uses. In reviewing the 2010 Los Angeles County Important Farmland Map, the City of Bradbury is located outside of the survey boundary.⁷ Existing agricultural uses can continue and new agricultural uses consistent with the General Plan could be added. The implementation of the following goals, objectives and policies will further ensure that impacts there are ***no impacts resulting from the conversion of farmlands to non-agricultural use.***

Land Use Goal 1 – The Land Use Element maintains the existing rural residential character of the city. The element designates the general location, distribution, and extent of existing and permitted development.

Land Use Objective 1 – To maintain the existing character of the community and to preserve those environmental resources and amenities that make the City of Bradbury a desirable place to live.

Conservation Policy 9 – Minimize conflict between agricultural and urban land uses.

(b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

Refer to response to II(a). There are ***no impacts*** resulting from conflicts with zoning and agricultural uses or Williamson Act contracts.

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

The Angeles National Forest and the City of Monrovia border the northern boundary of the City. Although there is no forest land or timberland in the City of Bradbury, the City's existing regulations pertaining to development on the steep slopes adjacent to the forest ensure protection of this area. The 1994 General Plan EIR did not specifically address impacts related to forest and timberlands, but did analyze impacts on biological resources, including impacts to natural communities (e.g., oak forest). The Initial Study prepared for the 1994 General Plan indicated that impacts in regard to biological resources could be "Possibly Significant Unless Mitigated."⁸ The 1994 General Plan proposed policies and programs to protect biological resources which included forest land areas. It was determined that adverse impacts related to natural resources in the City could be reduced through implementation of the policies and programs in the General Plan's Conservation Element.⁹ Moreover, the City of Bradbury's Development Code includes Hillside Development Standards which severely restrict development and grading in the northern portion of the City. The Hillside Development Standards provide additional protection for the forest areas outside of the City.

⁷ Website accessed on July 25, 2013: <ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2010/los10.pdf>.

⁸ City of Bradbury 1994 General Plan Initial Study, p. A-v.

⁹ City of Bradbury 1994 General Plan Environmental Impact Report, p. 3-44.

Although the 1994 General Plan EIR did not address this subject, the General Plan EIR contained enough information about existing land use, vegetation types and zoning that with the exercise of reasonable diligence, information about forest and forest land zoning was readily available to the public. Therefore, impacts to forests and forest land zoning are not a new impact.

The 2012-2030 General Plan Update proposes no substantive changes to existing land use classifications that would affect forest land. Implementation of the following objectives and policies will further ensure there are **no impacts** resulting from conflicts between forestlands and zoning.

Open Space Objective 1 – Make Open-Space resources available to existing and future residents.

Open Space Policy 1 – Protect and preserve oak woodlands and mandate replacement planting of native oaks where oak woodlands are proposed for alteration.

Open Space Policy 3 – Mandatory replacement planting of native trees and oaks.

Open Space Policy 5 – Prevention of soil erosion.

Conservation Policy 14 – Explore the use of Habitat Conservation Plans and Natural Communities Conservation Programs.

Conservation Policy 19 – Protect natural resources.

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

Refer to response to II(c). Impacts resulting from resulting from the loss or conversion of forest land are **less than significant**.

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

Refer to responses to II(a), II(b), II(c) and II(d). Impacts resulting from other changes in the environment which would result in the loss or conversion of forest or agricultural lands are **less than significant**.

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

(a) Conflict with or obstruct implementation of the applicable air quality plan?

The California Air Resources Board (CARB) is the state regulatory agency responsible for ensuring implementation of the Clean Air Act and regulating emissions from motor vehicles and consumer products.¹⁰

The City of Bradbury is located within the South Coast Air Basin (SCAB), which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAQMD is responsible for preparing the Air Quality Management Plan (AQMP), which incorporates both state and federal air quality standards. In general, the SCAB has relatively poor air quality.¹¹ Most areas of the SCAB have exceeded state and federal air quality standards. To combat the Basin's poor air quality, the SCAQMD adopted the 2012 AQMP.

