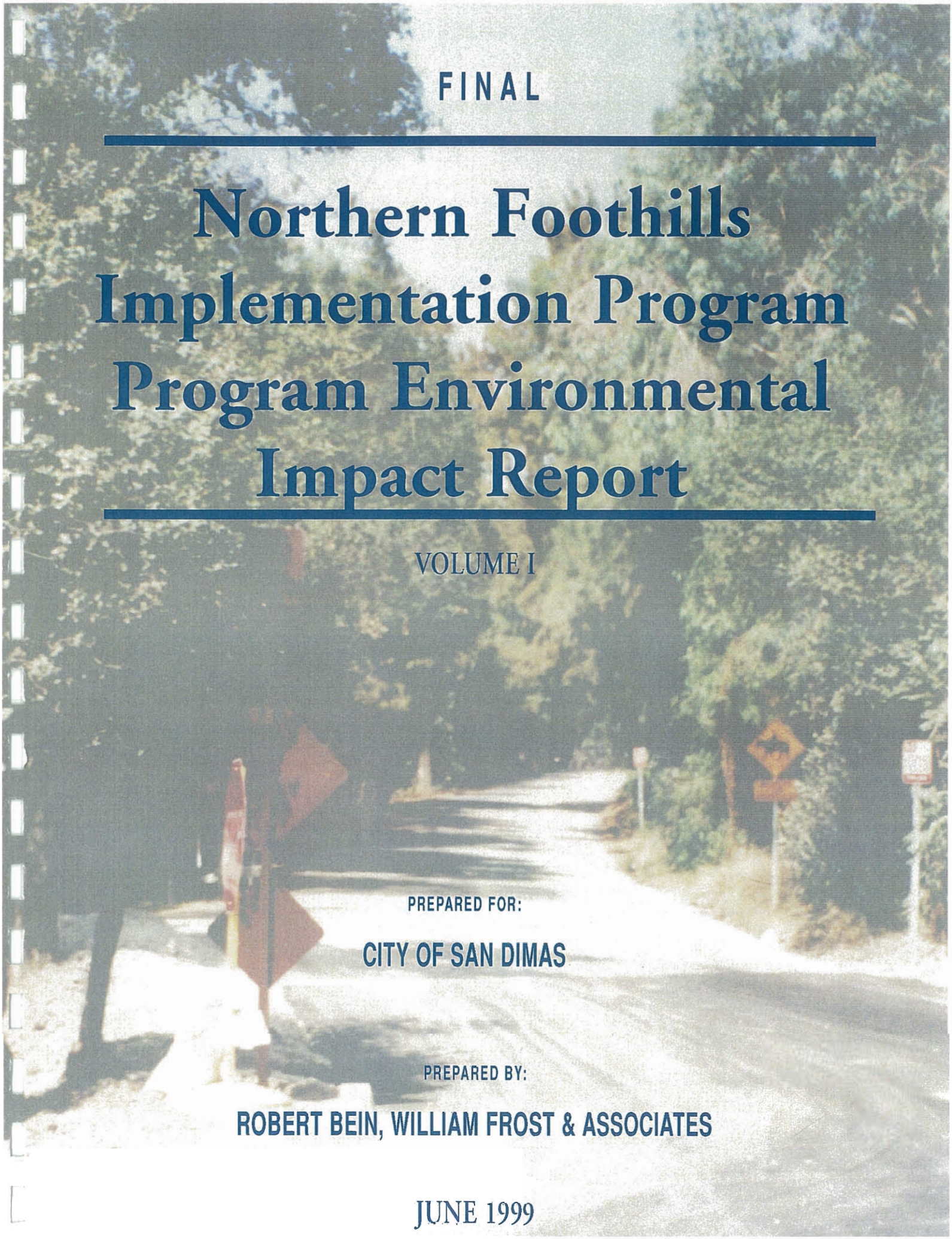

FINAL

Northern Foothills Implementation Program Program Environmental Impact Report

VOLUME I

PREPARED FOR:

CITY OF SAN DIMAS

PREPARED BY:

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FINAL

PROGRAM ENVIRONMENTAL IMPACT REPORT

for the

NORTHERN FOOTHILLS IMPLEMENTATION PROGRAM

VOLUME I

SCH # 98121072

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1.0 Introduction and Purpose

1.0 INTRODUCTION AND PURPOSE

1.1 PURPOSE OF THE EIR

The City of San Dimas is the lead agency under the California Environmental Quality Act (CEQA), and is responsible for preparing the Environmental Impact Report (EIR) for the Northern Foothills Implementation Program (State Clearinghouse No. 98121072. This EIR has been prepared in conformance with CEQA (California Public Resources Code Section 21000 et seq.), California CEQA Guidelines (California Code of Regulations, Title 14, Section 15000 et seq.), and the rules, regulations, and procedures for implementation of CEQA, as adopted by the City of San Dimas. The principal CEQA Guidelines sections governing content of this document are Sections 15120 through 15132 (Content of an EIR), and Section 15168 (Program EIR).

Due to the fact that specific characteristics of individual projects resulting from the Northern Foothills Implementation Program have not been specified at this time, the EIR will be prepared as a Program EIR in accordance with Section 15168 and 15180(b) of the CEQA Guidelines. The intent of this review process is to address plan components, present what can be deemed as a "worst case scenario" in terms of possible buildout and public improvements and formulate a master document which will be utilized as the environmental clearance for the Implementation Program and future development proposals. The EIR will be utilized as the master CEQA clearance document for future focused studies, if determined necessary by the City, which will tier off of the Program EIR in accordance with Section 15152 of the CEQA Guidelines. Section 15168 of the CEQA Guidelines is cited as follows:

> *"(a) General. A Program EIR is an EIR which may be prepared on a series of actions that can be characterized as one large project and are related either:*
>
> *(1) Geographically,*
> *(2) As logical parts in the chain of contemplated actions,*
> *(3) In connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program, or*
> *(4) As individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways.*
>
> *(b) Advantages. Use of a Program EIR can provide the following advantages. The Program EIR can:*

(1) Provide an occasion for a more exhaustive consideration of effects and alternatives than would be practical in an EIR on an individual action,

(2) Ensure consideration of cumulative impacts that might be slighted in a case-by-case analysis,

(3) Avoid duplicative reconsideration of basic policy considerations,

(4) Allow the Lead Agency to consider broad policy alternatives and program-wide mitigation measures at an early time when the agency has greater flexibility to deal with basic problems or cumulative impacts, and

(5) Allow reduction in paperwork.

(c) Use with Later Activities. Subsequent activities in the program must be examined in the light of the Program EIR to determine whether an additional environmental document must be prepared.

(1) If a later activity would have effects that were not examined in the Program EIR, a new Initial Study would need to be prepared leading to either an EIR or a Negative Declaration.

(2) If the agency finds that pursuant to Section 15162, no new effects could occur or no new mitigation measures would be required, the agency can approve the activity as being within the scope of the project covered by the Program EIR, and no new environmental document would be required.

(3) An agency shall incorporate feasible mitigation measures and alternatives developed in the Program EIR into subsequent actions in the program.

(4) Where the subsequent activities involve site specific operations, the agency should use a written checklist or similar device to document the evaluation of the site and the activity to determine whether the environmental effects of the operations were covered in the Program EIR.

(5) A Program EIR will be most helpful in dealing with subsequent activities if it deals with the effects of the program as specifically and comprehensively as possible. With a good and detailed analysis of the program, many subsequent activities could be found to be within the scope of the project described in the Program EIR, and no further environmental documents would be required."

The discussion following Section 15168 of the CEQA Guidelines describes the proper process for Program EIRs as follows:

> *"Use of the Program EIR also enables the Lead Agency to characterize the overall program as the project being approved at that time. Following this approach when individual activities within the program are proposed, the agency would be required to examine the individual activities within the program to determine whether their effects were fully analyzed in the Program EIR. If the activities have no effects beyond those analyzed in the Program EIR, the agency could assert that the activities are merely part of the program which had been approved earlier, and no further CEQA compliance would be required. This approach offers many possibilities for agencies to reduce their costs of CEQA compliance and still achieve high levels of environmental protection."* (Discussion following CEQA Guidelines, Section 15168 (emphasis added.)

The purpose of this Program EIR is to review the existing conditions, analyze potential environmental impacts, and suggest feasible mitigation measures to reduce potentially significant effects of the proposed Northern Foothills Implementation Program in the City of San Dimas.

1.2 COMPLIANCE WITH CEQA

This Program EIR is subject to a 45-day review period by responsible and trustee agencies and interested parties. Section 15087 of the CEQA Guidelines lists optional procedures for noticing including publication in a newspaper, posting on-site or mailing to owners of a property or properties contiguous to the site. In accordance with the provision of Sections 15085(a) and 15087(a)(1) of the State CEQA Guidelines, as amended, the City of San Dimas, serving as the Lead Agency, will: 1) publish a notice of availability of a Draft EIR in a newspaper of general circulation; and 2) will prepare and transmit a Notice of Completion (NOC) to the State Clearinghouse. (Proof of publication is available at the offices of the Lead Agency.) A copy of the NOC is provided at the front of this document.

Any public agency or members of the public desiring to comment on the Draft EIR must submit their comments in writing to the individual identified on the document's NOC prior to the end of the public review period. During the public review period, the City of San Dimas will hold a public hearing regarding the Draft EIR. The public will be afforded the opportunity to orally comment on the Draft EIR at the public hearing. Such comments shall be recorded and shall have the same standing and response requirements as written comments provided during the public review period. Upon the close of the public review period, the Lead Agency will then proceed to

evaluate and prepare responses to all relevant oral and written comments received from both citizens and public agencies during the public review period.

The Final EIR will consist of the Draft EIR, and revisions to the Draft EIR and responses to comments addressing concerns raised by responsible agencies or reviewing parties. After the Final EIR is completed and at least 10 days prior to its certification, a copy of the Responses to Comments will be transmitted to agencies providing written or oral comments on the Draft EIR.

1.3 EIR SCOPING PROCESS

In compliance with the State CEQA Guidelines, the City of San Dimas has taken steps to maximize opportunities for interested individuals, parties and agencies to participate in the environmental process. During the preparation of the Draft EIR, an effort was made to contact various Federal, State, regional, and local government agencies and other interested parties to solicit comments and inform the public of the proposed project. This included the distribution of an Initial Study and Notice of Preparation (NOP) on December 21, 1998, and a public scoping meeting on January 20, 1999.

Initial Study

In accordance with Section 15063(a) of the State CEQA Guidelines, as amended, the City undertook the preparation of an Initial Study. The Initial Study determined that a number of environmental issue areas may be impacted by the proposed project. As a result, the Initial Study determined that this Draft EIR should address the project's significant impacts on a variety of environmental issue areas.

Notice of Preparation

Pursuant to the provision of Section 15082 of the State CEQA Guidelines, as amended, the City of San Dimas circulated an NOP to public agencies, special districts, and members of the public requesting such notice for a 30-day period commencing December 21, 1998 and ending January 19, 1999. The purpose of the NOP was to formally convey that the City is preparing a Draft EIR for the Northern Foothills Implementation Program, and that as Lead Agency, was soliciting input regarding the scope and content of the environmental information to be included in the EIR. The Initial Study was circulated with the NOP. The NOP, Initial Study, and responses to the NOP are provided in Appendix 14.1 of this EIR.

The City received response letters from the following agencies:

- Bonita Unified School District;
- County of Los Angeles, Department of Parks and Recreation;
- County of Los Angeles, Department of Public Works;

- State of California, Department of Fish and Game;
- United States Department of the Interior, Fish and Wildlife Service;
- State of California, Department of Transportation, District 7;
- City of La Verne;
- Southern California Water Company;
- City of Pomona;
- County Sanitation Districts of Los Angeles County;
- Southern California Association of Governments; and
- Morrison & Foerster, LLP.

NOP and Scoping Results

The following specific environmental concerns were raised in responses to the NOP and in comments expressed during the scoping meeting held for the project (the numerical reference in parenthesis is the EIR Section in which the analysis is provided):

- Roads and Access (5.3);
- Equestrian and Pedestrian Trails (5.3);
- Fire Department Access (5.10);
- Endangered Species (5.8);
- Viewshed Protection (5.2);
- Ability of school buses and other services providers to access the area (5.10);
- Impacts on local elementary schools (5.10);
- Growth Inducing Impacts (6.2);
- Storm Water Runoff and Flooding (5.7);
- Wastewater Generation and Treatment (5.10); and
- Consistency with SCAG's Regional Comprehensive Plan (4.0, 5.1 and 6.2).

This EIR focuses primarily on changes in the environment that would result from the proposed project. The EIR identifies potential impacts of the proposed project and provides measures to mitigate potential significant impacts. Those impacts which cannot be mitigated to less than significant levels are also identified. This EIR addresses impacts in the following areas:

- Land Use and Relevant Planning;
- Aesthetics/Light and Glare;
- Access;
- Air Quality;
- Noise:
- Earth Resources;
- Hydrology and Drainage:
- Biological Resources;

- ❖ Cultural Resources: and
- ❖ Public Services and Utilities.

Based on the Initial Study, no impacts upon Traffic Volumes and Roadway Segments or Intersections, Short-Term Air Quality, Short-Term Noise, Energy and Mineral Resources, or Risk of Upset are anticipated as a result of the proposed project. As a result, these issues are not addressed in this Draft EIR.

1.4 FORMAT OF THE EIR

This Program EIR is organized into 14 sections.

1. Section 1.0, INTRODUCTION AND PURPOSE, provides CEQA compliance information.

2. Section 2.0, EXECUTIVE SUMMARY, provides a brief project description and summary of the environmental impacts and mitigation measures.

3. Section 3.0, PROJECT DESCRIPTION, provides a detailed project description indicating project location, project characteristics, phasing, and objectives, as well as associated discretionary actions required.

4. Section 4.0, BASIS FOR THE CUMULATIVE ANALYSIS, describes the approach and methodology for the cumulative analysis.

5. Section 5.0, DESCRIPTION OF ENVIRONMENTAL SETTING, IMPACTS AND MITIGATION MEASURES, contains a detailed environmental analysis of the existing conditions, project impacts, mitigation measures and unavoidable adverse impacts. The analysis of each environmental category in this Section is organized as follows:

    - ❖ "EXISTING CONDITIONS" describes the physical conditions which exist at this time and which may influence or affect the issue under investigation;

    - ❖ "PROJECT IMPACTS AND MITIGATION MEASURES." Under this subheading, the following will be provided: an impact statement; a conclusory statement regarding the level of significance after mitigation; impact analysis; and a listing of mitigation measures.

        - ♦ "Project Impacts" describes potential environmental changes to the existing physical conditions which may occur if the proposed project is implemented;

- "Mitigation Measures" are those specific measures which may be required of the project in order to avoid an adverse impact; minimize a significant adverse impact; rectify a significant adverse impact by restoration; reduce or eliminate a significant adverse impact over time by preservation and maintenance operations; or compensate for the impact by replacing or providing substitute resources or environment. The measures presented in this EIR are separated into those that would be implemented as part of project design and measures that would mitigate project impacts above and beyond any reduction in potential impacts accomplished by project design features;

- "Significance" (Level of Significance After Mitigation) discusses whether the project and the project's contribution to cumulative impacts can be reduced to levels that are considered less than significant.

- "Cumulative Impacts" describes potential environmental changes to the existing physical conditions which may occur with the proposed project together with other reasonably foreseeable, planned, and approved future projects; and

- "Unavoidable Significant Impacts" describes any unavoidable significant impacts that would be created by the proposed project after the implementation of mitigation measures.

6. Section 6.0, LONG-TERM IMPLICATIONS OF THE PROPOSED PROJECT, discusses significant environmental changes that would be involved in the proposed action, should it be implemented and discusses growth inducing impacts.

7. Section 7.0, ALTERNATIVES TO THE PROPOSED PROJECT, describes a reasonable range of alternatives to the project or to the location of the project which could feasibly attain the basic project objectives.

8. Section 8.0, INVENTORY OF MITIGATION MEASURES, lists mitigation measures proposed to minimize the significant impacts.

9. Section 9.0, INVENTORY OF SIGNIFICANCE AFTER MITIGATION, describes any impacts which would remain significant following mitigation.

10. Section 10.0, EFFECTS FOUND NOT TO BE SIGNIFICANT, provides an explanation of potential impacts which have been determined not to be significant.

11. Section 11.0 ORGANIZATIONS AND PERSONS CONSULTED, identifies all Federal, State or local agencies, other organizations and individuals consulted.

12. Section 12.0, BIBLIOGRAPHY, identifies reference sources for the EIR.

13. Section 13.0, MITIGATION MONITORING PROGRAM, identifies responsibilities for monitoring mitigation.

14. Section 14.0, APPENDICES, contains technical documentation for the project.

1.5 RESPONSIBLE AND TRUSTEE AGENCIES

Certain projects or actions undertaken by a Lead Agency require subsequent oversight, approvals, or permits from other public agencies in order to be implemented. Such other agencies are referred to as Responsible Agencies and Trustee Agencies. Pursuant to Sections 15381 and 15386 of the State CEQA Guidelines, as amended, Responsible Agencies and Trustee Agencies are respectively defined as follows:

> *"Responsible Agency"* means a public agency which proposes to carry out or approve a project, for which a Lead Agency is preparing or has prepared an EIR or Negative Declaration. For the purposes of CEQA the term "Responsible Agency" includes all public agencies other than the Lead Agency which have discretionary approval power over the project." *(Section 15381)*
>
> *"Trustee Agency* means a State agency having jurisdiction by law over natural resources affected by a project which are held in trust for the people of the State of California. Trustee Agencies include...." *(Section 15386)*

Responsible and Trustee Agencies and other entities may use the Program EIR in their decision-making process or for informational purposes.

1.6 INCORPORATION BY REFERENCE

Pertinent documents relating to this EIR have been cited in accordance with Section 15148 of the CEQA Guidelines encourages "incorporation by reference" as a means of reducing redundancy and length of environmental reports. The following documents, which are available for public review at the City of San Dimas, are hereby incorporated by reference into this EIR. Information contained within these documents

has been utilized for each section of this EIR. A brief synopsis of the scope and content of these documents is provided below.

- *City of San Dimas General Plan*, adopted in 1991. The General Plan is formulated for a projected "build-out" in the year 2020. The General Plan is comprised of a Land Use Element, Circulation Element, Housing Element, Open Space Element, Conservation Element, Noise Element and Safety Element. The General Plan includes an assessment of existing conditions; a synopsis of State-mandated planning requirements for each of the elements; development policies, comprised of goals, objectives, policies and plan proposals to guide the City's decision making; and implementation measures.

- *City of San Dimas Final Environmental Impact for the General Plan*, May 1991. The Final EIR addresses the impacts associated with build-out of the General Plan. No unavoidable adverse impacts were identified in the Final EIR. All impacts identified in the Final EIR could be mitigated to levels of insignificance with the implementation of identified mitigation measures.

- *City of San Dimas Zoning Ordinance*. Chapter 18 provides the provisions for promoting and protecting the public health, safety and welfare of the people of the City, to encourage the most appropriate use of land, and to conserve and stabilize the value of property. The Zoning Ordinance establishes classifications of land use zones and regulations for development within these zones.

- *City of San Dimas Noise Ordinance*, revisions adopted April 1988. It is the policy of Chapter 8.36 to use its police powers to reduce noise in the community by prohibiting unnecessary, excessive and annoying noises from all sources. The Noise Ordinance was created to both implement the goals of the noise element of the General Plan and prohibit unwanted and unnecessary sounds of all types within the community.

- *Northern Foothills Development and Infrastructure Study*, prepared by LSA Associates, November 1998. The purpose of the report was to identify physical and environmental attributes of the study area, assess the condition of available public services and facilities, and to analyze the policy context for future development within the study area. The report identifies development, infrastructure and policy issues.

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2.0 Executive Summary

2.0 EXECUTIVE SUMMARY

2.1 PROJECT SUMMARY

The City of San Dimas undertook the preparation of the *Northern Foothills Development and Infrastructure Study* as way to implement goals in the General Plan and to respond to the development moratorium imposed until July 22, 1999. The development strategy proposed in the *Northern Foothills Development and Infrastructure Study* (November 1998) would permit a maximum of up to 127 dwelling units on the 972 vacant acres, depending upon the City Council's final determination of density. Implementation of the Northern Foothills Implementation Program involves a General Plan Amendment and a Zone Change/Specific Plan.

2.2 ENVIRONMENTAL ISSUES/MITIGATION SUMMARY

The summary table, which includes impact statements, mitigation measures, level of significance, and unavoidable impacts, begins on page 2-3.

2.3 SUMMARY OF PROJECT ALTERNATIVES

As part of the *Northern Foothills Development and Infrastructure Study* prepared by LSA Associates, four development alternatives and their potential maximum development yield were developed. These include: A) Existing Strategy - 127 dwelling units; B) Reduced Density - 106 dwelling units; C) Additional Reduced Density - 80 dwelling units; and D) Further Reduced - 48 dwelling units. These four development scenarios serve as the base in selection of a CEQA Proposed Project and Alternatives to the CEQA Proposed Project for this EIR.

For purposes of this EIR, the CEQA Proposed Project is the Existing Strategy development scenario, which proposes a maximum of up to 127 dwelling units. The Reduced Density, Additional Density and Further Reduced Density development scenarios were selected as Alternatives to the CEQA Proposed Project, and will be analyzed in this Section.

Section 7.0, *Alternatives to the Proposed Project*, analyzes a range of reasonable alternatives to the proposed project that could feasibly attain the basic objectives of the proposed project, while evaluating the comparative merits of each alternative. Potential environmental impacts associated with six alternatives are compared to impacts from the proposed project below. These alternatives include: 1) No Project - No Development Alternative; 2) No Project - Existing General Plan Alternative; 3) Reduced Density Alternative; 4) Additional Reduced Density Alternative; 5) Further Reduced Density Alternative; and 6) Transfer of Development Rights Alternative.

The ***No Project - No Development Alternative*** would not allow any further development beyond what exists today. No additional development would be permitted in the project area.

The ***No Project - Existing General Plan Alternative*** would permit development to occur under the existing general plan designations and policies. Under this alternative, a maximum of 195 dwelling units would be permitted.

The ***Reduced Density Alternative*** would apply similar development standards as the proposed project. Under this alternative, a maximum of 106 dwelling units would be permitted.

The ***Additional Reduced Density Alternative*** would apply more stringent development standards than the proposed project. Under this alternative, a maximum of 80 dwelling units would be permitted.

The ***Further Reduced Density Alternative*** would apply the most stringent development standards of any of the alternatives proposed. Under this alternative, a maximum of 48 dwelling units would be permitted.

The ***Transfer of Development Rights Alternative*** would be permit development densities to be transferred within the project area. Under this alternative, a maximum of up to 127 dwelling units would be permitted.

Section 7.7 identifies the environmentally superior alternative. The Further Reduced Density Alternative was selected as the environmentally superior alternative to the proposed project.

2.2 ENVIRONMENTAL SUMMARY

IMPACTS	LEVEL OF SIGNIFICANCE	MITIGATION MEASURES	UNAVOIDABLE SIGNIFICANT IMPACTS
LAND USE			No unavoidable significant impacts related to land use and relevant plans and polices have been identified.
On-Site Land Use			
Implementation of the proposed project would result in the development of existing open space with a maximum of 127 single-family residential units, thereby altering portions of the project area to a permanent developed condition.	Less than significant impact with mitigation.	LU1. The City shall review all future proposals on a case-by-case basis to ensure that incremental impacts do not occur with any future development. If necessary, the City shall require additional environmental evaluations and clearances, and impose site-specific mitigation to further reduce any potential impacts.	
Compatibility with Surrounding Land Uses			
Future residential development of the 972 vacant acres would result in potential land use incompatibility with neighboring uses.	Less than significant.	No mitigation measures are required.	
Relevant Plans and Policies			
Future residential development of the 972 vacant acres would be consistent with relevant plans and policies of the City of San Dimas.	Less than significant.	No mitigation measures are required.	
Cumulative Impacts			
The proposed project combined with other future development, could increase the intensity of construction in the City of San Dimas.	Less than significant.	No mitigation measures are required.	

IMPACTS	LEVEL OF SIGNIFICANCE	MITIGATION MEASURES	UNAVOIDABLE SIGNIFICANT IMPACTS
AESTHETICS			Implementation of the proposed project would not result in unavoidable significant impacts related to aesthetics, light or glare. However, the permanent alteration of on-site topographic features remains a significant impact resulting from project implementation, even with imposition of mitigation measures.
Landform Alteration			
Construction of infrastructure and future residences within the project area would result in the permanent alteration of on-site topographic features.	Significant.	AES1. The City of San Dimas shall adopt the implementing policies and actions for Visual Intrusiveness for New Development in the *Northern Foothills Development and Infrastructure Study*. Future development proposals shall be reviewed to determine their compliance with the policies and actions. AES2. Grading for all future development proposals in the Northern Foothills project area shall be designed in accordance with all applicable grading criteria for Visual Intrusiveness for New Development in the *Northern Foothills Development and Infrastructure Study*.	

IMPACTS	LEVEL OF SIGNIFICANCE	MITIGATION MEASURES	UNAVOIDABLE SIGNIFICANT IMPACTS
		In addition to those standards imposed by other City ordinances and by the Northern Foothills Zoning, grading in the Northern Foothills area shall be subject to the following standards: AES3. Grading shall not exceed the minimum necessary to accommodate structures properly, as determined by the planning director or designee. AES4. Grading practices shall reflect the natural topography of the land. AES5. Creation of level area (i.e., pads) by grading shall be minimized. AES6. Grading on hillside areas or close to ridgelines shall incorporate the breaking of hard edges left by cut and fill operations to provide a more rounded appearance that closely resembles the natural contours of the land. AES7. Grading within residential subdivisions shall be finished so that it is responsive to the original configuration of the land, as well as the adjacent contours. AES8. All graded slopes (cut or fill), including roadsides, shall undergo a permanent revegetation in a timely manner to minimize any change of erosion and siltation. Backdrop landscaping shall be provided, with heavy complements of drought and fire resistant trees and shrubs, sufficient to reduce erosion and present a natural, undisturbed appearance.	

IMPACTS	LEVEL OF SIGNIFICANCE	MITIGATION MEASURES	UNAVOIDABLE SIGNIFICANT IMPACTS
		AES9. Created slopes within the residential areas or any subdivision shall have more variety and texture in their appearance than engineered and uniform slopes. Not only shall these planes be undulating in appearance, but they should also have slopes that vary in gradient. AES10. Created slopes, either cut or fill, that are adjacent to roadways shall be graded in such a way that an undulating appearance in the graded plan is provided for a more pleasing roadscape.	
Aesthetics			
Development associated with the proposed project would alter the visual character of the project area.	Less than significant impact with mitigation.	AES11. All future development proposals in the Northern Foothills project area shall be designed in accordance with all applicable criteria for Visual Intrusiveness for New Development in the *Northern Foothills Development and Infrastructure Study*. AES12. Wherever possible, structures shall be built with rooftops lower in elevation than any adjacent ridgelines. A specific setback from the ridge may be required by the City of San Dimas to protect the ridgeline viewshed. Ridgeline setbacks shall be determined on a project-by-project basis. AES13. Except for window surfaces, the use of polished or reflecting exterior building materials and finishes shall be avoided.	

IMPACTS	LEVEL OF SIGNIFICANCE	MITIGATION MEASURES	UNAVOIDABLE SIGNIFICANT IMPACTS
		AES14. On downhill sites, decks shall be located and designed to avoid tall and highly visible supports. Exposed areas under decks shall be screened with lattice, or similar treatments composed of fire-resistant materials. AES15. Individual residential units located within viewsheds shall be oriented to avoid creating a line of solid development. AES16. Open vistas shall be protected by such means as adequate setbacks, open space, building height limits, and view corridors pursuant to the *San Dimas Municipal Code*. AES17. Natural scenic features such as mature trees, rock outcroppings, watercourses, and views shall be integrated into individual project design subject to the approval by the City of San Dimas. AES18. Individual developments shall incorporate adequate landscape screening in order to minimize project views to off-site uses, as demonstrated in a Landscape Plan requiring review and approval by the City of San Dimas Development Plan Review Board (DPRB) on a project-by-project basis prior to the issuance of building permits. AES19. The architecture of structures in the hillside areas shall be consistent with the overall natural environmental qualities of the site; the architecture shall meld itself to the topography rather than dominate it.	

IMPACTS	LEVEL OF SIGNIFICANCE	MITIGATION MEASURES	UNAVOIDABLE SIGNIFICANT IMPACTS
		The following hillside architecture and urban design guidelines shall be employed in addition to those applicable throughout the City. The Development Plan Review Board shall determine that the architecture and urban design are satisfactory. A. Residential units shall be asymmetrically massed, with the horizontal portions far greater than the vertical proportions. B. Massing and proportions shall be consistent with the topography. C. Hillside architecture shall not dominate the environment; its forms and colors shall blend into the natural surroundings. The exterior finishes, textures and colors of hillside structures shall be restrained through the encouragement of earth-tone colors and the discouragement of reflective materials or finishes. Preference shall be given to the use of earth-tone colors and materials for roofs due to their visual impact. D. For a lower, more horizontal profile, structures shall be encouraged to be designed so that rooflines run parallel to the slope, rather than intersecting it.	

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Light and Glare			
Development of the proposed project would introduce new sources of light and glare into the area.	Less than significant impact with mitigation.	AES20. Lighting for all future development proposals in the Northern Foothills project areas shall be designed in accordance with all applicable lighting criteria for Visual Intrusiveness for New Development in the *Northern Foothills Development and Infrastructure Study*. AES21. Exterior lighting for buildings shall be the minimum necessary to provide for safety for pedestrians and other non-vehicular uses around the primary building on a parcel. Landscaping shall be used to reduce the long-range visibility of night lighting. AES22. Proper lighting techniques to direct light on-site and away from other properties, as determined by the City of San Dimas, shall be required to reduce light and glare (including directional lighting, use of non-reflective glass, use of appropriate types of lighting fixtures, and earthtone building materials). AES23. Windows with highly reflective treatments shall be avoided and windows shall be located as to avoid highly reflective sun orientations to surrounding properties.	
Cumulative Impacts			
Project development, along with cumulative projects, may result in greater urbanization within the northern portion of the City of San Dimas.	Less than significant.	No mitigation measures are required.	

IMPACTS	LEVEL OF SIGNIFICANCE	MITIGATION MEASURES	UNAVOIDABLE SIGNIFICANT IMPACTS
CIRCULATION			Implementation of the proposed project would not result in any significant adverse impacts with respect to access.
Implementation of the proposed project would require the installation of additional roadways to provide access for future residents.	Potentially significant. Implementation of the mitigation measures would ensure that a "backbone" road system is designed to provide adequate and safe access, and thus would reduce impacts to a less than significant level.	CIR1. Modify the footnote for Access Implementing Policies and Actions #1 to read as follows: "The 26-foot width is currently permitted for access roads, which do not directly serve development. The proposed revision would permit new development to front on 26-foot wide access roads, provided that additional on-site parking is made available."	
		CIR2. Modify the wording for the third bullet point under Access Implementing Policies and Actions #1 to read as follows: "Revise City roadway standards to provide an exception to current requirements for street paving along private roadways which will ultimately serve a maximum of four dwellings, based on the maximum density allowable in the General Plan. Such limited use roadways should be permitted to be hard packed (e.g., decomposed granite) as approved by the City Engineer, provided that adequate maintenance is guaranteed to ensure that the roadway will be regularly graded and kept clear of ruts and debris. Maximum grade shall be determined based on existing topographic conditions."	

IMPACTS	LEVEL OF SIGNIFICANCE	MITIGATION MEASURES	UNAVOIDABLE SIGNIFICANT IMPACTS
		CIR3. The City of San Dimas shall adopt the implementing policies and actions, as amended in Circulation Mitigation Measures CIR1 and CIR2, for Access and Infrastructure Planning, Financing and Construction in the *Northern Foothills Development and Infrastructure Study*. Future development proposals shall be reviewed to determine their compliance with the policies and actions. CIR4. For the three proposed roadways of the "backbone" road system, the maximum grade shall not exceed 12 to 15 percent, unless existing topography dictates an exception for short roadway segments. CIR5. A detailed study of Sycamore Flat Motorway is required. The study shall analyze the potential for the roadway grade not to exceed 12 to 15 percent. This maximum grade may not be attainable on all portions of the Sycamore Flat Motorway; however, every effort shall be made to achieve this objective, and to minimize the length and steepness of grades. The study shall also analyze ways in which the radius of the sharpest curves could be increased, and the grades could be improved beyond eliminating the need for the frequent dips to intercept drainage on the existing dirt road. In addition, the study shall determine the need and location, if warranted, for the following: guardrails on sharp curves, warning signs to inform drivers of the curves, and signs posting maximum safe speed.	

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		CIR6. Future roadways shall be constructed per the roadway standards illustrated on Exhibit 5.3-3, *Proposed Roadway Standards*.	
AIR QUALITY			Implementation of the proposed project would not result in unavoidable significant long-term impacts related to air quality.
Long-Term Air Quality Impacts			
Buildout of the proposed project area would result in an overall increase in the local and regional pollutant load due to direct impacts from vehicle emissions.	Less than significant impact with mitigation (mitigation included in AQMP, General Plan and General Plan EIR).	AQ1. In order to reduce emissions associated with both mobile and stationary sources, all future development projects submitted to the City for consideration shall adhere to the programs and policies contained in the City of San Dimas General Plan and mitigation measures outlined in the General Plan EIR. <u>General Plan EIR Mitigation Measures</u> AQ2. Dust control measures required by the SCAQMD to be implemented during construction shall be actively enforced by City Staff. Such measures include maintaining adequate soils moisture, as well as removing any soil spillage onto traveled roadways through site housekeeping procedures. AQ3. Reducing interference with existing traffic and preventing truck queuing around local receptors shall be incorporated into any project construction permits. The permits shall limit operation to daytime periods of better dispersion that minimizes localized pollutant accumulation.	

IMPACTS	LEVEL OF SIGNIFICANCE	MITIGATION MEASURES	UNAVOIDABLE SIGNIFICANT IMPACTS
Air Quality Management Plan			
The project would be considered consistent with the AQMP and Regional Comprehensive Plan and Guide.	Not significant.	No mitigation measures are required.	
Cumulative Impacts			
The proposed project, together with other future projects located outside of the project area, would increase cumulative pollutant emissions within the South Coast Air Basin.	Less than significant.	No mitigation measures are required.	
NOISE			Implementation of the proposed project would not result in unavoidable significant long-term impacts related to noise.
Long-Term Traffic Noise Impacts			
Implementation of future development projects within the project area would result in an increase in the ambient noise level beyond existing conditions.	Less than significant impact with adherence to Chapter 8.36 of the San Dimas Municipal Code and General Plan policies.	No mitigation measures are required.	
Cumulative Impacts			
The proposed project, combined with cumulative projects, would increase the ambient noise levels in the site vicinity.	Potentially significant. Impact analysis and mitigation determination evaluated on a project-by-project basis.	No mitigation measures are required.	

IMPACTS	LEVEL OF SIGNIFICANCE	MITIGATION MEASURES	UNAVOIDABLE SIGNIFICANT IMPACTS
GEOLOGY			Implementation of the proposed project would not result in unavoidable significant impacts related to geology and soils.
Structures associated with future development could potentially be subject to damage as a result of land accelerations associated with seismic activity.	Potentially significant. Mitigation incorporated on a project-by-project basis as recommended through detailed geotechnical evaluation would reduce impacts associated with seismic activity to less than significant levels in areas deemed suitable for development.	G1. The applicant(s) shall submit a geotechnical report for review and approval by the Director of Public Works. This report will primarily involve assessment of potential soil related constraints and hazards such as slope instability, settlement, liquefaction, or related secondary seismic impacts, where determined to be appropriate by the Director of Public Works. The report shall also include an evaluation of potentially expansive soils and recommend construction procedures and/or design criteria to minimize the effect of these soils on the proposed developments. All reports shall recommend appropriate mitigation measures and be completed in the manner specified by the City of San Dimas Subdivision Ordinance (Title 17). G2. The applicant(s) shall submit a report by an engineering geologist indicating the ground surface acceleration and potential ground surface rupture from earth movement for the various PDAs. All structures within the development shall be constructed in compliance with the g-factors as indicated by the geologist's report. Calculations for footings and structural members to withstand anticipated g-factors shall be submitted for review and approval by the Director of Public Works. G3. Future development projects shall comply with the California Building Code (Title 24 of the California Code of Regulations) and the San Dimas Building Code.	

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		G4. All grading and improvements on the subject property shall be made in accordance with Grading Ordinance (Municipal Code Chapter 15.04) and to the satisfaction of the director of Public Works. Grading shall be in substantial compliance with a tentative tract map and the proposed grading that is approved by the Planning Commission. Surety to guarantee the completion of the project grading and drainage improvements, including erosion control, shall be posted to the satisfaction of the Director of Public Works and the City Attorney. G5. The applicant(s) shall exercise special care during the construction phase of the project to prevent any off-site situation. The applicant shall provide erosion control measures and shall construct temporary desiltation/detention basins of a type, size and location as approved by the Director of Public Works. The basins and erosion control measures shall be shown and specified on the grading plan and shall be constructed to the satisfaction of the Director of Public Works prior to the start of any other grading operations. Prior to the removal of any basins or erosion control devices so constructed, the area served shall be protected by additional drainage facilities, slope erosion control measures and other methods as may be required by the Director of Public Works. The applicant shall maintain the temporary basins and erosion control devices until the Director of Public Works approves of the removal of said facilities.	

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		G6. The applicant(s) shall submit a grading plan, in compliance with City standards, for review and approval by the Director of Public Works. All grading work must be in compliance with the approved plan and completed to the satisfaction of the Director of Public Works. All slopes within this project shall be graded no steeper than 2:1, unless otherwise approved by the Director of Public Works. G7. The applicant shall submit a grading, drainage and retaining wall plan with a geotechnical soils report for review and approval by the Director of Public Works. G8. Any grading required outside of a PDA boundary will require the applicant(s) to either obtain slope easements or off-site grading agreements in a form suitable for recording from the affected applicant(s). G9. Given the amount of slope instability (i.e., landsliding) within the project area and the project proximity to major earthquake faults, the hazards associated with strong ground motion and possible surface rupture, in-depth, site-specific geotechnical studies shall be required to evaluate whether development within any of the 10 PDAs is not geotechnically feasible. At a minimum such studies should follow CDMG: Special Publication 17 (dated 1977), *Guidelines for Evaluating and Mitigating Seismic Hazards in California*. It is suggested that the scope of work presented in these "guidelines" be performed prior to any form of foundation investigation, unless such an investigation is to establish setbacks from known geologic hazards.	

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On-Site Disposal Systems			
Near surface conditions beneath the potential development areas (PDAs) may be conducive to the usage of on-site disposal systems.	Less than significant impact with mitigation.	G10. All septic systems (i.e., trench/leach fields and seepage pits) shall be installed at locations pursuant to the requirements of the Los Angeles County Health Department.	
Cumulative Impacts			
The proposed project, combined with other future development, may result in increase geologic impacts within the area.	Potentially significant. Mitigation incorporated on a project-by-project basis would reduce impacts to less than significant levels in areas deemed suitable for development.	G11. Site-specific geological evaluations shall be conducted on a project-by-project basis addressing remedial grading techniques, building setbacks, or special foundations for seismic areas, to the satisfaction of the appropriate jurisdiction Engineer.	
HYDROLOGY AND DRAINAGE			Implementation of the proposed project would not result in unavoidable significant impacts related to hydrology and drainage.
Surface Hydrology			
Implementation of future development projects within the project area would result in the conversion of existing natural terrain to a developed use, thus altering surface drainage patterns.	Less than significant impact with mitigation.	H1. The project applicant(s) shall provide and engineering hydrologic analysis of the development site watershed. Should the analysis indicate that the proposed development project would impact downstream facilities (i.e., inadequate capacity of the downstream storm drain system), construction of an on-site detention basin could be used as mitigation. On-site detention facilities, if necessary, shall be designed to provide the appropriate storm volume for the storm frequency indicated by the LACPW and the	

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		City of San Dimas City Engineer. Storm drain plans shall be subject to review and approval by the San Dimas City Engineer prior to the issuance of grading permits. H2. In connection with site plan and design review, all required drainage improvements associated with individual developments shall be designed in accordance with the LACPW and the City of San Dimas design standards and shall be reviewed and approved by the City of San Dimas City Engineer prior to the commencement of grading.	
Watershed Debris Production			
Debris production would be reduced by future developments within the vicinity of drainage areas.	Less than significant impact with mitigation.	H3. Prior to issuance of grading/building permits, the project applicant(s) shall provide site-specific engineering hydrologic analysis, to the satisfaction of the San Dimas City Engineer, to determine if debris basin(s) are necessary to reduce bulk flow. If determined necessary, the debris basin(s) shall be designed and constructed at the downstream ends of undeveloped drainage areas pursuant to LACPW methods and standards and subject to final design approval by the San Dimas City Engineer.	
Flooding			
Implementation of future development projects within the project area would increase surface water runoff, thereby potentially increasing the risk of flooding.	Less than significant impact with mitigation.	H4. Project applicant(s) shall comply with the requirements of the LACPW to minimize flooding risks associated with stream or riverbed excavation, to prevent any impediment to the flow of storm runoff, and to ensure restoration of disrupted flood control facilities.	

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		Proposed Roadways H5. Drainage system design requirements for the future developments and all future roadways shall follow the minimum criteria for Private Drains (PD) or Miscellaneous Transfer Drains (MTD) defined by LACPW. General criteria includes, but is not limited to: A. Any roadcrossing of natural drainages shall be designed to accommodate adequate capacity to convey the 50-year clear water discharge, or greater. ❖ Minimum stormdrain pipe size diameter is 24 inches, but if conveys debris then 48 inches; and ❖ Stormdrain flow velocity is limited to 20 feet per second (fps) if exceeded must use special pipe with additional concrete thickness. H6. Project applicant(s) shall allow canyon slopes to drain along their natural path and not divert flows from one watershed to another. Drainage facilities located within the proposed roadways shall be implemented pursuant to the requirements of the LACPW and the City of San Dimas.	
Water Quality			
Implementation of future developments could result in an increase in urban pollutant discharges into San Dimas and Big Dalton washes.	Less than significant impact with mitigation.	H7. Refer to Mitigation Measure G5, of Section 5.6, *Geology, Soils, and Seismicity.*	

IMPACTS	LEVEL OF SIGNIFICANCE	MITIGATION MEASURES	UNAVOIDABLE SIGNIFICANT IMPACTS
Groundwater			
The proposed project would not result in adverse impacts to the amount of available groundwater available or degrade groundwater quality.	Not significant.	No mitigation measures are required.	
Cumulative Impacts			
The proposed project, combined with other future development, may result in increased hydrology and drainage impacts in the area.	Potentially significant. Impacts must be evaluated and mitigated to less than significant levels on a project-by-project basis.	H8. Site-specific hydrology assessments subject to review and approval by the appropriate jurisdiction shall be prepared on a project-by-project basis to determine necessary mitigation in order reduce potential impacts to less than significant levels.	
BIOLOGICAL RESOURCES			No unavoidable significant impacts with respect to biological resources would occur with implementation of the proposed project.
Vegetation			
Development within the project area would result in the loss of native and non-native vegetation associations.	Less than significant impact with mitigation.	Native Grassland BIO1. Impacts to native grassland shall be mitigated by the restoration of native grassland on the cut/fill slopes, other areas disturbed by construction activities, and additional areas supporting non-native vegetation, shall be reseeded with native grassland plant species Revegetation shall occur at a ration of 2:1. That is, for every acre of native grassland removed, two acres of habitat shall be replaced. Restoration shall consist of hydroseeding with appropriate native bunchgrasses and forbs and include the following:	

IMPACTS	LEVEL OF SIGNIFICANCE	MITIGATION MEASURES	UNAVOIDABLE SIGNIFICANT IMPACTS
		A. Establishment of restoration/revegetation sites shall be conducted between September 1 and November 30. Introduction of hydroseed mix and container plants shall be immediately after preparation of the restoration sites. B. Revegetation shall be considered successful at three years if the percent cover and species diversity of the restored and/or created habitat areas are similar to percent cover and species diversity of adjacent existing habitats, as determined by quantitative testing of existing and restored and/or created habitat areas. C. Monitoring shall be conducted for three years to ensure successful establishment of the restored areas by native grasses and forbs. If success standards are not met, remedial measures, including hydroseeding or introduction of additional container stock shall be implemented as directed by the City of San Dimas and the project biologist. <u>Habitat Replacement - Mixed Willow Riparian Forest and Coast Live Oak Riparian Forest</u> BIO2. Impacts on wetlands and/or riparian habitats shall be mitigated as part of the mitigation required for any CDFG Section 1601 Streambed Alteration Agreement and/or ACOE Permit that may be processed for future development projects. As part of the permit/agreement, a conceptual streambed/riparian related mitigation plan would need to be developed. The objective	

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		of the mitigation is to ensure no net loss of habitat values from projects. The mixed willow riparian forest and coast live oak riparian forest are vegetation types that would be impacted by future development projects within the project area and shall require permitting. The mitigation plan shall include the following elements: A. Responsibilities and qualifications of the personnel to implement/supervise the plan; B. Plant material and seed mixes; C. Site preparation and planting implementation; D. Performance criteria; E. Monitoring and maintenance plan; F. Long-term preservation of the site; G. Agency coordination; and H. Construction document preparation.	
		BIO3. In addition, the native trees may also fall under the jurisdiction of the City of San Dimas Tree Ordinance. A detailed tree survey shall be completed in the impact areas prior to implementation of future development projects. The tree replacement shall consist of a minimum of two 15-gallon native tree specimens for each removal, unless approved otherwise by the City of San Dimas. Native tree mitigation programs shall include: A. A minimum of two 15-gallon native trees shall be planted on-site as replacement for one tree removed. B. The Landscape Architect/designer for the project shall design replacement trees into landscape plans and shall be subject to review by the City of San Dimas.	

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		C. Planting specification shall consider the following: • The newly planted trees shall be planted high, as much as 3/4 above the new adjacent grade. • Amending the backfill soil with wood shavings, etc. However, it is not recommended when existing soil is high in natural organic matter with a sandy loam texture. • In regards to the need of planting amendments and drainage systems, recommendations shall be based on soil tests of this project and approved by the City. D. Any City approved work within the driplines of saved trees, including branch removal, shall be under the inspection of a qualified arborist. E. Copies of the "Tree Report", the "Tree Ordinance" and the "City approved Grading Plans" shall be maintained on-site during all site construction. <u>Coastal Sage Scrub</u> BIO4. To mitigate for impacts to coastal sage scrub, the following measure shall be incorporated into any future development projects that include the removal of coastal sage scrub habitat types.	

IMPACTS	LEVEL OF SIGNIFICANCE	MITIGATION MEASURES	UNAVOIDABLE SIGNIFICANT IMPACTS
		A. All cut and fill slopes, other areas disturbed by construction activities, and additional areas supporting non-native vegetation, shall be reseeded with coastal sage scrub plant species. Revegetation shall occur at a ration of 2:1. That is, for every acre of coastal sage scrub removed, two acres of habitat shall be replaced. Revegetation shall be implemented in stages. The initial stage shall begin during site grubbing and shall consist of crushing/mulching scrub, within areas to be graded, with a dozer. The crushed/mulched material along with the top four to six inches (10 to 15 cm) of topsoil shall then be removed in one operation with a loader or dozer and stockpiled nearby as directed by the project biologist. Soil stockpiles shall be stored at depths no greater than seven feet (2 m) until revegetation sites are prepared and shall be maintained free of contamination (storage depths may require adjustment based upon length of storage). Stockpiles shall be stored no longer than six months. Once a restoration site is prepared (roughened by sheep's foot or similar equipment) the stockpiled soil shall be spread to a depth of approximately one foot (30 cm). Appropriate scrub container stock shall be incorporated into the revegetation areas as outlined in the detailed mitigation/restoration plan to be developed by the project biologist. In addition, container stock consisting of	

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		native bunchgrasses shall be incorporated into the planting. The redistributed material, along with the container stock, shall be watered by a temporary irrigation system until established, as determined by the project biologist. B. Crushed plant material and soil to be stockpiled shall be obtained from various locations on-site. Areas to be revegetated shall be determined by the project biologist based upon such factors as the configuration of the cut and/or fill slopes and proximity to areas of intact scrub communities. C. The timing of the stockpiling of plant material and topsoil shall be dictated by the grading/construction schedule. Reintroduction of stockpiled material to revegetation sites shall be conducted between September 1 and November 30. Container stock shall be planted during the same time period. D. Performance standards shall be developed and apply for the revegetation of coastal sage scrub. Generally these standards include 75 percent coverage by redistributed vegetative materials, seeded species, and container stock (whichever of the three or combination is used) at the end of five years. In addition, a 50 percent survival of any container stock originally planted is expected. If 50 percent survival has not been achieved, replanting with appropriate size container stock necessary to achieve this standard shall be performed.	

IMPACTS	LEVEL OF SIGNIFICANCE	MITIGATION MEASURES	UNAVOIDABLE SIGNIFICANT IMPACTS
		E. Monitoring of the revegetation areas shall be conducted for five (5) years to ensure successful colonization of the restored areas by scrub species. If success standards are not met, remedial measures, including hand seeding, hydroseeding, or introduction of additional container stock shall be implemented as directed by the City and the project biologist.	
Wildlife			
Development within the project area would result in the loss of native and non-native vegetation associations and the wildlife habitat they provide.	Less than significant impact with mitigation.	BIO5. Refer to Mitigation Measures BIO1 through BIO4.	
Wildlife Movement			
Future development associated with the proposed project could result in the reduction of wildlife movement within the project area.	Less than significant.	No mitigation measures are required.	
Special Status Biological Resources			
Implementation of future development projects may result in impacts to special status biological resources.	Potentially significant. Mitigation incorporated on a project-by-project basis would reduce impacts to special status biological resources to less than significant levels.	<u>Plants</u> BIO6. To fully document the potential impacts to sensitive plant species, focused surveys for the following state or federally listed threatened or endangered plant species shall be conducted during the optimal survey period prior to any development approvals from the City for any project. *Braunton's milkvetch* *Nevin's barberry* *Thread-leaved brodiaea*	

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		In addition, focused surveys may also be warranted for sensitive species that are not currently classified as endangered, threatened, or proposed for listing, but which may be listed in the future or would be of concern to state and federal resource agencies during future environmental review processes for projects. The following species may require focus surveys if specific project locations contain appropriate habitat: *Slender Mariposa lily* *Pious daisy* *Plummer's Mariposa lily* *Robinson's peppergrass* *San Gabriel Mountains dudleya* *Rayless ragwort* *Many-Stemmed dudleya* Focused surveys shall be conducted using the USFWS' survey protocol. In addition, surveys for federally listed species shall be conducted by qualified biologists that possess valid section 10(a)(1)(a) permits issued by USFWS. Should focused surveys find a state or federally listed threatened or endangered species, or a substantial population of other lower status special status plant species on-site, mitigation would need to be coordinated with the USFWS, CDFG, and/or CNPS and may include habitat preservation off-site or population relocation to off-site natural open space areas.	

IMPACTS	LEVEL OF SIGNIFICANCE	MITIGATION MEASURES	UNAVOIDABLE SIGNIFICANT IMPACTS
		Wildlife BIO7. To fully document the potential impacts to sensitive wildlife species, focused surveys for the following state or federally listed threatened or endangered wildlife species shall be conducted during the optimal survey period prior to any development approvals from the City for any project. *Quino checkerspot butterfly* *Least Bell's vireo* *Santa Ana sucker* *Bank swallow (nesting)* *Arroyo southwestern toad* *Coastal California gnatcatcher* *California red-legged frog* *Raptor (nesting)* *Southwestern willow flycatcher* In addition, focused surveys may also be warranted for sensitive species that are not currently classified as endangered, threatened, or proposed for listing, but which may be listed in the future or would be of concern to state and federal resource agencies during future environmental review processes for projects. The following species may require focus surveys if future project locations contain appropriate habitat: *Arroyo chub, San Bernardino mountain kingsnake, Grasshopper sparrow, Santa Ana speckled dace, Coast patchnose snake, Tricolored blackbird, Coast range newt, Two-striped garter snake, Pallid bat, Large-blotched*	

IMPACTS	LEVEL OF SIGNIFICANCE	MITIGATION MEASURES	UNAVOIDABLE SIGNIFICANT IMPACTS
		ensantina, Loggerhead shrike, Townsend's western big-eared bat, Western spadefoot, California horned lark, San Diego black-tailed jackrabbit, Mountain yellow-legged frog, San Diego cactus wren, Dulzura California pocket mouse, Southwestern pond turtle, Yellow warbler, Pallid San Diego pocket mouse, San Diego horned lizard, Yellow-breasted chat, Los Angeles pocket mouse, Coastal western whiptail, Summer tanager, San Diego desert woodrat, Silvery legless lizard, Southern California rufous-crowned sparrow, Southern grasshopper mouse, San Bernardino ring-necked snake, Bell's sage sparrow, and American badger. Focused surveys shall be conducted using the USFWS' survey protocol. In addition, surveys for federally listed species shall be conducted by qualified biologists that possess valid section 10(a)(1)(a) permits issued by USFWS. Should surveys find a state or federally listed threatened or endangered species, or a substantial population of the other lower status special status wildlife species on-site, mitigation shall need to be coordinated with the USFWS and CDFG. Mitigation may include habitat preservation off-site or habitat replacement through enhancement or restoration of on-site or off-site resources.	

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		BIO8. Prior to approval of projects, a Resources Management Plan (RMP) shall be submitted to and approved by the City of San Dimas. The RMP shall contain procedures and performance standards that must be executed to protect, replace, or manage biological resources affected or potentially affected by construction and occupation of the development. The RMP shall contain a summary of mitigation milestones that shall identify the schedule of completion, and the party or parties responsible for their implernentation.	
Cumulative Impacts			
Development of the proposed project, as well as buildout of the City's General Plan, would result in the cumulative loss of open space.	Potentially significant, however, cumulative development is mitigated on a project-by-project basis.	No mitigation measures are required.	
CULTURAL RESOURCES			With imposition of the recommended mitigation measures, no unavoidable significant impacts would occur with implementation of the proposed project.

IMPACTS	LEVEL OF SIGNIFICANCE	MITIGATION MEASURES	UNAVOIDABLE SIGNIFICANT IMPACTS
Paleontological Resources			
Grading and excavation activities associated with future development projects may result in impacts to undocumented paleontological resources.	Potentially significant. Mitigation measures that include inspections and monitoring would reduce the significance of impacts to less than significant levels.	The following mitigation measures shall be applied only in areas underlain by the Puente Formation and Pleistocene age deposits (refer to Exhibit 5.6-3, *Geologic Map*). No additional paleontological resource mitigation on other areas of the project site would be required. CR1. Prior to grading in areas of the Puente Formation and Pleistocene age deposits, the applicant(s) shall retain a qualified paleontologist to perform field surveys of individual development sites, in order to determine if significant fossils are exposed in any area of development. CR2. The applicant(s) shall retain a qualified paleontologist to perform on-site inspections of all construction excavations and, if necessary, salvage exposed fossils. The paleontologist shall have the authority to divert or redirect grading in the area(s) of an exposed fossil to facilitate evaluation and, if necessary, salvage fossils. Grading monitoring in these rock units shall initially be on a full time basis (i.e., all major excavations shall be monitored). If it is determined that an abundance of fossils is not expected or if subsurface conditions are different than anticipated, the duration of monitoring may be decreased in accordance with good paleontological practices.	

IMPACTS	LEVEL OF SIGNIFICANCE	MITIGATION MEASURES	UNAVOIDABLE SIGNIFICANT IMPACTS
		CR3. Due to the small nature of some fossils present within the Puente Formation and Pleistocene deposits, matrix samples shall be collected for processing through fine mesh screens during salvaging activities. CR4. Upon completion of all laboratory and field work, all final mitigation reports shall be filed with the repository and the City of San Dimas. Monthly progress reports shall be filed with the applicant(s) and available to the City of San Dimas. CR5. Collected paleontological resources shall be donated to a public, nonprofit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County.	
Cultural Resources			
Grading and excavation activities associated with future development projects may result in impacts to cultural resources.	Potentially significant. Mitigation measures that include site-specific surveys would reduce the significance of impacts to less than significant levels.	CR6. Individual property owners/applicants shall be responsible for cultural resources studies specific to each individual parcel to be developed. The owner/applicant shall be responsible for implementing mitigation measures to properly manage any cultural resources discovered. Site-specific cultural resources studies must include the following: a) completion of a literature review of the particular project area; b) consultation with the appropriate Native American group, if required; c) reconnaissance of the project area; and 4) mitigative treatment of any cultural resources discovered.	

IMPACTS	LEVEL OF SIGNIFICANCE	MITIGATION MEASURES	UNAVOIDABLE SIGNIFICANT IMPACTS
		CR7. Any projects with the potential to impact archaeological site CA-LAN-825 shall evaluate their condition and importance through text excavation and archival research. CR8. Archaeological site CA-LAN-825 must be relocated and a site record supplement generated for the site. Evaluation of the site may necessitate further mitigative treatment. CR9. The tunnels, steel pipe and storage tank described by LSA Associates (1998: 2-41) shall be formally recorded and evaluated by the proponent of any project with the potential to disturb them. Further mitigative treatment may be necessary.	
Cumulative Impacts			
Cumulative development may impact important cultural resources in the absence of any mitigation.	Potentially significant. Evaluated and mitigated on a project-by-project basis.	No mitigation measures are required.	

IMPACTS	LEVEL OF SIGNIFICANCE	MITIGATION MEASURES	UNAVOIDABLE SIGNIFICANT IMPACTS
PUBLIC SERVICES, FACILITIES AND UTILITIES			Implementation of the proposed project would not result in unavoidable significant impacts related to police service, water resources and facilities, wastewater, electricity, natural gas, solid waste, schools, parks and recreation, and communication systems. However, the ability of the Fire Department to provide adequate service to all reaches of the project area remains a significant impact resulting from project implementation, even with imposition of mitigation measures.
Fire Protection			
Development of future projects within the Northern Foothills project area would increase the demand for fire protection services beyond existing conditions.	Significant.	<u>Fire-Resistant Design and Materials Guidelines</u> PSU1. Roofing. Roofs shall be of noncombustible class "A" materials, such as clay or concrete shake, cinder, metal or tile. Open ends of roofs, such as tile roofs, shall be capped with noncombustible material to prevent bird nest or other combustible material from lodging within the roof.	

IMPACTS	LEVEL OF SIGNIFICANCE	MITIGATION MEASURES	UNAVOIDABLE SIGNIFICANT IMPACTS
		PSU2. Glass. The size and number of glazed openings on the side of the house facing the downhill side or other unique fire hazard areas shall be held to a minimum and shall be glazed with extra-strength glass (thick, safety tempered and/or double-panned). Glass areas shall not exceed 50 percent of any wall. <u>Access Requirements</u> Roads must provide access for fire suppression equipment and for evacuation of residents in the event of fire. PSU3. Traffic roadways shall be at least 26 feet wide and passable in all weather. The roadway curb-to-curb width shall be reduced to 16 feet, where permitted by the City. (Refer to Access Implementing Policy and Action #1, bullets one and two) in Section 5.3, *Circulation*). <u>Water Supply</u> PSU4. Fire flow and hydrant locations shall be provided so that adequate water is available in the event of fire. Planned water supplies, piping and hydrants shall be installed and in working order prior to construction involving combustible materials. All development proposals must demonstrate conclusively that the development can be served with adequate water capacity. PSU5. In the event that individual property owners install a water well, water from the well or other sources, such a pool, shall be available to the Fire Department for fire-fighting purposes.	

IMPACTS	LEVEL OF SIGNIFICANCE	MITIGATION MEASURES	UNAVOIDABLE SIGNIFICANT IMPACTS
		Los Angeles County Fire Department PSU6. Future development projects shall be reviewed by the Los Angeles County Fire Department. Specific department requirements for access, fire flows, hydrants or other fire and life safety requirements will be addressed at the plan check phase and must be complied with prior to approval of a tentative map. PSU7. Residential projects shall meet fire flow requirements in accordance with relevant City building codes, fire codes and requirements of the Los Angeles County Fire Department. PSU8. Fire sprinkler systems shall be installed in all residential buildings, where feasible. PSU9. As required by Section 1117.2.1 of the Los Angeles County Fire Code, a fuel modification plan, a landscape plan and an irrigation plan shall be submitted with any subdivision of land or prior to any new construction, remodeling, modification or reconstruction where such activities increase the square footage of the existing structure by at least 50 percent within a 12-month period, and where said structure or subdivision is located within an area designated as a Very High Fire Hazard Severity Zone or within Fire Zone 4. Said plans shall be reviewed and approved by the Forestry Division of the Los Angeles County Fire Department for reasonable fire safety.	

IMPACTS	LEVEL OF SIGNIFICANCE	MITIGATION MEASURES	UNAVOIDABLE SIGNIFICANT IMPACTS
		PSU10. Future development projects shall be required to comply with all applicable code and ordinance requirements for Fire Zone 4 pertaining to construction, access, water mains, fire hydrants, fire flows and brush clearance.	
Police Service			
Development of future projects within the Northern Foothills project area would increase the demand on police services beyond existing conditions.	Less than significant.	No mitigation measures are required.	
Water			
Development of future projects within the Northern Foothills project area would increase the existing demand for domestic water which would require the extension of water facilities (i.e., private water wells, groundwater wells and distribution lines) to the higher develop able regions of the project area.	Less than significant impact with mitigation. Proposed water system design (i.e.,groundwater wells and pipelines) would be required to be constructed and maintained pursuant to Southern California Water Company (SCWC) and State Department of Health Services (DHS) requirements and standards.	PSU11. The City of San Dimas shall adopt the implementing policies and actions for Infrastructure Planning, Financing, and Construction in the *Northern Foothills Development and Infrastructure Study*. Future development proposals shall be reviewed to determine their compliance with the policies and actions.	

IMPACTS	LEVEL OF SIGNIFICANCE	MITIGATION MEASURES	UNAVOIDABLE SIGNIFICANT IMPACTS
		PSU12. The project applicant(s) shall obtain the necessary permit(s) from the Public Health Programs and Services Department of the Bureau of Environmental Protects pursuant to Title 11 of the Los Angeles County Code (adopted by the City of San Dimas) and the California Water Code, prior to drilling groundwater wells. Construction of the groundwater wells shall be consistent with the California Department of Water Resources' Bulletin 74. PSU13. The project applicant(s) shall consult the Upper San Gabriel Water Master prior to applying for a water well permit and provide "rights" to said groundwater. PSU14. Prior to tentative map approval and issuance of building permits, as applicable, the project applicant(s) shall analyze and demonstrate the feasibility of construction water tanks and extending water lines to serve the development pursuant to the requirements of the Southern California Water Company and subject to review and approval by the City of San Dimas.	

IMPACTS	LEVEL OF SIGNIFICANCE	MITIGATION MEASURES	UNAVOIDABLE SIGNIFICANT IMPACTS
Wastewater			
Development of future projects within the Northern Foothills project area would result in an increased demand for wastewater services that would require the extension of sewer lines or the installation of septic systems.	Less than significant impact with mitigation.	PSU15. Refer to Mitigation Measure PSU11. PSU16. Prior to the installation of a private sewer or septic system, the project applicant(s) shall consult with the California Regional Water Quality Control Board (RWQCB) on a project-by-project basis to obtain waste discharge requirements. PSU17. Prior to tentative map approval and issuance of building permits, as applicable, the project applicants(s) shall analyze and demonstrate the feasibility of constructing on-site sewage disposal systems (i.e., septic tanks/seepage ponds) for any given subdivision pursuant to the requirements of the Uniform Plumbing Code and subject to review and approval by the City of San Dimas. PSU18. Prior to the approval of any on-site sewage disposal systems or the issuance of drilling permits, soil testing and applicable geological reports shall be submitted to the County of Los Angeles Department of Health Services and to the City of San Dimas for review and approval (refer to Section 5.6, *Geology*).	

IMPACTS	LEVEL OF SIGNIFICANCE	MITIGATION MEASURES	UNAVOIDABLE SIGNIFICANT IMPACTS
Electricity			
Development of future projects within the Northern Foothills project area would result in additional electrical demands beyond existing conditions and would require the extension of electrical facilities into the project area.	Less than significant impact with mitigation.	PSU19. Refer to Mitigation Measure PSU11. PSU20. The City of San Dimas shall adopt the implementing policies and actions for Visual Intrusiveness, as they relate to overhead utilities, in the *Northern Foothills Development and Infrastructure Study*. Future development proposals shall be reviewed to determine their compliance with the policies and actions. PSU21. Prior to the issuance of building permit(s), the applicant(s) shall consult SCE and the City of San Dimas to determine the feasibility of placing electrical facilities above ground or underground.	
Natural Gas			
Development of future projects within the Northern Foothills project area would result in consumption of natural gas beyond existing conditions and would require the extension of gas distribution facilities.	Less than significant impact with mitigation.	PSU22. Refer to Mitigation Measure PSU11. PSU23. Prior to the issuance of building permit(s), the applicant(s) shall consult with The Gas Company and the City of San Dimas to determine the feasibility (both physically and economically) of extending underground gas distribution facilities to future development areas.	

IMPACTS	LEVEL OF SIGNIFICANCE	MITIGATION MEASURES	UNAVOIDABLE SIGNIFICANT IMPACTS
Solid Waste			
Development of future projects within the Northern Foothills project area would result in increased projected solid waste generation.	Less than significant impact with mitigation.	PSU24. Prior to the issuance of building permit(s), the applicant(s) shall consult with the local waste hauler to determine the feasibility of accessing the development site. Should accessibility not be achievable, the project applicant(s) shall (1) work with the City of San Dimas and the trash hauler to identify locations where trash could be picked up, or (2) be required to have individual property owners responsible for delivering their own rubbish to the local landfill.[1] PSU25. Future developments, as applicable, shall incorporate storage and collection of recyclables into each project design and refuse collection contracts shall include collection of recyclables. Individual projects, as applicable, shall reserve space appropriate for the support of recycling, adequate storage areas and access for recycling vehicles, as appropriate.	
Schools			
Development of future projects within the Northern Foothills project area would generate additional students beyond existing conditions.	Less than significant impact with mitigation.	PSU26. Individual development projects within the project area shall pay school fees to the Bonita Unified School District in accordance with Government Code Sections 65995, 65995.5 and 65995.7. The project applicant shall provide the City of San Dimas with evidence of school fee payment prior to the issuance of permits.	

[1] The City of San Dimas has an ordinance that presently requires mandatory trash pick up.

IMPACTS	LEVEL OF SIGNIFICANCE	MITIGATION MEASURES	UNAVOIDABLE SIGNIFICANT IMPACTS
Development of future projects within the Northern Foothills project area would create new transportation (pedestrian and bus) impacts for the Bonita Unified School District.	Less than significant impact with mitigation.	PSU27. Project applicants shall work with the Bonita Unified School District to identify the most appropriate locations for bus routes and stops, if feasible. PSU28. Project applicants shall work with the Bonita Unified School District to identify the most appropriate "Safe Route to School" for students generated by the project. Future project residents shall be notified of the "Safe Route to School."	
Parks and Recreation			
Development of future projects within the Northern Foothills project area would create additional demand on parks and recreational facilities.	Less than significant impact with mitigation.	PSU29. Prior to the approval of future development projects within the project area, the project applicant(s) shall consult the City of San Dimas to determine if the proposed development would impact existing equestrian and/or hiking trails. The City of San Dimas shall coordinate planning efforts with the Los Angeles County Department of Parks and Recreation if the City intends to designate trails for the project area or connect trails between adjacent jurisdictions. PSU30. Future development projects that include equestrian trails shall be reviewed by the Equestrian Commission.	

IMPACTS	LEVEL OF SIGNIFICANCE	MITIGATION MEASURES	UNAVOIDABLE SIGNIFICANT IMPACTS
Communications			
Development of future projects within the Northern Foothills project area would result in the need for additional communication services.	Less than significant impact with mitigation.	PSU31. Refer to Mitigation Measure PSU20. PSU32. Prior to the issuance of building permit(s), the project applicant(s) shall consult the appropriate communication providers and the City of San Dimas to determine the feasibility of placing communication facilities underground or aboveground on an individual project basis.	
Cumulative Impacts			
Cumulative development would increase demand for services and utilities. There would be an increased demand for the Los Angeles County Sheriff's Department, San Dimas and Los Angeles County Fire Departments, and other public services. Increased consumption and generation rates are anticipated for electricity, natural gas, water, wastewater, solid waste, telephone, and cable/tv.	Less than significant. Analysis has concluded that cumulative development is subject to standards and requirements of reviewing agencies and no additional mitigation is required.	No mitigation measures are required.	

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3.0 Project Description

3.0 PROJECT DESCRIPTION

3.1 PROJECT LOCATION AND SETTING

Location

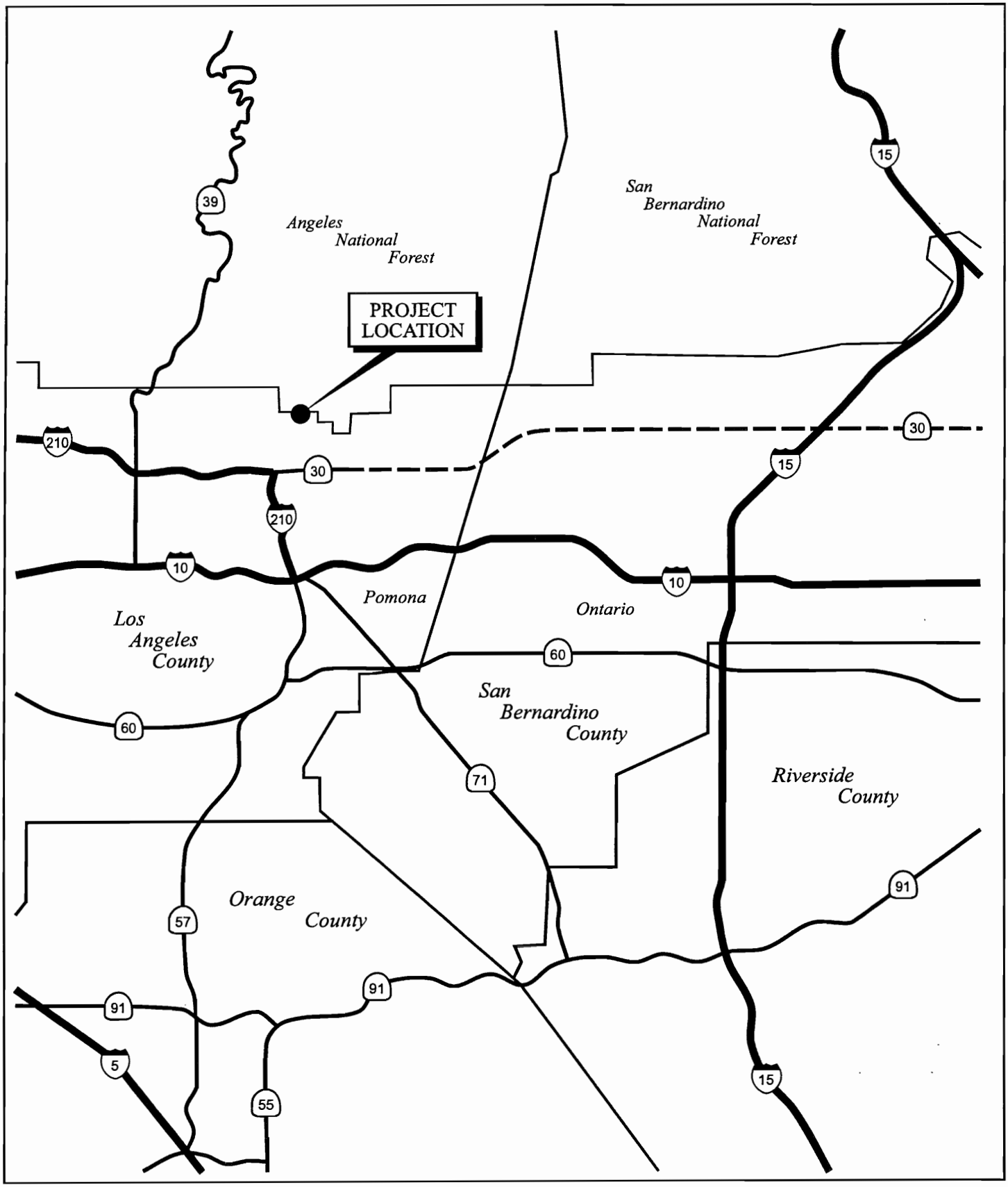
The project area is located within the northern portion of the City of San Dimas, County of Los Angeles, California (refer to Exhibit 3.1-1, *Regional Vicinity Map*). The approximately 3,000 acre project area is generally bordered by the Angeles National Forest to the north and northeast, the City of La Verne to the east and southeast, residential areas within San Dimas to the south, and the City of Glendora immediately to the west (refer to Exhibit 3.1-2, *Project Area Boundary*). Regional access is provided via Interstate 210 (I-210) and State Route 30. Primary access to the project area is provided via Foothill Boulevard, which parallels the project area's southern boundary.

Existing Conditions

Most of the existing development is along the base of the Northern Foothills near to Foothill Boulevard and San Dimas Canyon Road. Land uses in the nearly 3,000 acre project area are principally public ownership and single family residential. Public ownership includes 1,280 acres of National Forest, a city-owned golf course, a city park (Horsethief Canyon Park - now nearing completion), a county regional park (San Dimas Canyon Park), and a county juvenile probation facility. Nearly one-third of the area is in private ownership. The land is generally vacant or underutilized and is available for future development. Existing zoning regulations could have allowed up to 448 lots on the vacant 972 acres, but subsequent revisions to the general plan reduced that to 195 lots.

There are paved roads leading to much of the perimeter of the area but the existing lots, which are sparsely improved with a couple of ranches, equestrian facilities and accessory buildings, are primarily accessed by a series of unpaved motorways. Except for several overhead electrical lines, generally intended to serve existing facilities at Johnstone Peak, there is no other infrastructure in the undeveloped portions of the Northern Foothills.

Topographically elevations range from 1,000 to 3,200 feet above sea level and the area is characterized by steep terrain, narrow canyons and broad ridgelines. Major topographical features include Johnstone Peak, Sycamore Flat and three major north-south ridgelines that result in four uniquely identifiable canyons (Wildwood, Sycamore, Ham and Lodi). The overall average slope of the area is 52 percent. There is evidence of a number of landslides and slope failures in the area and the area is traversed by the Cucamonga branch of the Sierra Madre Fault. The project area is highly visible to the surrounding developed communities below it.



Source: LSA Associates

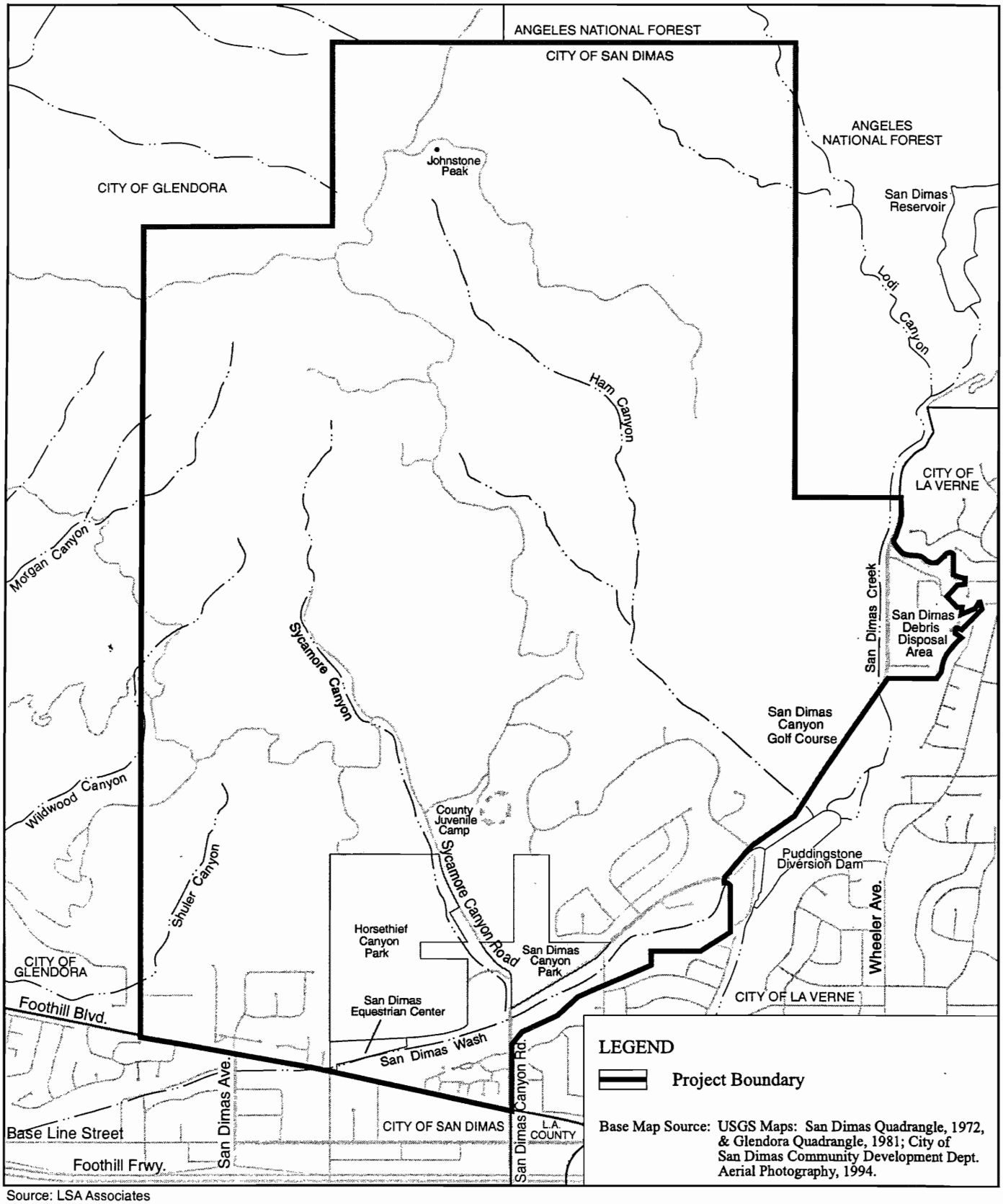
NORTHERN FOOTHILLS IMPLEMENTATION PROGRAM
PROGRAM ENVIRONMENTAL IMPACT REPORT

0 5 miles

Regional Vicinity Map

Robert Bein, William Frost & Associates
2/99 JN 10-034933-6377

Exhibit 3.1-1



Source: LSA Associates

NORTHERN FOOTHILLS IMPLEMENTATION PROGRAM
PROGRAM ENVIRONMENTAL IMPACT REPORT

Project Area Boundary

0 2,000'

ROBERT BEIN, WILLIAM FROST & ASSOCIATES
2/99 JN 10-034933-6377

Exhibit 3.1-2

The area is replete with a variety of biological resources. Plant communities include chaparral, coastal sage scrub, grasslands, woodlands and riparian scrub. A number of sensitive species are likely to live in these habitat areas. In addition, the area contains several blue-line streams.

3.2 BACKGROUND AND HISTORY

Recent Development Efforts

Wildwood Development

In May 1983, a project was proposed, with the City of Glendora as the lead agency, to develop 104 single-family detached residences, 57 in the City of Glendora and 47 in the City of San Dimas. This project was never approved and discussions regarding the Wildwood Development terminated many years ago.

Horsethief Canyon Park

Construction of Horsethief Canyon Park is nearing completion. This facility is City-owned and operated, and houses the Sycamore Canyon Stables. The park contains picnic areas, as well as equestrian and hiking trails. There are two soccer fields, with one being lighted; a tot lot; a volleyball court; horseshoe pits; and a restroom building. In addition, the park hosts the Annual Western Days Rodeo. Additional park improvements are anticipated in the future.

Chu Property (APN 8678-029-017 and 018)

This property is located above the San Dimas Canyon Golf Course. The owner has "floating" access easements to the property, one crossing the central portion of the golf course, and one traversing the current golf course driving range. Several years ago, the owner of the property had several discussions with City staff members about developing a residential project on this land, but has yet to submit any applications to the City.

Terrebonne Tract

The only recent development in the area is the Terrebonne Tract (26042 and 33166), which was approved and built in the mid to late 1980s. The project consists of 80 single-family residences

Development Moratorium in the Northern Foothills

At a May 19, 1997 City Council study session with the Planning Commission, it was recommended that a moratorium be imposed on development in the northern foothills,

until potential revisions to existing City regulations could be reviewed and considered for revision.

At the May 27,1997 City Council hearing, the Council directed staff to set a public hearing to consider a moratorium on development in the northern foothills.

At the June 24, 1997 City Council hearing, the council considered proposed *Ordinance No. 1080: An Ordinance of the City Council of the City of San Dimas Establishing a Moratorium on the Issuance of Building or Other Discretionary Permits and the Receipt and Processing of Applications Seeking Development Approval for Properties Identified in the City's Northern Foothills.* The ordinance proposed a 45-day moratorium on development in the northern foothills. The Council decided to continue consideration of a moratorium on development in the northern foothills for a maximum of four weeks. In addition, the Council directed staff to submit an implementation timeline and moratorium ordinance for consideration at that time.

On July 22, 1997, the City Council approved Ordinance No. 1080, which imposed a 45-day moratorium on development within the northern foothills.

On August 26, 1997, the City Council approved an extension of the development moratorium when it adopted *Ordinance No. 1082: An Ordinance of the City Council of the City of San Dimas Extending a Moratorium on the Issuance of Building or Other Discretionary Permits, and the Receipt and Processing of Applications Seeking Development Approval for Properties Identified as the City's Northern Foothills.* The City Council's approval of Ordinance No. 1082 extending the development moratorium for one year.

On June 9, 1998, the City Council considered extending Ordinance No. 1082 for one additional year. The Council approved *Ordinance No. 1083: An Ordinance of the City Council of the City of San Dimas Extending a Moratorium on the Issuance of Building or Other Discretionary Permits, and the Receipt and Processing of Applications Seeking Development Approval for Properties Identified as the City's Northern Foothills.* Ordinance No. 1083 extends the development moratorium until July 22, 1999.

3.3 PROJECT OBJECTIVES

As a part of the *Northern Foothills Development and Infrastructure Study*, a guiding principle was developed. The guiding principle seeks to: 1) preserve sensitive resources in place, 2) adapt future hillside development to the natural hillside topography, and 3) maximize view opportunities to, as well as from development. The overall project objective is to fit future projects into their hillside setting rather than altering the hillside to fit the projects. While individual property rights within the

Northern Foothills Area must be acknowledged and recognized, the priority between development and natural resource values should be given to protecting the resource.

3.4 PROJECT CHARACTERISTICS

Under the existing General Plan, the maximum development permitted is one dwelling unit per five acres (1 du/5 ac), which would permit a total of 195 dwelling units on the 972 vacant acres in the project area. The development strategy proposed in the *Northern Foothills Development and Infrastructure Study* (November 1998) would permit a maximum of up to 127 dwelling units on the 972 vacant acres, depending upon the City Council's final determination of density.

Development Location and Density

Exhibit 3.4-1, *Potential Development Areas*, illustrates both potential development areas, as well as areas with the potential for water service. The development and water service areas were delineated as a part of the *Northern Foothills Development and Infrastructure Study* prepared by LSA Associates. As shown on Exhibit 3.4-1, development has the potential to generally occur in either the lower or higher elevation portions of the project area. The higher and lower elevation portions of the project area are separated by significantly steep slopes (< 30 percent).

The maximum allowable development densities for development within the project area are shown in Table 3.4-1, *Maximum Allowable Density*.

Rural Character

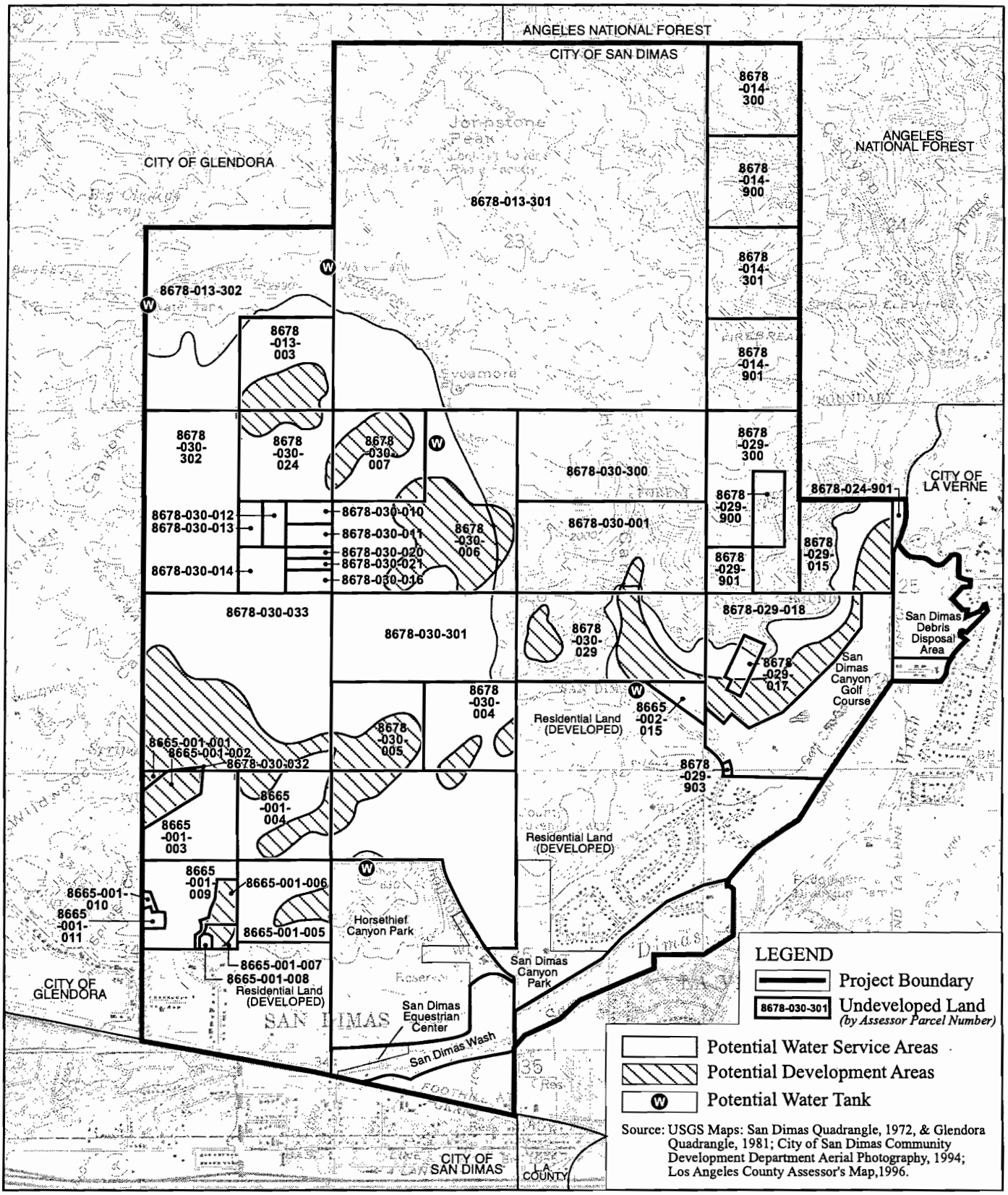
Development within the project area, even when clustered, should be rural in character. For purposes of this project, "rural" is defined as:

> *"A way of life characterized by living in an area with few people; a natural, peaceful, quiet setting; allowance for a sense of solitude; and unhindered view of stars in the night sky. Rural areas are unencumbered by typical urban/suburban facilities, including curbs; gutters and sidewalks; street lighting except where needed for safety purposes; formal, manicured landscaping; and commercial facilities."*

It is intended that future development within the Northern Foothills project area be rural in character, as defined above.

General Plan Amendment and Zone Change/Specific Plan

The proposed project involves a General Plan Amendment and Zone Change/Specific Plan. The General Plan Amendment would amend the San Dimas General Plan text



Source: LSA Associates

NORTHERN FOOTHILLS IMPLEMENTATION PROGRAM
PROGRAM ENVIRONMENTAL IMPACT REPORT

0 2,000'

Potential Development Areas

ROBERT BEIN, WILLIAM FROST & ASSOCIATES
2/99 JN 10-034933-6377

Exhibit 3.4-1

TABLE 3.4-1
MAXIMUM ALLOWABLE DENSITY

Actual Slope	Development Feasibility Zone	
	Within	Outside
0% > 25%	1 du / 5 acres	1 du / 20 acres
25% > 35%	1 du / 10 acres	1 du / 20 acres
35% > 50%	1 du / 20 acres	1 du / 40 acres
50% or greater	1 du / 40 acres	1 du / 80 acres

Source: LSA Associates, *Northern Foothills Development and Infrastructure Strategy*, November 1998, Table 5.A.

to create a "Northern Foothills" land use designation and to outline development policies and requirements specific to the Northern Foothills area consistent with the "Northern Foothills Development Strategy." The Zone Change/Specific Plan would create either a new zone or specific plan to implement the policies and requirements of the General Plan and the adopted Development Strategy.

The recommendation of the Northern Foothills Development Strategy is to amend the General Plan and Zoning Ordinance as follows:

General Plan Revisions

- *Amend the land use designation of all privately-owned lands within the Northern Foothills project area that are currently designated Single Family Residential to Very Low Estate, with the exception of the Terrebonne Tract, to a new designation of "Northern Foothills." Retain the existing "Park" and "Open Space" land use designations for the National Forest, Camp Glen Rocky, Horsethief Canyon Park, San Dimas Wash, San Dimas Canyon Golf Course and other publicly-owned lands.*

- *Amend the land use designation of the National Forest Service property (APN 8678-030-301) to "Northern Foothills."*

- *Add new text to the General Plan that outline development policies and requirements specific to the Northern Foothills project area.*

Zoning Ordinance Revisions

- ❖ *Create a new zone to apply to lands within the Northern Foothills project area. The new zoning shall include standards/requirements for, but not limited to, slope density, minimum lot sizes, building height, building envelope, landscaping, and street geometrics.*

- ❖ *In place of the current slope density formula contained in the SF-H zone, use the following minimum size requirements.*

Average natural slope[1] <20%	• *2 acres in a non-clustered land division* • *1 acre in a clustered land division*
Average natural slope 20 to 48%	*Within Development Feasibility Zone:* • *5 acres in a non-clustered land division* • *1 acre in a clustered land division* *Outside of Development Feasibility Zone:* • *10 acres in a non-clustered land division* • *2 acres within a clustered land division*
Average natural slope >48%	• *20 acres in a non-clustered land division* • *2 acres within a clustered land division*

1 "Average natural slope" will be calculated over the natural ground prior to development using the same formula that is currently contained in the City's Zoning Ordinance.

- ❖ *In the zone of the Northern Foothills area, include the following text zone following the above text regarding minimum lot sizes.*

  "The establishment of minimum lot sizes within the Northern Foothills is intended to set minimum lot size only. The density of new development whether it is within a clustered or a non-clustered project, shall not be permitted to exceed the maximum density allowed by the San Dimas General Plan."

- ❖ *Establish standards which measure building height from the "average of the lowest point of contact and the highest point of contact with the ground to the highest point of the structure" to the following:*

  - *"The building envelope for all structures shall be as follows:*

Downhill Lot. An overall maximum height of 20 feet is permitted as measured from finished grade, from the minimum front setback extending towards the rear of the lot. The maximum height at the side setbacks shall be 15 feet extending towards the center of the lot at a 45-degree angle to a maximum height of 20 feet as measured from finished grade.

Uphill Lot. A maximum height of 15 feet is permitted at the minimum front setback, and shall extend up and toward the rear of the lot at a 45-degree angle to a maximum overall height of 20 feet, as measured from finished grade. The maximum height at the side setbacks shall be 15 feet extending towards the center of the lot at a 45-degree angle to a maximum height of 20 feet, as measured from finished grade.

Cross Slope Lots. A maximum height of 20 feet is permitted, as measured from finished grade, from the minimum front setback extending towards the rear of the lot. The maximum height at the side setbacks shall be 15 feet extending towards the center of the lot at a 45-degree angle to a maximum height of 20 feet as measured from the finished grade."

- *Establish landscaping requirements for the Northern Foothills area to require landscaping of all slopes in excess of 5 feet in vertical height.*

- *Revise the special hillside street geometric standards within the SF-H zone as they affect the Northern Foothills area to permit the use of access roads, 26 feet wide, to provide direct access to residential lots.*

- *Apply the Private Horse Overlay zone or its equivalent to all privately owned lands.*

3.5 PHASING

Individual improvement and redevelopment/development projects would occur in incremental phases over time, based largely on economic considerations, infrastructure improvements, market demand and other planning considerations. This is due, in part, to the scattered nature of separate property ownership in the area. The phasing and extent details of each development would be evaluated by the City of San Dimas Planning Department on a case-by-case basis.

3.6 AGREEMENTS, PERMITS AND APPROVALS

Following a determination that the Final Program EIR is adequate and certification of the EIR by the City Council, a Notice of Determination (NOD) would be issued by the City. It is anticipated that future development may be the subject of additional environmental review on an individual project-by-project basis, in accordance with the provisions of Section 15168 of CEQA, as determined by the City of San Dimas.

The following is a list of various agencies and the associated approvals and permits potentially required for the proposed project.

NORTHERN FOOTHILLS IMPLEMENTATION PROGRAM

Agency	Approval/Permit
City of San Dimas	Final EIR Certification
	General Plan Amendment
	Zone Change

FUTURE DEVELOPMENT PROPOSALS

Agency	Approval/Permit
City of San Dimas	Environmental Review and Clearance (Negative Declaration, Mitigated Negative Declaration, EIR)
	Tentative Tracts and Parcels Maps
	Site Plan Approval(s)
	Landscape Plan Approval(s)
Regional Water Quality Control Board	Water Discharge Permit
California Department of Fish & Game and/or City of San Dimas	1603 Agreement
Army Corps of Engineers	404 Permit
Local Utility Companies	Infrastructure Service Fees
	Connections

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4.0 Basis for Cumulative Analysis

4.0 BASIS FOR CUMULATIVE ANALYSIS

Section 15355 of the State California Environmental Quality Act (CEQA) Guidelines, as amended, provides the following definition of cumulative impacts: *"Cumulative impacts refers to two or more individual effects which, when considered together, are considerable, or which compound or increase other environmental impacts."* Pursuant to Section 15130(a) of the aforementioned Guidelines, *"Cumulative impacts shall be discussed when they are significant."* The Initial Study Checklist provided as part of Appendix 14.1 indicates that the proposed project may yield potentially significant cumulative effects. As a result, Section 5.0 of this Environmental Impact Report (EIR) provides a cumulative impact assessment for each applicable environmental issue, and does so to a degree which reflects each impact's severity and likelihood of occurrence.

As indicated above, a cumulative impact involves two or more individual effects. Such effects can be internal to, and confined solely to, a proposed project itself, or also be attributable to other external projects, producing related or cumulative effects. Per State CEQA Guidelines Section 15130, the discussion shall be guided by the standards of practicality and reasonableness. The following elements are necessary in an adequate discussion of cumulative impacts:

1. Either:

   a. A list of relevant past, present and reasonably anticipated future projects producing related or cumulative impacts, including those projects outside the control of the Agency, or

   b. A summary of projections contained in an adopted General Plan or related planning document which is designed to evaluate regional or area-wide conditions;

2. A summary of the expected environmental effects to be produced by those projects with specific reference to additional information stating where that information is available;

3. A reasonable analysis of the cumulative impacts of the relevant projects. An EIR shall examine reasonable options for mitigation or avoiding any significant cumulative effects of a proposed project; and

4. With some projects, the feasible mitigation for cumulative impacts may involve the adoption of ordinance or regulations rather than the imposition of conditions on a project-by-project basis.

Pursuant to Section 15130(1)(b) which cites *"a summary of projections contained in an adopted General Plan or related planning document,"* the following reference text

is restated from Section 2.3, Project Characteristics, of the *Final EIR for the San Dimas General Plan Revision*. The following text includes editorial comments shown in **bold** to reflect that the San Dimas General Plan was adopted in 1991.

> *"State planning law requires that each city and county adopt a comprehensive, long-term General Plan for the physical development of its jurisdictional area, and of any land outside its boundaries having a relationship to land use planning activities. The General Plan is intended to provide an acceptable plan for growth within the City. The plan coordinate land planning, infrastructure, public services, and community facilities with one another. The General Plan provides the regulatory framework to deal with the unique considerations and needs of the City. The General Plan also establishes development guidelines to insure that all development is designed to be compatible with adjacent areas and create an overall aesthetic quality for the City.*
>
> *The update of the General Plan incorporates policies and programs to implement desired goals and objectives of the City. The update of the General Plan looks toward a horizon year of 2020, a thirty year time frame. The maximum build-out population is projected to be 34,945 for year 2020. The City's current **(1990/1991)** population is approximately 32,000. The revised General Plan contains seven mandated elements:*
>
> - *Land Use*
> - *Circulation*
> - *Housing*
> - *Open Space*
> - *Conservation*
> - *Noise*
> - *Safety*
>
> *The General Plan Map proposes 18 categories. A description of each land use category is provided in Table 1 **(of the Final EIR)**. The goals of each General Plan element are indicated in Table 2 **(of the Final EIR)**. The General Plan contains a variety of implementation measures to achieve these goals."*

Table 4-1 on the following page is restated from the *Final EIR* and provides a summary of existing land uses in 1989 with those proposed in 2020 with the General Plan Revision.

TABLE 4-1
EXISTING LAND USE & GENERAL PLAN SUMMARY

Land Use Category	Existing Land Use* (Acres)	General Plan Revision (Acres)
Single Family Residential Very Low Estate		1,527
Single Family Residential Very Low		499
Single Family Residential Low	3,191	2,337
Residential Low/Medium		251
Residential Medium	186	86
Residential High		48
Mobile Home		92
Commercial	225	263
Administration/Professional	39	43
Industrial	287	312
Public/Semi-Public	132	255
Park	1,957	1,974
Open Space	1,819	1,819
Freeway Right-of-Way	372	372
Vacant	1,574	0
TOTAL	**9,782**	**9,878**

* As of December 1989.
Source: Table II-4, Existing Land Use & General Plan Summary, *Final EIR for the San Dimas General Plan Revision*, May 1991.

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5.0 Description of Environmental Setting, Impacts and Mitigation Measures

5.0 DESCRIPTION OF ENVIRONMENTAL SETTING, IMPACTS AND MITIGATION MEASURES

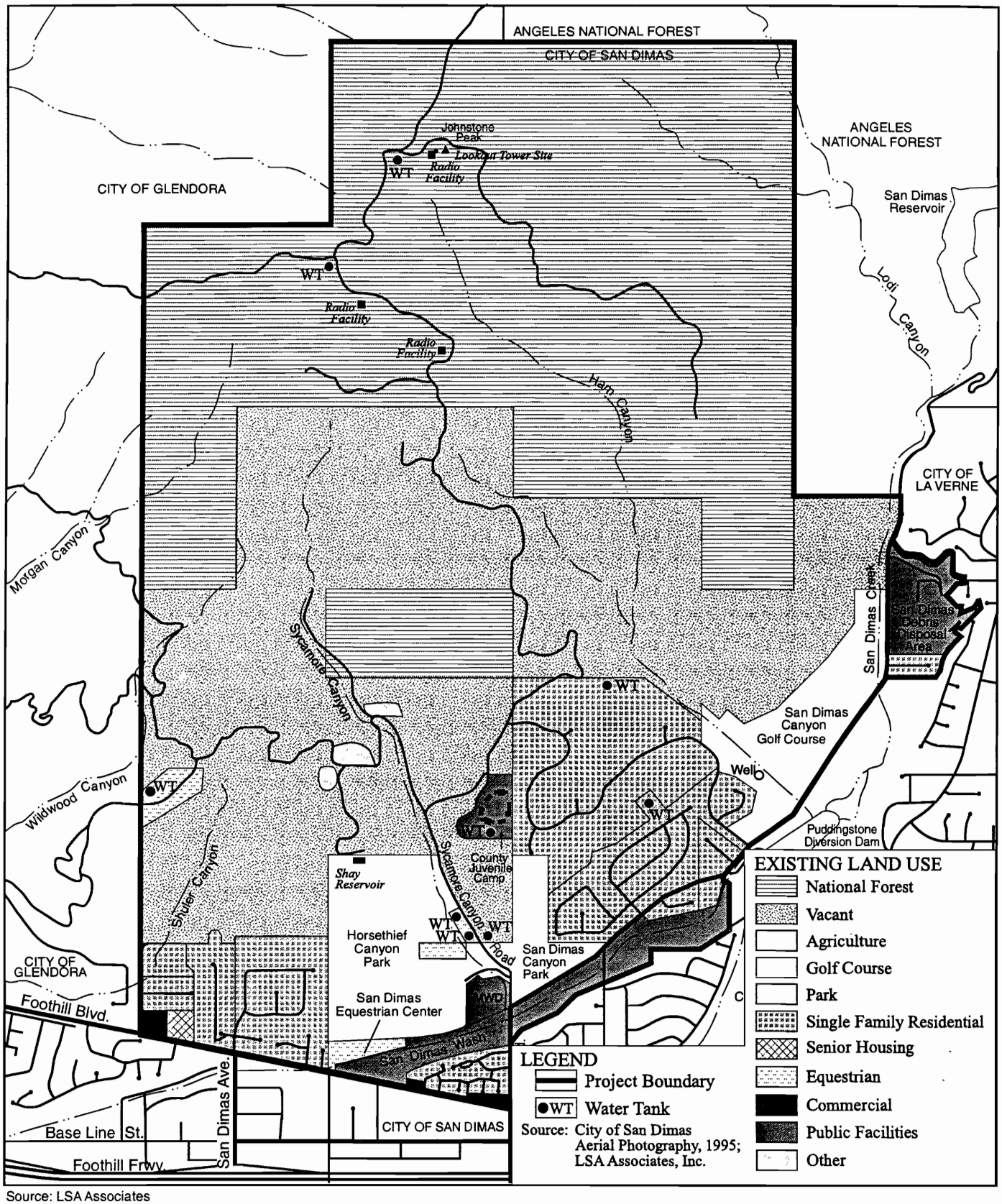
5.1 LAND USE AND RELEVANT PLANNING

Information and evaluations contained in this section is based on site surveys conducted by Robert Bein, William Frost & Associates (RBF) in August 1998 and December 1998. RBF also utilized ground and aerial photographs for the on-site and surrounding land use analysis, as well as the following reference documents: the *City of San Dimas General Plan* dated May 1991, the *City of San Dimas General Plan EIR* dated May 1991, Chapter 18 of the *San Dimas Municipal Code (Zoning Ordinance)*, and the *San Dimas Northern Foothills Development and Infrastructure Study* dated November 1998. This section identifies the existing land use conditions within the Northern Foothills study area, and analyzes project compatibility with existing uses and consistency with relevant plans and polices.

EXISTING CONDITIONS

On-Site Land Use

Existing land uses within the Northern Foothills project area are illustrated in Exhibit 5.1-1, *Existing Land Use*. Existing development with the study area occurs along the base of the Northern Foothills, along Foothill Boulevard and San Dimas Canyon Road. Existing land uses within the 3,000-acre study area are principally in public ownership and are developed as single family residential uses. From west to east, existing on-site land uses include single family residential neighborhoods along Cataract and Shirlmar Avenues; Los Angeles County's San Dimas Canyon Park; Horsethief Canyon Park; the Sycamore Canyon Equestrian Center; Camp Glenn Rocky, a Los Angeles County juvenile probation facility; the San Dimas Canyon Golf Course; and the San Dimas Debris Disposal Area. In addition, there are other uses located farther up into the foothills, which are typically identified by their commonly used names, such as Wildwood Ranch, Maecatlan Ranch, the Experimental Forest, and the Johnstone Peak transmitter facilities. Table 5.1-1, *Existing Land Uses By Acreage*, describes existing land uses and their respective acreages within the study area.



Source: LSA Associates

NORTHERN FOOTHILLS IMPLEMENTATION PROGRAM
PROGRAM ENVIRONMENTAL IMPACT REPORT

Existing Land Use

0 2,000'

Robert Bein, William Frost & Associates
2/99 JN 10-034933-6377

Exhibit 5.1-1

TABLE 5.1-1
EXISTING LAND USE BY ACRE

Land Use	Acreage	% of Total
National Forest	1,280.0	43.0
Vacant Land	972.0	32.7
Single Family Residential	352.0	11.8
Public Facilities	141.0	4.7
Golf Course	70.0	2.4
Parks	68.0	2.3
Agriculture	56.0	1.9
Equestrian	21.5	0.7
Other[1]	7.5	0.3
Commercial	5.0	0.2
Senior Citizen Housing	3.0	0.1
Total Study Area Acreage	***2,976.0***	***100.0***

1 These uses include areas which have been used for residential, commercial, or heavy equipment storage but have been vacated.
Source: LSA Associates, *Northern Foothills Development and Infrastructure Study*, Table 2.A.

The following further describes each of those existing on-site land uses defined in Table 5.1-1.

Angeles National Forest/San Dimas Experimental Forest

National Forest lands are the predominant land use within the Northern Foothills project area (1,280 acres, or 43 percent of the project area). This portion of the Northern Foothills study area is part of the larger San Dimas Experimental Forest that includes a total of 17,153 acres within the Angeles National Forest. Operating as a field laboratory for studies in the ecology of chaparral and related ecosystems for over 50 years, the San Dimas Experimental Forest is under the jurisdiction of the Pacific Southwest Forest and Range Experiment Station, which is an agency of the U.S. Forest Service. According to the Forest Service, a broad data base together with unique physical features make the San Dimas Experimental Forest an ideal location for studies of topics such as acid deposition, sediment production, biomass production control, and chaparral management systems.

Early research efforts in the Experimental Forest began with the development of equipment to be used to measure meteorologic and hydrologic phenomena in support of studies on plant water use and conservation. Early experiments also included

studies of sediment production and slope stabilization. In 1960, a fire destroyed 16,556 acres of the forest and changed the emphasis of research within the Experimental Forest to emergency rehabilitation and revegetation. Current research examines sediment movement, prescribed burning, nutrient cycling, air pollution impacts as well as basic ecological studies on the recovery of flora and fauna after fire. Research planned for the future includes remote sensing of vegetation and fire temperatures. Other uses within the Experimental Forest include four water tanks facilities, three separate radio facilities, and the Johnstone Peak radio tower.

Vacant Land

The majority of land and parcels within the project area have not been developed and remain vacant. There are 47 parcels[1] that remain undeveloped, which total 972 acres, or approximately 33 percent of the project area. Of these parcels, 33 are in private ownership, while 14 are publicly-owned by the National Forest Service, Los Angeles County, or the City of San Dimas. The privately-owned parcels range in size from 1 to 158 acres and are distributed throughout the project area. These vacant areas are located within the steep canyons and hillsides (above 35 percent slope) and moderately-sloped (between 10 to 35 percent slope) chaparral-covered hills, and are characterized by the intermingling of grasslands, coastal sage scrub, and oak and riparian woodland habitat areas.

Single-Family Residential

Single-family residential uses cover approximately 352 acres of the project area, and include from west to east: the homes along Cataract Avenue, Shirlmar Avenue, Longhorn Road, the Hillview/Canyon Hill Community, the Gray Oaks community (Terrebonne Tract), Fernridge Drive, La Mesa Oaks Drive, and Caballo Ranch Road. These tracts are currently built out, and new development is anticipated to be primarily limited to remodeling and additions.

Public Facilities

- *Camp Glen Rocky:* Camp Glenn Rocky is operated by the Los Angeles County Probation Department as a juvenile probation facility, and contains approximately 55,000 gross square feet of building area on approximately 35 acres. It is a maximum-security senior juvenile camp, housing male wards of the court aged 16 to 18. There are currently 102 boys at the camp, which has a total capacity of 125. On an average day, 17 to 18 full-time-equivalent staff members are present at the camp. Since the camp is a maximum security facility, most buildings and activities within the facility occur within a 15-foot

[1] Note that the identification of the 47 parcels is based upon the Assessor Parcels Numbers and in no way reflects a determination as to the actual development potential of the parcel.

tall "perimeter fence." Some maintenance buildings are located outside the perimeter wall. Entry to the facility is provided through a locked front door and adjacent security room.

The camp was acquired by the County Probation Department in 1977. Its original use is uncertain, but County staff believes that the facility was originally constructed as a fire camp or another U.S. Forest Service facility in the 1950s, since the County Probation Department has acquired several other facilities from the Forest Service over the years. Thus, many of the buildings within the camp are nearly 50 years old, and approaching their useful life span.

While the County Probation Department intends to operate the facility approximately 20 to 30 more years, the annual nature of funding decisions and the ongoing budget problems of Los Angeles County makes the long-term future of the facility is uncertain.