A new technical report was prepared to analyze the air quality impacts associated with the 2012-2030 General Plan Update (See Chapter 6). Using the approved land use, population and housing projections from the General Plan adopted in 1994 and readopted in 2007, SCAQMD prepared the 2012 AQMP. Because the 2012-2030 General Plan Update does not alter those projections, the technical report found the 2012-2030 General Plan Update complied with the SCAQMD's 2012 AQMP.¹² Therefore, this impact is considered *less than significant*.

(b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

The Initial Study for the 1994 General Plan stated that no development is anticipated that would result in a substantial increase in vehicle trips and off-site power and natural gas generation. As a result, the Initial Study found that no long term impacts would violate any air quality standard or contribute to an existing or projected air quality violation.

Construction impacts were analyzed in the 1994 General Plan EIR. The EIR found that, with compliance of SCAQMD Rules 402, 403 and pertinent regulations of Title 24 of the California Code of Regulations (establishing energy standards for new construction), there were no significant adverse impacts to air quality.

The technical report evaluating air quality found the 2012-2030 General Plan Update does not have the potential to violate federal or state ambient air quality standards.¹³ The report analyzed the following criteria pollutants: VOC, NO_x, CO, SO_x, PM₁₀ and PM_{2.5}. Emissions levels in the air quality technical report were calculated based on total build-out of the General Plan Area. These calculations demonstrated that operational impacts, associated with building energy use,

¹⁰ Air Quality and Greenhouse Gas Evaluation, 2012-2030 City of Bradbury General Plan Update, p. 15.

¹¹ Air Quality and Greenhouse Gas Evaluation, 2012-2030 City of Bradbury General Plan Update, p. 16-17.

¹² Air Quality and Greenhouse Gas Evaluation, 2012-2030 City of Bradbury General Plan Update, p. 4.

¹³ Air Quality and Greenhouse Gas Evaluation, 2012-2030 City of Bradbury General Plan Update, p. 24.

vehicles, and area sources, would not exceed SCAQMD thresholds. Therefore, **no impacts** regarding this issue area will occur.

(c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

The SCAB is in nonattainment for the following criteria pollutants: ozone, particulate matter, carbon monoxide, nitrogen dioxide, sulfur dioxide, and lead.¹⁴ The 2012-2030 General Plan Update does not include changes in land use or development which would increase pollutant emissions beyond what was contemplated in the existing General Plan or the AQMP. The 2012-2030 General Plan Update will permit development and activities which could generate pollution. Impacts to air quality include construction-related emissions from grading activities and the use of construction equipment, vehicle trips, and emissions related to the use of natural gas and power.

Construction Emissions. Construction activities associated with individual projects may result in emissions of CO, VOCs, NO_x, SO_x, PM₁₀, and PM_{2.5}. However, because details associated with construction of individual projects are unknown at this time, any project which may exceed construction emissions thresholds will be required to prepare project-specific studies.

Operational Emissions. Operational activities associated with the 2012-2030 General Plan Update will result in some emissions of ROG, NO_x, CO, SO_x, PM₁₀, and PM_{2.5}.¹⁵ These emissions have three primary sources: area sources (i.e., lawn mowers, architectural coatings and consumer products), building energy use and mobile sources (i.e., vehicles). However, all operational emissions associated with the 2012-2030 General Plan Update fall far below significance thresholds. To illustrate, the 2012-2030 General Plan Update is expected to emit 55.04 pounds per day of CO during the summer, and the current SCAQMD threshold for CO is 550 pounds per day.¹⁶ The Air Quality Analysis found that operational emissions will not exceed pollutant thresholds.¹⁷

The Air Quality Analysis found the 2012-2030 General Plan Update's contribution to cumulative impacts is not cumulatively considerable.¹⁸ Additionally, the City has adopted measures to reduce construction and operational emissions for all future development. The following goals, objectives and policies will reduce air quality impacts to a level that is **less than significant**.