- *Other Public Facilities:* Other public facilities are located within the project area, including a Metropolitan Water District facility, the San Dimas Debris Disposal Area, and other facilities along the San Dimas Wash. Locations of these facilities comprise about 106 acres of the project area.

Golf Course

The 70-acre San Dimas Canyon Golf Course is located northeast of San Dimas Canyon Park, with its entrance about 3/4 mile northeast of the park entrance, off of San Dimas Canyon Road. The 18-hole course is open to the public and operates daily from daylight (5:30 a.m. in the winter, 5:00 a.m. in the summer) until dark. The course is operated on land leased from the City of San Dimas and the City of La Verne, and is currently in the 14th year of a 25-year lease contract. Golf Course staff estimate that approximately 88,000 rounds were played at the course in 1998, averaging 241 rounds each day.[2]

Parks

- *San Dimas Canyon Park:* San Dimas Canyon Park is owned and operated by the Los Angeles County Department of Parks and Recreation and includes picnic grounds and hiking trails. The park is home to the San Dimas Canyon Nature Center, as well as various recreational uses. The park has one full-time park employee (a Recreation Services Supervisor), who is assisted by as many as three part-time recreation leaders during peak, summer months. The park is open year-round.

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[2] Telephone conversation with Tripp Stevens, San Dimas Canyon Golf Course, February 23, 1999.

The Nature Center also includes a wildlife sanctuary, where birds and animals of the region that can not otherwise survive in the wild are sheltered. The Center also includes animal enclosures designed for public viewing, a small native plant garden, museum/gift shop, and a self-guided one-mile nature trail. The San Dimas Canyon Nature Center Association assists with maintenance and fundraising efforts for the Center, and has about 10 active volunteers. The Nature Center is open daily (except holidays) from 9:00 a.m. to 3:00 p.m., and 9:00 a.m. to 5:00 p.m. on weekends.

Additional facilities available at San Dimas Canyon Park include two large children's playgrounds; five picnic areas (about 150 picnic tables total); an unlighted softball field; and two camping areas, use of which is by reservation only, and limited to youth groups such as Scouts or school groups. The park's capacity is approximately 1,000 people over any given day. Park officials estimate the average use of the park totals about 7,000 visitors each month, with higher numbers occurring over the summer months.

- *Horsethief Canyon Park:* Construction of Horsethief Canyon Park is nearing completion. This facility is City-owned and operated, and houses the Sycamore Canyon Stables. The park contains picnic areas, as well as equestrian and hiking trails. There are two soccer fields, with one being lighted; a tot lot; a volleyball court; horseshoe pits; and a restroom building. In addition, the park hosts the Annual Western Days Rodeo. Additional park improvements are anticipated in the future.

Equestrian

One privately-owned equestrian facility is located within the project area. The San Dimas Equestrian Center is located at Foothill Boulevard and the San Dimas Wash.

Commercial

The project area is comprised of five total acres of commercial uses. Located along the north side of Foothill Boulevard, these commercial uses include an office/retail center at the corner of Foothill and San Dimas Canyon Road, a restaurant at the intersection of Foothill Boulevard and Cataract Avenue, and a Kindercare Preschool located on Foothill Boulevard near the San Dimas Wash. These uses take their primary access from Foothill Boulevard and thus, have little impact on development within the remainder of the project area other than providing neighborhood commercial services to the general area.

Senior Citizen Housing

The three-acre Park San Dimas Senior Apartment Complex, which is a senior citizen housing complex, is located above Foothill Boulevard. The apartment complex includes 135 one- and two-bedroom units for adults who are 62 years and older.

SURROUNDING LAND USES

As discussed previously, the project area is generally bordered by the Angeles National Forest to the north and northeast, the City of La Verne to the east and southeast, residential areas within the City of San Dimas to the south, and residential and commercial areas within the City of Glendora immediately to the west.

Review of the City of La Verne Zoning Map shows that areas immediately east of and surrounding the San Dimas Debris Disposal Area are zoned "PR1/5D" and "PR3D". These are residential zones that allow construction of detached single family residential at densities of one dwelling unit per five acres and three dwelling units per acre, respectively. Areas within La Verne that neighbor the San Dimas Canyon Golf Course, include the Puddingstone Diversion Dam and Reservoir facility and areas zoned "PR4.5D" and "PR8A". These are residential zones that allow construction of detached single family and attached residential at densities of 4.5 detached dwelling units per acre and eight attached dwelling units per acre, respectively.

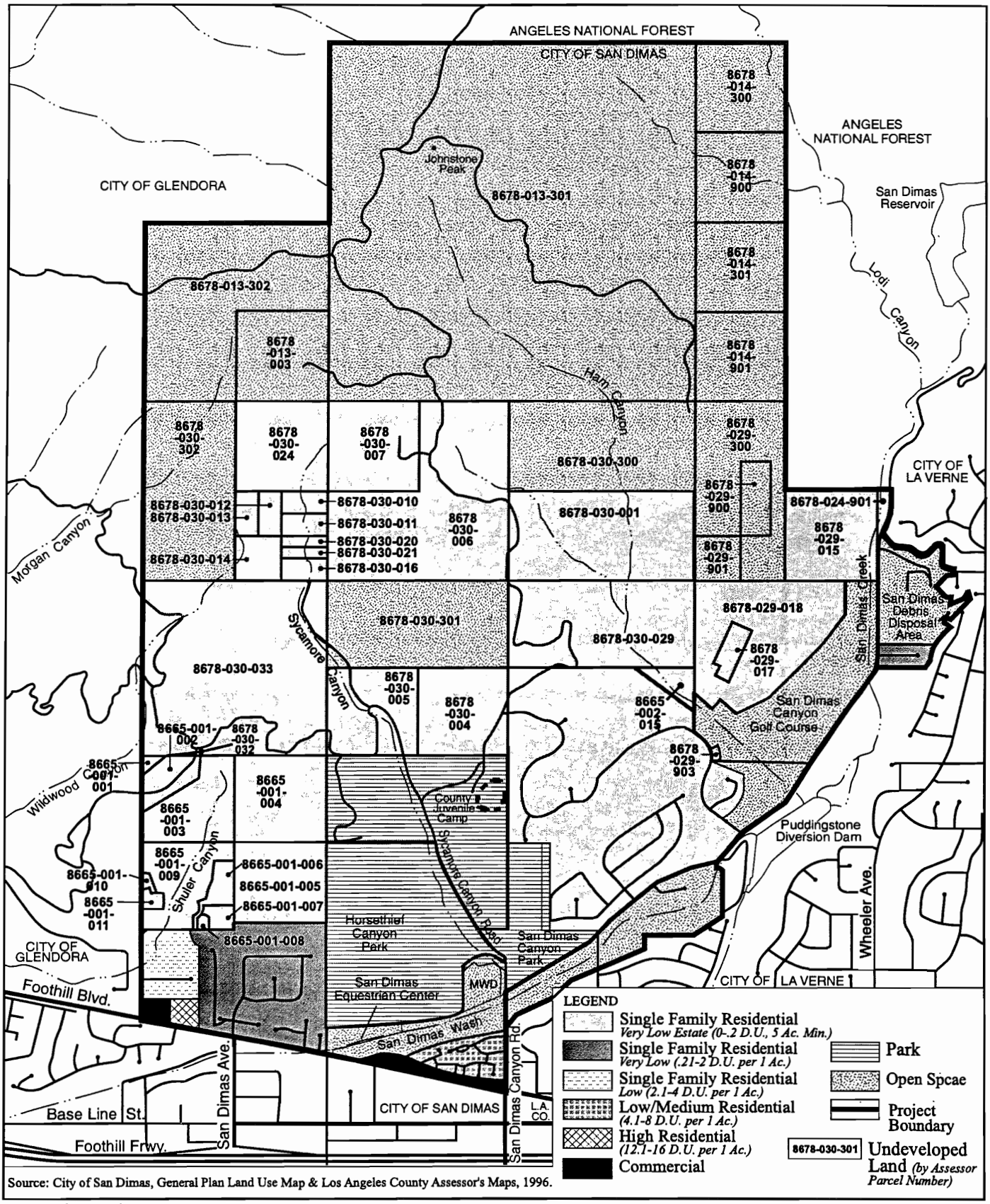
Review of the City of Glendora General Plan shows that the eastern boundaries of Glendora, which abuts the western boundary of the City of San Dimas and the project area, are predominantly in "Public Open Space (0 - 0.2 units per acre)" and "Very Low Density Residential (0.2 - 1 unit per acre)". The Glendora Zoning Map shows that these same areas are zoned "Rural Hillside Residential", north of Country Club Drive in Glendora, and "Single Family Estate (12,500 sf. lots)", above Foothill Boulevard. The areas south of Foothill Boulevard are zoned "Planned Redevelopment" and "Single Family Residences".

RELEVANT PLANS AND POLICIES

The following discusses those relevant plans and policies that relate to the project area and proposed project.

San Dimas General Plan

Each City or County in California is required by Article 5, Chapter 3, Division 1, Planning and Zoning Law of the California Government Code (Section 65300 et. seq.) to prepare and adopt a General Plan. The General Plan was adopted by the City in 1974. The various elements of the General Plan were updated most recently in 1991. Presently, the City's General Plan includes elements relating to Land Use, Circulation, Housing, Conservation, Safety, Noise, and Open Space.



Source: City of San Dimas, General Plan Land Use Map & Los Angeles County Assessor's Maps, 1996.

Source: LSA Associates

NORTHERN FOOTHILLS IMPLEMENTATION PROGRAM
PROGRAM ENVIRONMENTAL IMPACT REPORT

General Plan Land Use

0 2,000'

ROBERT BEIN, WILLIAM FROST & ASSOCIATES
2/99 JN 10-034933-6377

Exhibit 5.1-2

- *High Residential:* Densities range from 12.1 to 16 dwelling units per acre. Permitted uses include multi-family dwellings such as apartments and multi-story residential.

- *Commercial:* Permitted uses include retail sales and service oriented businesses, such as restaurants, automotive service, dry cleaning, banks, etc.

- *Open Space and Park:* The Open Space and Park designations are similar in terms of objectives and therefore, are discussed together. The purpose of these designations is to protect and preserve open space for preservation of natural resources, for production of other resources, for outdoor recreation and education, and for public health and safety. The Open Space designation includes all City and County parks, golf courses, Los Angeles County Flood Control lands, and U.S. Forest Service lands. Buildings and structures, when permitted, can not occupy more than 25 percent of the gross area of the affected parcel.

As shown on the Land Use Map, the entire northern portions and some of the southern portions of the study area are intended for Open Space uses. An "island" of Open Space owned by the U.S. Forest Service is located in center of the study area. This Open Space island is surrounded by Single Family Residential Estate Very Low, which comprises much of the study area. A pocket of Park-designated area is intended for the southern portions of the project area. Smaller parcels along Foothill Boulevard are designated Single Family Residential Very Low, Single Family Residential Low, Low/Medium Residential, High Residential, Commercial, Park, and Open Space. It should be noted that much of these areas along Foothill Boulevard and San Dimas Canyon Road are presently developed.

❖ *Circulation Element:* In accordance with Section 65302 (b) (California Government Code), the element identifies the general location and extent of existing and proposed major thoroughfares, transportation routes, terminals, and other local public facilities. Additionally, the element addresses issues relating to regional coordination, transit and commuter provisions; equestrian/ recreational trails; bikeway system; fiscal limitations; and traffic capacity.

According to the Roadway Classifications Exhibit of the Circulation Element, the only roadways traversing the study area that are defined and classified include Foothill Boulevard, which is designated "Major" and Terrebonne Avenue, which is designated "Collector".

❖ *Conservation Element:* The element establishes a management plan for natural resources to prevent waste, destruction or neglect. The element is concerned

with the conservation, development and utilization of natural resources such as water, soils, rivers, wildlife, minerals and other natural and cultural resources. The element overlaps the Open Space Element of the General Plan, which relates to open space and the preservation of natural resources and managed production of resources. This element addresses water resources, watersheds, groundwater, surface drainage, agricultural soils, mineral resources, solid waste recycling, and cultural resources.

- *Open Space Element:* The element designates open space land within the City, which is defined by Section 65560(b) of the Government Code as "any parcel or area of land or water which is essentially unimproved and devoted to open space use ..." The element further defines open space as uses which preserve and enhance natural resources, managed production of resources, outdoor recreation, and public health and safety. The element addresses future demands for park land and recreation facilities, school district lands, trails, scenic resources, and scenic highways.

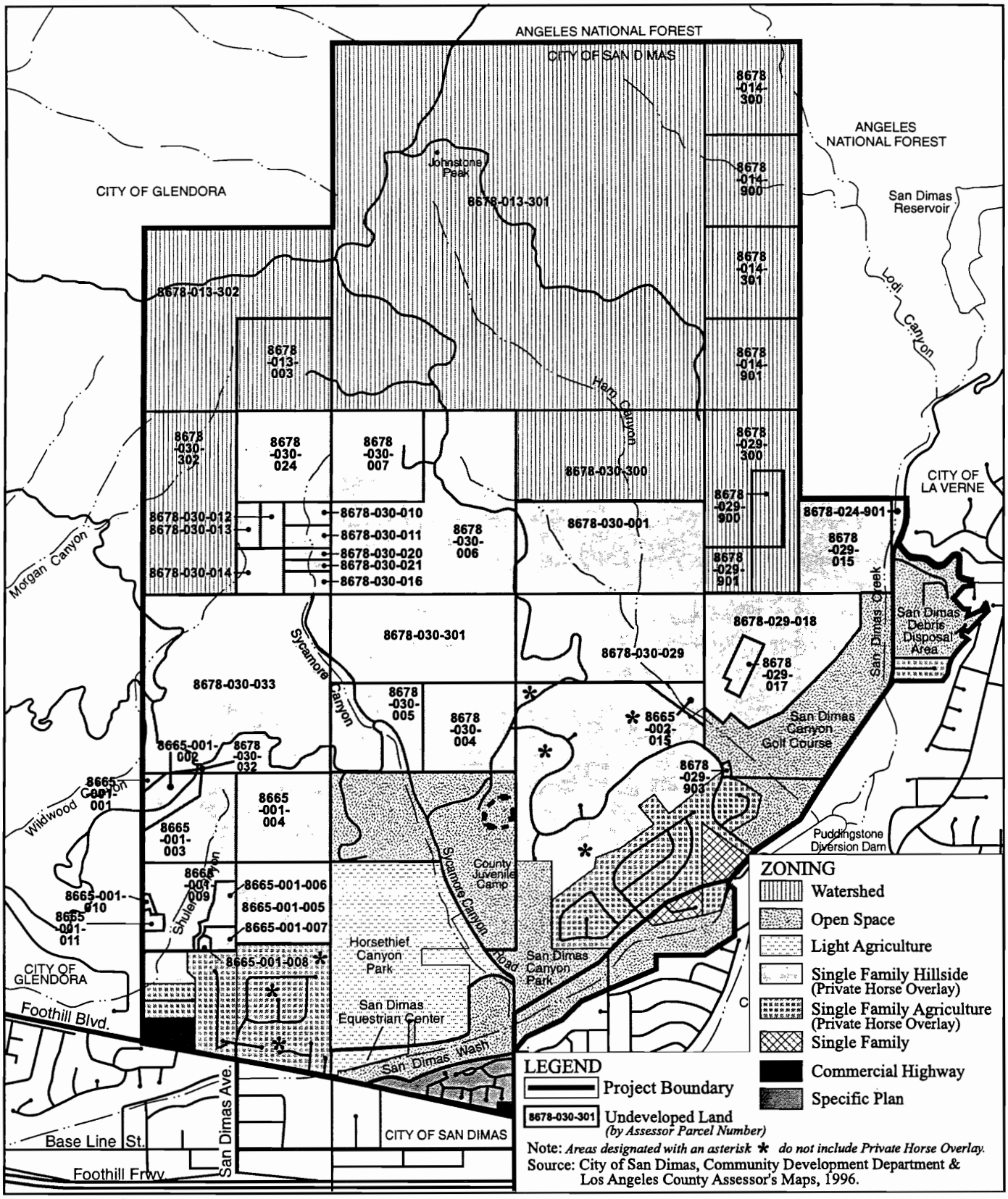
  Horsethief Canyon Park and the San Dimas Canyon Golf Course are defined as Parks in the Open Space Element. Additionally, the Recreational Trails exhibit delineates an equestrian trail along the southern portions of the project area. The equestrian trail parallels Foothill Boulevard and connects with the San Dimas Canyon Golf Course and San Dimas Creek. Finally, Foothill Boulevard is designated a "Scenic Highway" by the Open Space Element. This element intends to improve the streetscape image of Foothill Boulevard through enhanced landscaping, medians, land use controls, and other streetscape elements.

San Dimas Zoning Ordinance

The San Dimas Zoning Ordinance sets forth all existing zoning regulations and provisions in order to designate, regulate, and restrict location and use of buildings, structures, and land for residence, commerce, trade, industry, or other purposes. The ordinance also regulates and limits height, number of stories, size of buildings and other structures, yard size, and open space.

The San Dimas Zoning Map is illustrated in Exhibit 5.1-3, *Existing Zoning*. According to the Zoning Map, the project area is comprised of eight zoning classifications, including Watershed, Open Space, Light Agriculture, Single Family Hillside, Single Family Agriculture, Single Family Residential, Commercial Highway, and Specific Plan. The following discusses the objectives of these zoning classifications.

- *Open Space (OS):* The zone protects and preserves open space for preservation of natural resources, for preservation and production of resources, for outdoor recreation and education, and for public health and safety. Residential development is permitted as a conditional use.



Source: LSA Associates

NORTHERN FOOTHILLS IMPLEMENTATION PROGRAM
PROGRAM ENVIRONMENTAL IMPACT REPORT

Existing Zoning

0 2,000'

ROBERT BEIN, WILLIAM FROST & ASSOCIATES
2/99 JN 10-034933-6377

Exhibit 5.1-3

- *Light Agriculture (AL):* The zone promotes orderly development of large open areas of land; establishes agricultural uses; and allows single family residential. Permitted uses include horticulture and agriculture, single family dwellings, and grazing.

- *Single-Family Hillside (SF-H):* The zone provides for development of safe, comfortable residential areas where residents can enjoy views and a natural setting. It creates development which blends with the natural setting when viewed from neighboring areas and other parts of the City. Primary uses include single family dwellings, watershed and flood control facilities, grazing, public parks and open space, public and private trails, and communication facilities.

- *Single-Family Agriculture (SF-A):* The zone is intended to provide for development of single-family residential homes at urban standards, with not more than one dwelling unit permitted on any lot or parcel, and permitting certain domestic animals. Permitted uses include any use permitted within the Single Family Residential zone, wholesale nurseries, orchards, and field crops.

- *Single-Family Residential (SFR):* The zone is intended to provide for development of single family residential homes at urban standards, with not more than one dwelling unit permitted on any lot or parcel. Primary uses include single family dwellings and manufactured housing on permanent foundations.

- *Commercial Highway (CH):* The zone accommodates general commercial, office and other highway oriented businesses and transportation-related service facilities which serve the City and transportation corridor-related needs. Permitted uses include those permitted within the Neighborhood Commercial zone, retail businesses, restaurants, and fortune telling.

- *Specific Plan. No. 9:* The Specific Plan is intended to provide for the classification and development of parcels as a coordinated and comprehensive project so as to take advantage of the superior environment which will result from large scale community planning. Regulations established in the Specific Plan allow a diversity of uses and development standards created specifically for the project area, while ensuring substantial compliance with the spirit, intent, and provisions of other portions of the Zoning Ordinance. The Specific Plan is intended to conserve scenic qualities of the area and provide an enriched scenic highway environment with aesthetic cohesiveness, harmonious massing of structures and interfacing of open space through the utilization of superior land planning and architectural design.

- *Private Horse Overlay Zone (P-H):* Two of the residential zones within the study area, Single Family Hillside and Single Family Agriculture, are within the Private Horse Overlay Zone. The overlay zone allows for the maintenance and keeping of horses in suitable areas.

As shown on the Zoning Map, the entire northern portions of the study area are zoned for Watershed uses. Single Family Hillside (Private Horse Overlay) zoning is located just south of these areas zoned Watershed and comprises a large portion of the study area. Numerous parcels just south of the Single Family Hillside (Private Horse Overlay) areas are zoned Open Space. Other smaller parcels located north of Foothill Boulevard are zoned Single Family Agriculture (Private Horse Overlay), Single Family, Commercial Highway, and Specific Plan. The Horsethief Canyon Park, which is surrounded by areas zoned as Open Space, is zoned Light Agriculture.

Angeles National Forest Land and Resources Management Plan

Those areas under the control of the National Park Service, within Angeles National Forest, do not contain any significant development, as the primary mission of the National Park Service is the preservation of the natural ecosystems under their control. Any potential development within National Park Service-controlled areas must remain consistent with the Angeles National Forest Land and Resources Management Plan. The Angeles National Forest Land and Resources Management Plan states "the 17,045 acres within the San Dimas Experimental Forest, including the 1,460 acre Fern Canyon Research Natural Area, will be managed for research in cooperation with the Pacific Southwest Forest Experimental Station. Although located in the Mt. Baldy Ranger District, this area will not be covered by the Plan. This land is generally closed to the public except by special permit."

The Plan also states that the Experimental Forest "...exists as a research and demonstration area for application of wildland technology. Fern Canyon is held as a control to evaluate treatments in other drainages. Research projects of national and worldwide interest are short- and long-term, with emphasis in sediment and erosion studies, post-fire vegetation sequences, and air quality management." As discussed previously, 1,280 acres or 43 percent of the Northern Foothills project area are located within the Angeles National Forest.

IMPACTS AND MITIGATION MEASURES

Significance Criteria

A project will normally have a significant adverse environmental impact on land use if it results in any of the following:

- a conflict with adopted environmental plans and goals of the community in which it is located;
- a disruption or division of the physical arrangement of an established community;
- a conflict with established recreational, educational, religious, or scientific uses of the area;
- induce substantial growth of concentration of people; or
- displace a large number of people.

Potential impacts related to land use compatibility and consistency with related planning policies have been identified and are categorized below according to topic.

On-Site Land Use

- ***IMPLEMENTATION OF THE PROPOSED PROJECT WOULD RESULT IN THE DEVELOPMENT OF EXISTING OPEN SPACE WITH A MAXIMUM OF 127 SINGLE-FAMILY RESIDENTIAL UNITS, THEREBY ALTERING PORTIONS OF THE PROJECT AREA TO A PERMANENT DEVELOPED CONDITION.***

Significance: Less than significant impact with mitigation.

Impact Analysis: The proposed project anticipates construction of 972 acres of vacant land, which represents approximately 33 percent of the project area. Most of these vacant lands are designated by the City General Plan as Single Family Residential Estate Very Low. As discussed previously, permitted densities within these areas can range from 0 to 0.2 dwelling units per acre. Assuming a maximum permitted density of one dwelling unit per five acres, the 972 acres of presently vacant land can conceivably be developed with 195 total dwelling units.

Recently, however, the City determined that given the severe topography and slopes of the project area and other physical and infrastructure constraints, the General Plan's permitted density for development may be considered inappropriate and that further analyses were needed to re-evaluate the development potential of the project area. Accordingly, in 1998, the San Dimas City Council approved the report entitled, "San Dimas Northern Foothills Development and Infrastructure Study", which addressed these issues. The study was prepared to identify the physical and environmental attributes of the San Dimas Northern Foothills study area, which is also the project area for this EIR; assess the condition of available public services and facilities; and analyze the public policies that would affect and regulate future development within the study area boundaries. As a result of the analyses contained in the study, a development strategy was formulated based on land use and planning principles, slope analyses, physical conditions of the study area, City development policies, and other issues. A component of the development strategy was its establishment of "Development Feasibility Zones." It was determined that these zones represented the most feasible

portions of the study area that can be potentially developed in the future. The development strategy also concluded that other areas outside the zones can potentially be developed, but at lower densities given their physical constraints. Accordingly, the development strategy recommended that any development within the Development Feasibility Zones could be developed at a permitted density of one dwelling unit per five acres and that development outside the zone could be developed at one dwelling unit per 20 acres. Based on these permitted densities, a maximum of up to 127 single family detached residential units could potentially be developed within the vacant lands of the study area.

Construction of a maximum of up to 127 residential units would result in some degree of land use impact. The vacant lands are located within the steep canyons and hillsides (above 35 percent slope) and moderately-sloped (between 10 to 35 percent slope) chaparral-covered hills, and are characterized by the intermingling of grasslands, coastal sage scrub, and oak and riparian woodland habitat areas. Future construction would permanently commit these portions of the study area to single family detached residential units and alter the aforementioned open space and biological resources. There will be increased local traffic, as well as incremental increases in associated noise and air emissions. Views of the study area from off-site vantage points would be affected since open areas will be affected with the proposed project. Refer to Sections 5.3, 5.2, 5.8, 5.4, and 5.5, respectively, which further discuss and evaluate project impacts relating to traffic, aesthetics and views, biology, air, and noise. Given that construction would only occur on vacant lands, displacement of people would not result with the proposed project.

Though the proposed project would result in some land use impact, the level of impact is not considered significant for the following reasons. First, the 972 acres anticipated for residential development are designated by the City General Plan as Single Family Residential Estate Very Low. The City has always intended the 972 acres to be developed with single family detached residential units at lower densities. Secondly, the proposed project would develop the 972 acres at a lower overall density than presently permitted with the General Plan. As discussed earlier, if the acreages were developed in accordance with the City's General Plan, 195 dwelling units can be developed instead of the maximum 127 units currently being anticipated. The proposed project would develop at least 68 fewer units or 35 percent less than what is permitted under present General Plan density. Thirdly, the proposed project does not guarantee any future development with the entire range of entitlements and approvals that are required for construction. Each individual property owner is required to acquire the necessary City and other jurisdictional approvals, entitlements, and clearances prior to any future construction. Future development will be reviewed by the City on a case-by-case basis. Land use issues resulting from future residential development would be resolved with compliance with applicable design standards and guidelines contained in the San Dimas Northern Foothills Development and Infrastructure Study, San Dimas General Plan and Zoning Ordinance, and other plans

of the City. In addition, implementation of mitigation measures recommended in other sections of this EIR would alleviate impacts associated with traffic, aesthetics and views, air, noise, etc. As an additional safeguard, as permitted by CEQA Guidelines, further environmental clearances and evaluations can be required by the City. The City could impose site-specific mitigation to further reduce any potential impacts to less than significant levels.

Residential development of the 972 vacant acres would not conflict with other existing land uses within the project area. Residential development has always been anticipated for the vacant lands; the entire project area was planned to support the residential development. The project would not disrupt or divide the physical arrangement of any established community; would not conflict with any established recreational, educational, religious or scientific uses; or induce substantial growth of concentration of people. The City would review all future proposals on a case-by-case basis to ensure that incremental impacts would not result with any particular development. The City could impose site-specific mitigation to further reduce any potential impacts to less than significant levels.

Mitigation Measures:

LU1. The City shall review all future proposals on a case-by-case basis to ensure that incremental impacts do not occur with any future development. If necessary, the City shall require additional environmental evaluations and clearances, and impose site-specific mitigation to further reduce any potential impacts.

Compatibility with Surrounding Land Uses

❖ ***FUTURE RESIDENTIAL DEVELOPMENT OF THE 972 VACANT ACRES WOULD RESULT IN POTENTIAL LAND USE INCOMPATIBILITY WITH NEIGHBORING USES.***

Significance: Less than significant.

Impact Analysis: The future construction of a maximum of up to 127 residential units is compatible with neighboring uses in the Cities of La Verne and Glendora. The project is compatible with similar residential uses to the south, within the City San Dimas. Based on the San Dimas General Plan, the City has always intended the 972 acres to be developed with low density single family detached residential units. The land use interface with the City of La Verne also does not result in any land use incompatibility. As discussed previously, the La Verne Zoning Map shows that areas immediately east and southeast of the study area are intended for single family detached and attached residential uses. Within the City of Glendora, their General Plan and Zoning Maps show that areas along the eastern boundaries of Glendora, which abut the western boundary of the City of San Dimas and the project area, are

either intended for single family residential uses or presently developed with single family residences. Future residential development anticipated with the proposed project are not considered incompatible with these uses. Any potential land use incompatibility impact is considered less than significant.

Mitigation: No mitigation measures are required.

Relevant Plans and Policies

- ***FUTURE RESIDENTIAL DEVELOPMENT OF THE 972 VACANT ACRES WOULD BE CONSISTENT WITH RELEVANT PLANS AND POLICIES OF THE CITY OF SAN DIMAS.***

Significance: Less than significant.

Impact Analysis: The proposed project would be consistent with the San Dimas General Plan and Zoning Ordinance, and Angeles National Forest Land and Resources Management Plan. The project would not conflict with any adopted environmental plans or goals of the community.

San Dimas General Plan

The following discusses project consistency with the Land Use, Circulation, Conservation, and Open Space Elements.

- <u>*Land Use Element:*</u> The vacant 972 acres anticipated for single family detached residential development are designated by the City General Plan and Land Use Element as Single Family Residential Estate Very Low. The City has always intended for the 972 acres to be developed for residential purposes. The proposed project will develop the 972 acres at a lower overall density than originally anticipated with the General Plan. Given that the proposed project would not develop a total number of units that exceed permitted densities for the 972 acres, it is concluded that the proposed project would not be in conflict with the City's General Plan and Land Use Element. Existing land uses elsewhere within the project area would continue to operate as currently developed. Those areas designated Open Space and Park would not be affected by the proposed project. The City intends for these particular areas to ultimately remain in open space.

  It should be noted that to better guide and regulate future development within the Northern Foothill project area, an Amendment to the General Plan (GPA) is being proposed. The GPA would amend the General Plan to create a "Northern Foothills" land use designation and define development policies and requirements that are specific to the Northern Foothills study area that are

consistent with the Development Strategy described in the San Dimas Northern Foothills Development and Infrastructure Study.

- *Circulation Element:* The project does not propose any improvements to Foothill Boulevard or Terrebonne Avenue that would conflict with the Circulation Element classifications of these roadways. These roadways would continue to be classified as "Major" and "Collector", respectively.

- *Conservation and Open Space Elements:* The proposed project affects those vacant areas within the project area that are designated Single Family Residential Estate Very Low. Those areas designated Open Space and Park would not be affected by the proposed project. The City intends for these particular areas to ultimately remain in open space. Horsethief Canyon Park and the San Dimas Canyon Golf Course would continue to be defined as Parks in the Open Space Element. The equestrian trail proposed along the southern portions of the project area would continue to be required. Likewise, the streetscape image of Foothill Boulevard through enhanced landscaping, medians, land use controls, and other streetscape elements would continue to be required in the future.

San Dimas Zoning Ordinance

The 972 acres anticipated for residential development are zoned by the City Zoning Ordinance as Single Family Hillside (Private Horse Overlay). The City has always intended for the 972 acres to be developed with detached single family residential units. Accordingly, it is concluded that the project would not be in conflict with the City's Zoning Ordinance. Existing land uses elsewhere within the project area would continue to operate as currently developed. Those areas zoned Open Space would not be affected by the proposed project. The City intends for these particular areas to ultimately remain in open space.

In addition to the aforementioned GPA, a Zone Change/Specific Plan is also being proposed for the project area to create either a new zone or specific plan to better implement the regulations and standards established with the Development Strategy described in the San Dimas Northern Foothills Development and Infrastructure Study.

Angeles National Forest Land and Resources Management Plan

The proposed project would not conflict with the Angeles National Forest Land and Resources Management Plan, which only affects lands within the San Dimas Experimental Forest and Fern Canyon Research Natural Area. These areas would not be affected by future residential construction anticipated for the 972 acres of vacant lands, as these vacant lands are outside the National Forest area.

Mitigation Measures: No mitigation measures are required.

CUMULATIVE IMPACTS

- ***THE PROPOSED PROJECT COMBINED WITH OTHER FUTURE DEVELOPMENT, COULD INCREASE THE INTENSITY OF CONSTRUCTION IN THE CITY OF SAN DIMAS.***

Significance: Less than significant.

Impact Analysis: Cumulative impacts are not expected to be significant due to the following reasons. First, the proposed project would allow construction of less single family detached residential units than allowed under the existing General Plan. As discussed previously, assuming a maximum density of one dwelling unit per five acres, which is the maximum density permitted under the General Plan, the 972 acres of presently vacant land can conceivably be developed with 195 total dwelling units. The project, however, proposes to allow future development to occur at two different densities: one dwelling unit per five acres, and one dwelling unit per 20 acres. Based on these permitted densities, the proposed project could develop a maximum of up to 127 dwelling units. The proposed project therefore, would result in less overall development than permitted with the present General Plan and less incremental development within the cumulative scenario, which is General Plan buildout. Secondly, the 972 acres of vacant land was previously analyzed and evaluated in the City's General Plan EIR for single family residential development. Therefore, single family residential development of the 972 acres was already provided some level of environmental clearance by the City. Given that the proposed project would provide less residential units than previously analyzed and intended by the City, it can be concluded that the proposed project would result in less incremental development and less cumulative impact. Finally, any potential land use impact is, for the most part, site-specific and would require further evaluation on a case-by-case basis. As discussed previously, the City would review all future proposals on a case-by-case basis to ensure that incremental impacts would not result with any particular development proposal, thus, reducing the likelihood of any cumulative impact. Potential cumulative effects upon land use and planning are not anticipated to be significant.

Mitigation Measures: No mitigation measures are required.

UNAVOIDABLE SIGNIFICANT IMPACTS

No unavoidable significant impacts related to land use and relevant plans and policies have been identified.

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5.2 AESTHETICS

The purpose of this Section is to describe the existing aesthetic environment on-site and in the site vicinity and to analyze potential project impacts to the aesthetic character of the site. Visual resources information for this Section was compiled from site photographs and site surveys conducted by Robert Bein, William Frost & Associates (RBF) in December 1998 and aerial photographs dated 1994. Consideration of public scenic views, introduction of new sources of light and glare, and compatibility of the proposed project with adjacent uses and local aesthetic resources are also included in this Section.

EXISTING CONDITIONS

The boundaries of San Dimas are delineated by urbanized areas and open space. The northern portion of the City is part of the San Gabriel Mountains and foothills, which form a natural backdrop for the City. These foothills, which are part of the Angeles National Forest, consist of undeveloped land planned for low density hillside use.[1] The western and southern boundaries of the City are adjacent to the cities of Glendora, Covina, and Pomona. The eastern boundary is bordered by the cities of La Verne and Pomona.

Aesthetics

The scenic resources of the City of San Dimas include: the open foothills and canyons, and views to the San Gabriel Mountains. The northern foothills, Way Hill, San Dimas Canyon, Sycamore Canyon, Walnut Creek, Cinnamon Creek and other associated canyons are unique visual resources within the City of San Dimas. The City's canyons, where were formed by natural drainage courses, are unique visual resources. These scenic resources are visible from most areas of the City.

The scenic highway system is one of the major means in which one experiences the rural environment of the City of San Dimas. The 210 Foothill Freeway and State Route 30 (SR-30) are considered scenic corridors of regional significance, because of the quality of their environment and the large number of people traveling these routes.

On-Site

The natural slopes of the Northern Foothills area are one of the primary resources of the City of San Dimas. The foothill area, which is visible throughout the City, creates a dramatic backdrop for the community, and provides substantial visual open space at the northern portion of the City. The Northern Foothills area occupies much of the southerly and easterly facing slopes of Johnstone Peak. Elevations within the project

[1] City of San Dimas General Plan EIR, May 1991, Page 3.0-68.

area range from approximately 1,000 feet above mean sea level (msl) to approximately 3,200 feet msl. The project area is characterized by steep terrain, narrow canyons, and broad ridge lines. Major topographic features within the project area include Johnstone Peak (3,178 feet); Sycamore Flat; and three major north/south ridge lines that divide the project area into four uniquely identifiable canyon areas: Wildwood Canyon, Sycamore Canyon, Ham Canyon, and Lodi Canyon.

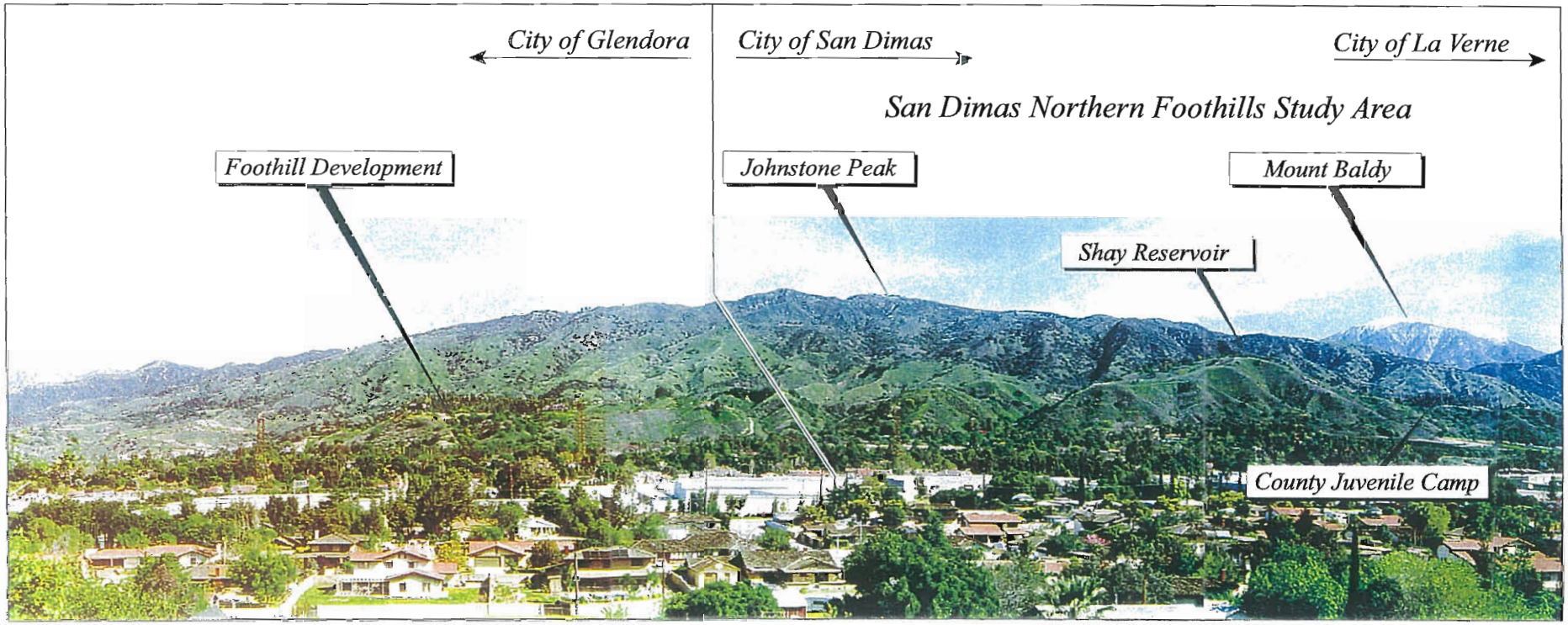
From most locations within the City of San Dimas, the lower slopes of the Northern Foothills area are not readily visible due to intervening structures and landscaping with the valley area. As discussed in Section 5.1, *Land Use and Relevant Planning*, the southern portion of the project area contains single- and multiple-family residential uses. It should be noted that many areas within the proposed project area are located in small valley-like settings. Refer to Exhibit 5.2-1, *Panorama of Project Site and Surrounding Areas*, which provides a panoramic photograph of the project site and areas that surrounding the project site. Exhibit 5.2-2, *Site Photographs*, provides photographs of on-site features and view of both on- and off-site locations.

Primary Viewsheds

Three distinct types of viewsheds are relevant to the Northern Foothills Implementation Program: (1) views of the project area from surrounding sites, (2) views from the project area to outlying areas, and (3) interior views, experienced when viewing from within the Northern Foothills area. From outlying areas, individual views of the foothills vary depending upon elevation and distance from the area. Certain high points in the southern portion of San Dimas provide good distant views of the foothills.

As the project area is approached from other portions of the City, views become obscured by existing development. Views are limited to glimpses of the foothills from north-south roadway corridors, or from points where a break in development occurs.

Views from some of the highest points within the project area, such as Johnstone Peak, are spectacular on clear days. Looking south, the entire valley floor is visible, extending from Rancho Cucamonga to the east, Chino Hills to the south, and Glendale to the west. Distant views of clusters of skyscrapers in downtown Los Angeles to the west, and the San Gorgonio and the San Jacinto Mountains in the east are also visible. From within the project area, the interior views of canyons and successive ridge lines to the north are dominant. Small, picturesque valleys of rolling hills are present between the lowest range of foothills at the south of the project area and the higher elevations within the national forest lands. The wealth of natural flora and the diversity of terrain within the Northern Foothills provide views that are continuously changing, based on the movement of the sun throughout the day, and the transition of the seasons throughout the year. Refer to Section 5.8, *Biological Resources*, for a description of existing vegetation within the project area.

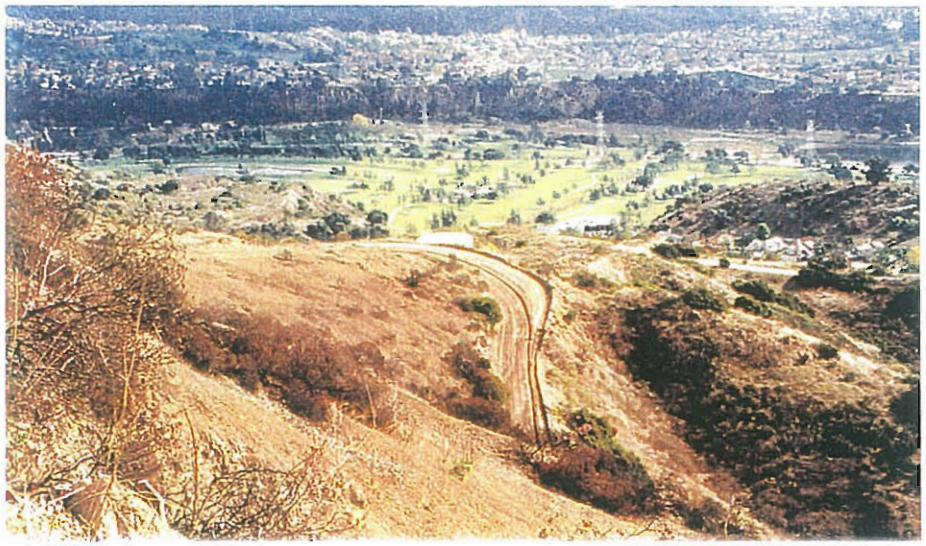


Panorama of project and adjacent areas.

NORTHERN FOOTHILLS IMPLEMENTATION PROGRAM
PROGRAM ENVIRONMENTAL IMPACT REPORT

Panorama of Project Site and Surrounding Areas

Source: LSA Associates



View looking East towards San Dimas Canyon Golf Course and City of La Verne

View looking West to City of Glendora

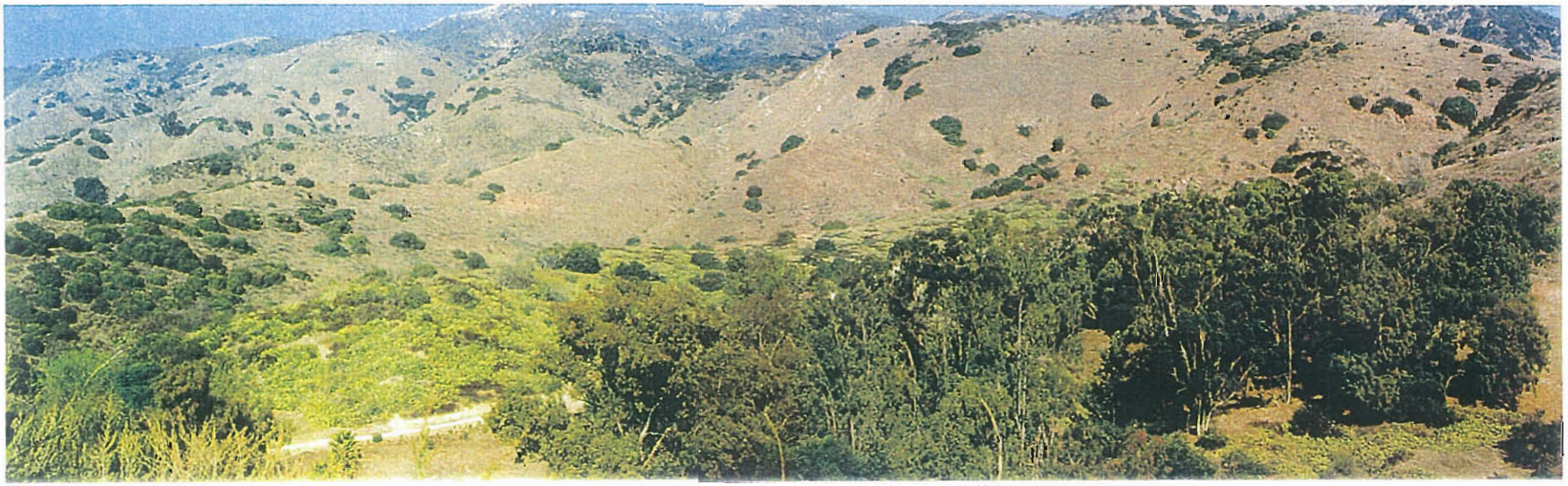
View looking North of Schuler Canyon

View looking South of Schuler Canyon

NORTHERN FOOTHILLS IMPLEMENTATION PROGRAM
PROGRAM ENVIRONMENTAL IMPACT REPORT

Site Photographs

View from Wildwood Motorway looking East towards Sycamore Canyon



View of Wildwood Motorway looking North towards Sycamore Flat and Johnstone Peak

NORTHERN FOOTHILLS IMPLEMENTATION PROGRAM
PROGRAM ENVIRONMENTAL IMPACT REPORT

Site Photographs

View looking East to homes from Terrebonne Avenue

View looking North from Cataract Avenue

Shay Reservoir (Water Storage Tank)

Water Tunnel in Sycamore Canyon

NORTHERN FOOTHILLS IMPLEMENTATION PROGRAM
PROGRAM ENVIRONMENTAL IMPACT REPORT

Site Photographs

Example of conflicts between vehicles and equestrians in project area

Example of road widths in project area on Sycamore Canyon Road

View of equestrian trail along
San Dimas Canyon Road

Example of existing motorway and overhead utilities in project area

NORTHERN FOOTHILLS IMPLEMENTATION PROGRAM
PROGRAM ENVIRONMENTAL IMPACT REPORT

Site Photographs

Some interior canyons contain boulder strewn stream courses and are heavily foliaged. Because access to such areas is limited, and poison oak is prevalent, much of the upper canyon habitats have remained generally undisturbed.

Off-Site

The Angeles National Forest borders the project area to the north and northeast. Residential areas parallel the south and southeast boundaries of the project area and are visible from various vantage points throughout the project site. Vacant open space is located west of the project area. Views of the project area are available from Foothill Boulevard and are occasionally filtered by existing structures and landscaping.

Light and Glare

On-Site

The current uses on-site produce minimal light and glare due to the generally low intensity of development within the project area. However, the light and glare generated from the project area are from the existing residential uses, the County Juvenile facility, and associated vehicles.

Off-Site

Minimal light and glare is emitted from the land uses surrounding the project site. The primary source of light in the vicinity of the project area includes residential uses located to the south across Foothill Boulevard, streetlights, and car headlights associated with vehicular travel on Foothill Boulevard. Additional residential areas located southeast of the project area within the City of La Verne provide an additional source of light and glare.

IMPACTS AND MITIGATION MEASURES

Significance Criteria

A project will result in a significant effect on the environment if it will have a "substantial, demonstrable negative effect." The significance of an aesthetic effect, in terms of this project, can be determined by examining anticipated project effects from a number of view points including observer position and changes to the present visual character of the project area. It is important to note that, in the absence of a site plan or building elevations, this impact analysis is more subjective and qualitative in nature and must assume worst case conditions relative to zoning requirements (setback, height, landscaping) and permitted land uses. The following standards are used to assess aesthetic impacts:

- ❖ Substantial obstruction of scenic views;

- Degradation of scenic views from important public gathering places;
- Obstruction or alteration of views from a designated scenic highway or heavily traveled roadway;
- Substantial alteration of unique environmental or man-made visual features;
- Development that does not conform with a jurisdiction's design guidelines or policies;
- Development that is out of scale or character with a distinct neighborhood or district; or
- Creation of light spill-over and glare effects which deter wildlife in sensitive habitat areas or present a nuisance to residential land uses.

The evaluation of aesthetic impacts is, by nature, a subjective exercise due to widely varying personal perceptions. Nevertheless, replacement of open space for residential uses would permanently alter the appearance of the project area.

NORTHERN FOOTHILLS IMPLEMENTATION PROGRAM

Section 5 of the *Northern Foothills Development and Infrastructure Study*, prepared by LSA Associates, includes a section on visual intrusiveness of new development in the project area. The following text has been excerpted from the study and includes both the guiding principle with regard to visual character and recommends policies and action items for the City of San Dimas.

Visual Intrusiveness of New Development

General Principle

Steep hillside areas, such as those existing within the Northern Foothills Area are inherently unstable platforms for development. As a result, the priority between development and preserving natural landforms needs to be given to preserving natural landforms in order to recognize and live within the limits placed by natural environmental constraints, protect public health and safety from the potential damaging effect of hillside alteration, and to contribute to the open space character of the area.

Implementing Policies and Actions

1. *The visual intrusiveness of new development shall be minimized. Rather than relying on substantial landform modification to create artificial building*

pads, new development shall be designed to fit quietly into the natural character of the area.

a. *Except within bedrock, where manufactured slopes in excess of 5 vertical feet cannot feasiblely be avoided, they shall be landform graded. "Landform grading" is a contour grading method which creates artificial slopes with curves and varying slope ratios in the horizontal and vertical planes designed to simulate the appearance of surrounding natural terrain. Grading plans shall identify which slopes are to be landform graded and which are to be conventionally graded.*

b. *Site design shall utilize varying setbacks, structure heights, innovative building techniques, and retaining walls to blend structures into the terrain:*

- *Allow for different lot shapes and sizes, as well as the provision of split development pads, with the prime determinant being the natural terrain.*
- *Within the lower elevations of the Northern Foothills area, allow flag lots in areas where it is demonstrated that the end result is the preservation of natural topography by minimizing grading, and if the lot can be designed to provide adequate visibility for emergency vehicle response.*

c. *Structures shall be sited in a manner that will:*

- *fit into the hillside's contour and relate to the form of the terrain;*
- *retain outward views from the maximum number of units while maintaining the natural character of the hillside;*
- *preserve vistas of natural hillside areas and ridgelines from public places and streets; and*
- *preserve existing views and allow new dwellings access to views similar to those enjoyed from existing dwellings.*

d. *Streets shall follow the natural contours of the hillside to minimize cut and fill. Streets may be split into two, parallel one-way streets (thereby effectively functioning as a two-way street with a median) in steeper areas to minimize grading and blend with the terrain. Cul-de-sacs or loop roads are encouraged where necessary to fit the terrain. On-street*

parking and sidewalks may be eliminated, subject to City approval, to reduce required grading.

e. *Driveways that serve more than one lot (when approved by the Fire Department), as well as diagonal driveways running along contour lines, are encouraged as a means of reducing unnecessary grading, paving, and site disturbance.*

f. *Clustered development is encouraged as a means of preserving the natural appearance of the hillside and maximizing the amount of open space. Under this concept, dwelling units are grouped in the more level portions of the site, while steeper areas are preserved in a natural state.*

The effect of permitted clustering is to enhance the environmental sensitivity of a development project, and facilitate the permanent protection of key features of the natural environment, such as steep slopes, biological habitats, ridgelines, and scenic areas, including their retention protected open space areas. Clustering is not be used to increase the overall density of an area beyond that which is otherwise permitted by the General Plan and applicable zoning regulations, nor is clustering to be used to create suburban style subdivisions within the Northern Foothills area. All development, including clustered development, is to be rural in character.

- *The location of clustered units shall be restricted to portions of a site with less than a 35 percent actual slope.*
- *Clustered development must preserve open space in its natural state. Adequate legal provisions shall be made to ensure the preservation of open space areas in perpetuity.*
- *When viewed from outside the Northern Foothills area from the south, southwest, and southeast, clustered subdivisions are to have no greater visual impacts than would a non-clustered development.*

g. *The use of retaining walls and structures is encouraged when it significantly reduces site grading.*

- *Except where employed to facilitate construction of a single story residential dwelling, retaining structures shall be located and restricted to 4 vertical feet in height so that they do not become a dominating visual feature. When taller retaining structures are built to accommodate a single family dwelling*

unit, the retaining structure should be located behind the dwelling so as to be screened from view by the home.

- *Where retaining walls face or will be visible from public streets, they should be faced with materials that help blend the wall into the natural character of the terrain.*

- *Large retaining walls in a uniform plane should be avoided. Break retaining walls into elements and terraces, and use landscaping to screen them from view.*

h. *The overall scale and massing of structures shall respect the natural surroundings and unique visual resources of the area by incorporating designs which minimize bulk and mass, follow natural topography, and minimize visual intrusion on the natural landscape.*

i. *Houses shall not be excessively tall so as to dominate their surroundings. Structures shall be a maximum of one story in height, but may be constructed on split, flat pads contained within a limited envelope parallel to the finished grade, rather than "jutting out" over natural slopes.*

j. *Building forms shall be scaled to the particular environmental setting so as to complement the hillside character and to avoid excessively massive forms that fail to enhance the hillside character.*

k. *Building facades shall change plane or use overhangs as a means to create changing shadow lines to further break up massive forms.*

l. *Wall surfaces facing towards viewshed areas shall be minimized through the use of single story homes, single story dwellings placed on split pads, setbacks, roof pitches, and landscaping.*

m. *Roof lines and elements shall reflect the naturally occurring ridgeline silhouettes and topographical variation, or create an overall variety, that blends with the hillside.*

n. *Architectural style, including materials and colors, should be compatible with the natural setting. The use of colors, textures, materials and forms which will attract attention by not relating to other elements in the neighborhood is to be avoided.*

o. *Require that a three-dimensional model be submitted for all proposed subdivisions, land divisions, and design review applications. Also require that viewshed analyses be submitted for all new residential*

construction to identify what development sites will look like in the post-development condition.

p. *As part of submittal requirements for tentative subdivision and parcel maps within the Northern Foothills area, require that building pads be identified for all proposed development, that tentative maps identify the type of construction (e.g., slab-on-grade, post and beam, etc.), and that tentative maps establish a three-dimensional building envelope for each dwelling.*

q. *Overhead utilities (e.g., electrical, telephone, etc.) shall only be permitted under the following circumstances:*

- *within the right-of-way of roadways connecting development areas;*
- *to serve development of a single dwelling unit on an existing lot of record; and*
- *within the rights-of-way of roadways where all lots are 5 acres in size or greater.*

In cases where aboveground utilities are permitted within the right-of-way of a roadway, connections to individual dwellings shall be underground. Utilities shall continue to be underground within subdivisions and parcel maps along roadways serving parcels smaller than 5 acres, as currently required. Where overhead utilities are permitted, their adverse visual impact on surrounding properties is to be mitigated through sensitive placement. Clear cutting of vegetation for an overhead utility corridor shall not be permitted.

2. *The interface between new development and natural open space shall be designed to provide a gradual transition from manufactured areas into natural areas. By extending fingers of planting into existing and sculptured slopes, the new landscape should blend in with the natural vegetation.*[2]

a. *Planting along the slope side of development shall be designed to allow controlled views out, yet partially screen and soften the architecture. In general, 50 percent screening of new structures with plant materials shall be accomplished.*

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[2] It is intended that the transition between manufactured areas and natural areas occur sufficiently beyond residential structures so as to permit the development to meet applicable Fire Department brush clearance requirements.

b. Trees and shrubs are to be arranged in informal, randomly spaced masses, and shall be placed selectively to reduce the scale of long, steep slopes.

c. For fire prevention purposes, a fuel modification zone shall be provided between natural open space and development. This zone shall consist of at least 100 feet, and have a fire-resistive ground cover. Larger trees and shrubs must be pruned.

3. To protect the public health and safety, new development within the Northern Foothills Planning Area shall ensure the ongoing maintenance of manufactured slopes.

a. New development within hillside areas shall be conditioned upon the following:

- *Where a manufactured slope over 5 feet in height is created in order to develop a single family dwelling on an existing legal lot of record, landowners should be required to record a deed restriction which provides an acknowledgment of the existence of the manufactured slope, requires that such slope be maintained by landowner, and indemnifies the City from damages should the slope fail in the future.*

- *In the case of a parcel map or subdivision, a declaration of covenants, conditions, and restrictions shall be prepared and recorded providing for the development and maintenance of manufactured slopes over 5 feet in height, and indemnifying the City from damages should the slope fail in the future.*

In addition, the applicant for such a land division or subdivision shall include a program and/or make provision for staff for preventive maintenance of manufactured slope areas in excess of 5 feet in height. Such program must be approved prior to approval of a final map, and shall include homeowner slope maintenance requirements and guidelines to be incorporated into the declaration of covenants, conditions, and restrictions.

b. A minimum five-year revegetation monitoring and maintenance program is to be required for all new development requiring slope bank and/or habitat vegetation. The revegetation monitoring program shall include monthly inspection for months 1 through 12, quarterly inspection for months 12 through 36, and semi-annual inspection for months 36 through 60. Inspections shall be performed by a qualified botanist subject to City approval.

4. *Primary ridgelines shall be protected from any construction activities including, but not limited to roads, structures, water tanks, antennae, utilities, etc. so as to maintain a natural skyline.*

   a. *New parcels which have as their only feasible building site a primary ridgeline shall not be created. Where the only feasible building site within an existing parcel is on a primary ridgeline, the structure shall be sited at the lowest possible elevation on the site, and along the least visible portion of the ridge upon which a structure can feasiblely be constructed.*

   b. *Where development is proposed to occur adjacent to a primary ridgeline (a ridge which is visible against the sky as viewed from a public street), it shall be set back a sufficient distance so as to be located below the ridgeline. The intent of this requirement is to maintain a natural skyline.*

   c. *Planting shall be used along recontoured secondary (non-skyline) ridges to recreate a natural silhouette, and to act as a backdrop for structures. Trees shall be planted to create a continuous linear silhouette since gaps in the planting will not give the desired effect.*

5. *Sources of lighting within the Northern Foothills shall be limited.*

   a. *Street lighting shall be limited to intersections and other locations needed to maintain safe access (e.g., sharp curves).*

   b. *Exterior lighting for buildings shall be of a low profile and intensity.*

Landform Alteration

❖ ***CONSTRUCTION OF INFRASTRUCTURE AND FUTURE RESIDENCES WITHIN THE PROJECT AREA WOULD RESULT IN THE PERMANENT ALTERATION OF ON-SITE TOPOGRAPHIC FEATURES.***

Significance: Significant.

Impact Analysis: The potential development of a maximum of up to 127 dwelling units within the project area would change the topography of portions of the project area. Grading to provide a circulation system and buildable areas would alter the current landforms. These alterations are permanent and would continue throughout the life of the proposed project.

It is important to note that no site development is proposed at this time. In addition, no grading of residential lots is proposed as a part of the Zone Change/Specific Plan. Future residential developments would be required to submit Development Plans and Tentative Maps to the City for review and approval, and would be subject to the criteria of the City's Northern Foothills Zone.

The proposed policies of the Northern Foothills Implementation Program set forth the need for future development to be sensitive to the topography of the project area. As discussed in Policy #1, the visual intrusiveness shall be minimized. It is the intent of this policy to have further development fit into the natural character of the site, rather than creating artificial building pads that would require substantial landform alteration. Policy 1.c. further defines that structures shall be sited to fit into the hillside's contour, preserve views of natural hillside areas and ridgelines, retain views from the maximum number of units, and maintain the natural character of the project area. Policy 1.d. outlines the criteria to minimize the impacts from installing roadways in the project area. Streets are to follow the natural contour of the hillside, and are to minimize the amount of cut and fill required for the roadway. Policy 1.f. permits the use of clustering development as a way to preserve the natural appearance of the hillside and to maximize the amount of open space. Under the clustering concept, dwelling units would be grouped in the more level portions of the site, while steeper areas are preserved in a natural state.

Policy 1.i requires that proposed single-family residential units be single-story. However, single-story homes typically require a larger pad area than a multi-story home of the same size. Thus, in steeply sloped areas, such as the Northern Foothills, the landform modification needed to create a building pad for the single-story home would be greater than a multi-story home of the same size. In some cases, the grading required to create the larger building pad for the single-story home would create a greater visual impact. However, with proper hillside management (i.e., landscaping, re-vegetation with native plants), these impacts would be reduced to less than significant levels.

Policy 4 addresses the preservation of primary ridgelines. These ridgelines are to be protected from any construction activities, such as roads, structures, water tanks, antennae, and utilities, to maintain a natural skyline.

On-site grading would be necessary for primary access roads into the project area, remedial grading and construction of residential uses. The landform alteration impacts resulting from on-site grading for roads and residences are considered significant, even with the imposition of mitigation measures and adherence to the implementing policies and actions in the *Northern Foothills Development and Infrastructure Study*.

Mitigation Measures:

AES1. The City of San Dimas shall adopt the implementing policies and actions for Visual Intrusiveness for New Development in the *Northern Foothills Development and Infrastructure Study*. Future development proposals shall be reviewed to determine their compliance with the policies and actions.

AES2. Grading for all future development proposals in the Northern Foothills project area shall be designed in accordance with all applicable grading criteria for Visual Intrusiveness for New Development in the *Northern Foothills Development and Infrastructure Study*.

In addition to those standards imposed by other City ordinances and by the Northern Foothills Zoning, grading in the Northern Foothills area shall be subject to the following standards:

AES3. Grading shall not exceed the minimum necessary to accommodate structures properly, as determined by the planning director or designee.

AES4. Grading practices shall reflect the natural topography of the land.

AES5. Creation of level area (i.e., pads) by grading shall be minimized.

AES6. Grading on hillside areas or close to ridgelines shall incorporate the breaking of hard edges left by cut and fill operations to provide a more rounded appearance that closely resembles the natural contours of the land.

AES7. Grading within residential subdivisions shall be finished so that it is responsive to the original configuration of the land, as well as the adjacent contours.

AES8. All graded slopes (cut or fill), including roadsides, shall undergo a permanent revegetation in a timely manner to minimize any change of erosion and siltation. Backdrop landscaping shall be provided, with heavy complements of drought and fire resistant trees and shrubs, sufficient to reduce erosion and present a natural, undisturbed appearance.

AES9. Created slopes within the residential areas or any subdivision shall have more variety and texture in their appearance than engineered and uniform slopes. Not only shall these planes be undulating in appearance, but they should also have slopes that vary in gradient.

AES10. Created slopes, either cut or fill, that are adjacent to roadways shall be graded in such a way that an undulating appearance in the graded plan is provided for a more pleasing roadscape.

Aesthetics

❖ ***DEVELOPMENT ASSOCIATED WITH THE PROPOSED PROJECT WOULD ALTER THE VISUAL CHARACTER OF THE PROJECT AREA.***

Significance: Less than significant impact with mitigation.

Impact Analysis: The visual analysis of any project must consider the actual visual quality of the area. Visual quality of the project area is defined by its open space value. Visual sensitivity is also a factor in a visual analysis. Visual sensitivity is defined by public views of the project, the number of viewers and the duration of the view. Therefore, a project located on a site of high visual quality with high sensitivity would have the most significant impact. The project area is considered to be in an area of significant visual quality, due to the amount of open space and vacant land within the project area.

The natural slopes of the Northern Foothills project area are one of the primary aesthetic resources of the City of San Dimas. The foothill area, which is visible through the City, creates a dramatic backdrop for the community, and provides substantial visual open space at the northern portion of the City. Development, particularly if it is dense, will result in a significant loss of the aesthetic value of the project area to the community. In addition, because of the steepness of the Northern Foothills, even development of individual single family dwellings on large lots can, along with needed access roads, result in substantial degradation of the area's aesthetic values.

From most locations within the City of San Dimas, the lower slopes of the Northern Foothills project area are not readily visible due to intervening structures and landscaping within the valley area. In addition, many of the more developable portions of the project area are in small valley-like settings, where development would not be highly visible when viewed from most areas within the City.

Views of the foothills, which encompass the project area, are currently available for motorists, pedestrians and residents located throughout the cities of San Dimas, Glendora, and La Verne. Views from these areas are unobstructed, thus the change in visual character from open space to developed conditions with amenities would be a distinct visual alteration of the project area. Aesthetic impacts could be reduced by locating individual developments in lower elevations where they could be screened by interspersed ridgelines, existing foothills, and landscaping. It should be noted that many of the potential developable portions of the proposed project area are located in small valley like settings, where development would not be highly visible when viewed from most areas within the City. Individual developments would require

detailed site and landscaping plans subject to approval from the City of San Dimas Development Plan Review Board (DPRB).

It is important to note that the Northern Foothills Implementation Program is an implementation strategy and program for the project area, and, at this time, no specific development plans have been submitted to the City.

The proposed policies of the Northern Foothills Implementation Program set forth the need for future development to minimize the visual impacts. Policy 1.i requires that proposed single-family residential units be single-story; however, an exact height limitation has not been determined at this time. When viewed from the adjacent neighborhood or communities, single-story residential units would be visually less intrusive than a multiple story home.

Along with the single-story limit, development on downhill lots within steeply sloping areas would be preferred over development on uphill lots. This is because downhill lots could be designed to "drape" down a hillside without requiring substantial cutting into the slope. Thus, from the street, the home would appear to be one story, with the living room, kitchen, dining room and family room at or near street level. Bedrooms, which would, in a flat land home be located on a second story, are sometimes placed farther away from the street, and on a lower level that the living room/kitchen floor. In mountainous areas, parking decks are often provided immediately adjacent to the street, while in other areas, the garage is placed on the flattest portion of the site. While this configuration would substantially reduce the cutting that is needed to create an uphill lot, homes can gain substantial height from their lowest to highest elevations and thus appear larger and more intrusive than they otherwise might. To reduce the intrusiveness of downhill lots, it is critical that maximum building height be measured from adjacent ground level than from "average" ground level.

Color is also a key component of the visual intrusiveness of hillside development. Natural earth tones (browns, tans, greens) will be less visually intrusive than bright colors. For example, Spanish Mediterranean homes with white walls and red tile roofs will generally be more visually intrusive than ranch style homes with tan walls, brown trim, and brown roofs. Policy 1.n. calls for building materials and colors to be compatible with the natural setting. Building materials, as indicated on individual site plans, would require approval by the City of San Dimas Development Plan Review Board (DPRB) on a project-by-project basis prior to the issuance of building permits.

Policy 1.o. requires a three-dimensional model be submitted for all proposed subdivisions, land divisions or design review applications. In addition, Policy 1.o. calls for the submittal of a viewshed analysis. Both the model and the viewshed analysis would provide the City with an opportunity to visualize what a future development would look like in its post-development condition, and provide input as to how best protect existing views of and from the development site.

In addition to the policies outlined in the *Northern Foothills Development and Infrastructure Study*, the *San Dimas Municipal Code* includes requirements for special edge treatments, such as landscaping and setbacks. Therefore, implementation of the policies for Visual Intrusiveness of New Development in the *Northern Foothills Development and Infrastructure Study*, in conjunction with design treatments pursuant to the *San Dimas Municipal Code* (i.e., landscaping and setbacks) would result in less than significant impacts with respect to aesthetics.

Mitigation Measures:

AES11. All future development proposals in the Northern Foothills project area shall be designed in accordance with all applicable criteria for Visual Intrusiveness for New Development in the *Northern Foothills Development and Infrastructure Study.*

AES12. Wherever possible, structures shall be built with rooftops lower in elevation than any adjacent ridgelines. A specific setback from the ridge may be required by the City of San Dimas to protect the ridgeline viewshed. Ridgeline setbacks shall be determined on a project-by-project basis.

AES13. Except for window surfaces, the use of polished or reflecting exterior building materials and finishes shall be avoided.

AES14. On downhill sites, decks shall be located and designed to avoid tall and highly visible supports. Exposed areas under decks shall be screened with lattice, or similar treatments composed of fire-resistant materials.

AES15. Individual residential units located within viewsheds shall be oriented to avoid creating a line of solid development.

AES16. Open vistas shall be protected by such means as adequate setbacks, open space, building height limits, and view corridors pursuant to the *San Dimas Municipal Code*.

AES17. Natural scenic features such as mature trees, rock outcroppings, watercourses, and views shall be integrated into individual project design subject to the approval by the City of San Dimas.

AES18. Individual developments shall incorporate adequate landscape screening in order to minimize project views to off-site uses, as demonstrated in a Landscape Plan requiring review and approval by the City of San Dimas Development Plan Review Board (DPRB) on a project-by-project basis prior to the issuance of building permits.

AES19. The architecture of structures in the hillside areas shall be consistent with the overall natural environmental qualities of the site; the architecture shall meld itself to the topography rather than dominate it. The following hillside architecture and urban design guidelines shall be employed in addition to those applicable throughout the City. The Development Plan Review Board shall determine that the architecture and urban design are satisfactory.

A. Residential units shall be asymmetrically massed, with the horizontal portions far greater than the vertical proportions.

B. Massing and proportions shall be consistent with the topography.

C. Hillside architecture shall not dominate the environment; its forms and colors shall blend into the natural surroundings. The exterior finishes, textures and colors of hillside structures shall be restrained through the encouragement of earth-tone colors and the discouragement of reflective materials or finishes. Preference shall be given to the use of earth-tone colors and materials for roofs due to their visual impact.

D. For a lower, more horizontal profile, structures shall be encouraged to be designed so that rooflines run parallel to the slope, rather than intersecting it.

Light and Glare

❖ ***DEVELOPMENT ASSOCIATED WITH THE PROPOSED PROJECT WOULD INTRODUCE NEW SOURCES OF LIGHT AND GLARE INTO THE AREA.***

Significance: Less than significant impact with mitigation.

Impact Analysis: Implementation of the proposed project would convert portions of the project area to an urban, built environment, thus resulting in the introduction of light into the area. The introduced light would consist of lighting for residences and streets. Policy 5 requires that new lighting sources within the project area be limited by installing street lighting only at intersections or other locations for safety reasons, and low profile and low intensity lighting for buildings.

In addition, light and glare impacts can be substantially reduced through siting development in areas that utilize existing topographic features as a barrier. With the implementation of recommended mitigation measures, light sources from individual on-site residential developments would not have a significant impact on surrounding areas. Street light illumination would be comparable to existing nearby residential developments. Proper lighting techniques to direct light on-site away from adjacent

properties would reduce potential light and glare impacts to a less than significant level.

Mitigation Measures:

AES20. Lighting for all future development proposals in the Northern Foothills project areas shall be designed in accordance with all applicable lighting criteria for Visual Intrusiveness for New Development in the *Northern Foothills Development and Infrastructure Study*.

AES21. Exterior lighting for buildings shall be the minimum necessary to provide for safety for pedestrians and other non-vehicular uses around the primary building on a parcel. Landscaping shall be used to reduce the long-range visibility of night lighting.

AES22. Proper lighting techniques to direct light on-site and away from other properties, as determined by the City of San Dimas, shall be required to reduce light and glare (including directional lighting, use of non-reflective glass, use of appropriate types of lighting fixtures, and earthtone building materials).

AES23. Windows with highly reflective treatments shall be avoided and windows shall be located as to avoid highly reflective sun orientations to surrounding properties.

CUMULATIVE IMPACTS

❖ ***PROJECT DEVELOPMENT, ALONG WITH CUMULATIVE PROJECTS, MAY RESULT IN GREATER URBANIZATION WITHIN THE NORTHERN PORTION OF THE CITY OF SAN DIMAS.***

Significance: Less than significant.

Impact Analysis: Construction of approved and pending projects in the local vicinity would permanently alter the nature and appearance of the area through the loss of open space. Security and street lighting would also introduce new light and glare sources to the area. Aesthetic, light and glare impacts can be mitigated with the use of building materials that are consistent with the general character of the area and proper lighting techniques to direct light on-site and away from adjacent properties.

Mitigation Measures: No mitigation measures are required.

UNAVOIDABLE SIGNIFICANT IMPACTS

Implementation of the proposed project would not result in unavoidable significant impacts related to aesthetics, light or glare. However, the permanent alteration of on-site topographic features remains a significant impact resulting from project implementation, even with imposition of mitigation measures.

5.3 CIRCULATION

The Section incorporates information contained in the *Northern Foothills Development and Infrastructure Study*, prepared by LSA Associates in November 1998.

EXISTING CONDITIONS

Existing Access[1]

At the present time, Sycamore Canyon Road provides the only paved access to the project area. From its intersection at Foothill Boulevard, this two-lane roadway runs north, providing access to San Dimas Canyon Park and Wildlife Sanctuary, the MWD Pumping facility, Horsethief Canyon Park, Sycamore Canyon Motorway (which in turn provides a southerly access to the San Dimas Experimental Forest and Johnstone Peak facilities), and ultimately terminates at Camp Glen Rockey. A sign has been posted just north of the San Dimas Park stating that Sycamore Canyon Road is a private roadway facility serving Camp Glen Rockey.

Access to the western portion of the project area is gained through a locked gate and a small wooden bridge at the point that Sycamore Canyon Road curves to the east. This unpaved and minimally maintained extension of Sycamore Canyon Road runs into the interior of the project area connecting with the Wildwood Motorway. The road is narrow, but does allow for vehicle travel. Although this dirt road is an existing public right-of-way, property owners in the area have restricted the access along this roadway in order to protect their properties. This roadway was originally declared public on October 20, 1900, through Los Angeles County Survey CS 3549, and was annexed into the City of San Dimas in the late 1960's as part of the annexation of the northern foothills area. Access to other portions of the project area cross private property along existing motorways.[2] Access to these motorways are limited, since many motorways are gated or otherwise blocked.

The Wildwood Ranch is located within this most westerly portion of the area. Presently, access from this area to the central and easterly parts of the foothills is difficult. There are three motorways traversing this area: Bluebird Motorway (running east-west through the Angeles National Forest); Ferguson Motorway (traveling north-south along the western border of the project area); and, Wildwood Motorway (which runs east-west, connecting with Sycamore Flats Motorway in the central portion of the project area).

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1 Source: LSA Associates, *Northern Foothills Development and Infrastructure Study*, November 1998.

2 "Motorway" denotes an unpaved, graded roadway.

The westerly most parts of the foothills can also be accessed from the Glendora foothills, farther to the west, although access from Wildwood Motorway into the project area can only be obtained by passing through a private development in the City of Glendora.

Access to the eastern portions of the project area can be obtained via another locked gate at the intersection of Sycamore Canyon Motorway and Sycamore Canyon Road. The existing gate is monitored and maintained by the United States Forest Service, since it is one of the primary access points to the San Dimas Experimental Forest, as well as the radio facilities atop Johnstone Peak. This road is paved for several hundred feet past the gate since it also serves as an emergency access to the Terrebonne Tract.

Roadways within this portion of the project area are generally narrow, unpaved dirt, and/or gravel, are steep in places, and are minimally maintained. Table 5-3-1 presents the roadway conditions in undeveloped areas, which are graphically depicted in Exhibit 5.3-1. Portions of area motorways exceed the 12 percent grade maximum established by the City. The motorway system is maintained informally by Los Angeles County, the Forest Service, and area property owners.

Due to the steepness of the existing terrain, no direct physical access is available into the most easterly portion of the foothills from San Dimas Canyon Road.

Existing Motorways

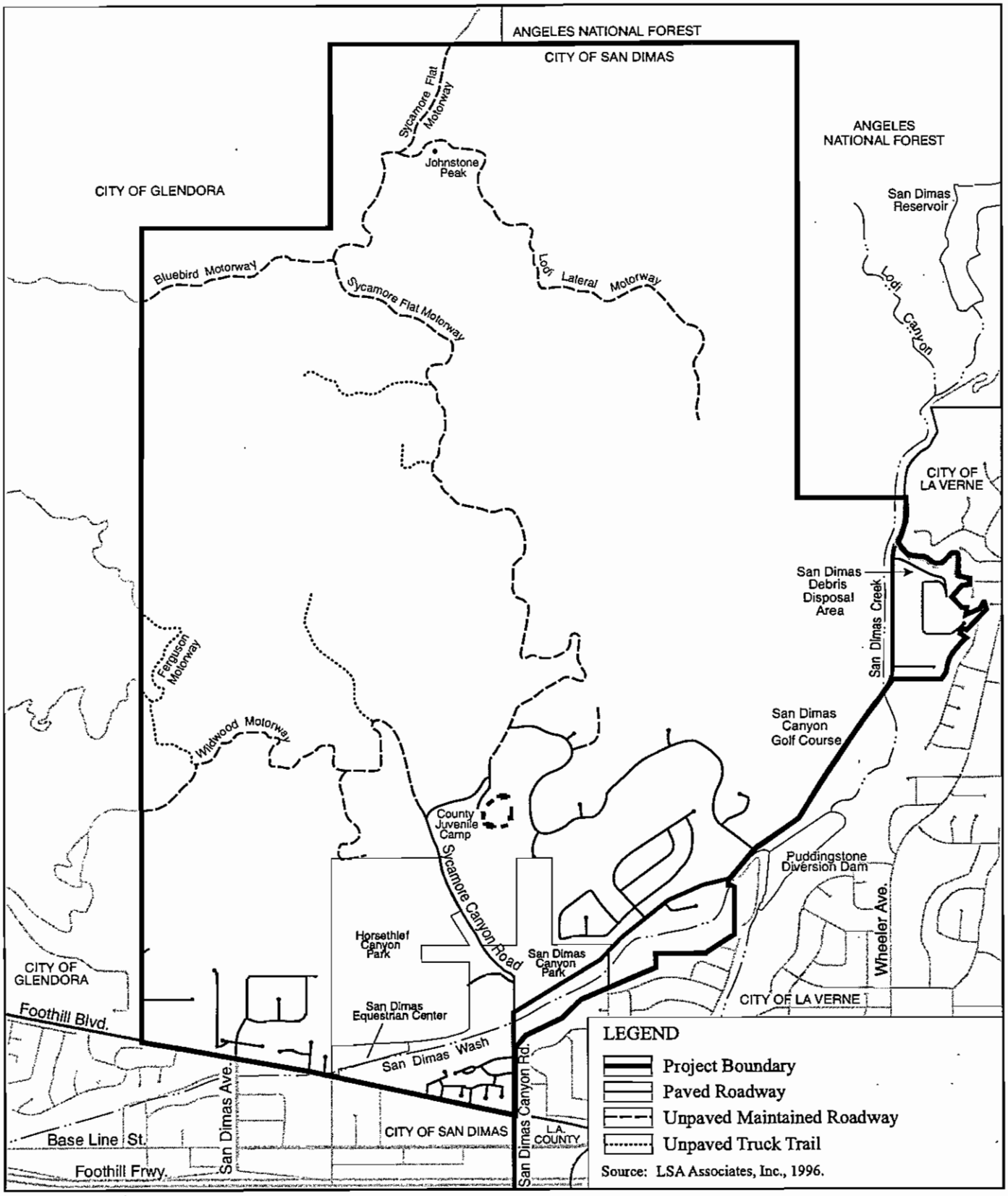
The "motorways" in the internal portions of the project area were established many years ago, principally to provide access for protection against brush fires. Generally they consist of dirt roads, seldom more than one lane in width. These "motorways" provide access to lands within the Angeles National Forest, and also, in many cases, provide the only means of access to privately-owned land within the National Forest boundaries, or between the National Forest boundaries and the developed communities in the valley below. Even though these "motorways" were constructed many years ago, with minimum grading and alteration of the land, it is noteworthy that they almost always have chosen a very reasonable location. Even with present-day grading equipment, it is seldom possible to improve upon the general location of these roads.

Where these roads cross privately-owned land, the rights of way are generally prescriptive, and do not show on the Assessor's maps. Usually the use of the roads is restricted by gates. However, landowners who must use the roads to reach their property are allowed to put their own locks on the gates, in series with the locks of other landowners, utilities, the National Forest, the Los Angeles County Fire Department and others who have established a need and right to use the roads.

TABLE 5.3-1
ROADWAY CONDITIONS IN UNDEVELOPED AREAS

Roadway	Condition	Width	Steepness[1]	Road Base	Notes
Sycamore Canyon Road: Portion 1 [2]	Paved	Average 20'	5%	Asphalt	One lane sections, but good condition.
Sycamore Canyon Road: Portion 2	Unpaved, maintained	10' - 15'	7%	DG[3]	One lane sections, rutted in places, but passable overall.
Sycamore Canyon Road: Portion 3	Unpaved truck trail	Average 10'	18%	Dirt	One lane sections, exceeds maximum slope.
Sycamore Flats Motorway	Unpaved, Maintained	Average 10'	15%	DG	One lane sections. Rutted in places. Passable overall. Exceeds maximum slope.
Bluebird Motorway	Unpaved, Maintained	Average 10'	12%	DG	One lane sections, exceeds maximum slope.
Ferguson Motorway	Unpaved, Maintained	Average 10'	20%	DG	One lane sections, exceeds maximum slope.
Wildwood Motorway	Unpaved, Maintained	Average 10'	13%	DG	One lane sections, exceeds maximum slope.
Lodi Lateral Motorway	Unpaved, Maintained	Average 10'	18%	DG	One lane sections, exceeds maximum slope.

1 Maximum slope as allowed by the City of San Dimas is currently 12 percent. Calculation for each roadway is based on specific locations along the roadway, not average slope of the entire road length.
2 See Exhibit 5.3-1, *Project Area Roadways*, for location of each portion of this roadway.
3 DG = Road surface composed of naturally-graded substances, typically Decomposed Granite.
Source: Table 2.B, *Northern Foothills Development and Infrastructure Study*, prepared by LSA Associates, November 1998.



Source: LSA Associates

NORTHERN FOOTHILLS IMPLEMENTATION PROGRAM
PROGRAM ENVIRONMENTAL IMPACT REPORT

0 2,000'

Project Area Roadways

Robert Bein, William Frost & Associates
2/99 JN 10-034933-6377

Exhibit 5.3-1

In addition to Sycamore Canyon Road, the project area is served principally by two "motorways", the Wildwood Motorway, which runs generally in an east-west direction, and the Sycamore Flat Motorway, which runs generally north-south. The discussion and analysis in this EIR will focus on the two motorways and Sycamore Canyon Road.

Wildwood Motorway

The Wildwood Motorway extends to the west from Sycamore Canyon Road to the westerly boundary of the City of San Dimas, and continues into the City of Glendora, connecting with Country Club Drive near Amelia Avenue. A branch, known as Wildwood Ranch Road, extends to the southwest approximately 1,000 feet east of the San Dimas/Glendora boundary, and connects with Country Club Drive by a more southerly route. Wildwood Ranch Road is presently the more-used connection. There is no existing connection which stays within the City of San Dimas at the westerly end. The grades of the portion of Wildwood Motorway within the City of San Dimas are generally moderate, and it appears that it would be physically possible to widen this existing one-lane dirt road to accommodate two traffic lanes (one in each direction) with a minimum roadway width of 26 feet and a paved surface.

Sycamore Flat Motorway

Sycamore Flat Motorway begins at Sycamore Canyon Road, and ascends generally to the north, to connect with Johnstone Peak Road, which continues to Big Dalton Canyon Road. Sycamore Flat Motorway also provides connections to Bluebird Motorway and other roads within the Angeles National Forest in the northerly part of the study area. On the way, Sycamore Flat Motorway provides access to several radio transmitter locations. This motorway also offers access to several parcels of privately-owned land, including the so-called Foster Ranch. Some locations along Sycamore Flat Motorway are quite steep, have sharp curves, and high cut slopes along the uphill side of the road. In spite of these limitations, the roadway fulfills very important access needs. The lower part of the road is paved to a nominal width of approximately 26 feet, and has existing curbs and gutters for a distance of approximately 1,000 feet, from the location where it curves off Sycamore Canyon Road to the sharp curve just below the Glen Rockey Juvenile Camp. There is a gate just above the entrance to the Juvenile Camp; however, the pavement continues approximately 800 feet to a junction with a spur road (also paved) which continues an additional distance of approximately 400 feet to a gate at the end of Terrebonne Avenue. This spur road provides emergency access to the homes along Terrebonne Avenue and its side streets.

Sycamore Canyon Road

Sycamore Canyon Road begins at a junction with San Dimas Canyon Road, just north of the crossing of San Dimas Wash, and continues north for a distance of approximately one and one quarter miles. This road is by far the most important and useful road into the San Dimas - Northern Foothills area. It provides access to the San

Dimas Canyon County Park, Horsethief Canyon City Park, the Metropolitan Water district facility, the County's Glen Rockey Juvenile Camp, Sycamore Flat Motorway, Wildwood Motorway, the Angeles National Forest, several radio transmitter locations, and numerous parcels of privately-owned land. The road is paved and has curbs and gutters on both sides, from the junction with San Dimas Canyon Road to the junction with Sycamore Flat Motorway, a distance of approximately 3,000 feet. The minimum roadway width is nominally 26 feet, although portions have been widened. The road is generally in satisfactory condition, and the existing width is adequate for the anticipated usage, although parking must be prohibited, except where the roadway has been widened. Use of the road by equestrians is a problem, and it would be highly desirable to provide a parallel off-street equestrian trail. Most of the road sits well above Sycamore Canyon Creek; however, there is one location near the junction with San Dimas Canyon Road where drainage problems have been experienced.

North of the location where Sycamore Canyon Road curves into Sycamore Flat Motorway, there is a gate, and Sycamore Canyon Road becomes a dirt road. The road continues for approximately 1,600 feet to the junction with Wildwood Motorway. From this spot, Wildwood Motorway bends sharply to the west and then south, and crosses Sycamore Canyon Creek with a concrete dip crossing. Ultimately it will be necessary to realign the intersection and construct a culvert for Wildwood Motorway. Sycamore Canyon Road becomes a rougher roadway, and continues to a very limited turning area approximately 2,200 feet further to the north. Beyond this location there is no evidence of a roadway, and the terrain becomes very steep; however, there are several small parcels of privately-owned land.

Above this point there is a spring in Sycamore Canyon which produces a sizeable flowing stream. This flow has been tapped for a water supply in the past, and there is an old pipeline which extends down the west side of the canyon.

It is worth noting that Sycamore Canyon Road appears on the Los Angeles County Assessor's maps as a continuous road, extending well beyond the end of the existing traversable roadway.

Access Findings from Northern Foothills Development and Infrastructure Study[3]

The following represents the conclusions reached in the *Northern Foothills Development and Infrastructure Study* with respect to access within the project area.

- *Apart from Sycamore Canyon Road, the existing motorway system is made of private roads. Historically, this system has served to provide access to the Angeles National Forest, existing communications facilities on and around Johnstone Peak, as well as several private properties. Since there are no*

[3] Source: LSA Associates, *Northern Foothills Development and Infrastructure Study*, November 1998.

existing easements or public rights-of-way identified for most of the motorway system, the only rights of access would most likely be prescriptive. Such prescriptive easements would, however, only apply to the level of activity that has occurred over the roadways in the past. Thus new development would most likely not have rights of access along the existing motorway system based on their previous use.

- Although a system of paved and graded roadways exists within the study area, the ownership and maintenance responsibilities of the roadways is confusing, at best. In at least one location, a keyed access gate has been placed by a private landowner across a public right-of-way as a means of protecting his property from unauthorized trespass. Keyed access gates have also been placed at two locations along Sycamore Canyon Road, restricting property owner, and in some cases emergency personnel access to the interior of the study area. In some cases, easements do not exist for private landowners who have traditionally used the roads for access to their properties. In other cases, maintenance of roadways is carried on in an informal manner by a combination of Forest Service, County, and landowner efforts. It is important that the ownership of access rights be clarified, and that maintenance responsibility for these roadways is resolved. As part of this effort, the City will need to establish a policy regarding its desire (or lack thereof) to have control and maintenance responsibility for area roadways and motorways.

- Sections of Sycamore Flats, Ferguson, Wildwood, and Lodi Lateral motorways, as well as the upper section of Sycamore Canyon Road exceed the maximum permitted 12 percent grade permitted in the City's Zoning Ordinance (Section 18.32.230.B.8). Several sections exceed the County Fire Ordinance maximum of 15 percent. Road gradients along these motorways are as steep as 20 percent, making access by private vehicles and fire fighting equipment difficult. In addition, portions of Bluebird Motorway are at the 12 percent maximum allowable gradient. In addition, many sections of these roadways are narrower than permitted by ordinance, and are effectively one lane. Because of the steepness of the terrain, it will be extremely difficult and environmentally destructive to widen area motorways to meet minimum width requirements, and to avoid exceeding the City's 12 percent or the County's 15 percent maximum gradient.

- In order to permit development of the Chu property, access issues must be resolved. Current access easements exist and allow access either across the Golf Course, or through the driving range, and it will be necessary to find an acceptable method of access that would not disrupt use of the golf course.

- Any significant development built to existing development standards would need to provide for a secondary access roadway. Although such an access could be planned, most options would entail acquiring rights-of-way or

easements across private property, as well as directing traffic through existing and established neighborhoods. Such access may also necessitate working with other agencies such as the Angeles National Forest and the City of Glendora to establish appropriate alignment and roadway standards.

IMPACTS AND MITIGATION MEASURES

Significance Criteria

Significant impacts would result from roadways exceeding City and County roadway standards for roadway width, length, maximum grade, or maximum curve radius.

NORTHERN FOOTHILLS IMPLEMENTATION PROGRAM

Section 5 of the *Northern Foothills Development and Infrastructure Study*, prepared by LSA Associates, includes sections on access and infrastructure. The following text has been excerpted from the study and includes both the guiding principle with regard to access and infrastructure planning, finance and construction, and recommends policies and action items for the City of San Dimas.

Access

General Principle

Roadway improvements to provide access to parcels should not adversely affect other properties through extensive grading, flood control facilities, or any other type of construction and/or requisite support infrastructure.

Implementing Policies and Actions

1. *Roadways within the Northern Foothills Area should provide for minimum safe passage of two cars along a paved road section, except in limited circumstances.*

   - *Revise City road standards to residential lots to take access from access roads (26-foot curb-to-curb, plus slope easements) within the Northern Foothills area.[4] Along this road section, on-street parking shall be prohibited.*

   - *Within the upper elevations of the Northern Foothills area, permit a further reduction in required roadway width for private roadways*

[4] The 26-foot width is currently permitted for access roads which do not directly serve development. The proposed revision would permit new development to front on 26-foot wide access roads.

which will ultimately serve a maximum of four dwellings, based on the maximum allowable density permitted by the General Plan, and where not providing such a reduction would effectively preclude access to an existing lot of record. For such roadways, revise City roadway standards to permit a curb-to-curb width which does not allow for passage of two vehicles (minimum 16 feet, measured edge-to-edge) for a distance of up to 150 feet in any one segment.

Where such a reduction in roadway width is permitted, owners whose land is served by such a roadway should be required to provide adequate assurance that the roadway will be kept properly maintained at all times. In addition, such landowners will be required to record a deed restriction which prohibits further subdivision of the property, and provides an acknowledgment of this special circumstance. Such owners will also be required to indemnify the City or any other service provider against any liability regarding emergency or non-emergency vehicle access.

- *Revise City roadway standards to provide an exception to current requirements for street paving along private roadways which will ultimately serve a maximum of four dwellings, based on the maximum density allowable in the General Plan. Such limited use roadways should be permitted to be hard packed (e.g., decomposed granite) as approved by the City Engineer, provided that adequate maintenance is guaranteed to ensure that the roadway will be regularly graded and kept clear of ruts and debris.*

  Where such an unpaved roadway is permitted, owners whose land is served by such a roadway should be required to provide adequate assurance that the roadway will be kept properly maintained at all times. In addition, such landowners will be required to record a deed restriction which prohibits further subdivision of the property, and provides an acknowledgment of this special circumstance. Such owners will also be required to indemnify the City or any other service provider against any liability regarding emergency or non-emergency vehicle access.

2. *Roadway grades and curves should accommodate safety and emergency vehicles.*

   - *Existing roadway grade standards shall be applied to all proposed subdivisions and parcel maps. However, the City Engineer may grant exceptions to existing roadway standards for grades and curves where, in his judgement, existing or future access cannot reasonably meet such standards. These exceptions are to be limited*

to providing access to a single family dwelling on an existing lot of record along roadways which will ultimately serve a maximum of four dwellings, based on the maximum allowable density in the General Plan, and where not providing such an exception would effectively preclude access to an existing lot of record.

Where the City Engineer grants an exception to roadway grade standards, owners whose land is served by such a roadway will be required to provide adequate assurance that the roadway will be kept properly maintained at all times. In addition, such landowners will be required to record a deed restriction which prohibits further subdivision of the property, and provides an acknowledgment of this special circumstance. Such owners will also be required to indemnify the City or any other service provider against any liability regarding emergency or non-emergency vehicle access.

3. *The provision of adequate flood control and/or erosion control measures for public and private roadways shall occur in a manner consistent with the rural character of the Northern Foothills Area.*

   - *Require the provision of concrete curbs and gutters to the portions of the Northern Foothills area where they are needed to prevent erosion, as determined by the City Engineer. Within the Northern Foothills Area, rolled curbs are to be the preferred road edge along paved roads where such curbing will be adequate to contain drainage and prevent erosion. If necessary, the City's street standards should be revised to accomplish this purpose.*

4. *New development shall be permitted to take access from Terrebonne Avenue only where there are no viable alternatives.*

5. *Consistent with the Northern Foothills' rural character, an equestrian trails system should be provided.*

   - *Working with the Equestrian Commission, prepare a trails plan to link future residential areas to existing and planned equestrian facilities and trails in the City.*

Infrastructure Planning, Financing, and Construction

General Principle

It is the ultimate responsibility of individual developers (including construction of a single family dwelling on an existing lot of record) to define the infrastructure

needed to serve their project, and to finance and construct needed roadway, water, sewage disposal, and utility facilities as part of their projects.

Implementing Policies and Actions

1. *The City shall encourage landowners within development feasibility zones to work together to cooperatively plan for, finance, and construct backbone infrastructure to serve each development feasibility zone.*

    - *Establishment of assessment districts to finance the capital costs of providing required infrastructure will be considered by the City on a case-by-case basis where the majority of landowners within a development feasibility zone have agreed to work together toward infrastructure planning and financing, and where establishment of such an assessment district is essential to the economic feasibility of development. The use of assessment districts to fund maintenance of community facilities is not appropriate within the Northern Foothills.*

      Los Angeles County Fire Department (LACFD) Fire Code Standard Number 10.207(A) states the requirements for design and construction of private access roads and driveways for single-family dwelling units with no public right-of-way. This section of the Fire Code is summarized below in Table 5.3-2.

TABLE 5.3-2
LACFD FIRE CODE STANDARD NO. 10.207(A)

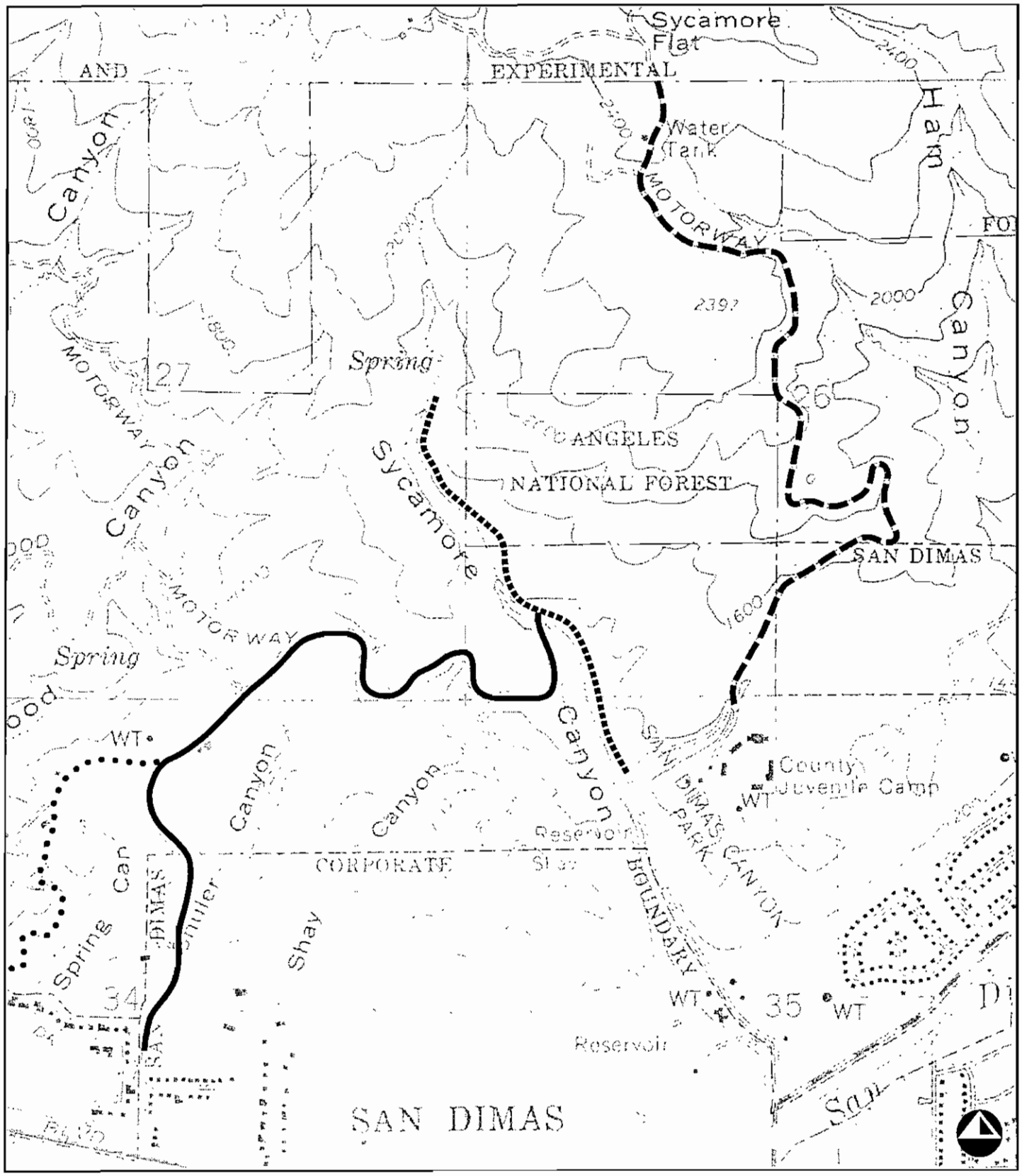
Section		Requirements
1.a.	*Surface Required for Grades Over 10%*	*Pavement - either asphalt or concrete*
1.b.	*Surface Required for Grades Less Than 10%*	*Pavement not required, but roadway must support apparatus up to 50,000 pounds.*
2.a.	*Roadway Width - No Hydrants*	*20-foot minimum to the sky; 15 feet in extraordinary circumstances.*
2.b.	*Roadway Width - Where Hydrants are Required*	*26-foot minimum to the sky, for a minimum length of 25 feet on either side of the hydrant.*
3.	*Length*	*All roads shall be extended to within 150 feet of all portions of exterior wall of a structure over 1,000 square feet in size.*
4.	*Maximum Grade*	*15 percent (with 20 percent allowed for a maximum of 150 feet). If 20 percent is allowed, absolute maximum average grade cannot exceed 17 percent.*
5.	*Maximum Curve Radius*	*32 feet as measured from centerline of roadway.*

Source: Los Angeles County Fire Department, 1996.
Northern Foothills Development and Infrastructure Study, prepared by LSA Associates, November 1998.

❖ ***IMPLEMENTATION OF THE PROPOSED PROJECT WOULD REQUIRE THE INSTALLATION OF ADDITIONAL ROADWAYS TO PROVIDE ACCESS FOR FUTURE RESIDENTS.***

Significance: Potentially significant. Implementation of the mitigation measures would ensure that a "backbone" road system is designed to provide adequate and safe access, and thus would reduce impacts to a less than significant level.

Impact Analysis: The recommended "backbone" road system for the project area consists of improvements to two existing "motorways" (Wildwood Motorway and Sycamore Flat Motorway) and to Sycamore Canyon Road (refer to Exhibit 5.3-2, *Proposed Roadways*). Together, these three roadways would ensure that adequate roadways are provided in the project area to accommodate future traffic at the recommended density level. These three roadways are recommended to be paved to a minimum width of 26 feet, as shown on the conceptual street section (refer to the top illustration on Exhibit 5.3-3, *Proposed Roadway Standards*). This width would provide for one lane in each direction, but would not accommodate on-street parking. The

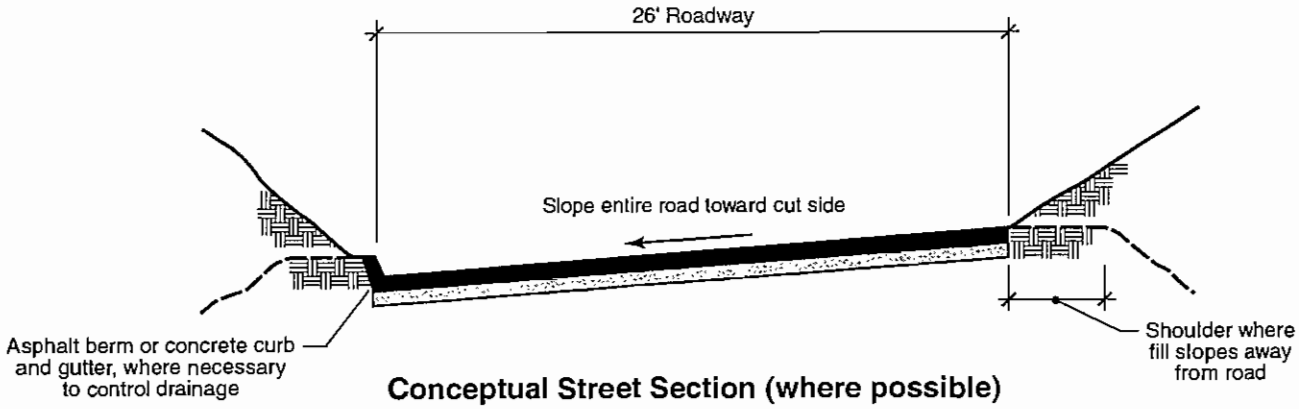


LEGEND

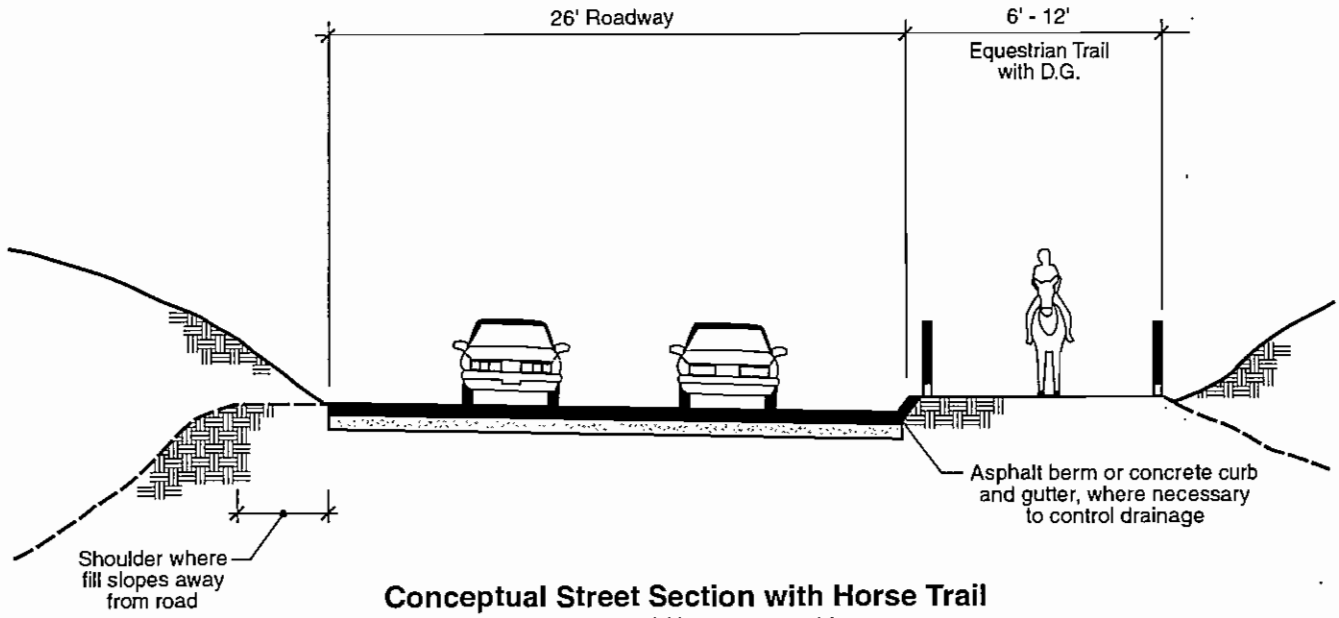
- Wildwood Motorway, with Connections to Cataract Avenue
- Sycamore Flat Motorway
- Sycamore Canyon Road
- Wildwood Ranch Road, with possible connections to Glendora. This road is not part of the recommended road system in the City of San Dimas.

NORTHERN FOOTHILLS IMPLEMENTATION PROGRAM
PROGRAM ENVIRONMENTAL IMPACT REPORT

Proposed Roadways



Conceptual Street Section (where possible)
"Backbone" Road System



Conceptual Street Section with Horse Trail
Horse trail could be separated from the roadway, where feasible

NORTHERN FOOTHILLS IMPLEMENTATION PROGRAM
PROGRAM ENVIRONMENTAL IMPACT REPORT

Proposed Roadway Standards

width and appearance of these roads would generally be similar to the existing portion of Sycamore Canyon Road above the entrance to Horsethief Canyon Park (refer to Exhibit 5.2-2, *Site Photographs*, in Section 5.2, *Aesthetics*). These roadways would also satisfy the minimum standards required by the Los Angeles County Fire Department, according to Fire Code Standard No. 10.207(A), adopted in 1996.

Where homes or other structures are to be constructed, fronting on these roads, it would be necessary to provide for additional on-site parking. Where equestrian trails parallel the road, additional right-of-way width and grading may be needed. Exhibit 5.3-3 also illustrates a typical roadway section that includes an equestrian trail.

The proposed "backbone" road system is not intended to provide direct access to every privately-owned parcel of land. In many cases, individual landowners would have to construct extensions, other City roads, private roads or driveways to reach building sites. The "backbone" road improvements also would not extend into the Angeles National Forest. Roads within the National Forest would be maintained and operated by the Forest Service, which would include the Bluebird Motorway and the Lodi Lateral Motorway, as well as the Ferguson Motorway, which is on privately-owned land.

Sycamore Flat Motorway

Regrading of the road and installation of pavement and better drainage facilities could significantly improve the road. However, special problems of grade and curve radius would be encountered in the improvement of Sycamore Flat Motorway. A detailed study would be needed to investigate ways in which the radius of the sharpest curves could be increased, and the grades could be improved beyond eliminating the need for the frequent dips to intercept drainage on the existing dirt road.

Wildwood Motorway

A new connection could be constructed, extending to the south from a location near the westerly boundary of the City of San Dimas, to join the existing end of Cataract Avenue. This road would stay entirely within the City of San Dimas, and would have a length of approximately 2,500 feet and a grade not exceeding 10%. The northerly portion of this road would extend down the westerly fork of Shuler Canyon. This portion of the road could be built entirely in fill, within this narrow canyon, with an underground pipe to carry the drainage, and an energy-dissipation structure at the outlet. This method of construction would avoid the need to disturb the steep slopes and vegetation on the sides of the canyon. This branch of Shuler Canyon is not classified as a "blue-line" stream.

The west fork of Shuler Canyon joins the main canyon approximately 1,000 feet north of the junction with existing Cataract Avenue. This portion of the canyon contains a "blue-line" stream. Further study will be necessary to identify the best way to minimize impacts on the drainage channel, vegetation, and existing homes on the hilltops, one on each side of the canyon. The existing improvements on Cataract

Avenue extending south to Foothill Boulevard are adequate to serve the traffic which could be expected to use this new connection.

Mitigation Measures:

CIR1. Modify the footnote for Access Implementing Policies and Actions #1 to read as follows:

> "The 26-foot width is currently permitted for access roads, which do not directly serve development. The proposed revision would permit new development to front on 26-foot wide access roads, provided that additional on-site parking is made available."

CIR2. Modify the wording for the third bullet point under Access Implementing Policies and Actions #1 to read as follows:

"Revise City roadway standards to provide an exception to current requirements for street paving along private roadways which will ultimately serve a maximum of four dwellings, based on the maximum density allowable in the General Plan. Such limited use roadways should be permitted to be hard packed (e.g., decomposed granite) as approved by the City Engineer, provided that adequate maintenance is guaranteed to ensure that the roadway will be regularly graded and kept clear of ruts and debris. Maximum grade shall be determined based on existing topographic conditions."