Conservation Goal 9 – Maintain Land Use policies that have minimal impact on existing air quality.

Conservation Goal 10 – Maximize efforts to reduce air pollution from mobile sources.

¹⁴ Air Quality and Greenhouse Gas Evaluation, 2012-2030 City of Bradbury General Plan Update, p. 11.

¹⁵ Air Quality and Greenhouse Gas Evaluation, 2012-2030 City of Bradbury General Plan Update, p. 22.

¹⁶ Air Quality and Greenhouse Gas Evaluation, 2012-2030 City of Bradbury General Plan Update, p. 24.

¹⁷ Air Quality and Greenhouse Gas Evaluation, 2012-2030 City of Bradbury General Plan Update, p. 23.

¹⁸ Air Quality and Greenhouse Gas Evaluation, 2012-2030 City of Bradbury General Plan Update, p. 4.

Conservation Goal 11 – Strive to achieve ambient levels of particulate matter to meet State and Federal clean air standards.

Conservation Policy 20 – Protect and improve air quality through coordinated efforts with other public agencies and jurisdictions.

(d) Expose sensitive receptors to substantial pollutant concentrations?

The SCAQMD updates the AQMP every three years to include control measures to reduce major sources of pollutants. These planning efforts have substantially decreased the population's exposure to unhealthful levels of pollutants, even while substantial population growth has occurred within the Los Angeles basin. The total number of days on which the basin exceeded the federal 8-hour standard has decreased dramatically over the last two decades from about 150 days to less than 90 days.

The Initial Study for the 1994 General Plan recognized that the City was predominantly built-out and did not anticipate long term impacts on sensitive receptors. Short term construction impacts were analyzed in the EIR and found to be less than significant.

The Air Quality Analysis found the 2012-2030 General Plan Update does not have the potential to expose sensitive receptors to substantial pollutant concentrations.¹⁹ The General Plan Update would not place new or modified sources of toxic air contaminants (TACs) near sensitive receptors.²⁰ Moreover, the General Plan Update would not place new sensitive receptors near any existing sources of TACs. Therefore, **no impacts** regarding this issue area will occur.

(e) Create objectionable odors affecting a substantial number of people?

Recognizing that future development would be residential in nature, the 1994 General Plan Initial Study did not anticipate impacts related to odor. Similarly, the 2012-2030 General Plan Update does not include changes in land use that would generate objectionable odors. Major sources of odors include uses such as large-scale farming, wastewater treatment plants, industry, and landfills.²¹ The 2012-2030 General Plan Update will not introduce any of these uses, or any similar uses, to the City.

Minor sources of odors include uses associated with construction.²² Of these minor sources, the use of diesel engines is the predominate source of odors. Diesel-fueled trucks and equipment traveling along rail lines and roadways would produce diesel exhaust fumes, which may be considered offensive to individuals. However, any diesel fumes would be temporary and would disperse rapidly with distance. Receptors would not be exposed to frequent or long-term diesel fumes.

The 2012-2030 General Plan Update will not generate odors which would affect a substantial number of people, therefore, impacts related to odors are **less than significant**.²³

¹⁹ Air Quality and Greenhouse Gas Evaluation, 2012-2030 City of Bradbury General Plan Update, p. 4.

²⁰ Air Quality and Greenhouse Gas Evaluation, 2012-2030 City of Bradbury General Plan Update, p. 25.

²¹ Air Quality and Greenhouse Gas Evaluation, 2012-2030 City of Bradbury General Plan Update, p. 27.

²² Air Quality and Greenhouse Gas Evaluation, 2012-2030 City of Bradbury General Plan Update, p. 27.

²³ Air Quality and Greenhouse Gas Evaluation, 2012-2030 City of Bradbury General Plan Update, p. 4.