CIR3. The City of San Dimas shall adopt the implementing policies and actions, as amended in Circulation Mitigation Measures CIR1 and CIR2, for Access and Infrastructure Planning, Financing and Construction in the *Northern Foothills Development and Infrastructure Study*. Future development proposals shall be reviewed to determine their compliance with the policies and actions.

CIR4. For the three proposed roadways of the "backbone" road system, the maximum grade shall not exceed 12 to 15 percent, unless existing topography dictates an exception for short roadway segments.

CIR5. A detailed study of Sycamore Flat Motorway is required. The study shall analyze the potential for the roadway grade not to exceed 12 to 15 percent. This maximum grade may not be attainable on all portions of the Sycamore Flat Motorway; however, every effort shall be made to achieve this objective, and to minimize the length and steepness of grades. The study shall also analyze ways in which the radius of the sharpest curves could be increased, and the grades could be improved beyond eliminating the need for the frequent dips to intercept drainage on the existing dirt road. In addition, the study shall determine the need and location, if warranted, for the following: guardrails on

sharp curves, warning signs to inform drivers of the curves, and signs posting maximum safe speed.

CIR6. Future roadways shall be constructed per the roadway standards illustrated on

CUMULATIVE IMPACTS

❖ ***THE PROPOSED PROJECT, COMBINED WITH CUMULATIVE PROJECTS, WOULD INCREASE THE NEED FOR ROADWAYS IN THE PROJECT AREA.***

Significance: Less than significant.

Impact Analysis: The need for new or expanded roadways has been analyzed in both this EIR and the General Plan EIR. The roadways proposed as a part of the project are to serve future residents. Existing roadways in the project area and surrounding vicinity are adequate to handle traffic from the proposed project and cumulative projects. The specific location and design of new roadways would be evaluated and mitigated on a project-by-project basis.

Mitigation Measures: No mitigation measures are required.

UNAVOIDABLE SIGNIFICANT IMPACTS

Implementation of the proposed project would not result in any significant adverse impacts with respect to access.

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5.4 AIR QUALITY

Information in this section is based primarily upon the *CEQA Air Quality Handbook* prepared by the South Coast Air Quality Management District (SCAQMD), April 1993 (revised November 1993), Air Quality Data (SCAQMD, 1990 through 1995), and the *Final 1997 AQMP* (SCAQMD, January 1997). Additional reference material was obtained from the California Air Resources Board and the *City of San Dimas General Plan* and *General Plan EIR*. This section focuses on potential long-term local and regional air quality impacts associated with the proposed project.

EXISTING CONDITIONS

The following information describes the regional and City-wide air quality setting.

South Coast Air Basin

Climate

The project area is located in the South Coast Air Basin (SoCAB), characterized as having a Southern California "Mediterranean" climate (a semi-arid environment with mild winters, warm summers and moderate rainfall). The SoCAB is a 6,600-square mile area bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. SoCAB includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, in addition to the San Gorgonio Pass area in Riverside County. The distinctive climate of the SoCAB is determined by its terrain and geographical location, as the SoCAB is a coastal plain with connecting broad valleys and low hills. The general region lies in the semi-permanent high pressure zone of the eastern Pacific. As a result, the climate is mild, tempered by cool sea breezes. The usually mild climatological pattern is interrupted infrequently by periods of extremely hot weather, winter storms, or Santa Ana winds.

The climate is characterized by moderate temperatures and comfortable humidities with precipitation limited to a few storms during the winter season (November through April). The average annual temperature varies little throughout the SoCAB, averaging 62 degrees Fahrenheit.[1] All portions of the SoCAB have had recorded temperatures over 100 degrees in recent years. January is usually the coldest month at all locations while July and August are usually the hottest months of the year. With a less pronounced oceanic influence, the eastern inland portions of the Basin show greater variability in annual minimum and maximum temperatures. The County of Los Angeles, for example, has an annual average temperature range from 37° Fahrenheit (F) to 97°F.

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[1] *CEQA Air Quality Handbook*, South Coast Air Quality Management District, revised November, 1993, page A8-1.

Rainfall

Although the SoCAB has a semi-arid climate, the air near the surface is moist because of the presence of a shallow marine layer. Except for infrequent periods when dry, continental air is brought into the SoCAB by off-shore winds, the ocean effect is dominant. Periods with heavy fog are frequent, and low stratus clouds, occasionally referred to as "high fog," are a characteristic climate feature. Annual average relative humidity is 70 percent at the coast and 57 percent in the eastern part of the SoCAB. Precipitation is typically 9 to 14 inches annually in the SoCAB and is rarely in the form of snow or hail due to typically warm weather. The frequency and amount of rainfall is greater in the coastal areas of the SoCAB (the project area averages approximately 15 inches annually, mostly in January and February).

Winds

With very low average wind speeds, the SoCAB's atmosphere has a limited capability to disperse air contaminants horizontally. Wind speed in downtown Los Angeles averages approximately 5.7 miles per hour (mph) with little seasonal variations.[2] Inland areas record slightly lower wind speeds than downtown Los Angeles, while coastal wind speeds average approximately two mph higher than Los Angeles. Summer wind speed averages slightly higher than winter wind speeds. The dominant daily wind pattern in the SoCAB is a daily sea breeze and a nighttime land breeze. This regime is broken only by occasional winter storms and infrequent strong northeasterly Santa Ana winds from the mountains and deserts north of the SoCAB.

Temperature Inversions and Smog

Under ideal meteorological conditions and irrespective of topography, pollutants emitted into the air would be mixed and dispersed into the upper atmosphere. However, the Southern California region frequently experiences temperature inversions in which pollutants are trapped and accumulate close to the ground. The inversion, a layer of warm, dry air overlaying cool, moist marine air, is a normal condition in the southland. The cool, damp and hazy sea air capped by coastal clouds is heavier than the warm, clear air which acts as a lid through which the marine layer cannot rise. The height of the inversion is important in determining pollutant concentration. When the inversion is approximately 2,500 feet above sea level, the sea breezes carry the pollutants inland to escape over the mountain slopes or through the passes. At a height of 1,200 feet, the terrain prevents the pollutants from escaping and it backs up along the foothill communities. Below 1,200 feet, the inversion puts a tight lid on pollutants, concentrating them in a shallow layer over the entire coastal basin. Usually, inversions are lower before sunrise than during the daylight hours. Mixing heights for inversions are lower in the summer and more

[2] Ibid.

persistent, being partly responsible for the high levels of ozone observed during summer months in the SoCAB. Smog in Southern California is generally the result of these temperature inversions combining with coastal day winds and local mountains to contain the pollutants for long periods of time, allowing them to form secondary pollutants by reacting with sunlight. The SoCAB has a limited ability to disperse these pollutants due to typically low wind speeds.

Ambient Air Quality Standards

Air quality at any location is dependent on the regional air quality and local pollutant sources. Regional air quality is primarily a function of Air Basin topography and wind patterns.

Ambient air quality is described in terms of compliance with Federal and State standards. Ambient air quality standards are the levels of air pollutant concentration considered safe to protect the public health and welfare. They are designed to protect people most sensitive to respiratory distress, such as asthmatics, the elderly, very young children, people already weakened by other disease or illness, and persons engaged in strenuous work or exercise. National Ambient Air Quality Standards (NAAQS) were established by the U.S. Environmental Protection Agency (EPA) in 1971 for six air pollutants. States have the option of adding other pollutants, to require more stringent compliance, or to include different exposure periods. California Ambient Air Quality Standards (CAAQS) for these same six pollutants and NAAQS are included in Table 5.4-1, *Local Air Quality Levels*.

The California Air Resources Board (CARB) is required to designate areas of the State as attainment, non-attainment, or unclassified for any State standard. An "attainment" designation for an area signifies that pollutant concentrations did not violate the standard for that pollutant in that area. A "non-attainment" designation indicates that a pollutant concentration violated the standard at least once, excluding those occasions when a violation was caused by an exceptional event, as defined in the criteria. An "unclassified" designation signifies that data do not support either an attainment or non-attainment status.

The EPA designates areas for O_3, CO, and NOx as either "Does not meet the primary standards," or "Cannot be classified," or "Better than national standards." For sulfur dioxide (SO2), areas are designated as "Does not meet the primary standards," "Does not meet the secondary standards," "Cannot be classified," or "Better than national standards." All other areas are designated "Unclassified." The attainment status designations for each of the six criteria pollutants are described below within the "Ambient Air Quality" discussion. The SoCAB is a non-attainment area for O3, CO, and PM10 for State and Federal standards and also NOx for Federal standards.

Ambient Air Quality

The South Coast Air Quality Management District (SCAQMD) operates several air quality monitoring stations within the Air Basin. The majority of the City of San Dimas is located within Source Receptor Area (SRA) 10. The communities within an SRA are expected to have similar climatology and subsequently, similar ambient air pollutant concentrations. The nearest air monitoring stations to the City within SRA 10 is located in the City of Pomona, in Los Angeles County. A second monitoring station near the City is located in the City of Azusa in SRA 9 San Bernardino County. Air Quality data from 1993 to 1997 for the Pomona and Azusa Monitoring Stations is provided in Table 5.4-1. The following air quality information briefly describes the various types and sources of pollutants which affect air quality.

Ozone

O3 is a colorless toxic gas that can irritate the lungs and damage materials and vegetation. Levels of O3 exceed Federal and State standards throughout the Air Basin. Because O3 formation is the result of photochemical reactions between NOx and reactive organic gases (ROG), typically produced by combustion sources, peak concentrations of O3 occur downwind of precursor emission sources. The entire Air Basin is designated as a non-attainment area for State and Federal O3 standards.

Carbon Monoxide

CO is an odorless, colorless toxic gas, produced almost entirely from combustion sources (automobiles). This pollutant interferes with the transfer of oxygen to the brain and it is generally associated with areas of high traffic density. The SoCAB is designated as a non-attainment area for State and Federal CO standards.

Nitrogen Dioxide

NO_2, often used interchangeably with NOX, is a reddish-brown gas that can cause breathing difficulties at high levels. Peak readings of NO2 occur in areas that have a high concentration of combustion sources (e.g., motor vehicle engines, power plants, refineries, and other industrial operations) in the vicinity. The entire Air Basin is designated as a non-attainment area for Federal NO_2 standards.

Fine Particulate Matter

On July 1, 1987, the EPA replaced the total suspended particulate (TSP) standard with a new particulate standard known as PM10. PM10 includes particulate matter 10 microns or less in diameter (a micron is one millionth of a meter). Sources of PM10 include agricultural operations, industrial processes, combustion of fossil fuels, construction and demolition, and windblown dust and wildfires. The entire Air Basin is designated as a non-attainment area for State and Federal PM10 standards. Particulates substantially reduce visibility and adversely affect the respiratory tract.

Sulfur Dioxide and Lead

Sulfur dioxide (SO_2), often used interchangeably with sulfur oxides (SOX), and lead (Pb) levels in all areas of the Air Basin do not exceed Federal or State standards. The SoCAB is designated as attainment for both State and Federal SO_2 standards. There is no NAAQS for lead.

As indicated in Table 5.4-1, *Local Air Quality Levels*, some exceedances of State standards for O_3 and PM10 occurred at the Pomona Monitoring Station and Azusa Monitoring Station from 1993 through 1997. The State O_3 standard was exceeded from 30 to 104 days a year over this five-year period. The Federal O_3 standard was exceeded 162 times during this period (45 times in 1993, 47 in 1994, 47 in 1995, 16 in 1996 and 47 in 1997). The State PM10 standard was exceeded numerous times each year from 1993 to 1997, at a rate of 101 times out of 239 samples. In other words, State PM10 standards were exceeded for 42% of all samples over the five-year period.

Regulatory Framework

Federal Clean Air Act

The 1970 Clean Air Act (CAA) authorized the establishment of the NAAQS, and set deadlines for their attainment. The Federal Clean Air Act Amendments of 1990 made major changes in deadlines for attaining NAAQS and in the actions required of areas of the nation that exceeded these standards.

California Clean Air Act

The 1988 California Clean Air Act (CCAA) requires that all air districts in the State endeavor to achieve and maintain CAAQS for O3, CO, SO2, and NO2 by the earliest practical date. The CCAA specifies that districts focus particular attention on reducing the emissions from transportation and area-wide emission sources. The Act also gives districts new authority to regulate indirect sources. Each district plan is to achieve a five percent annual reduction (averaged over consecutive three-year periods) in district-wide emissions of each non-attainment pollutant or its precursors. Any additional development within the region would impede the "no net" increase prohibition, in that further emissions reductions must be affected from all other airshed sources to fit any project development mobile source emissions increase.

A strict interpretation of the "no net" increase prohibition suggests that any general development within the region, no matter how large or small, would have a significant, project-specific air quality impact unless the development-related emissions are offset by concurrent emissions reduction elsewhere within the airshed.

Any planning effort for air quality attainment would thus need to consider both State and Federal planning requirements.

1997 Air Quality Management Plan

The SCAQMD has prepared multiple Air Quality Management Plans (AQMPs) to accomplish the 5 percent annual reduction goal. The most recent AQMP was adopted in 1997. To accomplish its task, the AQMP relies on a multi-level partnership of governmental agencies at the federal, state, regional and local level. These agencies (EPA, CARB, local governments, Southern California Association of Governments (SCAG), and the SCAQMD) are the cornerstones that implement the AQMP programs.

A 1997 AQMP was prepared by the SCAQMD and adopted by the District on November 15, 1996. The 1997 AQMP was then adopted by CARB on January 23, 1997. The 1997 Plan contains two tiers of control measures. Short and intermediate term measures are scheduled to be adopted between 1997 and the year 2005. These measures rely on known technologies and other actions to be taken by several agencies that currently have the statutory authority to implement the measures. They are designed to satisfy the Federal CAA requirement of Reasonably Available Control Technology (RACT) and the CCAA requirement of Best Available Retrofit Control Technology (BARCT). There are 37 stationary source and 24 mobile source control measures in this group.

Control Strategies. The 1997 AQMP continues to include most of the control measures outlined in the previous 1994 Ozone Plan with minor exceptions, but postpones many marginal measures found to be less cost-effective, drops future indirect-source rules that are now deemed infeasible, and focuses the SCAQMD's efforts on about ten major emission-reduction rules over the next two years. The SCAQMD will focus its efforts on seven major rules to reduce volatile organic compounds (VOCs), a key ingredient in smog, and the Plan includes new market-based measures giving businesses greater flexibility in meeting emission-reduction requirements, such as intercredit trading and additional credits for mobile source emission reductions.

The 1997 AQMP shows that measures outlined in the 1994 Ozone Plan are more than sufficient to attain the Federal health standards for the two most difficult ingredients in smog, PM10 and ground-level O_3, by the years 2006 and 2010, respectively. The CO standard will be met, as required, by 2000. The region already has met the three other Federal health standards for Pb, SO_2, and NO_2.

To help reduce PM10 pollution, the 1997 Plan outlines seven control measures for directly emitted particulates which will reduce emissions from agricultural areas, livestock wastes, wood-working operations, construction, and restaurants. The measures will also help control dust from paved and unpaved roads, which accounts for two-thirds of the directly-emitted particulates.

TABLE 5.4-1
LOCAL AIR QUALITY LEVELS
(As measured at the Pomona and Azusa Ambient Air Monitoring Stations)

Pollutant	California Standard	Federal Primary Standard	Year	Maximum[1] Concentration	Days (Samples) State/Federal Std. Exceeded
Carbon Monoxide (Pomona)	20 ppm for 1 hour	35 ppm for 1 hour	1993	8	0/0
			1994	10	0/0
			1995	8	0/0
			1996	8	0/0
			1997	8	0/0
	9 ppm for 8 hours	9 ppm for 8 hours	1993	8	0/0
			1994	10	0/0
			1995	8	0/0
			1996	8	0/0
			1997	5	0/0
Ozone (Pomona)	0.09 ppm for 1 hour	0.12 ppm for 1 hour	1993	0.21	104/45
			1994	0.24	104/47
			1995	0.22	87/47
			1996	0.19	44/16
			1997	0.16	30/7
Nitrogen Oxides (Pomona)	0.25 ppm for 1 hour	0.053 ppm annual average	1993	0.20	0/0
			1994	0.18	0/0
			1995	0.18	0/0
			1996	0.18	0/0
			1997	0.15	0/0
Sulfur Oxides (Whittier)	0.25 ppm for 1 hour	0.14 ppm for 24 hours or 80 ug/m^3 (0.03 ppm) annual average	1993	0.03	0/0
			1994	NM	NM
			1995	NM	NM
			1996	NM	NM
			1997	NM	NM
Fine Particulate Matter (Ontario Airport)	50 ug/m for 24 hours	150 ug/m for 24 hours	1993	101	19/0
			1994	127	25/0
			1995	239	33/8
			1996	100	24/0
			1997	NM	NM

ppm = parts per million
ug/m^3 = micrograms per cubic meter
NM = Not measured at the local ambient Air Monitoring Station.
NS = No standard set.
* Less than 12 months of monitoring

NOTES
1. Maximum concentration is measured over the same period as the California Standard.
2. Ozone, carbon monoxide, and nitrogen oxides were measured at the Pomona Station. The Azusa Monitoring Station was used for PM_{10} measurements. The Pomona and Azusa Stations are located in Los Angeles County.
3. The number of days in exceedence of State and Federal Standards is not out of 365 days of samples, but based on 59 samples in 1993, 62 samples in 1994, and 60 samples is 1995, and 58 samples in 1996. No PM10 samples were taken at the Azusa Monitoring Station in 1997. Percentages of days in exceedence of State Standards (based on number of days samples were taken) averages about 42%.

Sources: Data obtained from the *California Air Resources Board, Summary of Air Quality Data*, 1993 to 1997.

The 1997 Plan shows that both emissions and ambient pollution levels have continued their downward trend toward more healthful levels. The number of Stage I smog episodes for O_3 declined from 41 days in 1990 to just 14 days in 1995. CO also has declined, with the number of days over the standard down from 42 in 1990 to 13 in 1995. The average number of days exceeding the Federal 24-hour PM10 standard also declined between 1990 and 1995 by 9 percent.[3]

To ultimately achieve ambient air quality standards, further development and refinement of known low- and zero-emission control technologies, in addition to technological breakthroughs, would be necessary. Long-term measures rely on the advancement of technologies and control methods that can reasonably be expected to occur between 1994 and 2010.

Because of the EPA's principal authority over many off-road sources, the 1997 AQMP's off-road mobile source control measures are based on the EPA's proposed Federal Implementation Plan (FIP) for the SoCAB. The FIP's proposed control measures are based on a combination of stringent emission standards, declining caps on emission levels and emission/user fees.

Sensitive Receptors

Sensitive populations (sensitive receptors) are more susceptible to the effects of air pollution than the general population. Sensitive populations who are in proximity to localized sources of toxins and CO are of particular concern. Land uses considered to be sensitive receptors include residences, schools, playgrounds, parks, child care centers, athletic facilities, long-term health care facilities, hospitals, rehabilitation centers, convalescent centers, and retirement homes. All of the above land uses considered as sensitive receptors are located within the City of San Dimas.

Toxic Air Contaminants (TACS)

Toxic air pollutants are often termed "non-criteria" pollutants as ambient air standards have not been established for them. SCAQMD implements TAC controls through Federal, State and local programs. Federally, TACs are regulated by EPA under Title III of the Federal CAA. At the State level, the ARB has designated all 189 federal hazardous air pollutants as TACs, under the authority of AB 1807. The Air Toxins Hot Spots Information and Assessment Act (AB 2588) requires inventories and public notices for facilities that emit TACs. SB 1731 amended AB 2588 to require facilities with "significant risks" to prepare a risk reduction plan (reflected in SCAQMD Rule 1402). SCAQMD also regulates source-specific TACs.

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[3] Article entitled "AQMD Sees Progress in Attaining Federal Clean Air Standards," *AQMD Advisor*, Volume 3, Number 7, September 1996.

IMPACTS AND MITIGATION MEASURES

Significance Criteria

A project would normally be considered to have a significant effect on air quality if the project:

- ❖ violates any ambient air quality standard;
- ❖ contributes substantially to an existing air quality violation;
- ❖ exposes sensitive receptors to substantial pollutant concentrations, or
- ❖ conflicts with adopted environmental plans and goals of the community where it is located.

The significance of localized project impacts depends on whether ambient CO levels in the vicinity of the project are above or below State and Federal CO standards. If the project causes an exceedance of either the state one-hour or eight-hour CO concentrations, the project would be considered to have a significant local air quality impact. If ambient levels already exceed a state or federal standard, then project emissions would be considered significant if they increase one-hour CO concentrations by 1.0 ppm or more, or eight-hour CO concentrations by 0.45 ppm or more.[4]

Long-Term Air Quality Impacts

- ❖ ***BUILDOUT OF THE PROPOSED PROJECT AREA WOULD RESULT IN AN OVERALL INCREASE IN THE LOCAL AND REGIONAL POLLUTANT LOAD DUE TO DIRECT IMPACTS FROM VEHICLE EMISSIONS.***

Significance: Less than significant impact with mitigation (mitigation included in AQMP, General Plan and General Plan EIR).

Impact Analysis: Long-term air quality impacts would primarily consist of mobile source emissions generated from traffic and stationary source emissions. Existing land uses that are currently located along the southern portion of the project area should be considered as existing emittors of pollutants in this impact analysis.

Mobile Sources

Motor vehicles would constitute the primary source of pollutant emissions associated with buildout of the proposed project area. Implementation of the proposed project would result in an increase in mobile source emissions over existing conditions;

[4] *SCAQMD CEQA Air Quality Handbook*, page 9-10, April 1993 (revised November 1993).

however, this increase is not anticipated to generate any new significant air quality impacts. And while the proposed project would involve additional vehicle traffic and resultant pollutant emissions beyond existing conditions, this traffic and associated emissions increase was anticipated in the City of San Dimas General Plan EIR. In fact, the General Plan EIR analysis indicated that *"[g]rowth in the City of San Dimas will impact air quality almost exclusively through the vehicular traffic generated by the development."* The General Plan EIR goes on to say that *"[t]he anticipated incremental City of San Dimas development does not create a significant air quality impact on a local or regional scale."* Since the proposed project would result in a decrease in the intensity of the existing land use designations within the project area, that were previously analyzed in the General Plan EIR, the proposed project would not result in significant air quality impacts beyond those previously anticipated for the project area (refer to Sections 5.1, *Land Use/Relevant Planning*).

Stationary Sources

Electricity and natural gas is utilized by nearly every commercial, industrial, manufacturing, and residential development. Pollution is emitted through the generation of electricity and consumption of natural gas. Emissions from electricity and natural gas usage would occur with the development of future residences within the project area. However, this is considered to be a less than significant impact as the proposed project is consistent with and has been previously addressed within the General Plan EIR.

Mitigation Measures:

AQ1. In order to reduce emissions associated with both mobile and stationary sources, all future development projects submitted to the City for consideration shall adhere to the programs and policies contained in the City of San Dimas General Plan and mitigation measures outlined in the General Plan EIR.

General Plan EIR Mitigation Measures

AQ2. Dust control measures required by the SCAQMD to be implemented during construction shall be actively enforced by City Staff. Such measures include maintaining adequate soils moisture, as well as removing any soil spillage onto traveled roadways through site housekeeping procedures.

AQ3. Reducing interference with existing traffic and preventing truck queuing around local receptors shall be incorporated into any project construction permits. The permits shall limit operation to daytime periods of better dispersion that minimizes localized pollutant accumulation.

Air Quality Management Plan

❖ ***THE PROPOSED PROJECT WOULD BE CONSIDERED CONSISTENT WITH THE AQMP AND REGIONAL COMPREHENSIVE PLAN AND GUIDE.***

Significance: Not significant.

Impact Analysis: It is important to determine if project-related impacts have been properly anticipated in the regional air quality planning process and reduced whenever feasible. Therefore, it is necessary to assess the project's consistency with the AQMP.

SCAG is responsible under the Federal CAA for determining conformity of projects, plans and programs with the SCAQMD AQMP. SCAG's Regional Comprehensive Plan and Guide (RCPG, May 1995) is a compilation of the summaries of Plans for the Southern California Region. It establishes a broad set of goals for the region, and identifies strategies for agencies at all levels to use in guiding their decision-making toward implementation of the proposals.[5] The Growth Management and Regional Mobility Chapters contain policies to help guide local agencies in developing a more balanced number of houses and jobs.

Prior to adoption of the RCPG, formal AQMP Conformity Review Procedures were provided by SCAG for local agencies to follow when determining consistency of projects with the AQMP. These guidelines were primarily based on a project's influence on the subregional jobs/housing balance. Since adoption of the RCPG, SCAG released the Intergovernmental Review Procedures Handbook dated June 1, 1995, which states that project consistency with the RCPG policies, particularly the core chapters, should be analyzed to determine project consistency with regional growth and air quality documents. Core chapters include Growth Management, Regional Mobility, Air Quality, Hazardous Waste and Water Quality.

Policies within these chapters of the RCPG are aimed at SCAG's overall goals to: 1) reinvigorate the region's economy, 2) avoid social and economic inequities and the geographical isolation of communities and 3) maintain the region's quality of life. Selected policies include the following:

- ❖ "SCAG shall encourage existing or proposed local jurisdictional programs aimed at designing land uses which encourage the use of transit and thus reduce the need of roadway expansion, reduce the number of auto trips and vehicle miles traveled, and create opportunities for residents to walk or bike."

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[5] *Regional Comprehensive Plan and Guide*, Southern California Association of Governments, May 1995, page 1.

- "SCAG shall encourage local jurisdictional plans that maximize the use of existing urbanized areas accessible to transit through infill and redevelopment."

- "SCAG shall support local plans to increase density of future development located at strategic points along the regional commuter rail, transit centers and activity centers."

- "SCAG shall encourage efforts of local jurisdictions in the implementation of programs that increase the supply and quality of housing and provide affordable housing as evaluated in the Regional Housing Needs Assessment."

Although air quality is a regional problem, SCAG's RCPG and SCAQMD's AQMP place a heavy reliance on local implementation measures, such as land use decisions and local employment transportation programs. The implementation process stresses the freedom of cities to choose attainment measures that best suit local conditions.

As indicated in SCAQMD's *CEQA Air Quality Handbook*, there are two main indicators of consistency:

- Whether the project would not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP; and

- Whether the project would exceed the AQMP's assumptions for 2010 or increments based on the year of project build-out and phase.

Even though the proposed project involves a General Plan Amendment and would serve as a tool for implementing the approved General Plan, proposed land uses would result in a reduction in the number of dwelling units currently approved for the project area. This would result in a reduction in air quality impacts previously assumed in the AQMP. The project would, therefore, be considered consistent with the AQMP land use assumptions and goals.

Mitigation Measures: No mitigation measures are required.

CUMULATIVE IMPACTS

- ***THE PROPOSED PROJECT, TOGETHER WITH OTHER FUTURE PROJECTS LOCATED OUTSIDE OF THE PROJECT AREA, WOULD INCREASE CUMULATIVE POLLUTANT EMISSIONS WITHIN THE SOUTH COAST AIR BASIN.***

Significance: Less than significant.

Impact Analysis: A cumulative impact on air quality would be due to increased vehicle travel and fossil fuel consumption associated with on-going development in the Redevelopment Plan area, combined with development occurring outside of the area and elsewhere within the South Coast Air Basin. The proposed project would be consistent with General Plan buildout land uses, and would not result in the generation of additional pollutant emissions beyond those anticipated in the General Plan and General Plan EIR. As General Plan buildout was anticipated in the regional growth forecasts and AQMP, the proposed project would subsequently be consistent with regional growth forecast documents, including the Southern California Association of Governments (SCAG) Regional Comprehensive Plan (refer to Section 3.0, *Project Description*, for discussion of project consistency with regional planning documents). Thus, significant cumulative air quality impacts would not occur.

Mitigation Measures: No mitigation measures are required.

UNAVOIDABLE SIGNIFICANT IMPACTS

Implementation of the proposed project would not result in unavoidable significant long-term impacts related to air quality.

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5.5 NOISE

The purpose of this Section is to describe the existing noise environment within the project vicinity, analyze potential noise impacts from implementation of the proposed project. This section is also based on the *City of San Dimas General Plan* and *General Plan EIR*, dated May 1991.

EXISTING CONDITIONS

Existing Noise Environment

The most significant noise-producing activity within the City of San Dimas involves the transportation elements: arterials, the freeways, aircraft noise, and the rail line. In addition, numerous fixed sources of noise exist within portions of the City. Fixed Sources such as commercial/light industrial noise within the City of San Dimas is not considered excessive. However, where residential locations are adjacent to heavy industrial zones or trucking operations, a significant impact exists. This impact is primarily related to noise generated by loading dock operations, trucks entering and leaving the area, and mechanical equipment located north inside and outside the building(s). In addition, a significant part of the noise experienced within the City is produced by train movements on the Atchison Topeka and Santa Fe (AT & SF) rail line.

Noise Scales and Definitions

Sound is technically described in terms of the loudness (amplitude) of the sound and frequency (pitch) of the sound. The standard unit of measurement of the loudness of sound is the decibel (dB). Since the human ear is not equally sensitive to sound at all frequencies, a special frequency-dependent rating scale has been devised to relate noise to human sensitivity. The A-weighted decibel scale (dBA) performs this compensation by discriminating against frequencies in a manner approximating the sensitivity of the human ear.

Decibels are based on the logarithmic scale. The logarithmic scale compresses the wide range in sound pressure levels to a more usable range of numbers in a manner similar to the Richter scale used to measure earthquakes. In general, a 1 dBA change in the sound pressure levels of a given sound is detectable only under laboratory conditions. A 3 dBA change in sound pressure level is considered to be a "just detectable" difference in most situations. A 5 dBA change is readily noticeable and a 10 dBA change is considered a doubling (or halving) of the subjective loudness. It should be noted that, generally speaking, a 3 dBA increase or decrease in the average traffic noise level is realized by a doubling or halving of the traffic volume; or by about a 7 mile per hour (mph) increase or decrease in speed.

For each doubling of distance from a point noise source (a stationary source, such as a loudspeaker or loading dock), the sound level will decrease by 6 dBA. In other words, if a person is 100 feet from a machine, and moves 200 feet from that source, sound levels will drop approximately 6 dBA. For each doubling of distance from a source of noise, like a roadway, the noise levels are reduced by 3 to 4.5 dBA, depending on the ground cover between the source and the receiver. In terms of human response to noise, a sound 10 dBA higher than another is judged to be twice as loud; 20 dBA higher four times as loud; and so forth. Everyday sounds normally range from 30 dBA (very quiet) to 100 dBA (very loud). Examples of various sound levels in different environments are shown in Table 5.5-1, *Sound Levels and Human Response*.

The predominant community noise rating scale used throughout the State of California for land use compatibility assessment is the Community Noise Equivalent Level (CNEL). The CNEL reading represents the average of 24 hourly readings of equivalent levels, known as Leq's, based on an A-weighted decibel with upward adjustments added to account for increased noise sensitivity in the evening and night periods. These adjustments are + 5 dBA for the evening (7 p.m. to 10 p.m.), and + 10 dBA for the night (10 p.m. to 7 a.m.). CNEL may be indicated by "dBA CNEL" or just "CNEL".

The Leq is the sound level containing the same total energy over a given sample time period. The Leq can be thought of as the steady (average) sound level which, in a stated period of time, would contain the same acoustic energy as the time-varying sound level during the same period. Leq is typically computed over 1, 8 and 24-hour sample periods.

Another commonly used method for assessing land use compatibility is the day/night average level or Ldn. The Ldn is a measure of the 24-hour average noise level at a given location. It was adopted by the U.S. Environmental Protection Agency (EPA) for developing criteria for the evaluation of community noise exposure. It is based on a measure of the average noise level over a given time period called the Leq. The Ldn is calculated by averaging the Leq's for each hour of the day at a given location after penalizing the "sleeping hours" (defined as 10 p.m. to 7 a.m.), by a 10 dBA to account for the increased sensitivity of people to noises that occur at night. The maximum noise level recorded during a noise event is typically expressed as Lmax. The sound level exceeded over a specified time frame can be expressed as Ln (i.e., L90, L50, L10, etc.). L50 equals the level exceeded 50 percent of the time.

Noise Sensitive Receptors

The land uses which are considered to be sensitive receptors to noise within the City of San Dimas include residential areas, schools, hospitals, churches, recreational areas, office buildings and transient lodging. Residential areas are considered highly sensitive noise receptors during the nighttime hours.

Noise Standards

It is difficult to specify noise levels which are generally acceptable to everyone. What is annoying to one person may be unnoticed by another. Standards may be based on documented complaint activity in response to documented noise levels, or based on studies on the ability of people to sleep, talk, or work under various noise conditions. All such studies, however, recognize that individual responses vary considerably. Standards usually address the needs of most of the general population. With this caution in mind, noise standards for planning purposes examine both outdoor and indoor noise levels acceptable for different uses. The standards relate to existing conditions in a City so that they are realistically enforceable and consistent with a City's General Plan objectives.

Federal Noise Standards

The United States Noise Control Act of 1972 (NCA) recognized the role of the federal government in dealing with major commercial noise sources in order to provide for uniform treatment of such sources. As Congress has the authority to regulate interstate and foreign commerce, regulation of noise generated by such commerce also falls under congressional authority. The Federal government specifically preempts local control of noise emissions from aircraft, railroad and interstate highways.

The U.S. Environmental Protection Agency (EPA) has identified acceptable noise levels for various land uses, in order to protect public welfare, allowing for an adequate margin of safety, in addition to establishing noise emission standards for interstate commerce activities.

The U.S. Department of Housing and Urban Development (HUD) has established policies for granting financial support for the construction of dwelling units in noise impacted areas.

State Noise Standards

The State of California has also identified acceptable noise levels for various land uses, in order to protect public health and welfare with an adequate margin of safety. State requirements specify that interior noise levels resulting from exterior sources are not exceed 45dBA CNEL. This standard applies to all noise-sensitive land uses, which include: residential units, transient lodgings, hospitals, churches, nursing homes and educational facilities. The State Aeronautics Act uses 65 dBA CNEL as the criterion airports must meet for exterior areas of residential communities.

The California Office of Noise Control has developed criteria and guidelines for local governments to use when setting standards for human exposure t noise and preparing noise elements. These guidelines include noise exposure levels for both exterior and

interior environments. The outdoor maximum permitted noise standard varies with the land use.

City of San Dimas Noise Standards

The Federal government specifically preempts local control of noise emissions from interstate highways, railroads and aircraft. The State of California has established guidelines for acceptable community noise levels which are based on the CNEL rating scale. The guidelines rank noise land use compatibility in terms of "normally acceptable," "conditionally acceptable," and "clearly unacceptable" noise levels for various land use types. In addition to Federal and State noise standards, the City of San Dimas has adopted noise standards in its General Plan. These noise standards include Land Use Compatibility for community noise and permissible noise levels for noise sources not operating on a public right-of-way. As shown in Table 5.5-2, *Community Noise Exposure Levels,* residential units are "normally acceptable" in exterior noise environments up to 65 CNEL and "conditionally acceptable" up to 70 CNEL. Schools, libraries and churches are "normally acceptable" up to 70 CNEL, and office buildings and business, commercial and professional uses are "normally acceptable" up to 70 CNEL. As indicated in Table 5.5-2, many noise-sensitive land uses such as residential areas, schools, churches, hospitals, etc., use a daily noise level value of 65 dBA as the dividing line between a "conditionally acceptable" and a "normally acceptable" noise environment.

Local agencies may regulate noise levels of most sources not regulated by the Federal government; may provide standards for insulation of noise receivers either within the structure or by placement of noise barriers such as walls; and, through land use decisions, may reduce noise impacts by separating noise generators from noise sensitive uses. To provide a satisfactory noise environment and to minimize complaints about community noise, the City of San Dimas has adopted State standards for evaluating the compatibility of land uses with respect to outdoor and certain indoor noise levels. The purpose of the land use compatibility analysis is to screen projects which may require specific design considerations to mitigate noise impacts. The General Plan's noise exposure contours are used in conjunction with the noise standards indicated on Table 5.5-2, *Community Noise Exposure Levels*, to make such a determination.

The impact of construction noise which occurs during the daytime is considered minimal for nor more than two or three months of activity. However, late night and weekend disturbance caused by construction noise may cause a significant impact when experienced at nearby residential locations. The City of San Dimas/Municipal Code Chapter 8.36.100, Regulation of Construction Noise, states that permissible construction hours for the City of San Dimas are from 7 a.m. to 8 p.m. Monday through Saturday, with no construction permitted on Sundays or public holidays.

TABLE 5.5-1
SOUND LEVELS AND HUMAN RESPONSE

NOISE SOURCE	dB(A) Noise Level	RESPONSE
	150	
Carrier Jet Operation	140	Harmfully Loud
	130	Pain Threshold
Jet Takeoff *(200 ft.)* Discotheque	120	
Unmuffled Motorcycle Auto Horn *(3 ft.)* Rock'n Roll Band Riveting Machine	110	Maximum Vocal Effort Physical Discomfort
Loud Power Mower Jet Takeoff *(2000 ft.)* Garbage Truck	100	Very Annoying Hearing Damage (Steady 8-Hour Exposure)
Heavy Truck *(50 ft.)* Pneumatic Drill *(50 ft.)*	90	
Alarm Clock Freight Train *(50 ft.)* Vacuum Cleaner *(10 ft.)*	80	Annoying
Freeway Traffic *(50 ft.)*	70	Telephone Use Difficult
Dishwashers Air Conditioning Unit *(20 ft.)*	60	Intrusive
Light Auto Traffic *(100 ft.)*	50	Quiet
Living Room Bedroom	40	
Library Soft Whisper *(15 ft.)*	30	Very Quiet
Broadcasting Studio	20	Just Audible
	10	Threshold of Hearing

Source: Melville C. Branch and R. Dale Beland, Outdoor Noise in the Metropolitan Environment, 1970 (p. 2), and others.

As shown in Table 5.5-2 and in accordance with City standards, the exterior living areas (yards and patios) of residences should not exceed 65 CNEL. The California Noise Insulation Standard (California Administrative Code, Title 25, Chapter 1, Subchapter 1, Article 4) also requires that indoor noise levels in multi-family residences do not exceed a CNEL of 45 dBA.

TABLE 5.5-2
COMMUNITY NOISE EXPOSURE LEVELS

LAND USE CATEGORY	COMMUNITY NOISE EXPOSURE Ldn or CNEL dBA			
	Normally Acceptable	Conditionally Acceptable	Normally Unacceptable	Clearly Unacceptable
Residential - Multiple Family	50 - 65	60- 67	70 - 75	75 - 85
Residential - Low Density	50 - 60	55-70	70 - 75	75 - 85
Transient Lodging - Motel, Hotels	50 - 65	60- 70	70 - 80	80 - 85
Schools, Libraries, Churches, Hospitals, Nursing Homes	50 - 70	60 - 70	70 - 80	80 - 85
Auditoriums, Concert Halls, Amphitheaters	NA	50 - 70	NA	65 - 85
Sports Arenas, Outdoor Spectator Sports	NA	50 - 75	NA	70 - 85
Playgrounds, Neighborhood Parks	50 - 70	NA	67.5 - 75	72.5- 85
Golf Courses, Riding Stables, Water Recreation, Cemeteries	50 - 75	NA	67.5 - 80	80 - 85
Office Buildings, Business Commercial and Professional	50 - 70	67.5 - 77.5	75-85	NA
Industrial, Manufacturing, Utilities, Agriculture	50 - 75	70 - 80	75 - 85	NA

Source: City of San Dimas General Plan, 1991, Exhibit VIII-3, p. VIII-7. Modified from U.S. Department of Housing and Urban Development Guidelines and State of California Standards.

Notes: **NORMALLY ACCEPTABLE**
Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements.
CONDITIONALLY ACCEPTABLE
New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features are included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning, will normally suffice. Outdoor environment will seem noisy.
NORMALLY UNACCEPTABLE
New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements needed to mitigate the unacceptable noise levels must be made and needed noise insulation features must be included in the design. Outdoor areas must be shielded.
CLEARLY UNACCEPTABLE
New construction or development clearly should not be undertaken. Construction costs to make the indoor environment acceptable would be prohibitive and the outdoor environment would not be useable.
NA: Not applicable.

IMPACTS AND MITIGATION MEASURES

Significance Criteria

A project is considered to have a significant noise impact where it causes an adopted noise standard to be exceeded for the project site or for adjacent sensitive receptors. In addition to being concerned about the absolute noise level that might occur when a new source is introduced into an area, it is also important to consider the existing noise environment. If the existing noise environment is quiet and the new noise source greatly increases the noise exposure, even though a criterion level might not be exceeded, some impact may occur. Lacking adopted standards for evaluating such impacts, general rules of thumb for community noise environments are that a change of over 5 dBA is readily noticeable and, therefore, is considered a significant impact.[1] Changes from 3 to 5 dBA may be noticed by some individuals and are, therefore considered to constitute an adverse environmental impact since under these conditions sporadic complaints may occur. Changes in community noise levels of less than 3 dBA are normally not noticeable and are therefore considered less than significant.[2] Adverse impacts would result if increases in noise levels are audible (increases equal to, or greater than 3 dBA), although the noise level may not exceed the significant impact criteria specified above.

Project-related noise should also be compared to City of San Dimas noise performance standard as stated in Table 5.5-2, *Community Noise Exposure Levels*.

Impacts associated with project implementation are analyzed below. Mitigation measures are provided at the end of this section to minimize the significance of identified impacts.

Long-Term Noise Impacts

❖ ***IMPLEMENTATION OF FUTURE DEVELOPMENT PROJECTS WITHIN THE PROJECT AREA WOULD RESULT IN AN INCREASE IN THE AMBIENT NOISE LEVEL BEYOND EXISTING CONDITIONS.***

Significance: Less than significant impact with adherence to Chapter 8.36 of the San Dimas Municipal Code and General Plan policies.

Impact Analysis: Traffic associated with future development projects located throughout the proposed project area would increase the ambient noise level along existing adjacent local roadways beyond existing conditions. It should be noted that

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1 Assessment of Noise with Respect to Community Response, ISDR 1996, International Standardization, Switzerland.

2 Fundamentals and Abatement of Highway Traffic Noise, Bolt, Beranek and Newman, 1973.

noise impacts within the project area were previously addressed within the General Plan EIR. Land uses proposed as part of the project would result in fewer residential units in the project area than previously anticipated in the General Plan. Therefore, impacts are considered less than significant as the proposed project would result in a reduction in the number of single-family residential units resulting in a proportional decrease in the amount of noise from project-generated traffic.

Construction noise associated with individual development projects would be short-term and cease upon project completion. In addition, it should be noted that short-term construction noise impacts would be mitigated to a less then significant level through adherence to the provisions outlined in Chapter 8.36 of the San Dimas Municipal Code.

Mitigation Measures: No mitigation measures are required.

CUMULATIVE IMPACTS

❖ ***THE PROPOSED PROJECT, COMBINED WITH CUMULATIVE PROJECTS, WOULD INCREASE THE AMBIENT NOISE LEVELS IN THE SITE VICINITY.***

Significance: Potentially significant. Impact analysis and mitigation determination evaluated on a project-by-project basis.

Impact Analysis: Implementation of the proposed project, combined with development of cumulative projects, would increase ambient noise levels in the site vicinity. This increase would be due to both vehicular traffic noise along local roadways and stationary noise sources associated with residential development. As previously discussed, the proposed project would not individually create a significant noise impact; nor would it substantially contribute to a cumulative noise impact. As would the proposed project, cumulative development projects would be individually required to reduce noise impacts to below City noise standards and demonstrate adherence to the City of San Dimas Municipal Code requirements.

Mitigation Measures: No mitigation measures are required.

UNAVOIDABLE SIGNIFICANT IMPACTS

Implementation of the proposed project would not result in unavoidable significant long-term impacts related to noise.

5.6 GEOLOGY

The purpose of this Section is to identify potential geologic impacts to proposed on-site uses. This Section is primarily based on information contain within the *Report of Geotechnical Services in Support of Environmental Impact Report, Northern Foothills Development*, prepared by Converse Consultants dated January 15, 1999 (refer to Appendix 14.3, *Geotechnical Report*). The objectives of this discussion are to present the current regulatory settings for geologic considerations, summarize geology and geologic hazards, assess potential impacts, and present recommended mitigation measures.

EXISTING CONDITIONS

Topography

Topographically, the Northern Foothills project area is represented by a semicircular shaped landform that protrudes southward from the linear base of the San Gabriel Mountains, which is part of the Transverse Ranges physiographic province of southern California. This topographic "protrusion" of the San Gabriel Mountains foothill region is generally bounded by San Dimas Canyon on the east, Big Dalton Canyon and its broad alluvial fan on the west, and on the south by the San Dimas Wash and the adjacent Los Angeles basin. The most prominent features of the area are Johnstone Peak, the highest point (elevation 3,178 feet above mean sea level) at the northern margin of the project area, and the steep sided, deeply entrenched, Sycamore and Ham Canyons that drain the majority of the project area. Three smaller canyons, Shuler, Shay and Wildwood Canyons drain the southerly westernmost corner of the project area. The majority of surface flow from the project area is southward toward San Dimas Wash. Surface drainage from Shuler, Shay and Wildwood Canyons flows westward along the East Branch of Dalton Wash. Only a very limited portion of the northerly westernmost corner of the project area drains directly into Big Dalton Canyon.

There are four major topographic regions located within the Northern Foothills project area, which include: (1) the very gently sloping San Dimas Wash; (2) the more moderately sloping, uplifted and weakly to moderately incised terrace-like surface along the base of the foothills; (3) an uplifted, deeply incised area of rounded hill tops and ridges situated within the southwest corner of the site; and (4) the steep mountainous-type terrain that characterizes approximately 80 percent of the project area.

The very gently sloping alluviated San Dimas Wash flows south and southwest and has an overall surface gradient of about 0.2 percent, or about 70 feet per mile. Much of this active alluvial drainage is occupied by flood control features, as well as the eastern portion of San Dimas Golf Course. The adjacent uplifted terrace surface separates the

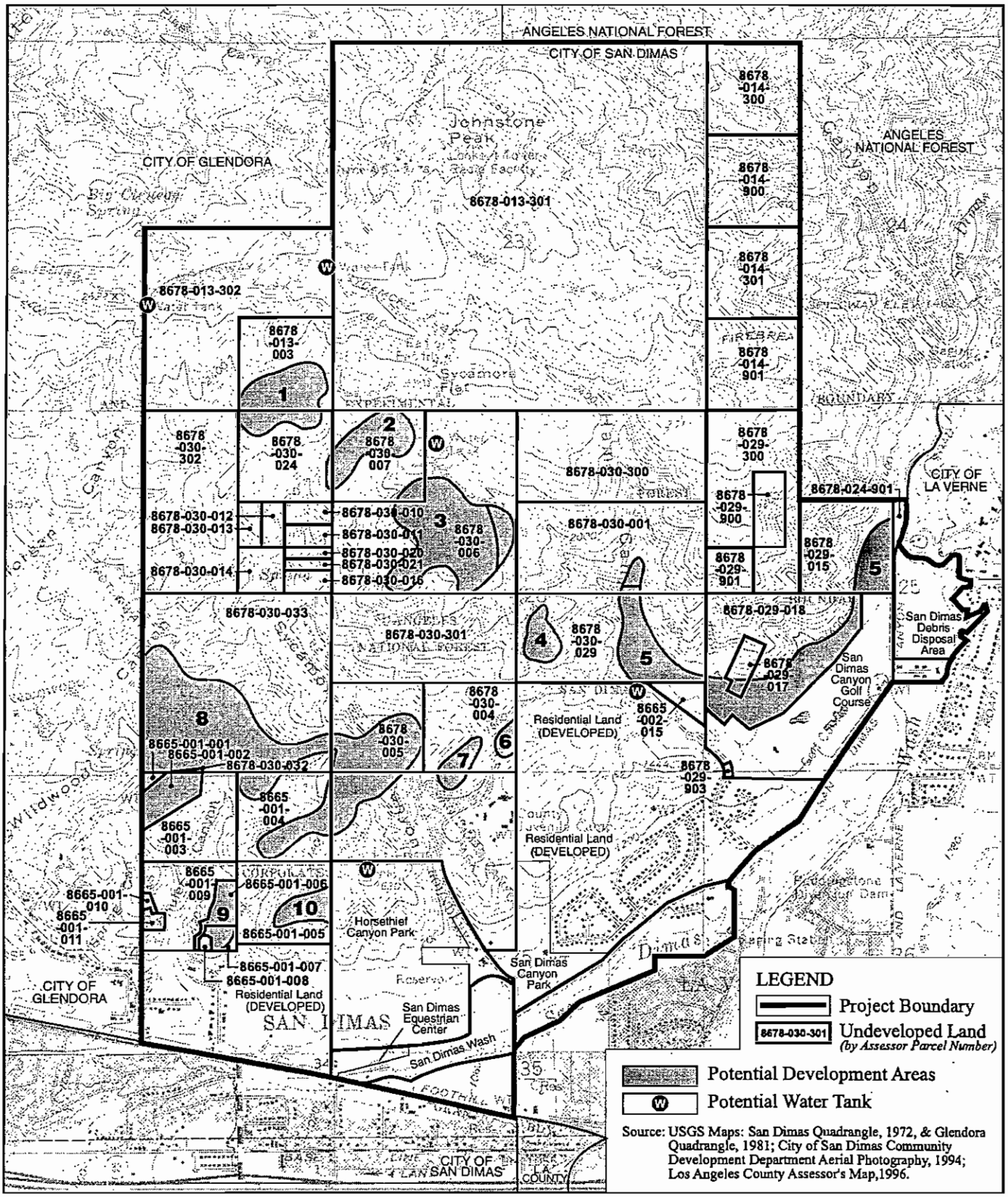
active wash from the sharp, steep face of the foothills region. This 1,000 foot to 1,500 foot wide terrace-like strip flanks the entire base of the foothills, with surface elevations that range from approximately 1,040 feet above mean sea level msl to approximately 1,400 feet above msl, and slopes towards the basin at inclinations between about 5 percent to as much as 40 percent within the uppermost incised portions at the base of the foothills. The majority of this terrace-like area is developed with single-family homes, San Dimas Canyon Park, an equestrian center (Horsethief Canyon Park), and the western two-thirds of San Dimas Golf Course.

The topography within the southwest corner of the foothills is characterized by rounded hilltops and ridgelines, which are largely controlled by the Puente Formation that underlies this area. Both Shay and Shuler Canyons have formed deep incisions into this area that have produced canyon walls/slopes as steep as 1:1 (horizontal to vertical) along the base of the canyons. More commonly, natural slopes vary between 5:1 to 2:1. Land surface elevations in this area range from a low of 1,200 feet above msl along the base of the hills to a high of about 1,630 feet above msl at the top of Shay Peak (informal name), located between Shay Canyon and the mouth of Sycamore Canyon.

The largest portion of the project area consists of relatively steep, mountainous-type terrain with deeply incised canyons, namely Sycamore and Ham Canyons, that extend northerly into the project area over a distance of two miles from the base of the foothills. The most prominent topographic features within this area are east-west trending ridgelines, located at the head of Sycamore and Ham Canyons, that include an area known as Sycamore Flat, and to the north the highest peak within the area, namely Johnstone Peak (3,178 feet above msl). Natural slopes within this portion of the project area vary from gently sloping (5 to 10 percent) along the tops of ridges, to 2:1 to 1:1 (50 to 100 percent) on most slopes, and steepen to near vertical near the bottom of the major canyons. The land surface elevation ranges from approximately 1,400 feet above msl to 3,180 feet above msl along the crest of Johnstone Peak.

The topography of the 10 Potential Development Areas (PDAs)[1] generally coincides with either the top of intermediate ridges and terrace-like surfaces within the central portion of the site (PDA nos. 1, 2, 3 and 4), with the remaining PDAs, except for PDA no. 5, situated on hilltops and subdued ridgelines, and within a gently rolling upland valley-like areas (refer to Exhibit 5.6-1, *Ten Potential Development Areas*). PDA no. 5 area is situated near the mouth of Ham Canyon and atop a dissected terrace surface located at the base of a steep mountainous region in the southeast corner of the site. All but PDA no. 8 is bordered above or below by steep, unstable terrain.

[1] Solely for the purpose of evaluation in the *Geotechnical Study*, the Potential Development Areas were numbered one through ten. Analysis in the *Geotechnical Study* focused primarily on the Potential Development Areas.



Source: LSA Associates

NORTHERN FOOTHILLS IMPLEMENTATION PROGRAM
PROGRAM ENVIRONMENTAL IMPACT REPORT

0 2,000'

Ten Potential Development Areas

ROBERT BEIN, WILLIAM FROST & ASSOCIATES
2/99 JN 10-034933-6377

Exhibit 5.6-1

Soils

The soils maps utilized during the geologic evaluation were two very generalized soils maps. The earliest map is the *Soils Map California, Reconnaissance Survey — Central Southern Area — Western Sheet* (dated 1917) prepared by University of California Agricultural Research Station for U.S. Department of Agriculture, Bureau of Soil at a scale of 1:250,000. This map shows the project area as mantled by only two soil types, Yolo loams along the base of the foothills and the remaining 90 percent of the project area labeled as Rock land/broken ground. The latest soils map is the *Report and General Soil Map* (scale - 1:750,000) Los Angeles County, California prepared by U.S. Department of Agriculture, Soil Conservation Service (dated Revised December 1969, and the soils map dated April 1994). This latest soil map delineates Vista-Amargosa type soils occupying the lower most portion of the foothills and Hanford-type soils occupying the low-lying alluvial terrace and San Dimas Wash.

In an effort to better define the various soil associations (types) that are likely present within the project area, those soil types listed in the 1969 USDA soils report that appear to closely approximate the soil types observed during Converse Consultant's field reconnaissance are indicated on Exhibit 5.6-2, *Soils Map*, and include USDA soils associations/types using USDA terminology identified in Table 5.6-1, *On-Site Soils*, below.

TABLE 5.6-1
ON-SITE SOILS

Soil Classification	Location and Description
Hanford — Yolo Association	The soils of this association occur on gently sloping (2 to 5 percent), alluvial fans between elevations from 1,020 to 1,140 feet above msl within the project area. Hanford soils are over 60 inches deep, are well drained, and have moderately rapid subsoil permeability. They have coarse sandy loam surface layers about 8 inches thick underlain by gravelly loamy coarse sand and coarse sandy loam substratum. Available water holding capacity is 5.0 to 7.5 inches for 60 inches of soil depth. Yolo soils are over 60 inches deep, are well drained and have moderate subsoil permeability. They have loam surface layers about 18 inches thick, underlain by an equal thickness of silty loam. Available water holding capacity is 8.5 to 10.5 inches for 60 inches of soil depth. Hanford soils make up about 80 percent of the association, with Yolo soil (20 percent) making up the remainder. PDA no. 5 is underlain by Hanford type soils.
Diablo-Altamont Association	These soils have formed atop 30 to 50 percent slopes underlain by siltstone, shale and sandstone bedrock of the Puente Formation located near the base of the foothills. Soils of this association are about 20 to 39 inches deep, are well drained, and have generally slow subsoil permeability. They have dark grey, neutral clay surface layers about 12 to 20 inches thick underlain by dark grayish brown- brown calcareous clay subsoils that are highly expansive. Available water-holding capacity is 2.5 to 5.5 inches. Runoff from these soils is rapid and the erosion hazard is high. PDA nos. 9, 10 and a portion of PDA 8 are underlain by these soils.