IV. BIOLOGICAL RESOURCES: Would the project:

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

Lands in the City of Bradbury are largely urbanized and the lower slopes contain few significant biological resources. Areas that provide habitat for sensitive or special-status species are primarily located in the northern, steep slopes near the Angeles National Forest. The types of vegetation expected in these areas include: Coastal Scrub, Chaparral, Oak Woodland and Riparian Woodland. A variety of mammals, birds and reptiles occur in the northern portion of the City. Most prevalent among the mammals are deer, bear, coyote, bobcats, raccoon, skunk, rabbits, mice rats, opossums and squirrels. Typical birds include varieties of scrub jay, hummingbird, warbler, wren and sparrow. Reptiles found in the hillside area include: lizards, rattlesnakes and garter snakes.²⁴ Prior to development of land located in a Resource Management Area, as specified in the Community Resource Element²⁵, detailed studies will be required to determine the magnitude of any potential impacts in order to ensure any impacts are less than significant.

The 1994 General Plan established three sensitivity categories for biological resources. Low Sensitivity areas have no significant habitats remaining. Areas with Moderate Sensitivity contain remnants of environmentally sensitive habitats or may be adjacent to ecologically sensitive areas. Development on these Moderately Sensitive areas could negatively impact adjacent parcels. Finally, Areas with High Sensitivity have not been disturbed and maintain the original native vegetation. Fields surveys are required for any new development in the high sensitivity areas, including the northern hillside areas. The 1994 General Plan EIR found impacts to biological resources to be less than significant without mitigation. In addition, the 1994 General Plan resulted in the adoption of Hillside Development Standards which promote development guidelines for new projects.

For the Bradbury 2012-2030 General Plan Update, a California Natural Diversity Data Base (CNDDDB) Survey was prepared. This report identifies biological resources potentially occurring in or nearby the City by reviewing the CNDDDB and aerial photos of the area²⁶. The survey found no US Fish and Wildlife designated critical habitat occurring in the City. One CNDDDB-sensitive community, southern coast live oak riparian forest, was documented in Bradbury Canyon and Bliss Canyon.²⁷ Seven other vegetation communities were identified in the 25-square mile survey area.²⁸ The CNDDDB search also identified 31 plant species and 32 wildlife species with the potential to occur in Bradbury.²⁹ However, the survey further explains that many of the species identified are habitat specialists, meaning that they only live in one specific

²⁴ City of Bradbury 1994 General Plan Environmental Impact Report, p. 3-41.

²⁵ 2012-2030 City of Bradbury General Plan Update, Community Resource Element, p. 16.

²⁶ City of Bradbury CNDB Search, January 17, 2014, p. 1.

²⁷ City of Bradbury CNDB Search, January 17, 2014, p. 2.

²⁸ City of Bradbury CNDB Search, January 17, 2014, p. 9.

²⁹ City of Bradbury CNDB Search, January 17, 2014, Table 1 p. 3-8

habitat. That habitat and those species were included because there was not sufficient habitat data available at the time of the survey to rule out their potential occurrence.³⁰

The 2012-2030 General Plan Update continues the land use and resource protection policies established in the 1994 General Plan, readopted in 2007 and described above. The proposed plan augments these protections with the following goals and policies:

Open Space Goal 1 – Protect and enhance Bradbury's Open Space.

Open Space Policy 1 – Protect and preserve oak woodlands and mandate replacement planting of native oaks where oak woodlands are proposed for alteration.

Open Space Policy 3 – Mandatory replacement planting of native trees and oaks.

Open Space Policy 4 – Protect existing Blueline Streams.

Open Space Policy 7 – Protect wildlife and their habitats, including rare and endangered species.

Conservation Goal 8 – Ensure that development in the steep foothill area is sensitive to the local environment.

Conservation Policy 6 – Conserve riparian vegetation.

Conservation Policy 7 – Conserve wildlife habitat and assist residents in living with wildlife.

Conservation Policy 8 – Conserve oak woodlands.

Conservation Policy 12 – Protect sensitive plant species and their habitats.

Conservation Policy 13 – Protect rare, threatened, or endangered species.

Conservation Policy 14 – Explore the use of Habitat Conservation Plans and Natural Communities Conservation Programs.