Soil Classification	Location and Description
Vista-Amargosa Association	The soils of this association occur in the steep (30 to 50 percent slopes), mountainous areas that are underlain by metamorphic bedrock between elevations of 1,300 and 3,180 feet above msl. Vista soils are 28 to 38 inches deep, are well drained, and have moderately rapid subsoil permeability. They have a coarse, sandy loam surface layer about 12 inches thick. The subsoil is a sandy loam about 12 inches thick and contains 2 to 3 percent more clay than the surface layer. Below is coarse sandy loam on hard bedrock. Available water holding capacity is 2.5 to 3.5 inches for 28 to 38 inches of soil depth. Amargosa soils are 14 to 20 inches deep, are excessively drained, and have moderately rapid subsoil permeability. They have a coarse sandy loam surface layer about 13 inches thick. Below is a gravelly sandy loam layer, containing about 20 percent by volume gravel, resting on hard bedrock at about 14 to 20 inches. Sheet and rill erosion have been moderate on these soils, removing from 25 to 40 percent of the original surface soil. Available water-holding capacity is 1.0 to 1.5 inches for 14 to 20 inches of soil depth. There are no PDAs underlain by these soils.
Soper and Ramona Association (undifferentiated)	These soils occur on, and are associated with, the highly erodible tuff breccia volcanic bedrock areas (Tgt). Soper soils are 36 to 60 inches deep, are well drained, and have moderately slow subsoil permeability. They have grayish-brown, neutral gravelly loam surface layers about 12 inches thick. The subsoil is a brown and light yellowish brown mildly alkaline and neutral gravelly, sandy clay loam about 24 inches thick. The volcanic breccia bedrock occurs at depths from 36 to 60 inches. Available water-holding capacity is 4.0 to 7.5 inches for 36 to 60 inches of soil depth. Runoff from these soils is rapid and their erosion hazard is high. Ramona soils, that comprise about 10 to 20 percent of the association, are over 60 inches deep, and well drained and have slow subsoil permeability. They are characterized by brown to reddish-brown, heavy loam, loam, or sandy loam surface layers about 18 inches thick. Subsoils are brown to reddish brown, dense clay loam or clay about 30 inches thick. Areas with up to 60 percent by volume of stones and cobbles also occur. Available water holding capacity is 8 to 10 inches for 60 inches of soil depth. Runoff from these soils is slow to medium and their erosion hazard is moderate to high. PDA nos. 1, 2, 3, 4, 6, and a portion of PDA 8 are underlain by these soils.
Gilroy soils	These soils are found on 15 to 50 percent slopes and overlie two isolated areas of basaltic bedrock (Tgb), are 22 to 40 inches deep and are well drained, and have moderately slow subsoil permeability. They have a dark grayish-brown, slightly acid clay loam surface layer about 18 inches thick. The subsoil is a brown heavy clay loam and light brownish gray loam about 22 thick. Available water holding capacity is 4.5 to 7.0 inches for 22 to 40 inches of soil depth. Runoff from these soils is rapid and they have a high erosion hazard. A portion of PDA no. 4 may be situated within an area of Gilroy soils.
Rock land	Rock land is characterized by very shallow soils and rock outcrops covering about 50 percent of the west central portion of the site. The outcrops consist entirely of volcanic rocks. Surface runoff is very rapid and the erosion hazard is severe. A portion of PDA no. 8 is situated in close proximity to a Rock land area.

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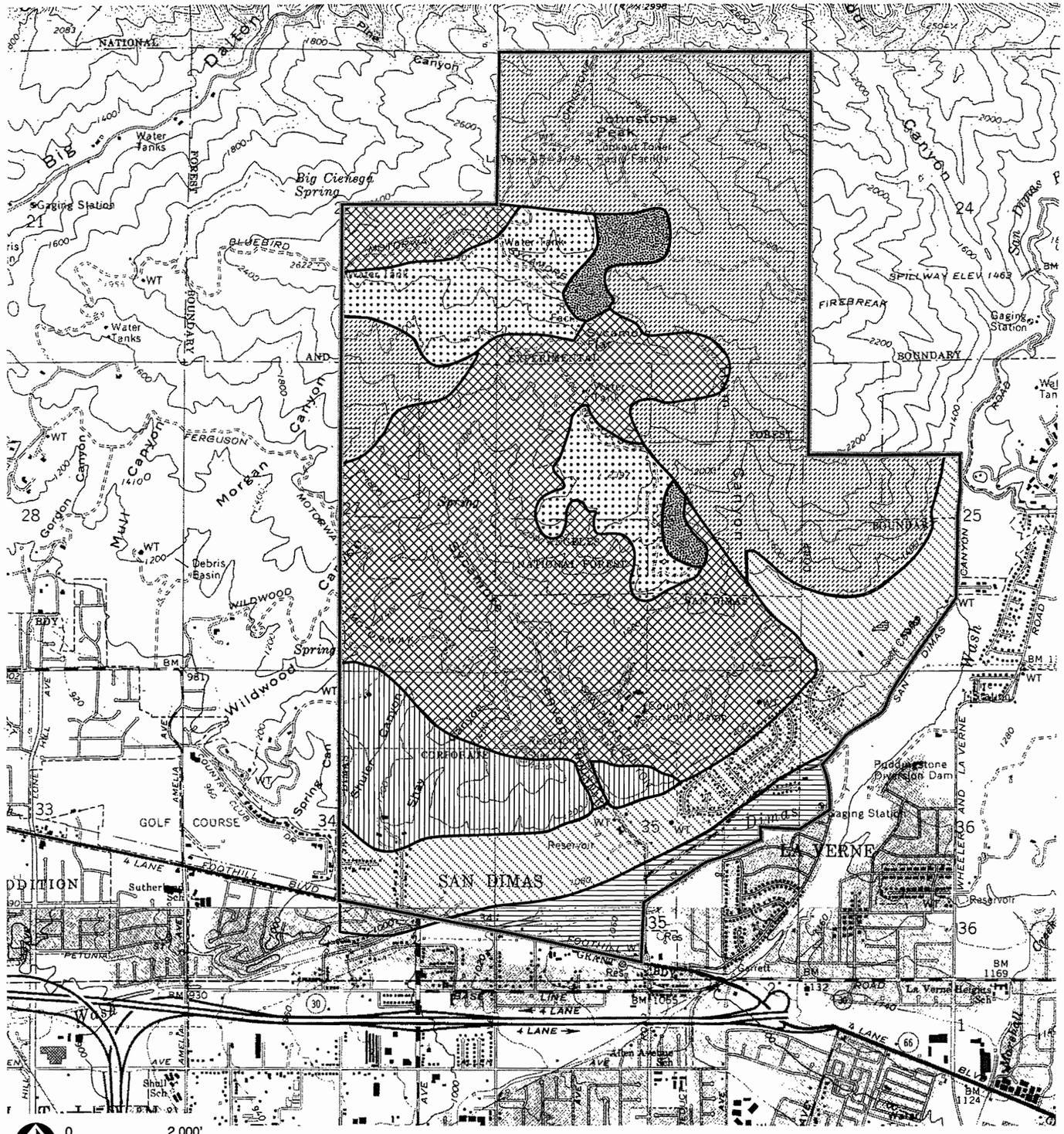


U.S.D.A. SOIL ASSOCIATION

- Vista-Armagosa
- Gilroy
- Soper & Ramona
- Diablo Altamont
- Hanford
- Yolo-Hanford
- Rockland

NOTES: (1) Base map from U.S.G.S. Topographic Maps, Glendora, California Quadrangle (dated 1966, photorevised 1972) and San Dimas, California Quadrangle (dated 1966, photorevised 1981).

Source: Converse Consultants, Geotechnical Engineering and Applied Sciences

NORTHERN FOOTHILLS IMPLEMENTATION PROGRAM
PROGRAM ENVIRONMENTAL IMPACT REPORT

Soils Map

Exhibit 5.6-2

ROBERT BEIN, WILLIAM FROST & ASSOCIATES
3/99 JN 10-034933-6377

Geologic Setting

The project area lies along the southern base of the San Gabriel Mountains, part of the Transverse Ranges physiographic province of southern California. The San Gabriel Mountains represent a structurally high block of ground that has been uplifted to its current height by tectonic uplift associated with the San Fernando — Sierra Madre — Cucamonga Fault zone along its southern base, and the San Andreas Fault that lies along the northern base of the mountain range. There are also numerous faults and shear zones within the range, especially near the base of the mountains. The largest of these internal faults is the San Gabriel Fault zone that transects the entire mountain range from east to west. The San Gabriel Mountains are composed largely of volcanic, granitic and metamorphic rocks, with subordinate amounts of ancient marine sedimentary rocks along the southern front of the range (refer to Exhibit 5.6-3, *Geologic Map).*

The various rock units that comprise the project area include, from oldest to youngest, metamorphic rocks, volcanic rocks assigned to the Glendora Volcanics of early to middle Miocene Age, marine sedimentary rocks of the upper Miocene age Puente Formation, uplifted Quaternary age steam terrace deposits, and recent slopewash and alluvium contained with active steam channels, landslide deposits, and artificial (man-made) fill (refer to Exhibit 5.6-3, *Geologic Map)* and Table 5.6-2, *Geologic Materials.*

The most common geologic hazards within the project area are active and inactive landslides, the high potential for seismically induced strong ground motion/shaking from future nearby earthquakes, and possibly ground surface rupture on any number of faults/shears within the site during a major earthquake on the nearby Sierra Madre — Cucamonga Fault zone. Although the California Division of Mines and Geology has indicated that no "active" faults project towards or transect the project area, the site is bounded directly on the south by the potentially active Cucamonga Fault (zone) and on the north (actually within the project area below Johnstone Peak) by the northern branch of the potentially active Sierra Madre Fault zone (refer to Exhibit 5.6-3, *Geologic Map).*

TABLE 5.6-2
GEOLOGIC MATERIALS

Geologic Material	Location and Description
Surficial Materials	Surficial materials within the project area, listed in order of increasing age are: artificial fill, slopewash and alluvium, and Quaternary age stream terrace deposits.
Artificial Fill (not designated)	Artificial fill consists of native soil and bedrock materials that have been excavated and placed as compacted engineered fill during development of the residential areas, the County juvenile camp, golf course and park sites. The majority of these man-made fills are probably on the order of 5 to 30 feet thick and overlie older stream-land terrace deposits and limited areas underlain by volcanic rock units. Some amount of fill soils also underlie portions of small ranches above Horsethief Canyon Park.

Geologic Material	Location and Description
Slopewash (Qsw)	Slopewash represents the accumulation of recently eroded soil and bedrock debris that has accumulated along the base of the foothills and within the major drainages (i.e. Sycamore and Ham Canyons). The composition of these soil-like materials are governed largely by the soil/bedrock materials from that they are derived. Along the base of the foothills, westerly from the mouth of Sycamore Canyon, the deposits consist largely of sandy silt/silty sand that is commonly loose highly porous, dry and contains abundant decaying organic debris. These soils range in thickness from several feet to about 10 feet. Slopewash materials easterly of Sycamore Canyon are composed largely of coarse grained soil and rock debris eroded from volcanic and metamorphic bedrock areas. Similar to the other areas, these soil-like deposits are commonly loose, highly porous, dry, contain decaying organic debris, and attain thicknesses of greater than 10 feet. PDA no. 5 is blanketed by these deposits.
Alluvium (Qal)	Alluvial deposits occupy the active channel bottoms within Sycamore and Ham Canyons, and San Dimas Wash. These materials consist of unconsolidated, crudely stratified, layers and lenses of silt, sand, gravel, cobbles and mixtures thereof. They are generally highly porous/permeable, interfinger with slopewash deposits and are subject to rapid erosion. A portion of PDA no. 5 is underlain by alluvial soils, primarily within the low-lying portions of Ham Canyon.
Quaternary Stream Terrace Deposits (Qt)	Uplifted stream terrace deposits of late Quaternary age occupy the southernmost portion of the site between the base of the foothills and San Dimas Wash. These deposits, that consist of partially consolidated alluvial-type soils, formed as ancient alluvial fan deposits that have subsequently been tectonically uplifted to heights of as much as 120 feet above the level of San Dimas Wash. There are also two small areas of terrace deposits along the lower flank of Sycamore and Wildwood Canyons. The deposits are composed of clay, silt, sand, gravel, cobbles and scattered small boulder size rock fragments, and are being actively eroded due to continual, episodic uplift during movement on the nearby Cucamonga Fault zone. These stream terrace deposits occupy portions of PDA nos. 5 and 8.
Bedrock Formations	The project area is underlain by, in order of increasing age, marine bedrock assignment to the Puente Formation, volcanic rocks designated as the Glendora Volcanics, and a much older complex of metamorphic rocks that have been intruded by granitic-type igneous rocks. The principle bedrock types within the Potential Development Areas are mostly volcanic rocks and to a lesser degree marine sedimentary strata.
Puente Formation (Tp)	The Puente Formation consists principally of interbedded marine siltstone, shale, siliceous shale, sandstone and subordinate amounts of conglomerate of late Miocene age. These ancient sedimentary rocks occupy the southernmost foothill region west of the mouth of Sycamore Canyon. An isolated area of exposed Puente Formation also lies just east of the mouth of Sycamore Canyon above San Dimas Canyon Park. Where exposed, these rocks are typically thin to medium bedded, very fractured, have a platy appearance, produce highly expansive soils, and are often highly folded adjacent to the faulted contact on the north with the Glendora Volcanics. Within the project area the exposed thickness of the Puente Formation is about 2,000 feet. PDA nos. 9, 10 and a portion of 8 are underlain by the Puente Formation.

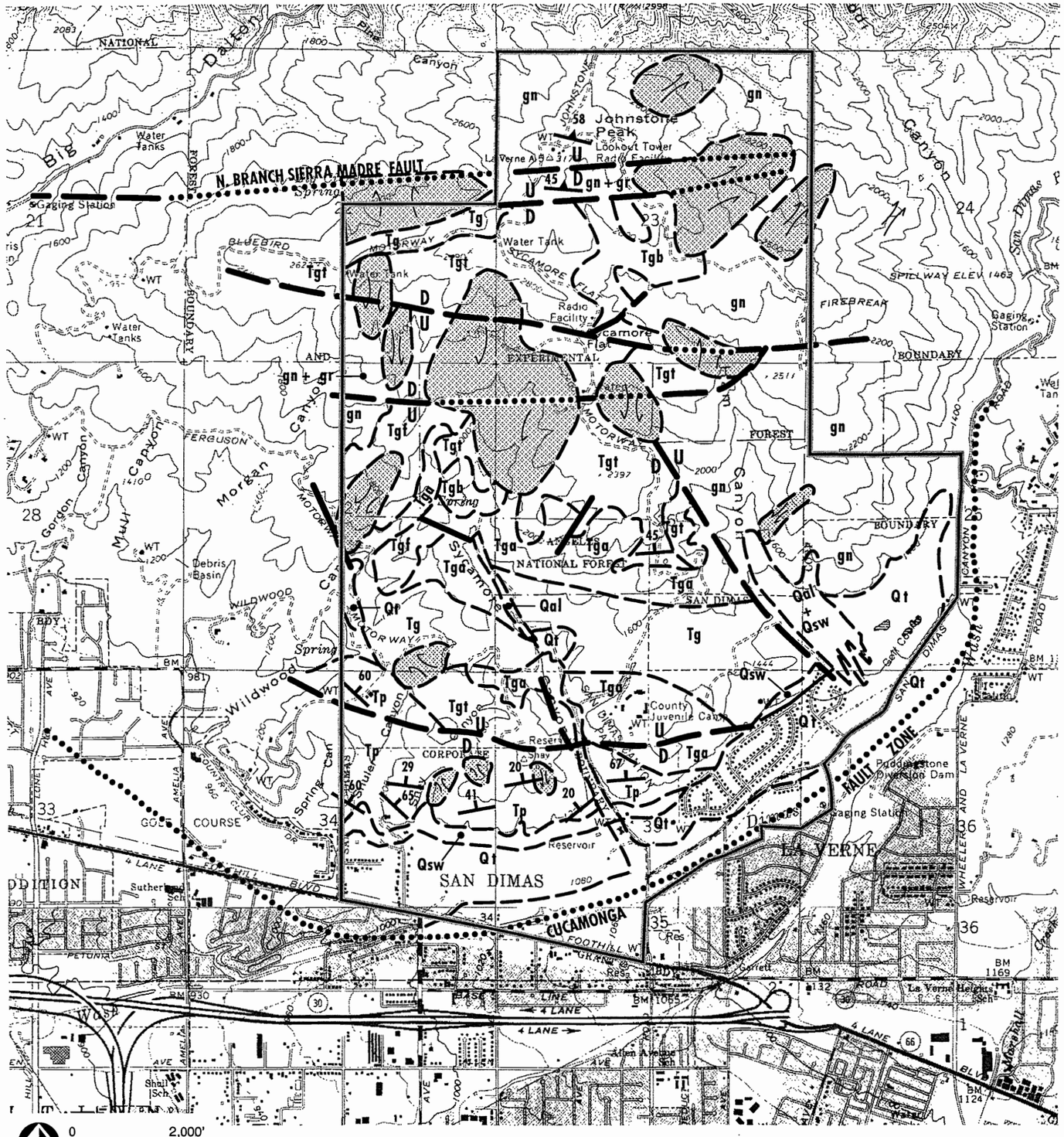
Geologic Material	Location and Description
Glendora Volcanics (Tg)	The Glendora Volcanics exposed within the project area constitute but a small, much faulted and eroded remnant of a Middle Miocene age volcanic field whose original extent covered at least 35 miles from north to south and almost as much as east to west. In the project area the Glendora Volcanics consist of, in decreasing order of abundance, a series of andosite flows, tuff breccia, and basaltic flows. The following presents a brief description of each of these rock types. The approximate location and extent of these various rocks is shown on Exhibit 5.6-3, *Geologic Map*.
Fine-grained Andosite (Tgf)	The oldest exposed rock unit of the Glendora Volcanics is a fine-grained to very fine-grained, massive andosite and associated red colored tuffaceous breccia. These rocks are usually light to dark gray on fresh (broken) surfaces and pale yellowish gray to greenish gray where weathered. Flow structure is almost always present, indicated by platy partings, with corrugations on weathered surfaces or the alignment of small mineral grains (i.e. feldspar) or collapsed vesicles. Close jointing/fracturing of these rocks facilitates disintegration so that smooth slopes characterize areas underlain by this member. PDA nos. 6 and 7 may be underlain by fine-grained andosite bedrock.
Calcic Andosite Flows (Tga)	Calcic andosite flows represent one of the most abundant rock types associated with the Glendora Volcanics. It is typically gray, often with a lavender tint, and studded with abundant small feldspar crystals. In outcrop, the rock is well jointed/fractured, and flow banding can be seen locally. A rusty-weathering massive breccia of calcic andosite fragments, some of that are markedly vesicular, is locally associated with these rocks. Portions of PDA nos. 3, 7, and PDA no. 8 are situated above these calcic andosite flow rock units.
Tuff Breccia (Tgt)	There are at least three sequences of tuff breccia within the project area. The northernmost exposure lies just south of Johnstone Peak and contains numerous scattered subangular fragments and blocks ranging in diameter from a fraction of an inch to over 10 feet in maximum dimension. The proportions of blocks to tuff matrix range from about 10 to 50 percent. The partly consolidated nature of these rocks results in weak topographic expression, few outcrops, and susceptibility to landsliding. In most road cut outcrops, the deposit is generally chaotic with no sign of bedding. Occasional lenses and thin streaking of bedded tuff matrix occur locally, whereas parts of the tuff breccia appears as volcanic mud flows and other tuff breccias. Located within the southern and central portion of the site are tuff breccias similar to that described above but contain a lower proportion of tuff matrix to blocks and also contain abundant shiny black needles of the mineral hornblend. PDA nos. 1 and 2 are situated atop a large landslide derived from the tuff breccia, whereas portions of nos. 3, 4 and 8 lie atop these tuff breccia/volcanic rocks.
Basalt Flows (Tgb)	A distinctive dark basaltic lava is exposed between Johnstone Peak and Sycamore Flat where it occurs as a single mass composed of several flows. Basaltic rocks are also found above the "spring" in Sycamore Canyon and in the vicinity of PDA no. 4. The basalt is black and vesicular, generally weathering dark purplish brown or dull gray, is moderately well jointed, hard and is the rock that produces the spring flow in Sycamore Canyon. Vesicles may be lined with opal, or filled with opal, calcedony, or calcite. PDA no. 4 is the only development area situated above these basaltic rocks. Throughout the area occupied by the Glendora Volcanics, intrusive diabase (i.e. dark colored granitic-type rocks) dikes cut the calcic andosite and basaltic lava in Sycamore Canyon, the tuff breccia near Johnstone Peak, as well as the older metamorphic rocks that occupy the northernmost and eastern margin of the project site.

Geologic Material	Location and Description
Metamorphic and Igneous Rocks (gn and gr)	The oldest rocks within the project area, that are commonly referred to as "basement rocks" because they underlie all other rock types, consist of metamorphic (map symbol gn) and intrusive granitic-type igneous rocks (gr). In the area surrounding Johnstone Peak the dominant rock type consists of metamorphic rocks represented by biotite feldspar angen gneiss that has been intruded (locally) by reddish colored granitic-type igneous rocks (mainly a dark colored medium to fine-grained hornblend diorite). Elsewhere, the metamorphic basement rock complex within the eastern portion of the site, consists largely of quartz feldspar gneiss and biotite hornblend gneiss. These rocks have also been intrenched by granitic-type igneous rocks, as well as intrusive volcanic rocks associated with the younger Glendora Volcanics. All of these metamorphic and igneous rocks lie within the National Forest boundaries. PDA no. 5 lies adjacent to steep mountainous terrain composed of these rocks.

Bedrock Structure

The bedrock structure within the project area is represented by much structural complexity insofar as geologic contacts are concerned. Rock units within the Glendora Volcanics that are fairly continuous locally become pinched off, and minor faulting is abundant. J.S. Sheldon (1955), who mapped much of the area, labeled it as "Zone of Faulting and Sliding" due to the complex geologic nature of geologic contacts and abundant landslides. It appears that the complex geologic structure within the project is the result of: (1) interconnected and interfingering volcanic flows and ancient flow avalanches (i.e., volcanic mud flows) and landslides; and (2) the fact that the project area is being "squeezed" between two faults, the Cucamonga Fault on the south and the northern branch of the Sierra Madre Fault on the north below Johnstone Peak. Internal to this structural block that is being squeezed on two sides, the geologic contacts between the Puente Formation and Glendora Volcanics, and the metamorphic rocks and Glendora Volcanics are fault contacts that dip steeply toward the mountains. Where observed, the fault contact between the Puente Formation and Glendora Volcanics is represented by a ± 20-foot wide zone of intense brecciation and allied shearing. Given the apparent compressional (i.e., squeezing) faulting, bedrock strata within the Puente Formation has been highly folded within approximately 100 feet of the fault contact with the Glendora Volcanics. This fault contact, as well as a branching fault splay, transects the southern portion of PDA no. 8. Similar east-west trending fault traces are suspected within the north central portion of the project area within the volcanic rocks, and border PDA nos. 1, 2 and 3.

Given the overall structural complexity of the project area, the majority of the bedrock units, and possibly even the older stream terrace deposits, have been rotated with bedding/layering dipping northerly (into the mountain) at moderate to steep angles (20 to 67 degrees). More steeply dipping strata/layers are noted in close proximity to the larger faults within the project area. Jointing and fracturing of both the sedimentary and volcanic rocks is very pervasive especially within the fine-grained andesite (Tgf) and andosite flows (Tga).



EXPLANATION

Qal	Alluvium
Qsw	Slopewash
Qls	Landslide materials
Qt	Terrace deposits (older alluvium)
Tp	Puente Formation, marine siltstone, sandstone, siliceous shale and conglomerate
Tg	Glendora Volcanics, undifferentiated
Tga	Andesite flows (calcic)
Tgb	Basaltic flows
Tgt	Tuff breccia (mainly andesite)
Tgf	Fine grained andesite
gr	Granitic rocks, undifferentiated
gn	Gneissic rocks, includes dikes of diorite

SYMBOLS

- Geologic Contact, approximately located
- 67 — Strike and dip of bedding
- 45 — Strike and dip of foliation
- Fault, dotted where concealed; U = upthrown side, D = downthrown side
- Direction of landslide movement

NOTES: (1) Base map from U.S.G.S. Topographic Maps, Glendora, California Quadrangle (dated 1966, photorevised 1972) and San Dimas, California Quadrangle (dated 1966, photorevised 1981).

(2) Geology modified from Shelton, J.S., 1955; and Streitz, 1969.

Source: Converse Consultants, Geotechnical Engineering and Applied Sciences

NORTHERN FOOTHILLS IMPLEMENTATION PROGRAM
PROGRAM ENVIRONMENTAL IMPACT REPORT

Geologic Map

Exhibit 5.6-3

Economic Mineral Potential

There are no documented mines or mineral deposits located within the project area. Some quarrying/surface mining is reported to have occurred within the Glendora Volcanics, specifically within the area labeled "Tg" on Exhibit 5.6-3. According to Mr. Sandy McHenry (personal communication, January 31, 1999), local quarrying of the volcanic rocks was performed in the past for railroad ballast. No information regarding production quantities are known.

The California Division of Mines and Geology (CDMG, 1987) has classified that portion of the project area underlain by volcanic, metamorphic and igneous rocks as a "Mineral Resource Zone (MRZ), MRZ-3" for sand and gravel/aggregate. MRZ-3 areas in hilly or mountainous terrain are underlain by sedimentary deposits of Tertiary age, crystalline basement rock or volcanic rock. Very little subsurface or surface data of the type needed to evaluate the suitability of these rocks for use in Portland cement is available. MRZ-3 areas located in areas underlain by alluvial deposits of Quaternary age, such as along the southern margin of the site, contain sand and gravel but not enough is known to delineate material suitable for aggregate.

Due to the presence of chalcedony, opal, and carbantes found in vesicle fillings and disseminated within the volcanic rocks, the deleterious nature of these substances (for production of aggregate for Portland cement) makes them generally unsuitable for exploitation as aggregate. The metamorphic rocks on the other hand, may be suitable for crushed aggregate, according to the CDMG (1987).

The Quaternary age alluvial deposits within San Dimas Wash contain clean, coarse aggregate material to depths of 30 to 70 feet (CDMG, 1987). Alluvial materials from San Dimas Wash are carried to and mix with alluvium in the San Gabriel (alluvial) fan to the west, that is mined for aggregate. Some areas along the San Dimas Wash within the project area have been mapped as MRZ-2 for aggregate resources. It should be noted that the MRZ-2 zone extends along the San Dimas Wash, including areas outside of the project area. However, given the limited extent and current level of development in and around the San Dimas Wash, the economic potential of these deposits is considered to be low. Given the fine-grained nature of the rocks comprising the Puente Formation within the project area, there is no potential for these deposits to contain aggregate materials.

Groundwater

Groundwater within the project area is contained primarily within fractures in the volcanic rocks and within the quaternary alluvium and recent alluvial deposits beneath the San Dimas Wash. There is no indication that the metamorphic rocks contain appreciable amounts of groundwater. Perennial springs within the area are limited to water that emanates from fractured volcanic rocks within Sycamore and Wildwood Canyons. Spring flow within Sycamore Canyon is captured via a man-made tunnel and pipeline that extends several hundred feet, or more, horizontally into the hillside. The average flow from this groundwater source is approximately 7 gallons per minute (gpm). A small diameter above ground pipeline conveys a portion of this spring flow

to a small ranch near the head of Shay Canyon. The amount of groundwater flow from the spring in Wildwood Canyon has not been measured, but is likely to be similar to the spring flow in Sycamore Canyon.

Several above ground concrete water tanks, in the vicinity of Sycamore Flat, are fed by horizontal wells that have been drilled into the volcanic rocks a number of years ago. These horizontal wells likely top groundwater-bearing fractures within the tuff breccia unit of the Glendora Volcanics and yield only several gallons per minute. The current status of these wells is unknown.

Groundwater within the Quaternary gravels and recent alluvial deposits in San Dimas Wash and near the mouth of Ham Canyon lies within the Foothill Groundwater Basin and represents the major source of groundwater within the project area. A number of wells have been drilled into these deposits over the past 70 years by various water purveyors.

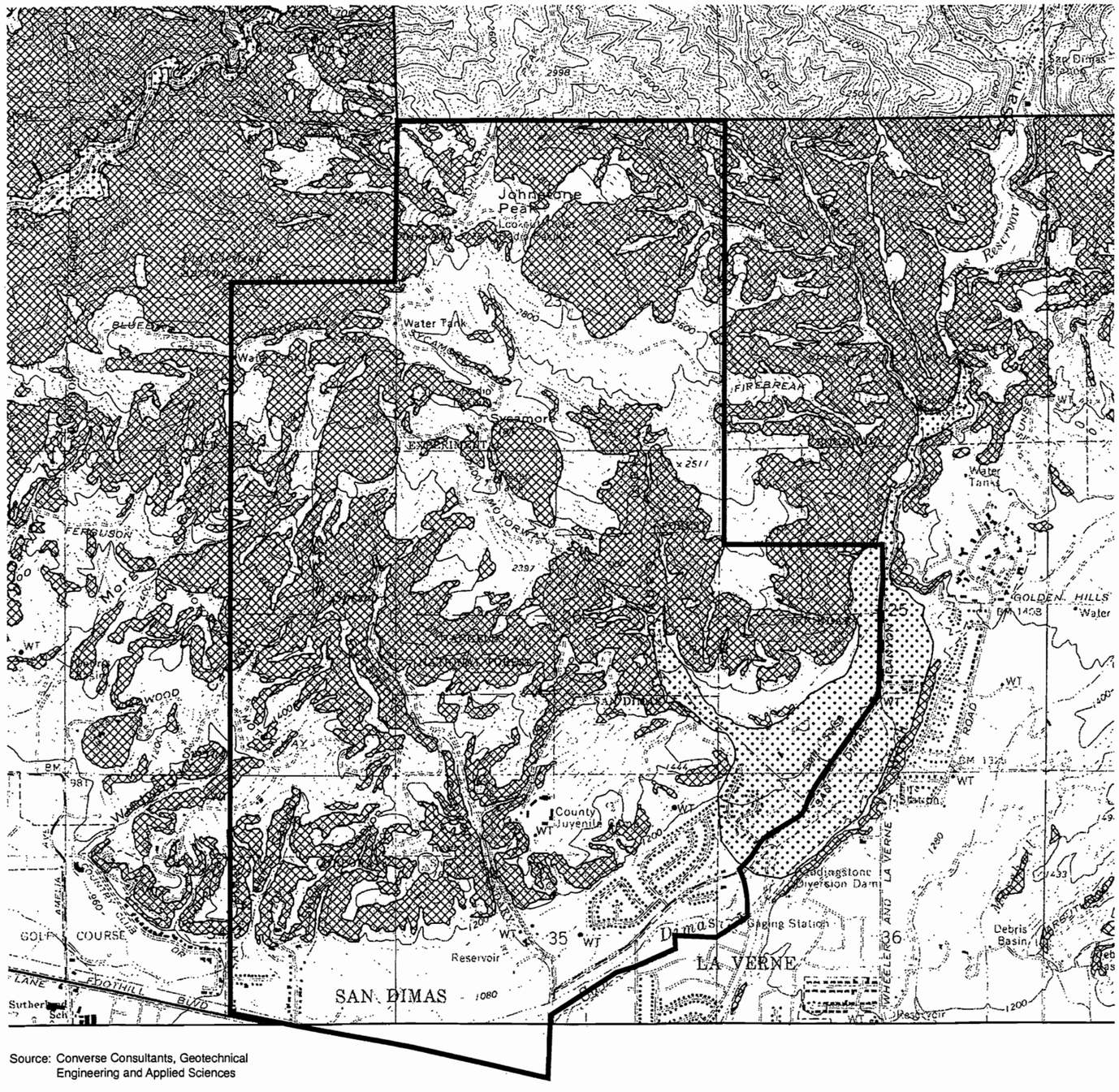
Depth to groundwater within the foothills portion of the project area is not known with much certainty. It is likely that, based on the occurrence of groundwater captured from the various horizontal wells, the groundwater table within the volcanic bedrock areas occurs between approximately 100 feet and 200 feet below ground surface (bgs) of the major ridgelines and within approximately 20 feet to 50 feet bgs within the lower reaches of the major canyons.

Depth to groundwater within the Quaternary gravels on the north side of the Cucamonga Fault and recent alluvium along the southern margin of the project area is on the order of approximately 20 feet to 50 feet bgs. The Cucamonga Fault acts as a barrier to groundwater flow, whereby groundwater levels are much lighter on the north side of the fault than those on the south.

Geologic Hazards

Southern California's system of faults have had a complex history of movement over the past 20 million years. Los Angeles County, like most regions in Southern California, is a region of high seismic activity and, as a result, is subject to risks and hazards associated with potentially destructive earthquakes. Seismic hazards can pose two types of hazards: primary and secondary. Primary hazards include ground shaking, ground displacement, or subsidence and uplift due to earth movement. These primary hazards can, in turn, induce additional secondary hazards. Examples of secondary hazards include ground failure (cracking, spreading and landslides), liquefaction, seismically-induced water waves (tsunamis and seiches), movement on nearby faults and dam failure. The potential for these secondary hazards depends on a number of factors including local geology, topographic conditions, distance from epicenter, and the duration and intensity of the seismic event.

The primary geologic hazards within the project area are those associated with landslides and earthquakes. The landslide hazard within the project area is documented by at least 14 existing landslides and potential earthquake induced landslides as indicated on Exhibit 5.6-4, *Seismic Hazards Zone Map*.



Source: Converse Consultants, Geotechnical Engineering and Applied Sciences

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MAP EXPLANATION
Zones of Required Investigation

Liquefaction
Areas where historic occurrence of liquefaction, or local geological, geotechnical and groundwater conditions indicate a potential for permanent ground displacements such that mitigation as defined in Public Resources Code Section 2693(c) would be required.

Earthquake-Induced Landslides
Areas where previous occurrence of landslide movement, or local topographic, geological, geotechnical and subsurface water conditions indicate a potential for permanent ground displacements such that mitigation as defined in Public Resources Code Section 2693(c) would be required.

Source: California Division of Mines and Geology Seimic Hazards Zone Map, Glendora Quadrangle Preliminary Map, September 30, 1998.

Faulting and Seismicity

The project area, like all of the Los Angeles Basin, is part of a very seismically active region. A number of faults with in the Los Angeles region are identified as active or are considered potentially active. An active fault is defined by the State Mining and Geology Board as one that has "had surface displacement within Holocene time (about the last 11,000 years)" This definition does not of course, mean that faults lacking evidence for surface displacement within Holocene time are necessarily inactive. A fault may be presumed to be inactive based on satisfactory geologic evidence; however, the evidence necessary to prove inactivity is sometimes difficult to obtain and locally may not exist.

A potentially active fault is a fault that shows evidence of surface displacement during Quaternary time (last 1.6 million years). Two potentially active faults, the Cucamonga Fault, located on the south portion of the project area, and the North Branch of the Sierra Madre Fault, along the northern portion of the project area, could produce surface rupture, and possibly smaller unnamed other faults within the project area. The potential exists for sympathetic movement (fault rupture triggered by an earthquake on a nearby fault) to occur on other faults and/or bedding plane shears within the project area. A major earthquake on the Sierra Madre or Cucamonga fault would likely be similar to the 1971 San Fernando or 1994 Northridge earthquake. During the 1971 San Fernando earthquake, the San Gabriel Mountains above Sylmar were raised up to 3 feet from their pre-earthquake elevation. Along with this uplift came limited, yet widespread secondary/sympathetic ground rupture in the foothills within several miles of the main fault trace. A major earthquake on the Cucamonga Fault, located beneath San Dimas Wash, could produce similar ground rupture effects within the project area.

Ground shaking accompanying earthquakes on any number of faults could be expected to be felt within the project area. The primary effect of ground shaking is damage to buildings and infrastructure and thus the potential for loss of life. However, the intensity of ground shaking would depend upon the magnitude of the earthquake, the distance to the epicenter, and the geology of the area between the epicenter and the property, and topographic position within the project area. A listing of recognized active faults and potentially active faults, their closest distances to the property, and the maximum expected earthquake along each fault is presented in Table 5.6-3, *Summary of Fault and Generalized Earthquake Information Northern Foothills Development.* Also presented are generalized evaluations of maximum ground shaking on-site for the maximum earthquakes and generalized predictions of the likelihood of such events occurring.

The most severe ground shaking within the project area would be expected to accompany a large earthquake on either the Cucamonga or Sierra Madre Fault zones. According to the 1997 Unified Building Code (UBC), the seismic ground-motion hazard within the project area is based on a probablistic ground motion that would have a 10 percent probability of exceedance in 50 years (475 year return period).

Ground motion is generally described as peak horizontal ground acceleration in percent "g" (gravity). For the project area, the peak horizontal ground acceleration for 10 percent probability in 50 years ranges between 0.5g to 0.8g (Petersen et al, 1997).

TABLE 5.6-3
SUMMARY OF FAULT AND GENERALIZED EARTHQUAKE INFORMATION
NORTHERN FOOTHILLS DEVELOPMENT

Fault	Distance from Site (miles)	Largest Expected Earthquake (Moment Magnitude)	Expected Level of Ground Shaking at Site	Likelihood of Occurrence
Cucamonga	0.5	7.0	High to Very High	Moderate
Sierra Madre	0.5	6.7	High to Very High	Moderate
San Jose	5	6.5	High	Low
Clamshell-Sawpit	8	6.5	Moderate to High	Moderate
Elysian Park (Blind) Thrust Fault	10	6.7	Moderate to High	Moderate
Raymond	13	6.5	Moderate	Low
Whittier-Elsinore	14	6.8	Moderate	Moderate
San Andreas	17	7.8	Moderate to High	High
Malibu Coast/ Hollywood	21	6.4	Moderate	Low
Elsinore	24	6.8	Low to Moderate	High
Compton (Blind) Thrust Fault	25	6.8	Moderate	Moderate
San Jacinto	25	6.8	Low to Moderate	High
Newport-Inglewood	31	6.9	Low to Moderate	Moderate
Palos Verdes	37	7.1	Low to Moderate	Moderate

The highest ground acceleration (i.e., 0.8g) would likely occur along the ridgetops within the project area. It is in these sharply defined topographic areas where the phenomena known as "ridgetop shattering" occurs due, in part, to amplification of the ground acceleration. The effects of shattering (i.e., significant fracturing) of the rock along ridgetops/lines is evident within the project area where roadcuts have exposed the highly fractured volcanic rocks beneath steep sided ridgetops.

Landslides

There are at least 14 significant landslides within the project area. As shown on Exhibit 5.6-3, *Geologic Map*, these landslides cover an area of several acres, up to about 130 acres. The largest of the mapped landslides encompasses all of PDA nos. 1 and 2. Other smaller, but no less significant, landslides border, or are contained within, PDA nos. 5, 8, 9 and 10. The areas most susceptible to landsliding are underlain by: (1) the tuff breccia unit of the Glendora Volcanics (Tgt); (2) on northwesterly-facing slopes underlain by the Puente Formation, and; (3) north-facing slopes underlain by metamorphic rocks. The majority of the landslides within the project area are historical in nature. However, as indicated on Exhibit 5.6-4, *Seismic Hazards Zone Map*, the majority of the area within and surrounding the PDAs are considered susceptible to earthquake induced landsliding. It is very likely that the more significant landslides that have been mapped within the project area occurred during major earthquakes in the vicinity of the property.

Factors conducive to the formation of the landslides within the area include: (1) the inherently weak nature and highly fractured (due to faulting) character of the tuff breccia unit in the Glendora Volcanics; (2) unsupported bedding planes in the Puente Formation and layers within the metamorphic rocks; and (3) the location and extent of faults that commonly form either the lateral margin(s) or headscarp area of the larger landslides. The faults essentially act as a continuous plane of weakness whereupon landslides may originate. Oversteepening of slopes, as well as elevated groundwater levels are also likely contributors to the formation of the landslides.

Liquefaction

Liquefaction is defined as the transformation of a granular material from a solid state into a liquefied state as a consequence of increased pore water pressure that occurs during an earthquake. Liquefaction can result in shifting of foundations, settling of roadways, and rupture of underground pipelines and cables. Buildings and other objects on the ground surface can settle, tilt, and collapse as the foundations beneath them lose support, and lightweight buried structures may float to the surface. Liquefaction effects could result in permanent ground deformations that could damage structures related to the proposed project. The liquefaction susceptibility of any given location is best evaluated by site specific studies that would typically include a determination of depth to water, surface soil types and strength properties. Four types of general failure commonly result from liquefaction: lateral spreading, flow failure, ground oscillation and loss of bearing strength.

According to the 1997 *Seismic Hazard Zone Map* prepared by the California Division of Mines and Geology (refer to Exhibit 5.6-4), the alluvial soils within and surrounding

PDA no. 5 are considered to be potentially liquefiable and subject to permanent ground displacement. Based on probable site conditions in areas identified as having a potential for liquefaction, any one of the four types of permanent ground displacement discussed above could occur with the PDA no. 5.

Seiche

Seiche is a term that is used to describe oscillatory waves that are created within an enclosed body of water (i.e., lake or reservoir) due to strong vibratory ground motion during an earthquake. The closest inland body of water to the project area is the San Dimas Reservoir, located approximately 3,000 feet north of PDA no. 5. Based on the location of the reservoir and the unlikely potential for failure of the supporting dam, the likelihood of a seiche impacting the project area is considered to be low.

TABLE 5.6-4
POTENTIAL DEVELOPMENT AREAS
EXISTING CONDITIONS SUMMARY

Potential Development Area (PDA) no.	Seismicity	Landslides	Liquefaction	Seiche
1	X	XX		
2	X	XX		
3	X	XX		
4	X	XX		
5	X	XX		
6	X	XX	X	
7	X	XX		
8	X	XX		
9	X	XX		
10	X	XX		

NOTE: X = The potential exists for future developments within the PDAs to be adversely affected in the absence of mitigation.

XX = Potentially effected by seismically induced landslides in the absence of mitigation.

IMPACTS AND MITIGATION MEASURES

Significance Criteria

A project will normally have a significant impact on the environment related to topography, soils, geology and seismicity if it will result in:

- Exposure of people or property to substantial geological hazards, such as landslides, mudslides, ground failure or similar hazards, or soil and/or seismic conditions so unfavorable that they could not be overcome by design using reasonable construction and/or maintenance practices;

- Location of a structure within a mapped hazard area or within a structural setback zone; location of a structure within a Fault-Rupture Hazard Zone, or within a known active fault zone, or an area characterized by surface rupture that might be related to a fault;

- Triggering or acceleration of geologic processes, such as landslides or erosion that could result in slope failure;

- Substantial irreversible disturbance of the soil materials at the site or adjacent sites, such that their use is compromised;

- Modification of the surface soils such that abnormal amounts of windborne or waterborne soils are removed from the site;

- Earthquake induced ground shaking capable of causing ground rupture, liquefaction, settlement, or surface cracks resulting in the substantial damage to people and/or property;

- Deformation of foundations by expansive soils (those characterized by shrink/swell potential);

- Modification of the on-site soils (i.e., grading) in a manner that results in decreased stability for adjacent developments; and

- On-site disposal systems that could cause a health hazard to on-site residences, adjacent developments or degrade ground/surface water quality.

Potential impacts associated with the project area's topography, soils, and the region's seismic activity are identified below. Mitigation measures are provided to reduce the significance of impacts.

❖ ***STRUCTURES ASSOCIATED WITH FUTURE DEVELOPMENT COULD POTENTIALLY BE SUBJECT TO DAMAGE AS A RESULT OF LAND ACCELERATIONS ASSOCIATED WITH SEISMIC ACTIVITY.***

Significance: Potentially significant. Mitigation incorporated on a project-by-project basis as recommended through detailed geotechnical evaluation would reduce impacts associated with seismic activity to less than significant levels in areas deemed suitable for development.

Impact Analysis:

Landslides

Based on currently available information, development within PDA nos. 1, 2, 3, 5, 8, 9 and 10 could be significantly impacted by renewed landslide movement resulting from strong ground motion from nearby earthquakes, erosion at the toe of the landslide(s), or adverse conditions created during grading activities. PDA nos. 4, 6 and 7 are not situated within or adjacent to any existing landslides. However, according to the *Seismic Hazard Zone Mapping* (refer to Exhibit 5.6-4) by the California Department of Mines and Geology (DMG), these areas are susceptible to landsliding during a major seismic event. It should be noted that approximately 50 percent of the entire project area has been identified by the CDMG as susceptible to seismically induced (earthquake generated) landsliding. Site-specific geotechnical evaluations for individual development projects would be required on a project-by-project basis to determine the suitability for future development. Recommended mitigation measures outlined within the site-specific geotechnical evaluations would reduce potential impacts associated with landsliding to less than significant levels. However, given the topographical/land ownership constraints within the project area, mitigation may not be feasible in some areas.

Faulting and Seismicity (Ground Surface Rupture)

Given the highly seismic character of the southern California region, moderate to severe ground shaking can be expected within the project area resulting from moderate to large earthquakes on nearby fault zones. During a major earthquake on either the Cucamonga or Sierra Madre fault, ground surface rupture on or in the vicinity of the fault zone could occur. Although none of the PDAs are situated on or within either of these two fault zones, a strong earthquake on either of these faults could trigger secondary (sympathetic) ground rupture on other faults/shears located in the project area. Therefore, the potential exists for surface rupture along bedding planes and other geologic discontinuities within the sedimentary bedrock of the Puente Formation and, possibly to a lesser degree, within the Glendora Volcanics. As previously discussed, given the apparent compressional (i.e., squeezing) faulting, bedrock strata within the Puente Formation has been highly folded within approximately 100 feet of the fault contact with the Glendora Volcanics. This fault contact, as well as a branching fault splay, transects the southern portion of PDA no. 8. Similar east-west trending fault traces are suspected within the northcentral portion

of the project area within the volcanic rocks, and border PDA nos. 1, 2 and 3. Future developments within each PDA would require site-specific geotechnical evaluations to assess the applicability of mitigation measures in order to reduce impacts associated with seismicity to less than significant levels. However, due to the topographical relief of the project area and current seismic constraints mitigation may not be suitable in some areas.

During strong ground motion associated with a major nearby seismic event, ridgetop shattering may occur. It should be noted, this phenomenon typically involves in place fracturing of rock and no appreciable ground displacement. Site-specific geotechnical evaluations would be required to address the suitability for development on any ridgetop within the project area. However, due to topographical constraints along some of the ridgetops within the project area, development may not be feasible.

Liquefaction

Portions of the project area (PDA no. 5) contain alluvial deposits that result in potential liquefaction hazards on-site. The primary impact of liquefaction is structural damage, through settling, tilting or collapsing. In general, the taller the structure, the more susceptible it is to damage. However, potential impacts associated with liquefaction would be mitigated through compliance with grading requirements set forth in the UBC, and the provisions of site-specific soils investigations prior to construction. This is expected to reduce potential impacts to the maximum extent feasible within a potentially seismically active area such as southern California.

Mitigation Measures:

G1. The applicant(s) shall submit a geotechnical report for review and approval by the Director of Public Works. This report will primarily involve assessment of potential soil related constraints and hazards such as slope instability, settlement, liquefaction, or related secondary seismic impacts, where determined to be appropriate by the Director of Public Works. The report shall also include an evaluation of potentially expansive soils and recommend construction procedures and/or design criteria to minimize the effect of these soils on the proposed developments. All reports shall recommend appropriate mitigation measures and be completed in the manner specified by the City of San Dimas Subdivision Ordinance (Title 17).

G2. The applicant(s) shall submit a report by an engineering geologist indicating the ground surface acceleration and potential ground surface rupture from earth movement for the various PDAs. All structures within the development shall be constructed in compliance with the g-factors as indicated by the geologist's report. Calculations for footings and structural members to withstand anticipated g-factors shall be submitted for review and approval by the Director of Public Works.

G3. Future development projects shall comply with the California Building Code (Title 24 of the California Code of Regulations) and the San Dimas Building Code).

G4. All grading and improvements on the subject property shall be made in accordance with Grading Ordinance (Municipal Code Chapter 15.04) and to the satisfaction of the director of Public Works. Grading shall be in substantial compliance with a tentative tract map and the proposed grading that is approved by the Planning Commission. Surety to guarantee the completion of the project grading and drainage improvements, including erosion control, shall be posted to the satisfaction of the Director of Public Works and the City Attorney.

G5. The applicant(s) shall exercise special care during the construction phase of the project to prevent any off-site situation. The applicant shall provide erosion control measures and shall construct temporary desiltation/detention basins of a type, size and location as approved by the Director of Public Works. The basins and erosion control measures shall be shown and specified on the grading plan and shall be constructed to the satisfaction of the Director of Public Works prior to the start of any other grading operations. Prior to the removal of any basins or erosion control devices so constructed, the area served shall be protected by additional drainage facilities, slope erosion control measures and other methods as may be required by the Director of Public Works. The applicant shall maintain the temporary basins and erosion control devices until the Director of Public Works approves of the removal of said facilities.

G6. The applicant(s) shall submit a grading plan, in compliance with City standards, for review and approval by the Director of Public Works. All grading work must be in compliance with the approved plan and completed to the satisfaction of the Director of Public Works. All slopes within this project shall be graded no steeper than 2:1, unless otherwise approved by the Director of Public Works.

G7. The applicant shall submit a grading, drainage and retaining wall plan with a geotechnical soils report for review and approval by the Director of Public Works.

G8. Any grading required outside of a PDA boundary will require the applicant(s) to either obtain slope easements or off-site grading agreements in a form suitable for recording from the affected applicant(s).

G9. Given the amount of slope instability (i.e., landsliding) within the project area and the project proximity to major earthquake faults, the hazards associated with strong ground motion and possible surface rupture, in-depth, site-specific geotechnical studies shall be required to evaluate whether development within any of the 10 PDAs is not geotechnically feasible. At a minimum such studies should follow CDMG: Special Publication 17 (dated 1977), *Guidelines for Evaluating and Mitigating Seismic Hazards in California*. It is suggested that the scope of work presented in these "guidelines" be performed prior to any form of

foundation investigation, unless such an investigation is to establish setbacks from known geologic hazards.

On-Site Disposal Systems

- ***NEAR SURFACE CONDITIONS BENEATH THE POTENTIAL DEVELOPMENT AREAS (PDAs) MAY BE CONDUCIVE TO THE USAGE OF ON-SITE DISPOSAL SYSTEMS.***

Significance: Less than significant impact with mitigation.

Impact Analysis: Proposed residential development within the project area would likely include the use of on-site sewage disposal systems. These systems, that include trench/leach fields and or seepage pits would require approval by the Los Angeles County Department of Health or other local health authority/agency. The factors to be assessed in evaluating the type and extent of the use of a particular disposal system include: the nature and depth of the surface soils, depth to impervious strata/bedrock, depth to groundwater, natural or finished ground slope in the disposal area, percolation rate of the soil/bedrock, lot size, required setbacks, drainage courses or any other pertinent factors.

According to a field reconnaissance in conjunction with an evaluation of existing soil and geologic data, near surface conditions beneath the various PDAs are conducive to the use of trench leach fields for sewage disposal. Given the fractured nature of much of the bedrock within the project area, the use of seepage pits also appears to be a reasonable alternative. However, major constraints to the use of such systems within the limits of the PDAs include topographic conditions (i.e., steep slopes), areas underlain by unstable landslides, and location of nearby major drainage courses, and spring flow in Wildwood and Sycamore Canyons. Future developments would be required to locate on-site sewage disposal systems a distance deemed appropriate by the Los Angeles County Department of Health away from the above mentioned constraint areas. If it is determined that on-site septic systems are not feasible due to existing site conditions, the applicant(s) shall investigate the potential of extending sewer lines from the nearest trunk line into the proposed development. However, the suitability of extending sewer lines into the project area would require geotechnical evaluation addressing soils, landslides, and seismicity associated with any proposed sewage pipeline. Consultation and approval from the local sewage service would also be required prior to connection to any existing facility (refer to Section 5.10, *Public Services and Utilities*).

Mitigation Measures:

G10. All septic systems (i.e., trench/leach fields and seepage pits) shall be installed at locations pursuant to the requirements of the Los Angeles County Health Department.

CUMULATIVE IMPACTS

❖ ***THE PROPOSED PROJECT, COMBINED WITH OTHER FUTURE DEVELOPMENT, MAY RESULT IN INCREASE GEOLOGIC IMPACTS WITHIN THE AREA.***

Significance: Potentially significant. Mitigation incorporated on a project-by-project basis would reduce impacts to less than significant levels in areas deemed suitable for development.

Impact Analysis: Cumulative effects related to geology resulting from implementation of the proposed project and development in the vicinity of the project and surrounding areas could expose more persons and property to potential impacts due to seismic activity. Although these impacts are considered potentially significant, they would be mitigated to less than significant levels on a project-by-project basis.

Mitigation Measures:

G11. Site-specific geological evaluations shall be conducted on a project-by-project basis addressing remedial grading techniques, building setbacks, or special foundations for seismic areas, to the satisfaction of the appropriate jurisdiction Engineer.

UNAVOIDABLE SIGNIFICANT IMPACTS

Implementation of the proposed project would not result in unavoidable significant impacts related to geology and soils.

5.7 HYDROLOGY AND DRAINAGE

The purpose of this Section is to provide a discussion of existing conditions, potential impacts and mitigation measures relating to drainage, flood control and water quality associated with the proposed project. The following discussion is based on field investigations and a *Preliminary Hydrology/Drainage Study*, prepared by Robert Bein, William Frost & Associates (RBF), dated January 1999 (refer to Appendix 14.4, *Hydrology/Drainage Study*).

EXISTING CONDITIONS

The project area encompasses approximately 3,000 acres within the northern portion of the City of San Dimas. The project area is generally bordered along the north and northeast by the Angeles National Forest, the City of La Verne along the southeast, residential areas to the south, and the City of Glendora along the west.

The Northern Foothills project area is primarily undeveloped, however, sparse development consisting of ranches, equestrian facilities, and unpaved roadways occurs at lower elevations. General topography of the area is characterized by steep terrain with elevations ranging from approximately 3,200 feet above mean sea level (msl) at Johnstone Peak to approximately 1,000 feet above msl along San Dimas Wash. Six intermittent blue-line streams are identified within the project area on the San Dimas USGS Quadrangle 7.5 minute series (refer to Exhibit 5.7-2, *Watershed Boundaries and Potential Development Areas*). No major flood control or drainage facilities are currently located within the project area, except for an existing debris basin located in Morgan Canyon.

Watersheds

The project area is located within seven independent watersheds or canyons, three major and four smaller. The natural watersheds generally consist of long canyons with significant topographic relief. Existing development is generally located within the smaller watersheds, primarily along the lower foothills. The majority of the project area naturally drains southerly toward the San Dimas Wash, which is a well defined regional floodplain and ephemeral creek generally located along the south and southeasterly boundary of the project area. A small portion of the project area drains westerly toward the City of Glendora and ultimately into the Big Dalton Wash. Both the San Dimas Wash and the Big Dalton Wash ultimately drain into the San Gabriel River. Nearby major regional flood control facilities consist of the San Dimas Wash to the south and southeast, San Dimas Reservoir to the east, Puddingstone Diversion Dam to the southeast, and the Big Dalton Wash to the east.

For purposes of this EIR, the analysis has been limited to those watersheds where future development could potentially occur (from west to east): (1) Morgan Canyon, (2) Wildwood Canyon, (3) Shuler Canyon, (4) Shay Canyon, (5) Sycamore Canyon, and (6) Ham Canyon. Sycamore Canyon and Ham Canyon watersheds cover a majority of the project area (approximately 70 percent). These existing canyons within the project

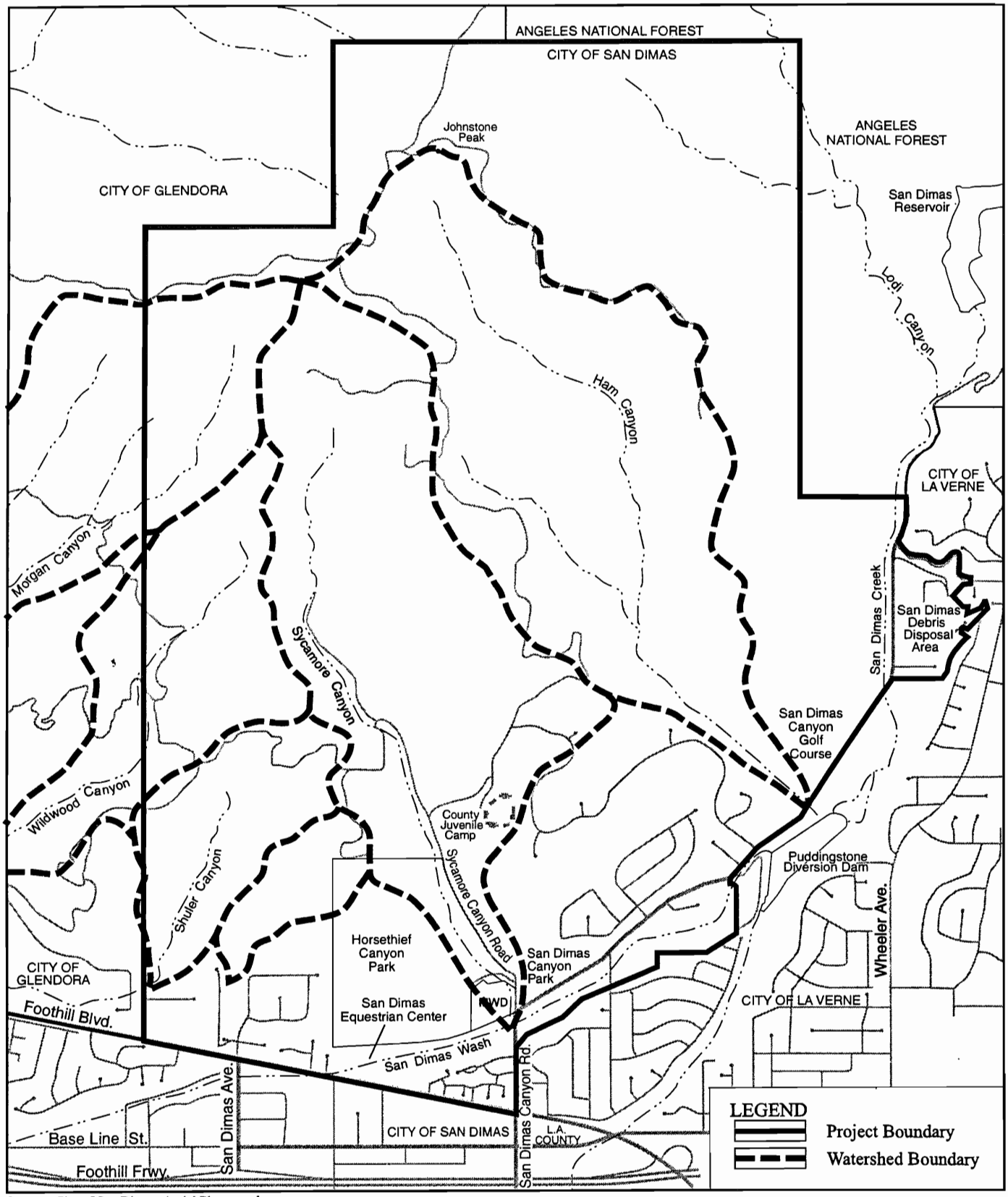
area support natural drainage courses that consist of seasonal intermittent alluvial streams that are consistent with natural drainages for the semi-arid southern California area. A general description of some of the characteristics associated with the natural watersheds are indicated in Table 5.7-1, *Summary of Watershed Characteristics*. The morphology of the natural alluvial streams in the foothill areas typically involves dynamic changes to the streambed and the streambeds are capable of delivering significant quantities of sediment and debris. The County of Los Angeles generally classifies the soils within the project area as USGR-F, which is typical of the Upper San Gabriel River. This soil classification has a relatively high runoff coefficient. Los Angeles County Public Works (LACFPW) has classified all canyon areas within the project boundaries as potential debris areas. In addition, the project area is located between the M and L rainfall zones (as designated by LACFPW), where expected average 24-hour rainfall (50-year) is 12 inches.

The delineation of existing watershed boundaries and the associated concentration points for the site are shown in Exhibit 5.7-1, *Watershed Boundaries*. A majority of the surface runoff generated from the project area currently drains in a southerly direction toward the San Dimas Wash. Some undeveloped portions of the watersheds drain into storm drain systems associated with existing development along the southern portion of the project area. Table 5.7-2, *Summary of Watershed Land Use - Existing Conditions*, summarizes the extent of development in each watershed.

An estimation of impervious areas within the project area have been performed based upon a review of recent aerial photographs, available topographic maps, and land use maps. Impervious areas are assumed to be 50 percent of the areas where development exists. This 50 percent assumes the presence of turf and landscaping within each individual residential lot. Table 5.7-2, *Summary of Watershed Land Use-Existing Conditions,* summarizes the watershed sizes and development conditions of the watersheds within the project area.

TABLE 5.7-1
SUMMARY OF WATERSHED CHARACTERISTICS

Watershed	Maximum Drainage Length (mile)	Average Slope (ft/mile)	Length/Width Ratio	Maximum Elevation Difference (ft)	Watershed Lag Time (min)
Morgan Canyon	1.89	1,050	3.6	1,990	19
Wildwood Canyon	1.70	740	3.5	1,260	19
Shuler Canyon	.95	510	2.5	480	15
Shay Canyon	.72	500	2.6	360	11
Sycamore Canyon	2.31	830	3.8	1,920	24
Ham Canyon	2.16	940	2.8	2,040	23



Source: City of San Dimas, Aerial Photography, 1995; LSA Associates, Inc.

NORTHERN FOOTHILLS IMPLEMENTATION PROGRAM
PROGRAM ENVIRONMENTAL IMPACT REPORT

Watershed Boundaries

0 2,000'

ROBERT BEIN, WILLIAM FROST & ASSOCIATES
2/99 JN 10-034933-6377

Exhibit 5.7-1

TABLE 5.7-2
SUMMARY OF WATERSHED LAND USE - EXISTING CONDITIONS*

Watershed	Drainage Area (Acres)	% Undeveloped	% Developed	% of Area Impervious
Morgan Canyon	410	95	5	2.5
Wildwood Canyon	270	90	10	5
Shuler Canyon	150	90	10	5
Shay Canyon	60	90	10	5
Sycamore Canyon	570	85	15	7.5
Ham Canyon	610	85	15	7.5
* Estimated based upon existing mapping.				

Surface Hydrology

The majority of the stormwater runoff from the project area drains to the San Dimas Wash and small portion drains to the Big Dalton Wash. Stormwater runoff from project area does not drain to any public water supply facility. A qualitative analysis was performed to evaluate the existing surface hydrology associated with each natural watershed within the project area. Drainage courses that collect runoff from the southern portions of the site drain to the San Dimas Wash. The area within the project boundaries where existing development exists is relatively small (approximately 25 percent) compared to the amount of undeveloped areas. The hydraulic conveyance capacity and level of flood protection of the existing storm drain systems were not evaluated due to the limited information was available at the time of the study preparation.

Evaluation of the surface runoff hydrology was conducted pursuant to the design and analysis criteria defined by the Los Angeles County Public Works Department (LACPW). The level of flood protection standards adopted by Los Angeles County define a particular rainfall return period or probability. A capital storm is utilized for (1) natural watercourses, (2) floodways, and (3) depressions or sumps. The capital storm flood protection is based upon a rainfall with a probability of recurrence of once in 50 years. The design flowrates include bulking due to the volume associated with debris and a burn in a natural watershed, or developed clear flow, whichever is greater. The Urban Design Storm provides a 25-year level of protection and is generally utilized for the design of all other drainage systems not requiring the capital storm. None of the existing watersheds within the project area contain stream gages that could provide actual historical data on runoff generated from specific rainfall events. In order to determine anticipated runoff quantities generated from ungaged watersheds, hypothetical hydrologic procedures outlined in the *Los Angeles County Public Works Hydrology Manual* were applied for the project area (refer to Appendix 14.4, *Hydrology and Drainage Study*.

A quantitative estimate of the existing surface runoff generated from the primary watersheds was developed applying a runoff yield procedure utilizing Los Angeles County hydrologic data and the adopted rational method procedure. Clear water 50-year discharges were estimated based on general assumptions for each watershed at concentration points corresponding to the downstream project boundary. Based on regional hydrologic characteristics obtained from the *Los Angeles County Public Works Hydrology* Manual, it was estimated that a 50-year discharge generated from these watersheds may be two to three cubic feet per second per acre for existing conditions depending upon the time of concentration for each watershed (refer to Appendix 14.4, *Hydrology and Drainage Study*, for a sample calculation of the runoff yield analysis). Estimated 50-year clear water discharges under existing watershed conditions range from 140 cubic feet per second (cfs) at Shay Canyon to 970 cfs at Ham Canyon. Table 5.7-3, *Estimated 50-Year Peak Discharges - Existing Conditions,* lists the estimated discharges for each watershed.

TABLE 5.7-3
ESTIMATED 50-YEAR PEAK DISCHARGES - EXISTING CONDITIONS

Watershed	Drainage Area (Acres)	Watershed Lag Time (min)	50-year Unit Flow Rate (cfs/acre)	Clearwater 50-Year Peak Discharge (cfs)	Bulked 50-Year Peak Discharge
Morgan Canyon	410	19	1.7	690	1,370
Wildwood Canyon	270	19	1.6	440	880
Shuler Canyon	150	15	1.8	270	550
Shay Canyon	60	11	2.4	140	290
Sycamore Canyon	570	24	1.5	860	1,720
Ham Canyon	610	23	1.6	970	1,930

Watershed Debris Production

The existing watersheds within the project area are undeveloped and consist of vegetated slopes and exposed earthen areas that are potential sediment sources, producing debris during heavy periods of runoff. Debris flows from foothills and mountainous areas are common in semi-arid areas of Southern California and have been disastrous on some occasions. Debris production is worsened after burns within the watershed, which commonly start in the grassland areas of Southern California. The foothill and canyon areas of the project area primarily drain into the San Dimas Wash. A potential exists for debris flows discharging from the mouths of the canyon to clog the existing downstream drainage systems within existing residential areas and, if severe enough, enter the existing residential development along the downstream portion of the project area. Typically at the entrance to canyons, debris collection facilities similar to the facility on Morgan Canyon can be constructed to limit the potential of this damage. In addition, the debris volume transported in the drainage

courses increase the apparent flowrate due to the volume of debris. In order to account for the debris volume in the flowrate, a bulking factor is applied to increase the clear water flow.

Debris production rates for the watersheds analyzed were estimated using the *Los Angeles Public Works County Hydrology Manual*. The project area is located within Debris Potential Area (DPA) Zone 1, defined as a zone of expected high debris potential. The amount of debris that is estimated to be produced from the undeveloped watersheds are shown in Table 5.7-4, *Estimated Debris Volumes - Existing Conditions*. The debris production rates of the subject watersheds range from 163 to 333 cubic yards per acre depending upon the size of the watershed.

TABLE 5.7-4
ESTIMATED DEBRIS VOLUMES - EXISTING CONDITIONS

Watershed	Drainage Area (Acres)	Debris Production CY	Debris Production CY Per Acre
Morgan Canyon	410	80,000	195
Wildwood Canyon	270	55,000	204
Shuler Canyon	150	37,000	247
Shay Canyon	60	20,000	333
Sycamore Canyon	570	94,000	165
Ham Canyon	610	99,000	163

Flooding

The City of San Dimas is a participant in the National Flood Insurance Program (NFIP), which is administered by the Federal Emergency Management Agency (FEMA). Communities in the NFIP must adopt and enforce minimum floodplain management standards, including identification of flood hazards and flood risks. Portions of the project area are located on the Flood Insurance Rate Map (FIRM) Community Panel Number 0601549991C, published in June 1978. The flood insurance rate map indicates flood hazard areas primarily along San Dimas Wash, along the south end of the project area. These low lying areas are designated as "areas of 500-year flood; or areas subject to 100-year flooding with average depths less than one (1) foot or with drainage areas less than one square mile." No other flood insurance studies have been published for areas within the undeveloped areas of the project area. Although FEMA may not have designated flood hazards within other portions of the project area or along some of the drainage course does not mean that no additional flood hazards exist within these locations. All natural courses have a defined floodplain, which is a function of the natural stream geometry and amount of tributary drainage area. Further study would be required to evaluate the characteristics of the natural drainage systems and delineate the natural floodplains.

Frequent flooding has been observed at Sycamore Canyon Road near the Metropolitan Water District (MWD) site as a result of low to non-existent channel capacity at Sycamore Canyon Creek. The MWD site is located along the north side of the intersection of Sycamore Canyon Road and San Dimas Canyon Road. At this location, it appears that the channel is ill defined, shallow and has very little capacity to convey anything greater than daily flows along the Creek. City officials indicate a frequency of flooding as often as twice a year at this location. There have been no previous hydrology/hydraulic studies conducted for the project area to determine the extent of flooding.

Water Quality

The project area is located within the upper watershed area, which ultimately drains into the San Gabriel River and is within the jurisdiction of the Los Angeles Regional Water Quality Control Board (LARWQCB) Region 4. Water quality in this region is considered to be relatively good. The County routinely conducts conventional analysis of water for minerals, dissolved solids, and pH. Both surface and groundwater is considered good quality and does not exceed Federal and/or State standards for drinking water.

Groundwater

Portions of the project area are located within the Foothill Groundwater Basin. Estimated groundwater depths are between 900 to 1,200 feet below ground surface (bgs) within the project area. Two existing water tunnels are located in the upper reaches of Sycamore Canyon and currently convey water via steel pipes along the west slope of Sycamore Canyon. Water from this system is currently not used for domestic purpose.

Spreading grounds exist along both the San Dimas Wash and the Big Dalton Wash. These spreading grounds recharge the groundwater basins that are supplied by upstream reservoirs. The San Dimas Reservoir releases water to the spreading grounds along the San Dimas Wash and the Big Dalton Reservoir releases water to the spreading grounds along the Big Dalton Wash. These facilities are owned and operated by the LACPW.

Regulatory Setting

U.S. Environmental Protection Agency

Under the authority of the Clean Water Act, the EPA created the National Pollutant Discharge Elimination System (NPDES) to control the pollution of urban storm water runoff, which ultimately drains into the ocean, coastal wetlands, or other surface waters. Administered in California by the State Water Resources Control Board (SWRCB) are two general storm water permits issued under the NPDES, one for

industrial activities and one for construction activities. Each industrial facility by the general permit which includes water treatment plants must develop and implement a storm water pollution prevention plan (SWPPP). All new construction resulting in disturbance of five or more acres of land also must comply with the requirements of the NPDES permits, and control and reduce discharge of pollutants into the storm drain system.

U.S. Army Corps of Engineers

The United States Army Corps of Engineers (ACOE) may implement their 404 Permit requirements for projects that propose to locate a structure in "waters of the United States" or that proposed to excavate or discharge, dredge or fill material into "waters of the United States".

IMPACTS AND MITIGATION MEASURES

Significance Criteria

A project will normally have a significant impact on surface water hydrology, water quality and/or groundwater if it meets or exceeds the following thresholds:

- ❖ increase in the amount of surface runoff greater than 50 percent;
- ❖ substantially degrade water quality;
- ❖ contaminate or substantially reduce a public water supply;
- ❖ substantially degrade or deplete groundwater resources;
- ❖ cause substantial flooding, erosion, or siltation;
- ❖ substantially interfere with groundwater recharge or direction and rate of groundwater flow;
- ❖ location within a flood-prone area or altering the course of flow of floodwaters; or
- ❖ cause a significant change in rate and amount of surface runoff or change in amount of water in any water body not anticipated by regional plans.

Surface Hydrology

- ❖ ***IMPLEMENTATION OF FUTURE DEVELOPMENT PROJECTS WITHIN THE PROJECT AREA WOULD RESULT IN THE CONVERSION OF EXISTING NATURAL TERRAIN TO A DEVELOPED USE, THUS ALTERING SURFACE DRAINAGE PATTERNS.***

Significance: Less than significant impact with mitigation.

Impact Analysis: In general, development within a watershed has a tendency to alter surface hydrology through the following: (1) increase peak flow rates over those in the

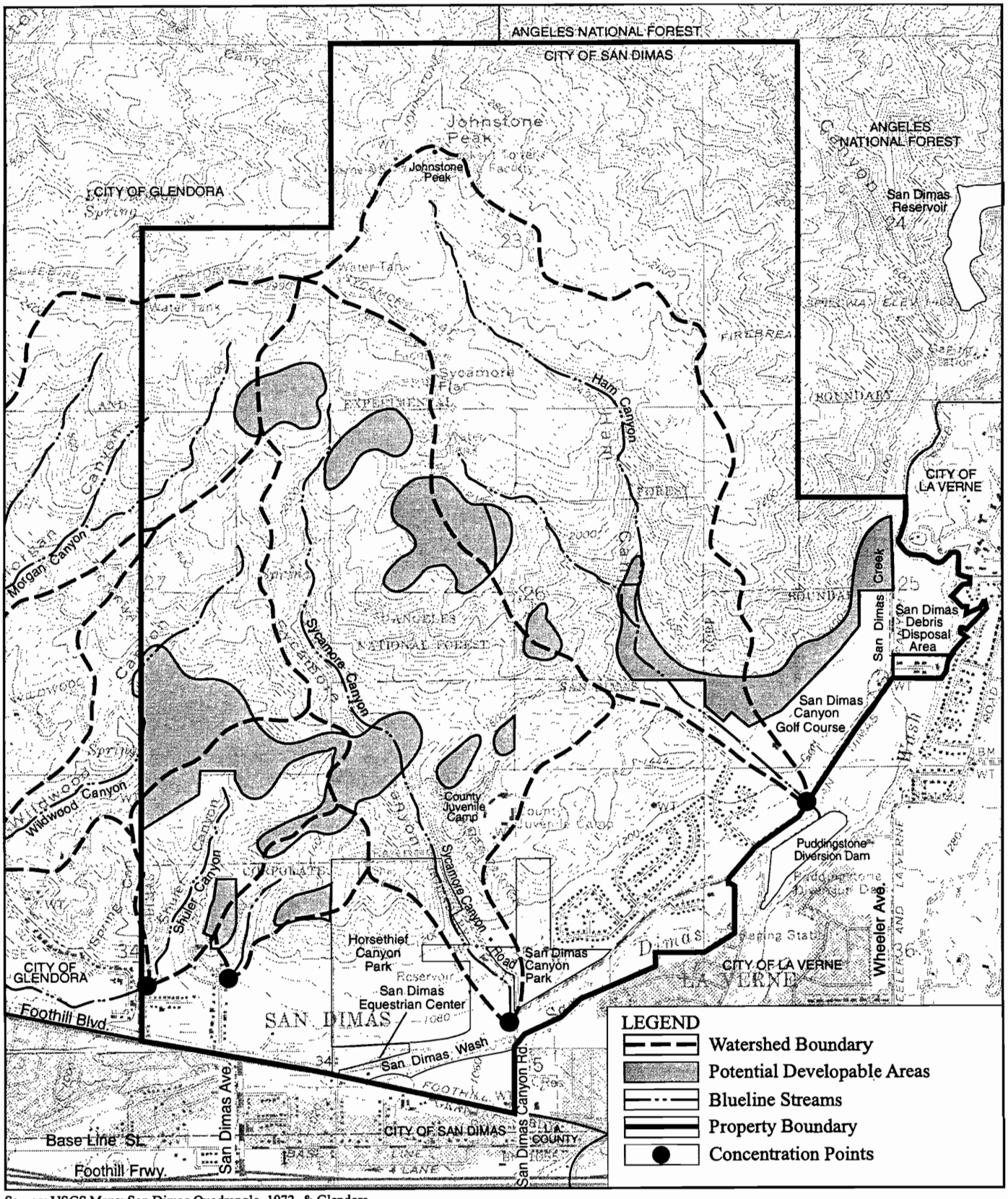
existing condition, (2) decrease the time of concentration through improved hydraulic efficiencies, and (3) increase the amount of impervious cover. This is due to the construction of houses, residential landscaping, streets, and other paved areas that enhance the ability of water to runoff instead of infiltration or soaking into the ground, or adhering to natural vegetation.

Exhibit 5.7-2, *Watershed Boundaries and Potential Development Areas*, indicates the potential developable areas within the watersheds. The existing General Plan allows a maximum development density of one dwelling unit per five acres (1du/5ac). The development strategy proposed in the Northern Foothills area would permit the 1 du/5ac within the development feasibility zone and 1 du/20 acres outside of the development feasibility zone. Based upon these densities, the impervious areas of each watershed were estimated. Impervious areas were assumed as 50 percent of the potential development area. Table 5.7-5, *Summary of Watershed Development Future Conditions,* summarizes future development conditions within each watershed. As shown in Table 5.7-5, the increase in impervious surfaces range from as low as one percent for the Morgan Canyon watershed to 20 percent for the Shay Canyon watershed. The percent of impervious surfaces is anticipated to increase ten percent for Sycamore Canyon and five percent for the Ham Canyon watersheds.

Table 5.7-6, *Comparisons of Existing and Future Watershed Conditions Hydrology*, summarizes the comparison of estimated existing conditions and ultimate watershed conditions hydrology. The anticipated increase in discharge is not considered significant due to the low-density of residential units anticipated for the potential developable areas. As indicated in Table 5.7-6, future development within the watersheds would increase the discharge less than 30 percent.

An evaluation of the change in the runoff yield was developed, assuming a 20 percent decrease in the time of concentration, in order to analyze the localized changes to surface hydrology (refer to Table 5.7-7). The analysis is consistent with values developed by LACPW for capital storm hydrology on watersheds with less than 10 acres of development.

It is anticipated that future development within the project area would result in an approximate 30 percent increase of discharge and therefore, not significantly increase the amount of surface runoff (an increase of 50 percent when compared to existing conditions is considered significant). However, the effect of the potential change in surface runoff must be evaluated in greater detail for future development projects that consider downstream flood protection. If determined necessary, implementation of individual on-site stormwater detention basins or improvements to existing deficient drainage systems would reduce surface water runoff impacts to less than significant levels.



Source: USGS Maps: San Dimas Quadrangle, 1972, & Glendora Quadrangle, 1981; City of San Dimas Community Development Department Aerial Photography, 1994; Los Angeles County Assessor's Map, 1996.

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Watershed Boundaries and Potential Development Areas

TABLE 5.7-5
SUMMARY OF WATERSHED DEVELOPMENT - FUTURE CONDITIONS

Watershed	Drainage Area (Acres)	Potential Developable Areas (Acres)	% Undeveloped	% Developed	%Impervious	% Increase Impervious
Morgan Canyon	410	6	95	5	5	1
Wildwood Canyon	270	47	70	30	15	10
Shuler Canyon	150	42	65	35	20	15
Shay Canyon	60	18	60	40	25	20
Sycamore Canyon	570	107	70	35	20	10
Ham Canyon	610	60	75	25	15	5

TABLE 5.7-6
COMPARISON OF EXISTING AND FUTURE WATERSHED CONDITIONS HYDROLOGY

Watershed	Drainage Area (Acres)	Existing Clear Water 50-Year Peak Discharge (cfs)	Future Clear Water 50-Year Peak Discharge (cfs)	% Increase in Discharge
Morgan Canyon	410	690	810	17
Wildwood Canyon	270	440	540	23
Shuler Canyon	150	270	340	26
Shay Canyon	60	140	170	21
Sycamore Canyon	570	860	1,020	19
Ham Canyon	610	970	1,160	20

TABLE 5.7-7
ESTIMATES OF LOCAL HYDROLOGY CHANGES

Condition	Time of Concentration (min)	I	C(I)	Q (cfs/acre)
Existing	19	2.7	0.67	1.8
Future	15	3.0	0.71	2.1
Change	-4	0.3	0.04	0.3

I = Rainfall Intensity (inches/hour)
C (I) = Runoff Coefficient
Q = 50-Year Peak Discharge Per Acre

Mitigation Measures:

H1. The project applicant(s) shall provide and engineering hydrologic analysis of the development site watershed. Should the analysis indicate that the proposed development project would impact downstream facilities (i.e., inadequate capacity of the downstream storm drain system), construction of an on-site detention basin could be used as mitigation. On-site detention facilities, if necessary, shall be designed to provide the appropriate storm volume for the storm frequency indicated by the LACPW and the City of San Dimas City Engineer. Storm drain plans shall be subject to review and approval by the San Dimas City Engineer prior to the issuance of grading permits.

H2. In connection with site plan and design review, all required drainage improvements associated with individual developments shall be designed in accordance with the LACPW and the City of San Dimas design standards and shall be reviewed and approved by the City of San Dimas City Engineer prior to the commencement of grading.

Watershed Debris Production

❖ ***DEBRIS PRODUCTION WOULD BE REDUCED BY FUTURE DEVELOPMENTS WITHIN THE VICINITY OF DRAINAGE AREAS.***

Significance: Less than significant impact with mitigation.

Impact Analysis: Debris, which is produced when soil and vegetation are dislodged and carried down hillsides, would be reduced by future developments within the Northern Foothills project area. The presence of pavement, houses with residential landscaping, and soil stabilization would also serve to hinder debris production. Debris production associated with future developments within individual watersheds would decrease proportionally to the decrease in undeveloped areas as shown in

Table 5.7-8, *Estimated Debris Volumes - Future Development Conditions.* The estimated reduction in debris production range from approximately 2,000 cubic yards in Morgan Canyon to approximately 20,000 cubic yards in Sycamore Canyon under developed conditions. This reduction in debris production is considered a positive effect, however, a substantial amount of debris could potentially be produced from the surrounding hillside (refer to Table 5.7-8).

TABLE 5.7-8
ESTIMATED DEBRIS VOLUMES - FUTURE DEVELOPMENT CONDITIONS

Watershed	Drainage Area (Acres)	Debris Production (CY)	Difference Between Existing & Future Conditions (CY)
Morgan Canyon	410	78,000	-2,000
Wildwood Canyon	270	44,000	-11,000
Shuler Canyon	150	25,000	-12,000
Shay Canyon	60	13,000	-7,000
Sycamore Canyon	570	74,000	-20,000
Ham Canyon	610	87,000	-12,000

If determined necessary by the City of San Dimas City Engineer, the construction of debris basins, which are intended to collect sediment and debris from undeveloped portions of the watersheds, would serve to protect future development as well as prevent sediment from entering the future and existing storm drain systems. With the installation of debris basins, only clear discharges would be carried by the system as opposed to bulked flows. In addition, the debris basins would serve to protect downstream developments from an existing flood hazard as well as provide flood protection to future developments. Debris basins would be determined on a project-by-project basis and, if necessary, constructed at downstream ends of undeveloped drainage areas pursuant to LACPW methods and standards. The construction of debris basin(s) would reduce potential debris flow impacts associated with future developments within the project area to less than significant levels.

Mitigation Measures:

H3. Prior to issuance of grading/building permits, the project applicant(s) shall provide site-specific engineering hydrologic analysis, to the satisfaction of the San Dimas City Engineer, to determine if debris basin(s) are necessary to reduce bulk flow. If determined necessary, the debris basin(s) shall be designed and constructed at the downstream ends of undeveloped drainage areas pursuant to LACPW methods and standards and subject to final design approval by the San Dimas City Engineer.

Flooding

❖ ***IMPLEMENTATION OF FUTURE DEVELOPMENT PROJECTS WITHIN THE PROJECT AREA WOULD INCREASE SURFACE WATER RUNOFF, THEREBY POTENTIALLY INCREASING THE RISK OF FLOODING.***

Significance: Less than significant impact with mitigation.

Impact Analysis: The increase in development within the watersheds would increase surface water runoff, thereby contributing to additional storm water flows in Sycamore Creek and San Dimas Wash channel, which are currently subject to flooding. The potential developable areas shown in Exhibit 5.7-2 are located primarily along canyon ridge lines, with the exception of an area along Sycamore Canyon. Proposed development within the Sycamore Canyon area would be subject to Federal Emergency Management Agency (FEMA) requirements. Potential development areas have not been identified along the low lying areas in the southwest portion of the project area where 500-year and 100-year flooding have been identified. Since the increase in discharge is considered minimal by the LACDPW (less than 50 percent), the impacts of ultimate development to the current flooding problems (i.e., Sycamore Creek and San Dimas Wash) would be less than significant. However, if determined necessary through additional site-specific hydrological analysis, future potential flooding problems would require mitigation on a project-by-project basis. Therefore, flood-related hazards to future developments would be less than significant.

Implementation of future development projects could potentially result in minor alterations to natural channel geomorphology due to an increase in peak discharge and an associated increase in channel flow velocity. Furthermore, future development projects within the watersheds would generally decrease sediment supply to the downstream channels, contributing to potential channel erosion. Site-specific studies would be required to determine the extent of potential erosion and sedimentation along natural channels associated with future development projects. Potential flooding impacts associated with the potential increase in channel discharge could be mitigated with stormwater detention basins located within the watershed. Therefore, potential flooding impacts would be reduced to less than significant levels.

Impacts of Proposed Roadways

Three segments of roadways are proposed to accommodate the proposed project area (refer to Exhibit 5.3-2 in Section 5.3, *Circulation*). Segment 1 begins at Cataract Road near the Shuler Canyon Creek crossing, continues north following the east side of Shuler Canyon and continues along the bottom of the west tributary to Shuler Canyon. The proposed roadway along the west tributary would require placement of fill along the channel bottom for a distance along the entire length of the tributary channel, a distance of approximately 900 feet. This tributary is not defined as a "blueline stream" however, placement of fill along the channel bottom would alter the natural

flow conditions, thereby resulting in an impact to the hydrologic/drainage pattern. This impact could be mitigated to a less than significant level with the installation of drainage facilities along the proposed roadway to provide adequate hydraulic capacity. Segment 1 continues north and east along the ridge lines to join Sycamore Canyon Road and crosses Sycamore Canyon Creek. In order to avoid obstruction of flow, the crossing would be designed to accommodate adequate capacity to convey the 50-year clear water discharge, or greater, as required by the City of San Dimas or County of Los Angeles.

Segment 2 extends northerly from San Dimas Canyon Park and primarily follows the west side of the Ham Canyon tributary. Segment 3 extends north from Segment 1 near the Sycamore Canyon crossing and follows the west side of the Sycamore Canyon Creek, approximately 15 to 50 feet higher than the natural channel bed. Implementation of these two proposed roadway segments would not significantly change the project area hydrology or drainage patterns, thus maintaining runoff from canyon slopes to drain along its natural path and avoiding the diversion of flows from one watershed. Therefore, the hydrology and drainage impacts associated with Segment 2 and Segment 3 are considered less than significant.

Mitigation Measures:

H4. Project applicant(s) shall comply with the requirements of the LACPW to minimize flooding risks associated with stream or riverbed excavation, to prevent any impediment to the flow of storm runoff, and to ensure restoration of disrupted flood control facilities.

Proposed Roadways

H5. Drainage system design requirements for the future developments and all future roadways shall follow the minimum criteria for Private Drains (PD) or Miscellaneous Transfer Drains (MTD) defined by LACPW. General criteria includes, but is not limited to:

- ❖ Any roadcrossing of natural drainages shall be designed to accommodate adequate capacity to convey the 50-year clear water discharge, or greater.
- ❖ Minimum stormdrain pipe size diameter is 24 inches, but if conveys debris then 48 inches; and
- ❖ Stormdrain flow velocity is limited to 20 feet per second (fps) if exceeded must use special pipe with additional concrete thickness.

H6. Project applicant(s) shall allow canyon slopes to drain along their natural path and not divert flows from one watershed to another. Drainage facilities located

within the proposed roadways shall be implemented pursuant to the requirements of the LACPW and the City of San Dimas.

Water Quality

❖ ***IMPLEMENTATION OF FUTURE DEVELOPMENTS COULD RESULT IN AN INCREASE IN URBAN POLLUTANT DISCHARGES INTO SAN DIMAS AND BIG DALTON WASHES.***

Significance: Less than significant impact with mitigation.

Impact Analysis: As with most urban development, the proposed project would result in an increase in urban pollutant discharge. Future development has the potential to impact San Dimas Wash and Big Dalton Wash. This impact is considered less than significant, since the proposed land uses would be low density residential, which would not substantially deteriorate water quality. In addition, there would be minimal or no water quality impacts, as no potential development areas were identified within the watersheds that drain to the Big Dalton Wash.

Proposed developments that involve grading and construction would contribute to an increase in pollution discharge. As a result, individual development projects would be required to mitigate short-term construction impacts pursuant to the National Pollution Discharge Elimination System (NPDES) criteria and standards.

Mitigation Measures:

H7. Refer to Mitigation Measure G5, of Section 5.6, *Geology, Soils, and Seismicity.*

Groundwater

❖ ***THE PROPOSED PROJECT WOULD NOT RESULT IN ADVERSE IMPACTS TO THE AMOUNT OF AVAILABLE GROUNDWATER AVAILABLE OR DEGRADE GROUNDWATER QUALITY.***

Significance: Not significant.

Impact Analysis: Groundwater levels are estimated at depths between 900 to 1,200 feet below ground surface (bgs) within the project area. These depths are expected to fluctuate seasonally, but are not expected to reach the project area elevation. The proposed project would not alter the direction of groundwater flow, nor result in the need to withdraw or change the rate of groundwater flow. Impacts to groundwater and the quality of groundwater are not anticipated with implementation of future development projects. Development within the project area would be subject to stormwater runoff management requirements, as outlined in the NPDES permit issued

by the California Regional Water Control Board to the County of Los Angeles and local agencies (Order No. 96-054, NPDES Permit CAS6140001).

Mitigation Measures: No mitigation measures are required.

CUMULATIVE IMPACTS

- ***THE PROPOSED PROJECT, COMBINED WITH OTHER FUTURE DEVELOPMENT, MAY RESULT IN INCREASED HYDROLOGY AND DRAINAGE IMPACTS IN THE AREA.***

Significance: Potentially significant. Impacts must be evaluated and mitigated to less than significant levels on a project-by-project basis.

Impact Analysis: Ultimate development within the Northern Foothills project area and within the City of San Dimas would contribute to a cumulative increase in runoff volume in the Los Angeles area. Future development within the area would be required to mitigate potential impacts to hydrology and drainage to less than significant levels on a project-by-project basis.

Mitigation Measures:

H8. Site-specific hydrology assessments subject to review and approval by the appropriate jurisdiction shall be prepared on a project-by-project basis to determine necessary mitigation in order reduce potential impacts to less than significant levels.

UNAVOIDABLE SIGNIFICANT IMPACTS

Implementation of the proposed project would not result in unavoidable significant impacts related to hydrology and drainage.

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5.8 BIOLOGICAL RESOURCES

The purpose of this Section is to identify existing biological resources within the project area, analyze potential project-related impacts from the proposed project to biological resource (including sensitive species), and to recommend mitigation measures to reduce the significance of identified impacts. Information in the Section is based on the *Draft San Dimas Northern Foothills Project Biological Technical Report*, prepared by BonTerra Consultants, dated February 19, 1999 (refer to Appendix 14.7, *Biological Resources Study*).

EXISTING CONDITIONS

Vegetation

The vegetation types that occur in the project area are delineated on Exhibit 5.8-1, *Biological Resources*. Exhibit 5.8-2, *General Biological Resources*, identifies the seven (7) vegetation types in the project area as previously identified by LSA in 1998 for the Northern Foothills Implementation Program.

A total of eleven (11) different vegetation types occur within the proposed project area. These vegetation types, discussed below, include: willow riparian forest; southern coast live oak riparian forest; mixed chaparral; hoaryleaf ceanothus chaparral; coastal sage chaparral scrub; mixed coastal sage scrub; native grassland; annual grassland/coastal sage scrub; annual grassland; burnt annual grassland/coastal sage scrub; and ornamental/developed. The acreage of vegetation associations within the potential development areas are summarized in Table 5.8-1, *Vegetation Associations*. In addition, refer to Appendix, 14.7, *Biological Assessment*, for a detailed discussion regarding the vegetation associations identified within the project area.

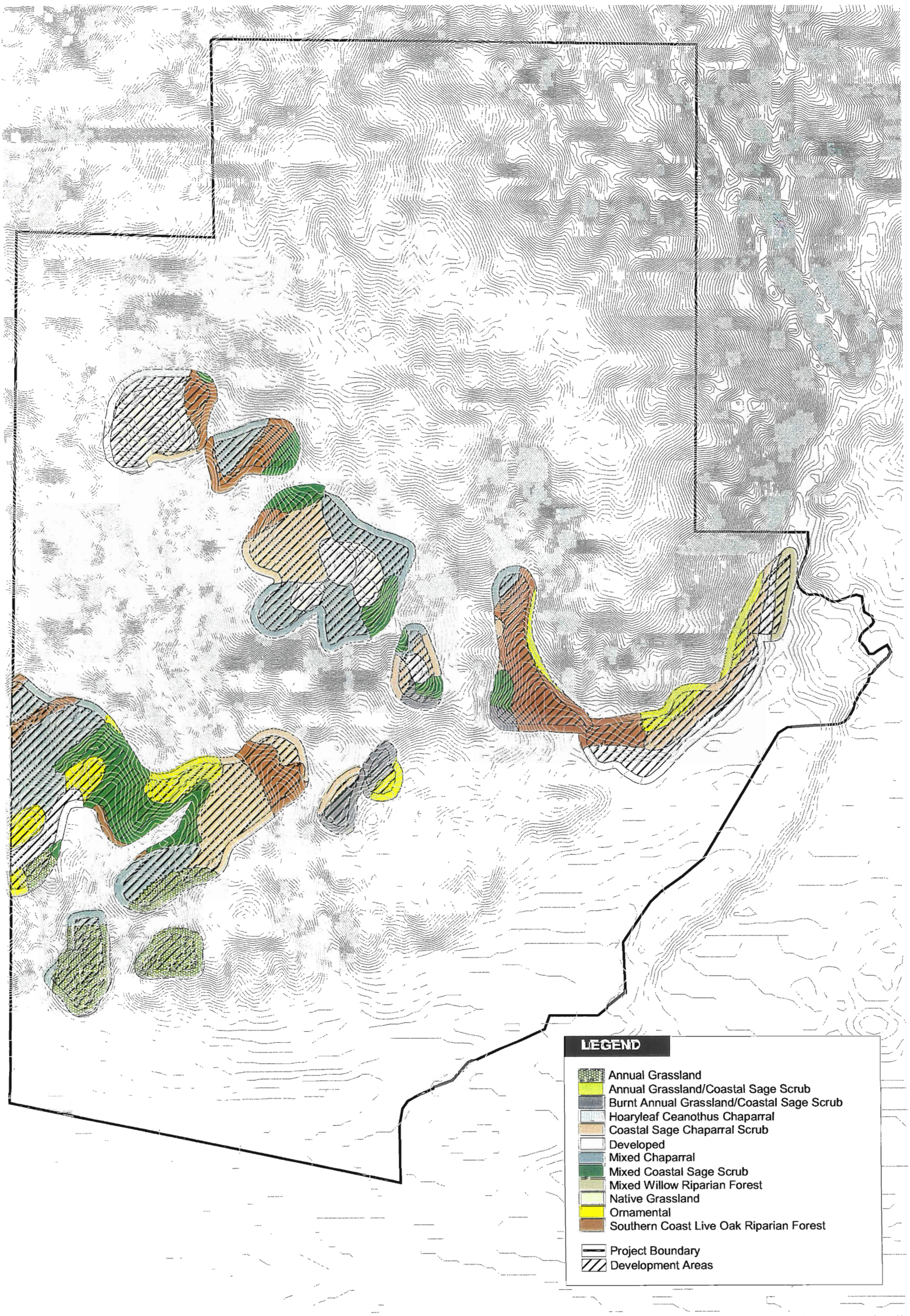
Wildlife

The diversity of habitat types and their spatial arrangement in the project area create a mosaic of high value habitat that is capable of supporting a wide variety of wildlife species. All components of wildlife habitat – open space, cover, water, and food – are present within the project area. Virtually all wildlife species of the local foothill ecosystem are expected to be present within the project area, or to use the area as part of a larger home range. This is attributable to the large size of the project area, its relatively high quality habitat, and the extensive surrounding areas of natural open space.

Of any single habitat type, woodlands are expected to support the greatest diversity and abundance of wildlife species. However, the inherent high value of woodland habitats is due, in part, to their proximity and interspersion with other habitats such as chaparral and coastal sage scrub.

TABLE 5.8-1
VEGETATION ASSOCIATIONS

Vegetation Associations	Development Area (acres)
Mixed Willow Riparian Forest	3.06
Southern Coast Live Oak Riparian Forest	48.91
Mixed Chaparral	66.71
Hoaryleaf Ceanothus Chaparral	2.49
Coastal Sage Chaparral Scrub	56.62
Mixed Coastal Sage Scrub	35.26
Native Grassland	32.28
Annual Grassland/Coastal Sage Scrub	14.74
Annual Grassland	23.87
Burnt Annual Grassland/Coastal Sage Scrub	7.07
Ornamental	9.05
Developed	26.77
TOTAL	***326.83***



Source: BonTerra Consulting

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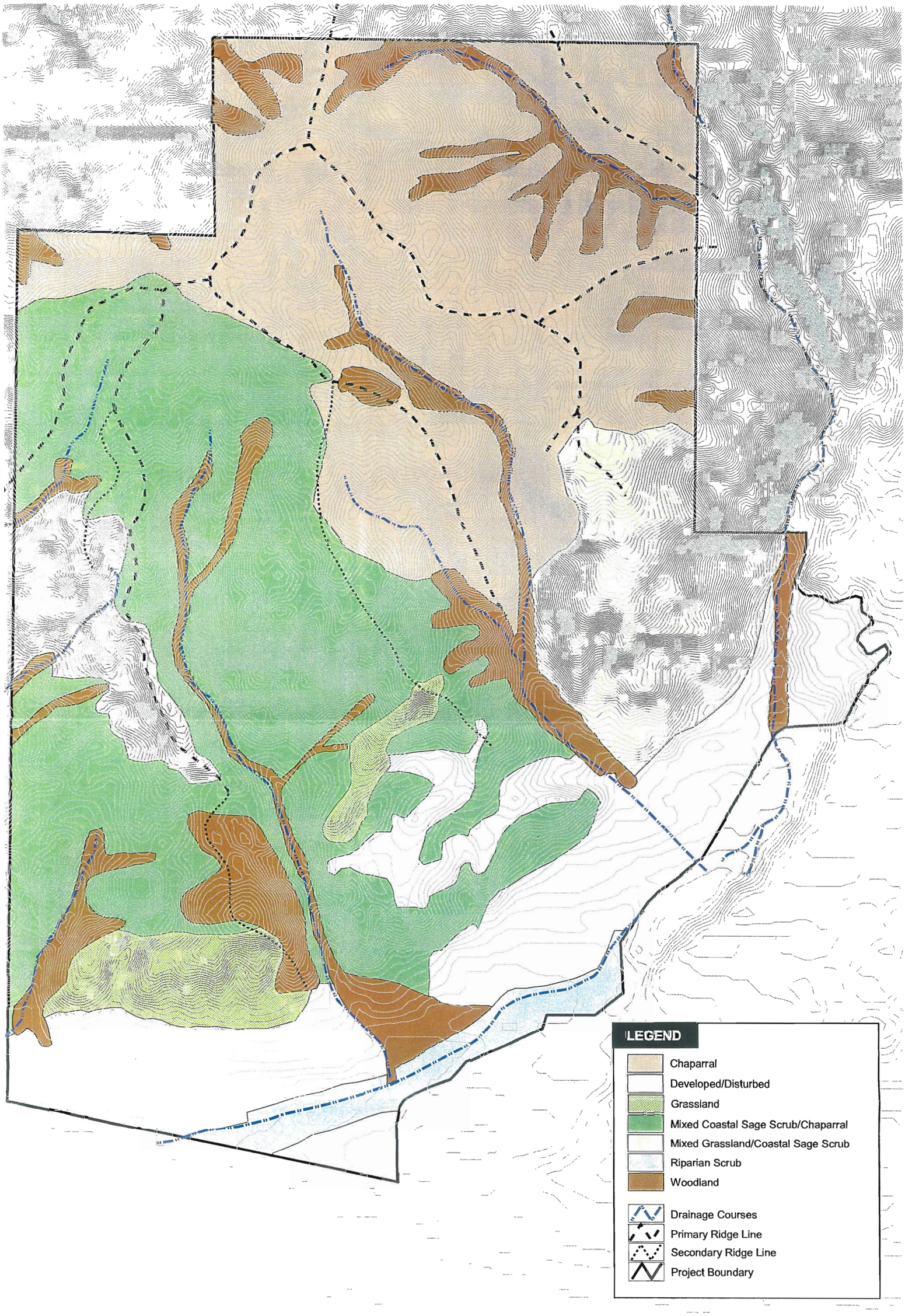
Biological Resources

Exhibit 5.8-1



Source: LSA / Global Geographic Services

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NORTHERN FOOTHILLS IMPLEMENTATION PROGRAM
PROGRAM ENVIRONMENTAL IMPACT REPORT

General Biological Resources

Robert Bein, William Frost & Associates
3/99 JN 10-034933-6377

Exhibit 5.8-2

Fish

The creeks and waterways in southern California are perennial and subject to periods of high water flow in winter and spring, and little to no flow in late summer and fall. These creeks and waterways can support a variety of habitats, including willow woodland, mule fat scrub, and freshwater marsh. The herbaceous cover present will vary by season from little to no cover during periods of high water flow to high coverage in late summer and fall. Native fish species that potentially inhabit this area have adapted to living in these naturally fluctuating conditions. However, natural and man-made causes such as drought, alteration of habitat, and introduced species have helped to reduce the native fish populations of southern California.

Major creeks within the project area are San Dimas Creek and the creek in Sycamore Canyon, hereafter referred to as Sycamore Canyon Creek. Non-native species introduced into the region that may occur within the slower moving portions of the creeks on-site include the fathead minnow (*Pimephales promelas*) and mosquito fish (*Gambusia affinis*). In addition, where substantial ponding occurs along San Dimas Creek, species such as large mouth bass (*Micropterus salmoides*), green sunfish (*Lepomis cyanellus*), and stocked trout (*Oncorlynclus* sp.) may also be present.

Amphibians

Amphibians require moisture for at least a portion of their life cycle and many require standing or flowing water for reproduction. Although much of the project area is dry for most of the year, a number of amphibian species occur or potentially occur even in the drier habitats. These species are able to survive in dry areas by remaining beneath the soil in burrows or under logs or leaf litter, emerging only when temperatures are low and humidity is high. Many of these species' habitats occur in association with water, and many emerge to breed after the rainy season begins. In addition, moisture in soil can remain high within certain habitats, depending on factors such as amount of vegetation cover, elevation, slope, and aspect.

San Dimas Creek and the Sycamore Canyon Creek may provide suitable habitat within the project area for the black-bellied salamander (*Batrachoseps nigriventris*), western toad (*Bufo boreas*), California treefrog (*Hyla cadaverina*), Pacific tree frog (*Hylla regilla*), and bullfrog (*Rana catesbeiana*). The project area also has the potential to support arboreal salamander (*Aneides lugubris*), Pacific slender salamander (*Batrachoseps pacificus*), ensatina (*Ensatina eschscholtzii*), and western spadefoot toad (*Scaphiopus hammondii*). These species may occupy areas immediately adjacent to areas of semi-permanent runoff where wetland vegetation occurs, and flood control channels.

Reptiles

Reptilian diversity and abundance typically varies with vegetation association type and character. Many species prefer only one or two vegetation associations; however, many will forage in a variety of habitat types. Most species occurring in open areas use rodent burrows and various objects lying on the ground surface for cover, protection from predators, and extreme weather conditions.

Reptile species observed or expected within the project area include the Coast horned lizard (*Phrynosoma coronatum*), western fence lizard (*Sceloporus occidentalis*), side-blotched lizard (*Uta stansburiana*), Gilbert's skink (*Eumeces gilberti*), western skink (*Eumeces skiltonianus*), coastal whiptail (*Cnemidophorus hyperythrus*), southern alligator lizard (*Gerrhonotus multicatinatus*), western glossy snake (*Arizona occidentalis*), ringneck snake (*Diadophis punctatus*), California kingsnake (*Lampropeltis getulus*), coachwhip (*Masticophis flagellum*), striped racer (*Masticophis lateralis*), gopher snake (*Pituophis melanoleucus*), western rattlesnake (*Crotalus viridis*), and speckled rattlesnake (*Crotalus mitchelli*). Other species with potential to occur in the project area include the western pond turtle (*Clemmys marmorata pallida*), silvery legless lizard (*Anniella pulchra pulchra*), western blind snake (*Leptotyphlops humilis*), night snake (*Hypsiglena torquata*), rosy boa (*Lichanura trivirgata*), long-nosed snake (*Rhinocheilus lecontei*), western patchnose snake (*Salvadora hexalepis*), western black-headed snake (*Tantilla planiceps*), two-striped garter snake (*Thamnophis hammondii*), and lyre snake (*Trimorphodon biscutatus*).

Birds

Birds were the most widely observed vertebrate taxon occurring within the project area. Some of the more common species observed or expected to occur within the project area are the mountain quail (*Oreortyx pictus),* California quail (*Callipepla californica*), mourning dove (*Zenaida macroura*), greater roadrunner (*Geococcyx californianus*), white-throated swift (*Aeronautes saxatalis*), Anna's hummingbird (*Calypte anna*), Costa's hummingbird (*Calypte costae*), acorn woodpecker (*Melanerpes formicivorus*), northern flicker (*Colaptes auratus*), Pacific-slope flycatcher (*Empidonax difficilis*), black phoebe (*Sayornis nigricans*), Say's phoebe (*Sayornis saya*), western kingbird (*Tyrannus verticalis*), loggerhead shrike (*Lanius ludovicianus*), western scrub jay (*Aphelocoma californica*), American crow (*Corvus brachyrhynchos*), common raven (*Corvus corax*), cliff swallow (*Hirundo pyrrhonota*), mountain chickadee (*Parus gambeli*), bushtit (*Psaltriparus minimus*), Bewick's wren (*Thryomanes bewickii*), house wren (*Troglodytes aedon*), western bluebird (*Sialia mexicana*), northern mockingbird (*Mimus polyglottos*), California thrasher (*Toxostoma redivivum*), European starling (*Sturnus vulgaris*), common yellowthroat (*Geothlypis trichas*), spotted towhee (*Pipilo maculatus*), California towhee (*Pipilo crissalis*), rufous-crowned sparrow (*Aimophila ruficeps*), white-crowned sparrow (*Zonotrichia leucophrys*), Brewer's blackbird (*Euphagus cyanocephalus*), house finch (*Carpodacus mexicanus*), and house sparrow (*Passer domesticus*).

Habitats within the project area provide high quality foraging habitat for a variety of raptors (birds of prey). Raptors observed within or near the project area include the turkey vulture (*Cathartes aura*), red-tailed hawk (*Buteo jamaicensis*), and American kestrel (*Falco sparverius*). Other raptors expected within the project area include the northern harrier (*Circus cyaneus*), sharp-shinned hawk (*Accipiter striatus*), Cooper's hawk (*Accipiter cooperii*), red-shouldered hawk (*Buteo lineatus*), golden eagle (*Aquila chrysaetos*), western screech owl (*Otus kennicottii*), and great horned owl (*Bubo virginianus*). There is also potential for the white-tailed kite (*Elanus leucurus*), merlin (*Falco columbarius*), prairie falcon (*Falco mexicanus*), barn owl (*Tyto alba*), and spotted owl (*Strix occidentalis*).