Conservation Policy 19 – Protect natural resources.

The impacts on candidate, sensitive or special species are considered ***less than significant***

(b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies and regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

Refer to response to IV(a). Impacts on riparian habitat or other sensitive natural community are considered ***less than significant***.

³⁰ City of Bradbury CNDB Search, January 17, 2014, p. 2

(c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

There are no federally-protected wetlands in the City.³¹ Refer to responses to IV(a). Impacts on federally protected wetlands are ***less than significant***.

(d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Protection of the migration patterns was achieved in the 1994 General Plan and continues in the 2012-2030 General Plan Update through the designation and classification of Sensitivity Areas and the low density residential patterns. Sensitivity Area policies protect habitat and low density land use patterns provide connections to the Angeles National Forest.

The 2012-2030 General Plan Update proposes no substantive changes to existing land use classifications or development envelopes that would create additional impacts to biological resources within the City. In addition, the goals and policies proposed in the 2012-2030 General Plan Update and listed in response IV(a) ensure impacts will be ***less than significant***.

(e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Refer to response to IV(a). There are ***no impacts*** resulting from conflicts with local policies or ordinances protecting biological resources.

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

Presently, there are no Habitat Conservation Plans, Natural Community Conservation Plans, or other approved local, regional, or State Habitat Conservation plans that apply to the City. However, Conservation Policy 14 in the 2012-2030 General Plan Update proposes exploring the use of these types of plans in the future. Lastly, given that the 2012-2030 General Plan Update proposes no substantive changes to existing land use classifications or development envelopes, ***no impacts*** in regards to this issue area will occur.

³¹ City of Bradbury CNDB Search, January 17, 2014, p. 2.

V. CULTURAL RESOURCES: Would the project:

(a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

The City of Bradbury does not have any sites listed as Federal and/ or State resources (listed on the National Register of Historical Place or California Register of Historic Resources, or otherwise listed as historic or potentially historic in the California Historic Resources Information System (CHRIS) maintained by the State Office of Historic Preservation). Places having local historic significance include the following sites:³²

- 1775 Royal Oaks Drive, North. This property contains an old stone milk house, and cistern.
- 5 Bradbury Hills Road. This property contains a single-story prairie style home that was designed by the Frank Lloyd Wright studio.
- 555 Deodar Lane. This site contains an old building referred to as the stone carriage house.
- 2001 Gardi Street. This site is the location of an 1890's two-story Queen Ann Farm House.

It is anticipated that as the City matures some structures or sites may be identified as worthy of preservation due to their age or the relationship to significant events in local history. In addition, ground-disturbing activities, particularly in areas that have not previously been excavated, have the potential to damage or destroy historic resources that may be present on or below the ground surface.

The 1994 General Plan relied on the general plan policies to ensure that historic resources were protected. The EIR for that document stated that the Conservation Element would serve as the primary tool to prevent impacts to these resources and impact levels would be insignificant with implementation of the proposed conservation plan.³³ Similarly, the 2012-2030 General Plan Update includes:

- Open Space Policy 6 – Preservation of historically or culturally significant sites.
- Conservation Policy 21 – Protect archaeological, historical and paleontological resources.

The 2012-2030 General Plan Update proposes no substantive changes to existing land use classifications or development envelopes. Additionally, policies and programs proposed and currently existing will ensure continued protection of these resources resulting in ***less than significant impacts***.

³² 2012-2030 City of Bradbury General Plan Update, Community Resources Element, p. 4.

³³ City of Bradbury 1994 General Plan Environmental Impact Report, p. 3-65.

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

No archaeological resources have been identified in the City and the potential for the existence of archaeological resources is low in the developed areas of the City due to previous construction-related, ground disturbing activities. Even so, ground-disturbing activities, particularly in areas that have not previously been excavated, have the potential to damage or destroy prehistoric archaeological resources that may be present on or below the ground surface.³⁴ Archaeological resources are often of cultural or religious importance to Native American groups, particularly if the resource includes human or animal burials.

The 1994 General Plan relied on the General Plan Conservation and Land Use policies to ensure that archaeological resources were protected. Particularly effective were land use policies limiting development and consequently excavation work to urbanized areas. Additionally, City regulations require all construction work to cease if a potential archeological resource is discovered and only continue once the potential resource has been evaluated. The 1994 General Plan EIR found that impacts related to archaeological resources were less than significant with the adoption of the Conservation Element.

The 2012-20130 General Plan Update also proposes the following policies to protect archaeological resources:

Conservation Policy 14 – Explore the use of Habitat Conservation Plans and Natural Communities Conservation Programs.

Conservation Policy 19 – Protect natural resources.

Conservation Policy 21 – Protect archaeological, historical and paleontological resources.

These policies ensure that archaeological resources are protected and impacts to archaeological resources are ***less than significant***.

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

Paleontological resources may be present in fossil bearing soils and rock formations below the ground surface. Ground-disturbing activities in fossil-bearing soils and rock formations have the potential to damage or destroy paleontological resources that may be present below the ground surface. Therefore, construction-related and earth-disturbing actions could damage or destroy fossils in these rock units.

The 1994 General Plan relied on the general plan Conservation and Land Use policies to ensure that paleontological resources were protected. Additionally, State and City regulations require all construction work to cease if a potential paleontological resource is discovered and only continue once the potential resource has been evaluated. The 1994 General Plan EIR

³⁴ City of Bradbury 1994 General Plan Environmental Impact Report, p. 3-62.

found that impacts related to paleontological resources were less than significant with the adoption of the Conservation Element.

The 2012-2030 General Plan Update also proposes policies to protect archaeological resources. Specifically, Conservation Policy 21 stated above, ensures that archaeological resources are protected and impacts related to this issue area are ***less than significant***.

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

Human burials outside of formal cemeteries often occur in prehistoric archeological contexts. Although the majority of the City is built out, the potential still exists for these resources to be present.

The 1994 General Plan relied on the general plan Conservation and Land Use policies to ensure that paleontological resources were protected. State, County and local regulations require all construction work to cease if a human body is discovered and only continue once the potential resource has been evaluated.

The 2012-2030 General Plan Update also proposes policies to protect archaeological resources. Specifically, Conservation Policy 21 stated above, ensures that paleontological resources are protected and impacts related to this issue area are ***less than significant***.

VI. GEOLOGY AND SOILS: Would the project:

(a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

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

ii) Strong seismic ground shaking?

iii) Seismic-related ground failure, including liquefaction?

iv) Landslides?

Similar to other communities located in the Los Angeles basin, the City of Bradbury is exposed to risk from multiple earthquake fault zones. The highest risks originate from the Sierra Madre and Duarte faults both delineated on the Alquist-Priolo Earthquake zone map. Areas of the City, which are underlain by faults, may be prone to earthquake induced ground surface rupture, strong seismic shaking, seismic-related ground failure, including liquefaction, and landslides.

The 1994 General Plan addressed potential seismic impacts through adoption of land use policies and a development plan that encouraged low density development. Safety policies more directly responded to potential risks resulting from seismic activity. With these policies in place, the General Plan EIR found seismic-related impacts to be less than significant.

The 2012-2030 General Plan Update does not propose substantive changes to existing land use classifications or development envelopes and continues to respond to seismic impacts with Land Use policies and safety goals. Additionally, the Update includes a policy that requires all new construction to adhere to the most current building and seismic codes. Proposed strategies to address seismic impacts ensure that impacts are ***less than significant***.

Safety Element Goal 1 – To protect the citizens, their property and public facilities from natural and man-made hazards.

Safety Element Goal 2 – To establish, maintain, and develop awareness on the part of all residents of Bradbury as to how to react and protect themselves and each other, in the event of a natural or man-made hazard or disaster.

Safety Element Goal 4 – To minimize the risk to persons and property due to seismic activity.

Safety Element Goal 7 – Protect the community from foods and landslides.

Safety Element Objective 1 – Prepare the community for expected or unexpected disasters resulting from natural or manmade causes.

Safety Element Objective 6 – Assure that potential flooding and landslide hazards are reviewed during new development.

Safety Element Policy 2 – Implement precautionary measures in high risk areas to reduce injury and loss of property caused by natural or manmade hazards.

Safety Element Policy 3 – Review all development proposal for compliance with established hazard avoidance criteria.

Safety Element Policy 12 – Restrict development in areas prone to seismic hazards.

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

The 1994 General Plan EIR discussed this issue area under Earth Resources and proposed a number of policies and implementation programs that addressed the geologic and seismic hazards that are present in the planning area. The EIR stated that these policies and programs would mitigate impacts associated with any new development proposed and any adverse impacts associated would be mitigated by the policies, programs, land use controls, and building and engineering methods.³⁵

³⁵ City of Bradbury 1994 General Plan Environmental Impact Report, p. 3-23-24.

Erosion is the natural process by which earth materials are loosened, worn away, decomposed, or dissolved, and transported to another site.³⁶ Precipitation, runoff, running water, and wind are common agents of erosion. The potential for erosion is generally low in exposed natural slopes but it greatly increases when slopes have been denuded of all ground cover and vegetation. Barren slopes are more susceptible to erosion and subject to riling or raveling.

The 2012-2030 General Plan Update does not include substantive changes in land use or allowable development envelopes. Continuation of existing programs as well as new polices such as Open-Space Policy 5 which specifically addresses the prevention of soil erosion ensures that impacts associated with soil erosion or loss of topsoil are **less than significant**.

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

The 1994 General Plan EIR discussed this issue area under Earth Resources and proposed a number of polices and implementation programs that addressed the geologic and seismic hazards that are present in the planning area. The EIR stated that these policies and programs would mitigate impacts associated with any new development proposed and any adverse impacts associated would be mitigated by the policies, programs, land use controls, and building and engineering methods.³⁷

Alluvium, which generally consists of fine particles such as silt and clay along with larger particles like sand and gravel, is generally highly susceptible to ground shaking and is considered an expansive soil. Soils in the City are predominantly alluvium within lower developed portions of the City. Using unsuitable materials for fill and/or foundation support would have the potential to create future heaving, subsidence, spreading, or collapse problems leading to building settlement and/or utility line and pavement disruption. The City requires a site-specific foundation investigation and report for any new development that identifies potentially unsuitable soil conditions and contains appropriate recommendations for foundation type and design criteria that conform to the analysis and implementation criteria described in the City's Building Code.

The 2012-2030 General Plan Update does not include substantive changes in land use or allowable development envelopes. It will continue established policies and programs. As a result, with the additional policies listed below impacts related to these issue areas are **less than significant**:

Open Space Policy 5 – Prevention of soil erosion.

Safety Policy 20 – Require that all new development incorporate sufficient measures to mitigate flood and landslide hazards including but not limited to on-site drainage systems and grading of site to minimize storm-water runoff.³⁸

³⁶ 2012-2030 City of Bradbury General Plan Update, Health and Safety Element, p. 20.

³⁷ City of Bradbury 1994 General Plan Environmental Impact Report, p. 3-23-24.

³⁸ 2012-2030 City of Bradbury General Plan Update, Community Resources Element, p. 7; 2012-2030 City of Bradbury General Plan Update, Health and Safety Element, p. 35.

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

The 1994 General Plan EIR under Earth Resources found that no impacts in regards to expansive soil would occur.

Expansive soil is any soil with an expansion index greater than twenty. The 2012-2030 General Plan Update does not include substantive changes in land use or allowable development envelopes. Impacts associated with expansive soil are ***less than significant***.

(e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

The 1994 General Plan EIR discussed this issue area under Earth Resources and proposed a number of policies and implementation programs that addressed the geologic and seismic hazards that are present in the planning area. The EIR stated that these policies and programs would mitigate impacts associated with any new development proposed and any adverse impacts associated would be mitigated by the policies, programs, land use controls, and building and engineering methods.³⁹

The majority of the total 400 single-family dwelling units in the City of Bradbury provide privately owned and maintained septic systems to process effluent generated on-site.⁴⁰ Agricultural areas do not have public sewers. Only a small portion of the City has access to public sewer services. The public mainline sewer system is maintained by the Los Angeles County Sewer Maintenance District.

There are thirty-two vacant lots and five underutilized parcels of land in the City of Bradbury.⁴¹ If development were to occur, the City could expect to add 91 additional dwellings. Although many of the new dwelling units will not have access to a public sewer system, the existing public sewer system has the capacity to accommodate the projected additional number of dwelling units. Any new construction would be subjected to existing development regulations and compliance with current seismic and geologic hazard safety standards, including design and construction standards that regulate land use in areas known to have or potentially have significant seismic and/or other geologic hazards.

The 2012-2030 General Plan Update does not include substantive changes in land use or allowable development envelopes and the goal, objectives and policies listed above in response VI (a) and (c) as it relates to soil stability will ensure impacts related to this issue area are ***less than significant***.

³⁹ City of Bradbury 1994 General Plan Environmental Impact Report, p. 3-23-24.

⁴⁰ 2012-2030 City of Bradbury General Plan Update, Community Resources Element, p. 30.

⁴¹ 2012-2030 City of Bradbury General Plan Update, Community Resources Element, p. 30.

VII. GREENHOUSE GAS EMISSIONS: Would the project:

Currently, no state or regional regulatory agency has formally adopted or widely agreed upon thresholds of significance for greenhouse gas emissions. CEQA Guidelines Section 15064.7 states that “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.” This section allows lead agencies to determine their own climate change thresholds.

The Association of Environmental Professionals (AEP) recommends that “[i]f a Lead Agency chooses to address GCC [Global Climate Change] in a [CEQA] document, it should be addressed in the context of a cumulative (versus project-specific) impact.” Additionally, according to the California Air Pollution Control Officers Association (CAPCOA):

“To determine what emission reductions are required for new projects one would have to know accurately the 1990 budget and efficacy of other GHG promulgated regulations as a function of time. Since the California Air Resources Board (CARB) will probably not outline its regulation strategy for several more years, it is difficult to determine accurately what the new project reductions should be in the short term.”

Additional guidance was given by the legislature in 2007 under SB 97, amending CEQA to establish that GHG emissions and their impacts are appropriate subjects for CEQA analysis. But the law does not address the evaluation and determination of significance. The law simply directs the State's Office of Planning and Research ("OPR") to develop draft CEQA Guidelines “for the mitigation of greenhouse gas emissions or the effects of greenhouse gas emissions” and directs the State Resources Agency to certify and adopt the CEQA Guidelines. Until that time, the OPR has issued a Technical Advisory (“Addressing Climate Change through CEQA Review”) to help guide agencies through the process by providing suggested standards for calculating GHG emissions, determining potential significance, and implementing mitigation measures, if necessary and feasible.

The City of Bradbury has begun requiring reductions in greenhouse gas emissions through the preparation of a Draft Greenhouse Gas Inventory and Forecast, which will provide thresholds for specific impacts and each development would be evaluated on a case-by-case basis. Additionally, the 2012-2030 General Plan Update includes the Climate Action Plan Element which proposed several Goals, Objectives, Policies and Actions that are related to the reduction of GHG emissions. As thresholds and regulations develop, new construction will be evaluated using the most up to date evaluation criteria and will be constructed consistent with the most current requirements.

Although the 1994 General Plan EIR did not analyze greenhouse gas emissions, the General Plan EIR contained enough information about existing land use, zoning and air quality that with the exercise of reasonable diligence, information about greenhouse gases and greenhouse gas emissions was readily available to the public and the impacts for consideration and evaluation. Therefore, impacts resulting from greenhouse gas emissions are not a new impact.