Mammals

Rodents are among the most diverse and widespread mammals and several species are expected to occur within the project area. Rodents that potentially occur include the California ground squirrel (*Spermophilus beecheyi*), Merriam's chipmunk (*Tamias merriami*), western gray squirrel (*Sciurus griseus*), pocket gopher (*Thomomys bottae*), California vole (*Microtus californicus*), dusky-footed woodrat (*Neotoma fuscicpes*), cactus mouse (*Peromyscus eremicus*), deer mouse (*Peromyscus maniculatus*), brush mouse (*Peromyscus boylii*), and black rat (*Rattus rattus*). The project area also has the potential to support the desert shrew (*Notiosorex crawfordi*), little pocket mouse (*Perognathus longimembris*), California pocket mouse (*Perognathus californicus*), agile kangaroo rat (*Dipodomys agilis*), house mouse (*Mus musculus*), and California mouse (*Peromyscus californicus*). Medium to large sized mammals observed or expected to occur include the Virginia opossum (*Didelphis virginiana*), broad-footed mole (*Scapanus latimanus*), brush rabbit (*Sylvilagus bachmani*), desert cottontail (*Sylvilagus audubonii*), black-tailed jackrabbit (*Lepus californicus*), coyote (*Canis latrans*), gray fox (*Urocyon cinereoargenteus*), common raccoon (*Procyon lotor*), striped skunk (*Mephitis mephitis*), long-tailed weasel (*Mustela frenata*), western spotted skunk (*Spilogale gracilis*), American badger (*Taxidea taxus*), mountain lion (*Felis concolor*), bobcat (*Felis rufus*), and mule deer (*Odocoileus hemionus*). A number of bat species are also expected to use various habitats within the project area for foraging, roosting, and potentially breeding. However, it is difficult to identify specific species of bats because they are difficult to detect due to their secretive habits.

Wildlife Movement

A wildlife dispersal or migration corridor is a relatively narrow strip of habitat that connects two or more larger areas or habitat. It is essentially free of any physical barriers such as freeways, fences, walls, housing tracts, or lakes. A typical wildlife corridor provides both refuge and ease of movement. Canyon bottoms and ridgelines offer both. Canyon bottoms offer food, water, shelter and ease of movement because of their rich plant growth, sparse undergrowth, and reliable water supplies. Ridgelines offer ease of movement between adjacent canyons and refuge in adjacent brush. Most animals will also use firebreaks and dirt roads as corridors, as long as they are not heavily traveled by vehicles at night.

Wildlife corridors vary greatly in their overall significance. General information that currently exists on corridors suggests that major drainages, canyon bottoms and ridgetops, as well as areas that provide important resources for wildlife, will be the most significant areas for wildlife movement. In general, two types of corridors exist. Regional corridors are generally those that allow movement between large, often widely separated areas. These may connect National Forests, mountain ranges, or other major wildlife use areas. Local wildlife corridors are those that allow dispersion between smaller, generally more adjacent areas, such as between canyons or ridges, or important resource areas.

With respect to the proposed project area, Morgan Canyon, Wildwood Canyon, Shuler Canyon, Shay Canyon, Sycamore Canyon, and Ham Canyon provide important resources to wildlife within the project area and the adjacent Angeles National Forest. These drainages currently act as travel routes within the project area and are expected to be used by a variety of wildlife species including, but not limited to, the coyote, bobcat, mule deer, and mountain lion. These larger and more mobile wildlife species may use these drainages to move within and between the adjacent open space areas, while the smaller and less mobile species such as rodents, amphibians, and reptiles, as well a large number of plant species may live in the "route" and require long periods or several generations of individuals to transverse to the area.

The portions of the drainages, mentioned above, in the vicinity of the project area do not currently act as "movement corridors", as defined above, due to the general lack of development in the area and the lack of connectivity to other large open space areas to the south. The canyons and ridgelines within the project area are expected to be used by resident wildlife for local movement within the project area and to the surrounding open space areas.

Special Status Biological Resources

The following addresses special status biological resources observed, reported, or having the potential to occur within the project area. These resources include plant and wildlife species that have been afforded special status and/or recognition by federal and state resource agencies, as well as private conservation organizations. In general, the principal reason an individual taxon (species, subspecies, or variety) is given such recognition is the documented or perceived decline or limitations of its population size or geographical extent and/or distribution (resulting in most cases from habitat loss).

Definitions of Special Status Biological Resources

A *federally endangered species* is one facing extinction throughout all or a significant portion of its geographic range. A *federally threatened species* is one likely to become endangered within the foreseeable future throughout all or a significant portion of its range. The presence of any federally threatened or endangered species on a project site generally imposes constraints on development, particularly if development would result in "take" of the species or its habitat. The term "take"

means to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, collect, or attempt to engage in such conduct. Harm in this sense can include any disturbance to habitats used by the species during any portion of its life history.

Proposed species are those officially proposed by the United States Fish and Wildlife Service (USFWS) for addition to the federal threatened and endangered species list. Because proposed species may be listed as threatened or endangered, these species could pose additional constraints prior to or during implementation of a proposed development project.

The State of California considers: an *endangered species* as one whose prospects of survival and reproduction are in immediate jeopardy; a *threatened species* as one present in such small numbers throughout its range that it is likely to become an endangered species in the near future in the absence of special protection or management; and a *rare species* as one present in such small numbers throughout its range that it may become endangered if its present environment worsens. Rare species applies to California native plants. State threatened and endangered species are fully protected against take.

Species of Special Concern is an informal designation used by the California Department of Fish and Game (CDFG) for some declining wildlife species that are not considered threatened or endangered. This designation does not provide legal protection but signifies that these species are recognized as sensitive by the CDFG. Species that are *California fully protected* include those protected by special legislation for various reasons, such as the mountain lion and white-tailed kite.

The California Native Plant Society (CNPS) is a local resource conservation organization that has developed an inventory of California's sensitive plant species (Skinner and Pavlik 1994). This inventory is the summary of information on the distribution, rarity, and endangerment of California's vascular plants. This rare plant inventory is comprised of four lists. CNPS presumes that *List 1A* plant species are extinct in California because they have not been seen in the wild for many years. CNPS considers *List 1B* plants as rare, threatened, or endangered throughout their range. *List 2* plant species are considered rare, threatened, or endangered in California but more common in other states. Plant species for which CNPS needs additional information are included on *List 3*. *List 4* plant species are those of limited distribution in California whose susceptibility to threat appears low at this time.

Special Status Plants

A total of eleven (11) special status plant species are known to occur in the vicinity of the project area; ten (10) of these species potentially occur in the project area. These species and their potential to occur in the project area are summarized in Table 5.8-2, *Special Status Plant Species Known to Occur in the Region of the*

TABLE 5.8-2
SPECIAL STATUS PLANT SPECIES KNOWN TO OCCUR IN THE REGION OF THE PROJECT SITE

Species	Status			Habitat	Optimal Survey Period	Presence
	USFWS	CDFG	CNPS			
Astragalus brauntonii Brauton's milkvetch	E	--	List 1B	Scrub and chaparral habitats	February - June	No suitable habitat
Berberis nevinii Nevin's barberry	E	E	List 1B	Floodplain sage scrub habitats	March - April	Potential
Brodiaea filifolia Thread-leaved brodiaea	T	E	List 1B	Venturan-Diegan transitional coastal sage scrub, grassland, and southern hardpan vernal pool habitats	March - June	Potential
Calochortus clavatus var. *Gracilis* Slender mariposa lily	SSC	--	List 1B	Chaparral habitats	March	Potential
Calochortus plummerae Plummer's mariposa lily	SSC	--	List 1B	Chaparral, cismontane woodland, coastal scrub, lower montane coniferous forest and valley and foothill grassland habitats (granitic)	May - July	Potential
Dudleya densifolia San Gabriel Mountains dudleya	C	--	List 1B	Scrub, grassland and rock outcrop habitats	May - June	Potential
Dudleya multicaulis Many-stemmed dudleya	SSC	--	List 1B	Scrub, grassland and rock outcrop habitats	May - June	Potential
Erigeron breweri var. *bisanctus* Pious daisy	--	--	List 1B	Chaparral and lower montane coniferous forest habitats	May - September	Potential
Helianthus nuttallii Los Angeles sunflower	--	--	List 1A	Coastal freshwater marsh habitats	August - October	No suitable habitat
Lepidium virginicum var. *robinsonii* Robinson's peppergrass	--		List 1B	Chaparral, coastal scrub	January - July	Potential
Senecio aphanactis Rayless ragwort	--		List 2	Cismontane woodland, coastal scrub, alkaline	January - April	Potential

LEGEND

Federal (USFWS)		State (CDFG)		California Native Plant Society (CNPS)	
E	Endangered	E	Endangered	1A	Plants Presumed Extinct in California
T	Threatened	T	Threatened	1B	Plants Rare, Threatened, or Endangered in California and Elsewhere
PE	Proposed Endangered	PE	Proposed Endangered	2	Plants Rare, Threatened, or Endangered in California But More Common Elsewhere
PT	Proposed Threatened	PT	Proposed Threatened	3	Plants About Which We Need More - A Review List
C	Candidate Species			4	Plants of Limited Distribution - A Watch List
SSC	Species of Special Concern				

Project Area. Refer to Appendix 14,7, *Biological Assessment*, for a detailed description of each special status plant species.

Special Status Vegetation Types

Vegetation types or communities that support concentrations of special status plant or wildlife species, are of relatively limited distribution, or are of particular value to wildlife, are considered to be special status vegetation types.

Woodland areas including mixed willow riparian forest and southern coast live oak riparian forest, particularly along streambeds, are highly special status vegetation types in the project area. These woodlands occur in Sycamore Canyon, Ham Canyon, and along San Dimas Canyon (along the eastern boundary of the project area). These areas support a wide diversity of wildlife species and may function as habitat linkages. These vegetation types may be subject to permit conditions as regulated by the U.S. Army Corps of Engineers (ACOE), pursuant to Section 404 of the Clean Water Act, and by the CDFG, pursuant to a Streambed Alteration Agreement under Section 1601 of the California Fish and Game Code. In addition, the ACOE may require a Section 401 Water Quality Certification, or a waiver thereof from the Regional Water Quality Control Board for impact to these areas.

Coastal sage scrub is also considered a special status vegetation type based on: (1) widespread awareness among the resource agencies, policy makers, and the public that this community has undergone widespread losses in the past; and (2) the State's ongoing effort to create regionally important coastal sage scrub preserves under the Natural Community Conservation Planning (NCCP) program described later in this section.

Native grasslands in the project area are considered a special status habitat (CDFG 1997) due to the decrease in the acreage of this vegetation type throughout southern California.

Special Status Wildlife

A total of fifty-seven (57) special status wildlife species are known to occur within the region and potentially occur in the project area. This includes the following twelve (12) species listed as endangered, threatened or proposed for listing by the USFWS or CDFG, or both: Quino checkerspot butterfly (*Euphydryas editha quino*), Santa Ana sucker (*Catostomus santaanae*), arroyo southwestern toad (*Bufo microscaphus californicus*), California red-legged frog (*Rana aurora draytonii*), Swainson's hawk (*Buteo swainsoni*), bald eagle (*Haliaeetus leucocephalus*), peregrine falcon (*Falco peregrinus*), western yellow-billed cuckoo (*Coccyzus americanus occidentalis*), southwestern willow flycatcher (*Empidonax trailii extimus*), least Bell's vireo (*Vireo bellii pusillus*), nesting habitat of bank swallow (*Riparia riparia*), and coastal California gnatcatcher (*Polioptila californica californica*). These endangered and threatened species are addressed below and summarized in Table 5.8-3, *Special Status Wildlife Species Known to Occur in the Region of the Project Area*.

TABLE 5.8-3
SPECIAL STATUS WILDLIFE SPECIES
KNOWN TO OCCUR IN THE REGION OF THE PROJECT AREA

Species	USFWS	CDFG	Potential to Occur on Project Site
Insects			
Euphydryas editha quino Quino checkerspot butterfly	E	–	potential habitat present , potential to occur
Fish			
Gila orcutti arroyo chub	SSC	SSC	habitat present, potential to occur
Rhinichthys osculus Santa Ana speckled dace	SSC	SSC	habitat present, potential to occur
Catostomus santaanae Santa Ana sucker	PT	SSC	habitat present, potential to occur
Amphibians			
Taricha torosa torosa coast range newt	–	SSC	habitat present, expected to occur
Ensantina eschscholtzii klauberi large-blotched ensantina	SSC	SSC	habitat present, potential to occur
Scaphiopus hammondii western spadefoot	SSC	SSC/P	potential habitat present, potential to occur
Bufo microscaphus californicus arroyo southwestern toad	E	SSC/P	habitat present, potential to occur
Rana aurora draytonii California red-legged frog	T	SSC/P	habitat present, potential to occur
Rana muscosa mountain yellow-legged frog	SSC	SSC/P	habitat present, potential to occur
Reptiles			
Clemmys marmorata pallida southwestern pond turtle	SSC	SSC/P	habitat present, potential to occur
Phrynosoma coronatum blainvillii San Diego horned lizard	SSC	SSC/P	habitat present, potential to occur
Cnemidophorus tigris multiscutatus coastal western whiptail	SSC	–	habitat present, potential to occur
Anniella pulchra pulchra silvery legless lizard	SSC	SSC	habitat present, potential to occur
Diadophis punctatus modestus San Bernardino ringneck snake	SSC	–	habitat present, potential to occur
Lampropeltus zonata parvirubra San Bernardino mountain kingsnake	SSC	SSC	habitat present, potential to occur

Species	USFWS	CDFG	Potential to Occur on Project Site
Salvadora hexalepis virgultea coast patchnose snake	SSC	SSC	habitat present, expected to occur
Thamnophis hammondii two-striped garter snake	SSC	SSC/P	habitat present, potential to occur
Birds			
Ixobrychus exilis hesperis western least bittern	SSC	SSC	limited habitat present, not expected to occur
Elanus leucurus white-tailed kite	–	FP	habitat present, potential to occur
Circus cyaneus northern harrier	–	SSC	habitat present, expected to occur
Accipiter striatus sharp-shinned hawk	–	SSC	habitat present, expected to occur
Accipiter cooperii Cooper's hawk	–	SSC	habitat present, expected to occur
Buteo swainsoni Swainson's hawk		T	habitat present, expected to occur
Buteo regalis ferruginous hawk	SSC	SSC	habitat present, expected to occur
Heliaeetus leucocephalus bald eagle	E	T/FP	lack of large bodies of water, may periodically occur
Aquila chrysaetos golden eagle	–	SSC/FP	habitat present, expected to occur
Falco columbarius merlin	–	SSC	habitat present, potential to occur
Falco peregrinus peregrine falcon	E	E/FP	habitat present, potential to occur
Falco mexicanus prairie falcon	–	SSC	habitat present, potential to occur
Athene cunicularia burrowing owl	SSC	SSC	habitat present, potential to occur
Asio otus long-eared owl	–	SSC	habitat present, potential to occur
Strix occidentalis occidentalis California spotted owl	SSC	SSC	limited habitat present, adjacent to suitable habitat, potential to occur
Coccyzus americanus occidentalis western yellow-billed cuckoo		E	habitat present, limited potential to occur
Empidonax trailii extimus southwestern willow flycatcher	E		habitat present, potential to occur
Lanius ludovicianus loggerhead shrike	SSC	SSC	habitat present, expected to occur

Species	USFWS	CDFG	Potential to Occur on Project Site
Vireo bellii pusillus least Bell's vireo	E	E	habitat present, limited potential to occur
Eremophila alpestris actia California horned lark	–	SSC	habitat present, potential to occur
Riparia riparia bank swallow (nesting)	–	T	potential habitat present, limited potential to occur
Campylorhynchus brunneicapillus sandiegoense San Diego cactus wren	–	SSC	habitat present, expected to occur
Polioptila californica californica coastal California gnatcatcher	T	SSC	habitat present, potential to occur
Dendroica petechia brewsteri yellow warbler	–	SSC	habitat present, expected to occur
Icteria virens yellow-breasted chat	–	SSC	habitat present, potential to occur
Piranga rubra summer tanager	–	SSC	habitat present, potential to occur
Aimophila ruficeps canescens Southern California rufous-crowned sparrow	SSC	SSC	habitat present, expected to occur
Amphispiza belli belli Bell's sage sparrow	SSC	SSC	habitat present, potential to occur
Ammodramus savannarum grasshopper sparrow	–	–	habitat present, potential to occur
Agelaius tricolor tricolored blackbird	SSC	SSC	habitat present, potential to occur
Mammals			
Antrozus pallidus pallid bat	–	SSC	habitat present, potential to occur
Corynorhinus townsendii townsendii Townsend's western big-eared bat	SSC	SSC	habitat present, potential to occur
Lepus californicus bennettii San Diego black-tailed jackrabbit	SSC	SSC	habitat present, potential to occur
Perognathus californicus femoralis Dulzura California pocket mouse	SSC	SSC	habitat present, potential to occur
Perognathus fallax pallidus pallid San Diego pocket mouse	SSC	SSC	habitat present, potential to occur
Perognathus longimembris brevinasus Los Angeles pocket mouse	SSC	SSC	habitat present, potential to occur
Onychomys torridus ramona southern grasshopper mouse	SSC	SSC	habitat present, potential to occur

Species	USFWS	CDFG	Potential to Occur on Project Site
Neotoma lepida intermedia San Diego desert woodrat	SSC	SSC	habitat present, potential to occur
Taxidea taxus American badger	–	–	habitat present, potential to occur

LEGEND

Federal (USFWS)		State (CDFG)	
E	Endangered	E	Endangered
T	Threatened	T	Threatened
PE	Proposed Endangered	PE	Proposed Endangered
PT	Proposed Threatened	PT	Proposed Threatened
C	Candidate Species	SSC	Species of Special Concern
SSC	Species of Special Concern	FP	Fully Protected
		P	Protected

Regulatory Background

Federal Endangered Species Act

The U.S. Fish and Wildlife Service ("Service"), under the auspices of the Endangered Species Act (Act), protects endangered and threatened species (listed species). Endangered species are defined as a species in "danger of extinction throughout all or a significant portion of its range," while a threatened species is likely to become endangered in the foreseeable future.

Section 9 of the Endangered Species Act prohibits the "taking" of listed species. The term "take" includes the direct killing, harming, or harassing of a species, and destruction of habitat that may be important for the species' survival and recovery. Harm is further defined as significant habitat alteration that results in death or injury to listed species by significantly impairing behavior patterns such as breeding, feeding, or sheltering. The "take" of listed species incidental to otherwise lawful activities is permitted by the Service. Procedures for obtaining a permit for incidental take are identified under Section 7 of the Act for Federal actions and Section 10 for non-Federal actions.

The Service tracks species that are candidates for the endangered and threatened species list. As part of the normal listing process, a species is proposed for listing (proposed rule) and then listed (final rule). The proposed and final rules are published in the Federal Register. If a species is known to be on the brink of extinction, the Service can make an emergency listing, which skips the proposed rule step. Species are not protected until they are listed. However, consultation with the Service regarding candidate species or species proposed for listing can prevent project delays should the species be listed prior to project completion.

Clean Water Act

The U.S. Army Corps of Engineers (ACOE) has jurisdiction over wetlands and waters of the United States under Section 404 of the Clean Water Act. Permitting of activities that would result in a discharge of dredge or fill material into "waters of the United States" or adjacent wetlands and associated habitat is required. By definition, these include all waterways, streams, and intermittent streams that could be used for interstate commerce, and their tributaries. The term "interstate commerce" has been broadly interpreted to include use by migratory waterfowl and out-of-state tourism. In non-tidal waters, jurisdictional limits extend to the "ordinary high water mark" (OHWM), which is defined as "that line on the shore established by the fluctuations of water and indicated by physical characteristics such as clear natural line impression on the bank, shelving, changes in the character of soil, and destruction of the surrounding area." The upstream limit of ACOE jurisdiction is that point on the stream where the OHWM is no longer perceptible. Alluvial fans (areas of sheet flow) are not regulated as waters of the United States. Because flow patterns vary drastically from event to event, alluvial fans do not exhibit OHWM's or other evidences of repeated water flow. Vernal pools are regulated by the ACOE as waters of the United States.

Nationwide 404 permits cover specific activities with minimal effect to aquatic resources and are approved by Congress. Nationwide permits are intended to allow dredging and filling to occur with little or no delay. A Nationwide 404 permit is required for all drainages affected by implementation of the proposed project.

California Department of Fish and Game

California Endangered Species Act

California Endangered Species Act (CESA) definitions of endangered and threatened species parallel those defined in the federal Endangered Species Act. Endangered species are in "serious danger of becoming extinct", and threatened species are "likely to become an endangered species in the foreseeable future" according to Sections 2062 and 2067, respectively, of the California Fish and Game Code. "Candidate species" are species that are under formal review by California Department of Fish and Game (CDFG) for addition to the endangered or threatened species list (Section 2067). Prior to being considered for protected status, the CDFG designates a species as being of special concern. Species of special concern are those species for which CDFG has information indicating that the species is declining.

Federally listed threatened or endangered species that may be affected by the proposed project would require a permit for incidental take, either through Section 7 or 10 of the federal ESA, which would be required if effects to these species and their habitats cannot be avoided.

State listed threatened or endangered species that may be affected by the proposed project would require a permit for incidental take under the California ESA (CESA) from CDFG if effects to these species cannot be avoided. Additional CESA species that are known or likely to occur in the project area include the California black rail, Swainson's hawk, and western yellow-billed cuckoo. As of January 1, 1998, under the California ESA Section A.B21, a separate State permit would not be necessary for the same species if a federal ESA take permit is already in effect.

Species and plant communities that are not currently listed as threatened or endangered, but are listed as federally proposed "threatened" or "endangered", State species of "special concern", "threatened" by the NDDB, or are known to be regionally rare do not currently require a permit for incidental take; however, project delays could occur if a species is listed prior to project completion.

Streambeds

CDFG has jurisdiction over lakes, streambeds and banks under Sections 1601-1603 of the California Fish and Game Code. The code requires a "Streambed Alteration Agreement" for projects which would alter stream channels or lake edges. The state definition of stream channels does not specify a flow rate or inundation frequency. A Streambed Alteration Agreement is required for all drainages affected by the implementation of the proposed project.

California Natural Diversity Database

The California Natural Diversity Database (NDDB) is a data base of sensitive species and vegetative communities which ranks the overall condition of species (or a community) on global (throughout its range) and State (within California) levels. Additionally, subspecies and varieties are assigned a ranking for the global condition of that subspecies or variety. The ranking is numerical ranging from 1 to 5, with 1 indicating very few remaining individuals or little remaining habitat and 5 indicating a demonstrably secure to ineradicable population condition. State ranks may also include a threat assessment ranging from 1 (very threatened) to 3 (no current threats known).

California Native Plant Society

The California Native Plant Society (CNPS) has cataloged California's rare and endangered plants into lists according to their population distributions and viability. These lists are numbered and indicate the following: (1A) presumed extinct in California; (1B) rare or endangered in California and elsewhere; (2) rare or endangered in California, but more common elsewhere; (3) more information is needed to establish species standing and; (4) plants of limited distribution which bear watching.

Regional Conservation Planning Programs

The purpose of the *Natural Communities Conservation Planning (NCCP)* program is to provide for regional protection and perpetuation of natural wildlife diversity while allowing compatible land use and appropriate development and growth. The NCCP process is intended to provide an alternative to "single species" conservation efforts by formulating regional, natural community-based habitat protection programs to protect numerous species. Among the objectives of this approach is to end legal and political gridlock and provide certainty for landowners who wish to develop valuable real estate without the delays posed by the probable listings of species and habitat protection.

The Southern California Coastal Sage Scrub Program, administered by the CDFG and USFWS, is the first NCCP project. This program is intended to provide the direction and collaborative support necessary to conduct research, planning, and habitat management efforts leading to the long-term conservation and protection of species in the coastal sage scrub community of southern California. The planning program would be carried out with the voluntary and cooperative participation of landowners, local governments, state and federal agencies, and environmental organizations.

Generally, the conservation program and the biological issues are being coordinated for the five-county southern California region (San Diego, Orange, Riverside, Los Angeles, and San Bernardino counties). However, because the area is so large and land planning considerations vary throughout the region, functional planning is being conducted on a subregional scale.

Progress made to date varies widely among subregional planning areas. For instance, the central and coastal Orange County NCCP was recently approved and is now being implemented in an area covering about 340,000 acres. Plans for other subregional areas are in very early formative stages. Aside from participants in a subregional plan for the Palos Verdes Peninsula, only three entities (the City of San Dimas, the Santa Monica Mountains Conservancy, and the Wildlife Corridor Conservation Authority) have enrolled in an NCCP program for Los Angeles County. Enrollment in the program is essentially the first step in the planning process that involves numerous additional steps. The next step would involve coordination with the CDFG and USFWS, the agencies that administer the NCCP. Such coordination would be initiated by the City of San Dimas and other enrollees or interested jurisdictions and could include the presentation of general baseline information regarding biological resources and land uses within the subregional planning area. The time limit for initiating these following steps has expired and therefore, the City of San Dimas is no longer considered a participant in the NCCP program.

Depending on whether the City re-enrolls in the program, the NCCP program in its current form may not be an appropriate or adequate mitigation/conservation program for impacts to habitat within the potential development areas. However, a separate

Habitat Conservation Plan (HCP) for all or several portions of the potential development areas could be prepared in conjunction with permit approvals for the future development projects. HCPs are usually prepared to mitigate for impacts to state or federally listed threatened or endangered species. However, an HCP can be prepared in anticipation of the listing of various plant and wildlife species, to ensure project applicants of a program by which to mitigate and permit the loss of such species in compliance with state and federal Endangered Species Acts.

IMPACTS AND MITIGATION MEASURES

Significance Criteria

A project will normally have a significant impact on biological resources if it will:

- substantially affect a rare or endangered species of plant or animal or the habitat of such species;
- interfere substantially with the movement of any resident or migratory fish or wildlife species; or
- substantially diminish habitat for fish, wildlife or plants.

The criteria for determining significant impacts on biological resources were developed in accordance with the state CEQA Guidelines. Section 15065(a) of the CEQA Guidelines states that a project may have a significant effect on the environment if "the project has the potential to substantially 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, or reduce the number or restrict the range of an endangered, rare, or threatened species." An evaluation of whether an impact on biological resources would be substantial must consider both the resource itself and how that resource fits into a regional or local context. Substantial impacts would be those that would diminish, or result in the loss of, an important biological resource or those that would obviously conflict with local, state, or federal resource conservation plans, goals, or regulations. Impacts are sometimes locally adverse but not significant according to CEQA because although they would result in an adverse alteration of existing conditions, they would not substantially diminish, or result in the permanent loss of, an important resource on a population- or region-wide basis. For purposes of this analysis, the term "region" refers to the area within eastern Los Angeles County. The actual or potential occurrence of biological resources within the potential development areas was correlated with the threshold criteria stated above to determine whether or not project impacts on these resources would be considered significant.

NORTHERN FOOTHILLS IMPLEMENTATION PROGRAM

Section 5 of the *Northern Foothills Development and Infrastructure Study*, prepared by LSA Associates, includes a section on visual intrusiveness of new development in the project area. The following text has been excerpted from the study and includes both the guiding principle with regard to open space and biological resources, and recommends policies and action items for the City of San Dimas.

Preservation of Open Space

General Principle

New development within the Northern Foothills will inevitably result in the loss of some open space and biological habitat areas. However, new development shall be designed so as to maximize the permanent preservation of open space, and to minimize the loss of biological resources.

Implementing Policies and Actions

1. *To the extent feasible, open space within the Northern Foothills should be preserved through establishment and implementation of a purchase of development rights program. In addition, the City should actively pursue an exchange program for property owners within the study area with the U. S. Forest Service in order to preserve the natural landscape while simultaneously providing private property owners with a means to realize use of their property.*

2. *Development projects are to be designed to protect habitat values and to preserve significant, viable habitat areas and habitat connections in their natural condition:*

    - *Within proposed developments, primary emphasis is to be placed on protecting the integrity of habitats and habitat linkages.*

    - *Within occupied habitat areas of rare, threatened or endangered species, disturbance of protected biotic resources is prohibited.*

    - *Within riparian areas, wetland areas, and coastal sage scrub habitats, the vegetative resources which contribute to habitat carrying capacity (vegetative diversity, faunal resting areas, foraging areas, and food sources) should be preserved in place or replaced so as to not result in a measurable reduction in the reproductive capacity of sensitive biotic resources.*

- *Within habitats of plants listed by the California Natural Diversity Data Base (CNDDB) as "special" or "of concern," new development shall not result in a reduction in the number of these plants, if they are present.*

- *The use of motorized off-road vehicles shall be prohibited, and off-trail activities shall be limited to those that are consistent with protection of environmental values.*

- *The establishment of buffer zones adjacent to areas of preserved biological resources shall be required. Such buffer zones shall be adequate in width so as to protect biological resources from grading and construction activities, as well as from the long-term use of adjacent lands. The landscape design adjacent to areas of preserved biological resources shall be designed so as to avoid invasive species that could negatively impact the value of the preserved resource.*

- *Manufactured slopes shall be landscaped or revegetated with natural or naturalized, fire-resistant vegetation.*

Vegetation

❖ ***DEVELOPMENT WITHIN THE PROJECT AREA WOULD RESULT IN THE LOSS OF NATIVE AND NON-NATIVE VEGETATION ASSOCIATIONS.***

Significance: Less than significant impact with mitigation.

Impact Analysis: Non-native vegetation associations present within the project area include annual grassland and ornamental/developed areas. These vegetation associations, and the habitats they provide, generally are of low biological value. Therefore, the loss of these areas is considered less than significant.

The native habitats that could be impacted by future development projects consist of mixed willow riparian forest, southern coast live oak riparian forest, chaparral, coastal sage scrub, and native grasslands. The impact acreage for each of these vegetation types is included in Table 5.8-1, *Vegetation Associations*.

Impacts to the mixed willow riparian forest and southern coast live oak riparian forest would be considered significant, as these associations are considered very sensitive by the state and federal resource agencies. In addition, portions of these associations may meet the three-parameter test for jurisdictional wetlands or exhibit indicators as "other" jurisdictional waters pursuant to Section 404 of the Clean Water Act or Section 1600 of the California Fish and Game Code. Alteration (grading or filling) of these associations may require authorization from the ACOE and CDFG.

Impacts to coastal sage scrub and native grasslands would be considered adverse and significant, because coastal sage scrub and native grasslands are considered unique communities within southern California and these areas have undergone a significant reduction region wide. Impacts to the chaparral habitats would be considered adverse but not significant due to large number of acres of chaparral remaining in the region.

Mitigation Measures:

Native Grassland

BIO1. Impacts to native grassland shall be mitigated by the restoration of native grassland on the cut/fill slopes, other areas disturbed by construction activities, and additional areas supporting non-native vegetation, shall be reseeded with native grassland plant species Revegetation shall occur at a ration of 2:1. That is, for every acre of native grassland removed, two acres of habitat shall be replaced. Restoration shall consist of hydroseeding with appropriate native bunchgrasses and forbs and include the following:

A. Establishment of restoration/revegetation sites shall be conducted between September 1 and November 30. Introduction of hydroseed mix and container plants shall be immediately after preparation of the restoration sites.

B. Revegetation shall be considered successful at three years if the percent cover and species diversity of the restored and/or created habitat areas are similar to percent cover and species diversity of adjacent existing habitats, as determined by quantitative testing of existing and restored and/or created habitat areas.

C. Monitoring shall be conducted for three years to ensure successful establishment of the restored areas by native grasses and forbs. If success standards are not met, remedial measures, including hydroseeding or introduction of additional container stock shall be implemented as directed by the City of San Dimas and the project biologist.

Habitat Replacement - Mixed Willow Riparian Forest and Coast Live Oak Riparian Forest

BIO2. Impacts on wetlands and/or riparian habitats shall be mitigated as part of the mitigation required for any CDFG Section 1601 Streambed Alteration Agreement and/or ACOE Permit that may be processed for future development projects. As part of the permit/agreement, a conceptual streambed/riparian related mitigation plan would need to be developed. The objective of the mitigation is to ensure no net loss of habitat values from projects. The mixed

willow riparian forest and coast live oak riparian forest are vegetation types that would be impacted by future development projects within the project area and shall require permitting. The mitigation plan shall include the following elements:

A. Responsibilities and qualifications of the personnel to implement/supervise the plan;
B. Plant material and seed mixes;
C. Site preparation and planting implementation;
D. Performance criteria;
E. Monitoring and maintenance plan;
F. Long-term preservation of the site;
G. Agency coordination; and
H. Construction document preparation.

BIO3. In addition, the native trees may also fall under the jurisdiction of the City of San Dimas Tree Ordinance. A detailed tree survey shall be completed in the impact areas prior to implementation of future development projects. The tree replacement shall consist of a minimum of two 15-gallon native tree specimens for each removal, unless approved otherwise by the City of San Dimas. Native tree mitigation programs shall include:

A. A minimum of two 15-gallon native trees shall be planted on-site as replacement for one tree removed.

B. The Landscape Architect/designer for the project shall design replacement trees into landscape plans and shall be subject to review by the City of San Dimas.

C. Planting specification shall consider the following:

- The newly planted trees shall be planted high, as much as 3/4 above the new adjacent grade.
- Amending the backfill soil with wood shavings, etc. However, it is not recommended when existing soil is high in natural organic matter with a sandy loam texture.
- In regards to the need of planting amendments and drainage systems, recommendations shall be based on soil tests of this project and approved by the City.

D. Any City approved work within the driplines of saved trees, including branch removal, shall be under the inspection of a qualified arborist.

E. Copies of the "Tree Report", the "Tree Ordinance" and the "City approved Grading Plans" shall be maintained on-site during all site construction.

Coastal Sage Scrub

BIO4. To mitigate for impacts to coastal sage scrub, the following measure shall be incorporated into any future development projects that include the removal of coastal sage scrub habitat types.

A. All cut and fill slopes, other areas disturbed by construction activities, and additional areas supporting non-native vegetation, shall be reseeded with coastal sage scrub plant species. Revegetation shall occur at a ration of 2:1. That is, for every acre of coastal sage scrub removed, two acres of habitat shall be replaced. Revegetation shall be implemented in stages. The initial stage shall begin during site grubbing and shall consist of crushing/mulching scrub, within areas to be graded, with a dozer. The crushed/mulched material along with the top four to six inches (10 to 15 cm) of topsoil shall then be removed in one operation with a loader or dozer and stockpiled nearby as directed by the project biologist. Soil stockpiles shall be stored at depths no greater than seven feet (2 m) until revegetation sites are prepared and shall be maintained free of contamination (storage depths may require adjustment based upon length of storage). Stockpiles shall be stored no longer than six months. Once a restoration site is prepared (roughened by sheep's foot or similar equipment) the stockpiled soil shall be spread to a depth of approximately one foot (30 cm). Appropriate scrub container stock shall be incorporated into the revegetation areas as outlined in the detailed mitigation/restoration plan to be developed by the project biologist. In addition, container stock consisting of native bunchgrasses shall be incorporated into the planting. The redistributed material, along with the container stock, shall be watered by a temporary irrigation system until established, as determined by the project biologist.

B. Crushed plant material and soil to be stockpiled shall be obtained from various locations on-site. Areas to be revegetated shall be determined by the project biologist based upon such factors as the configuration of the cut and/or fill slopes and proximity to areas of intact scrub communities.

C. The timing of the stockpiling of plant material and topsoil shall be dictated by the grading/construction schedule. Reintroduction of stockpiled material to revegetation sites shall be conducted between September 1 and November 30. Container stock shall be planted during the same time period.

D. Performance standards shall be developed and apply for the revegetation of coastal sage scrub. Generally these standards include 75 percent coverage by redistributed vegetative materials, seeded species, and container stock (whichever of the three or combination is used) at the end of five years. In addition, a 50 percent survival of any container stock originally planted is expected. If 50 percent survival has not been achieved, replanting with appropriate size container stock necessary to achieve this standard shall be performed.

E. Monitoring of the revegetation areas shall be conducted for five (5) years to ensure successful colonization of the restored areas by scrub species. If success standards are not met, remedial measures, including hand seeding, hydroseeding, or introduction of additional container stock shall be implemented as directed by the City and the project biologist.

Wildlife

❖ ***DEVELOPMENT WITHIN THE PROJECT AREA WOULD RESULT IN THE LOSS OF NATIVE AND NON-NATIVE VEGETATION ASSOCIATIONS AND THE WILDLIFE HABITAT THEY PROVIDE.***

Significance: Less than significant impact with mitigation.

Impact Analysis: Both native and non-native habitats within the project area are expected to provide nesting, foraging, and denning opportunities for a wide variety of wildlife species. However, the non-native habitats generally provide low quality wildlife habitat. The removal of native and non-native habitats within the potential development areas would result in the loss of small mammals, reptiles, amphibians, and other animals of slow mobility that are present within the project area. More mobile wildlife species now using the project area would be forced to move into remaining areas of open space, consequently increasing competition for available resources in those areas. This situation would result in the loss of individuals within the wildlife population that cannot successfully compete. The loss of native and non-native habitats from the project area would not result in any substantial reduction of general wildlife populations in the region because of the large area of the project area that would not be developed (approximately 2,600 acres) and the substantial amount of permanent open space adjacent to the project site. Therefore, these impacts are considered less than significant.

Mitigation Measure:

BIO5. Refer to Mitigation Measures BIO1 through BIO4.

Wildlife Movement

❖ ***FUTURE DEVELOPMENT ASSOCIATED WITH THE PROPOSED PROJECT COULD RESULT IN THE REDUCTION OF WILDLIFE MOVEMENT WITHIN THE PROJECT AREA.***

Significance: Less than significant.

Impact Analysis: The project area is expected to support local wildlife movement within the canyons and ridgeline between the Angeles National Forest and San Dimas Creek. Currently, the majority of the project area is open space. Potential development areas are located: near the upper portion of Shuler Canyon, and Shay Canyon; at the middle and the upper portion of Wildwood Canyon and Sycamore Canyon; and toward the lower portion of Ham Canyon. Development and human disturbance from future development areas would likely reduce the movement of wildlife through Wildwood Canyon, Sycamore Canyon, and Ham Canyon and concentrate wildlife movement into canyons and ridgelines outside of these areas. These impacts would be considered adverse on a local level. However, because the project area and the areas identified for potential development do not have the potential to link large areas of open space together, impacts to wildlife movement on-site are not considered regionally significant.

Mitigation Measures: No mitigation measures are required.

Special Status Biological Resources

❖ ***IMPLEMENTATION OF FUTURE DEVELOPMENT PROJECTS MAY RESULT IN IMPACTS TO SPECIAL STATUS BIOLOGICAL RESOURCES.***

Significance: Potentially significant. Mitigation incorporated on a project-by-project basis would reduce impacts to special status biological resources to less than significant levels.

Plants

Nine (9) special status plant species potentially occur in the proposed future development areas. Three (3) of these species *(Nevin's barberry, thread-leaved brodiaea,* and *San Gabriel Mountains dudleya)* are listed as threatened, endangered, or proposed for listing by the USFWS. Any impacts to these species would be considered significant. Sensitive plant surveys should be conducted for these species during future environmental evaluation of specific projects within the potential development areas to better evaluate the level of impact these resources would incur.

The project area also has the potential to support six (6) special status plant species not listed as threatened, endangered, or proposed for listing including the *slender mariposa*

lily, Plummer's mariposa lily, many-stemmed dudleya, pious daisy, Robinson's peppergrass, and *rayless ragwort.* The presence of any CNPS List 1B species on the project area may also result in significant impacts, depending on the species found, and the extent of the population on-site.

Focused surveys to determine the presence or absence of these species on any specific development site should be conducted. If no state or federally listed threatened or endangered, or if a limited number of the other lower status special status species are found, no additional mitigation may be warranted. However, should focused surveys find a state or federally listed threatened or endangered species, or a substantial population of other lower status special status plant species on-site, mitigation would need to be coordinated with the USFWS, CDFG, and/or CNPS and may include habitat preservation off-site or population relocation to off-site natural open space areas.

Wildlife

The project area contains approximately 139 acres of coastal sage scrub and grassland habitats that may support the *quino checkerspot,* a federally endangered species. Should this species occur on-site, impacts on this species would be considered potentially significant. Focused surveys should be conducted to first determine if the host plant for the species is present. If substantial populations of host plant are present, focused adult butterfly surveys should be conducted and coordination with the resource agencies when specific development plans are proposed.

Sycamore Canyon Creek, San Dimas Creek, and their associated woodland habitats provide potentially suitable habitat for the *arroyo chub, Santa Ana speckled dace, Santa Ana sucker, coast range newt, arroyo southwestern toad, California red-legged frog, mountain yellow-legged frog, southwestern pond turtle, San Bernardino mountain kingsnake,* and *two-striped garter snake.* Approximately 51.97 acres of mixed willow and southern coast live oak riparian forests are located within potential development areas. Impacts on these species, particularly those that are threatened or endangered, would be considered potentially significant and focused surveys for several of these species may be required by resource agencies when future development plans are proposed.

Sensitive reptile and amphibian species may occur in approximately 287.95 acres of upland habitat located on-site including coastal sage scrub, grasslands, oak woodland, and chaparral habitats: *large-blotched ensantina, western spadefoot toad, San Diego horned lizard, coastal western whiptail, silvery legless lizard, San Bernardino ringneck snake,* and *coast patch nose snake.* Impacts on these species would be considered adverse, but not significant, because none of these species is currently listed as threatened or endangered by state and/or federal resource agencies and suitable habitat for these species is common within the region.

A variety of sensitive bird species potentially occur within the 51.97 acres of riparian habitat within the potential development areas. However, most of these species would likely be located along San Dimas Creek. These species include *western yellow-billed cuckoo, southwestern willow flycatcher, least Bell's vireo, bank swallow, yellow warbler, yellow-breasted chat, tricolored blackbird,* and *summer tanager.* Impacts on these species would be considered potentially significant, particularly for threatened or endangered species, and focused surveys for several of these species may be required by resource agencies when future development plans are proposed.

Many sensitive bird species may also occur in 287.95 acres of upland areas of the project area, including coastal sage scrub, grasslands, oak woodland, and chaparral. These species include *loggerhead shrike, California horned lark, San Diego cactus wren, coastal California gnatcatcher, southern California rufous-crowned sparrow, Bell's sage sparrow,* and *grasshopper sparrow.* Impacts on these species would be considered potentially significant, particularly for threatened or endangered species, and focused surveys for several of these species may be required by resource agencies when future development plans are proposed.

The development of individual future projects would remove suitable foraging habitat for a variety of raptor species. Raptors that may occur on-site include *white-tailed kite, northern harrier, sharp-shinned hawk, Cooper's hawk, Swainson's hawk, ferruginous hawk, bald eagle, golden eagle, merlin, peregrine falcon, prairie falcon, burrowing owl, long-eared owl,* and *California spotted owl.* The loss of raptor foraging habitat is considered adverse, but not significant, due to the large amount of suitable foraging habitat adjacent to the potential development areas. However, any active raptor nest/burrow occurring within the potential development areas that would be impacted by project construction would be considered significant. Focused surveys for nesting/burrowing activity may be required by resource agencies when future development plans are proposed.

Approximately 291 acres of natural habitats, such as coastal sage scrub, grasslands, woodland, and chaparral, could be impacted by potential development areas. Sensitive mammal species that may occur in these habitats include the *pallid bat, Townsend's western big-eared bat, San Diego black-tailed jackrabbit, Dulzura California pocket mouse, pallid San Diego pocket mouse, Los Angeles pocket mouse, southern grasshopper mouse, San Diego desert woodrat,* and *American badger.* Impacts on these species would be considered adverse, but not significant, because none of these species are currently listed as threatened or endangered by state and/or federal resource agencies and suitable habitat for these species is common within the region. The *western least bittern* is not expected to occur on-site due to lack of suitable habitat. Therefore, impacts on this species would be considered less than significant.

Mitigation Measures:

Plants

BIO6. To fully document the potential impacts to sensitive plant species, focused surveys for the following state or federally listed threatened or endangered plant species shall be conducted during the optimal survey period prior to any development approvals from the City for any project.

Braunton's milkvetch
Nevin's barberry
Thread-leaved brodiaea

In addition, focused surveys may also be warranted for sensitive species that are not currently classified as endangered, threatened, or proposed for listing, but which may be listed in the future or would be of concern to state and federal resource agencies during future environmental review processes for projects. The following species may require focus surveys if specific project locations contain appropriate habitat:

Slender Mariposa lily
Plummer's Mariposa lily
San Gabriel Mountains dudleya
Many-Stemmed dudleya
Pious daisy
Robinson's peppergrass
Rayless ragwort

Focused surveys shall be conducted using the USFWS' survey protocol. In addition, surveys for federally listed species shall be conducted by qualified biologists that possess valid section 10(a)(1)(a) permits issued by USFWS.

Should focused surveys find a state or federally listed threatened or endangered species, or a substantial population of other lower status special status plant species on-site, mitigation would need to be coordinated with the USFWS, CDFG, and/or CNPS and may include habitat preservation off-site or population relocation to off-site natural open space areas.

Wildlife

BIO7. To fully document the potential impacts to sensitive wildlife species, focused surveys for the following state or federally listed threatened or endangered wildlife species shall be conducted during the optimal survey period prior to any development approvals from the City for any project.

Quino checkerspot butterfly
Santa Ana sucker
Arroyo southwestern toad
Least Bell's vireo
Bank swallow (nesting)
Coastal California gnatcatcher

California red-legged frog *Raptor (nesting)*
Southwestern willow flycatcher

In addition, focused surveys may also be warranted for sensitive species that are not currently classified as endangered, threatened, or proposed for listing, but which may be listed in the future or would be of concern to state and federal resource agencies during future environmental review processes for projects. The following species may require focus surveys if future project locations contain appropriate habitat:

Arroyo chub	*San Bernardino mountain kingsnake*	*Grasshopper sparrow*
Santa Ana speckled dace	*Coast patchnose snake*	*Tricolored blackbird*
Coast range newt	*Two-striped garter snake*	*Pallid bat*
Large-blotched ensantina	*Loggerhead shrike*	*Townsend's western big-eared bat*
Western spadefoot	*California horned lark*	*San Diego black-tailed jackrabbit*
Mountain yellow-legged frog	*San Diego cactus wren*	*Dulzura California pocket mouse*
Southwestern pond turtle	*Yellow warbler*	*Pallid San Diego pocket mouse*
San Diego horned lizard	*Yellow-breasted chat*	*Los Angeles pocket mouse*
Coastal western whiptail	*Summer tanager*	*San Diego desert woodrat*
Silvery legless lizard	*Southern California rufous-crowned sparrow*	*Southern grasshopper mouse*
San Bernardino ring-necked snake	*Bell's sage sparrow*	*American badger*

Focused surveys shall be conducted using the USFWS' survey protocol. In addition, surveys for federally listed species shall be con/ducted by qualified biologists that possess valid section 10(a)(1)(a) permits issued by USFWS.

Should surveys find a state or federally listed threatened or endangered species, or a substantial population of the other lower status special status wildlife species on-site, mitigation shall need to be coordinated with the USFWS and CDFG. Mitigation may include habitat preservation off-site or habitat replacement through enhancement or restoration of on-site or off-site resources.

BIO8. Prior to approval of projects, a Resources Management Plan (RMP) shall be submitted to and approved by the City of San Dimas. The RMP shall contain procedures and performance standards that must be executed to protect, replace, or manage biological resources affected or potentially affected by construction and occupation of the development. The RMP shall contain a

summary of mitigation milestones that shall identify the schedule of completion, and the party or parties responsible for their implementation.

CUMULATIVE IMPACTS

❖ ***DEVELOPMENT OF THE PROPOSED PROJECT, AS WELL AS BUILDOUT OF THE CITY'S GENERAL PLAN, WOULD RESULT IN THE CUMULATIVE LOSS OF OPEN SPACE.***

Significance: Potentially significant, however, cumulative development is mitigated on a project-by-project basis.

Impact Analysis: Cumulative development within the northern portion of San Dimas would have the potential to adversely affect biological resources. Regional loss of native areas is considered a significant issue. Future development within the area would be required to mitigated potential impacts to biological resources to less than significant levels on a project-by-project basis.

Mitigation Measures: No mitigation measures are required.

UNAVOIDABLE SIGNIFICANT IMPACTS

No unavoidable significant impacts with respect to biological resources would occur with implementation of the proposed project.

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5.9 CULTURAL RESOURCES

The purpose of this Section is to identify cultural resources which may exist on the property and to assess the significance of such resources. Mitigation measures are also recommended to preserve and/or protect the resources. This Section is primarily based on information contained in the *Paleontological Resources Assessment of the San Dimas Study Area*, dated January 8, 1999 and *Archaeology Resources Assessment for the San Dimas Study Area*, dated February 1, 1999, prepared by RMW Paleo Associates, Inc. (refer to Appendix 14.5 and 14.6, *Paleontological Resources Study* and *Cultural Resources Study*, respectively).

EXISTING CONDITIONS

Paleontological Resources

The project area is located within the San Gabriel Mountain Range, a part of the Transverse Range Geologic Province, which extends west to east from Point Conception to Riverside County. Within these mountains are a series of marine and non-marine sedimentary rocks, volcanic, and granitic rocks.

The youngest potentially fossiliferous rocks exposed within the project area are Pleistocene age sedimentary rocks (Qw, Qof, and Qod) (refer to Exhibit 5.6-3, *Geologic Map*, in Section 5.6). These rocks are the erosional products of weathering of the San Gabriel Mountains during the past 1.8 million years and typically range from 500,000 to 10,000 years old within the Los Angeles Basin. Fossils of various large and small mammals have been found within these and similar deposits at several locations in Los Angeles County. Remains of bison, horses, elephants and other large and small ice age animals have been recovered from Pleistocene age deposits near Pasadena to the west of the project area. Pleistocene age deposits are present along the southern boundary of the project area.

In the southwestern corner of the project area are exposures of Miocene age marine sedimentary deposits of the Puente Formation. The Puente Formation was deposited in a marine basin the extended across much of Riverside, San Bernardino, Orange, and Los Angeles Counties during the Middle to Late Miocene (14 to 15 million years ago). Water depths within the basin varied greatly, ranging from a few hundred feet to several thousand feet. The Puente Formation is well known for its fossil fish (Fritzsche 1980) in exposures located south of the project area. Present within this formation are fossils of marine mammals, whales and see lions (Barnes et al.). In addition, bird and shark remains are also known within exposures of this formation, south of the project area. A single tooth of an extinct horse was collected from the Puente Formation near the City of Corona (Stock 1928).

The majority of the project area is underlain by igneous rocks ranging in age from the Miocene (15 +million years old) to the Cretaceous (145 million years ago).

These rocks represent both intrusive and extrusive igneous rocks. Intrusive igneous rock form deep within the Earth and solidify from a molten magma. These include the various Cretaceous age rock units. Extrusive rocks are those associated with volcanic eruptions. The Glendora Volcanics are a series of lava flows that cooled at or near the surface. Biotite, dacite porphryry exposures in Dalton Canyon are probably igneous bodies associated with volcanoes that erupted leaving the Glendora Volcanics. There are no records of fossils from biotite and dacite porphryry deposits anywhere in the Los Angeles Basin and the igneous origin makes it unlikely that any fossils would be discovered within these deposits on-site.

The oldest rock unit within the project area is a Jurassic age (150± million years ago) gneiss, which are considered some of the oldest rocks in all of coastal southern California. This metamorphic rock was originally deposited as another rock type, probably a sedimentary unit such as sandstone or shale, then, as a result of the heat and pressure associated with the intrusion of the Cretaceous igneous rocks, the minerals were deformed and recombined to form the gneiss. The original rocks may have contained fossils but they were probably destroyed by the metamorphism. Fossils have been found in similar, though less metamorphosed, deposits in San Diego County.

Also present in the project area are superficial deposits that include landslide and Recent alluvial deposits. The landslide deposits have the same potential for the discovery of fossils as their parent rock unit. Landslide deposits are present in the northwestern corner of the project area and in a small area near the western boundary. Recent alluvial deposits are less than 10,000 years old and are generally too young geologically to contain fossil remains. These deposits are typically found covering the floors of canyons, such as Sycamore and Ham Canyons.

Cultural Resources

Ethnographic

The project area was inhabited by a Native American group ethnographically known as the Gabrielino, which identifies those people who were under the control of the Spanish Mission San Gabriel.

The Gabrielino arrived in the Los Angeles basin around 500 B.C.E. as part of the Shoshonean migration from the Great Basin region. Large, permanent villages were established in the fertile lowlands along rivers and streams, and in sheltered areas along the coast. Eventually, Gabrielino territory encompassed the greater Los Angeles basin, coastal regions from Topanga Canyon in the north to Aliso Creek in the south, and the islands of San Clemente, San Nicholas and Santa Catalina. The population may have numbered as many as 5,000 individuals in their peak in the precontact period.

The subsistence economy of the Gabrielino was one of hunting and gathering. The surrounding environment was rich and varied, and the natives were able to exploit mountains, foothills, valleys, deserts and coasts.

Results of Records Search

The records search revealed that only a very small portion of the project area has been examined for cultural resources in the past. Five reconnaissance reports, totaling 25 acres of examined surface area, have been produced for the project area: Driggers 1988, McIntyre 1988, Metcalf 1978, and Whelan 1993 and 1995. This 25 acres is less then one of percent of the approximately 3,000-acre project area. LSA Associates recently conducted field examinations, which are noted in the Northern Foothills Development and Infrastructure Study, November 1998, but the study makes no mention of what areas were examined and who conducted the examination.

Two archaeological sites, one prehistoric and one historic, have been reported within the project area. The prehistoric site (CA-LAN-825) has been plotted on Information Center maps, but virtually no additional information exists for the site. The site record is blank, except for a reference to the site being previously designated as CA-LAN-358. There is no additional information as to who recorded the site, when the site was recorded or what reconnaissance effort resulted in the discovery of the site. The historic site (CA-LAN-2054H), which is known as Johnstone Peak Lookout, was recorded by Neil Metcalf. The date of recordation of this site is dated January 19, 1992; however references are made of an inventory report titled *Johnstone Peak Electronic Site, Los Angeles County*, dated 1978.

The Johnstone Peak Lookout was constructed in 1938 to assist in fire suppression efforts. The lookout tower was later converted, internally and externally, to serve as an electronic facility. The lookout was removed from its original site by the Forest Service in 1995, and put on permanent display at the Los Angeles County Fairgrounds in Pomona.[1] A memorial for William Arthur Johnstone, from whom Johnstone Peak is named, consisting of a plaque attached to a rock is dated June 27,1940 and remains at the site.

LSA Associates reported that two horizontal "wells" or tunnels exist at the upper reaches of Sycamore Canyon.[2] According to property records, such tunnels were constructed prior to 1887 to tap water from the hillside. The lower tunnel is approximately five feet in height by three feet in width at the entrance and was observed to extend several yards into the mountain. The several hundred feet of the

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1 Source: Page 2-40, *Northern Foothills Development and Infrastructure Study*, prepared by LSA Associates, November 1998.

2 Source: *Northern Foothills Development and Infrastructure Study*, prepared by LSA Associates, November 1998.

tunnel are reinforced, but the balance of the tunnel that could be observed has no reinforcement. LSA Associates researchers did not observe the second tunnel closely, due to the steep slopes and dense vegetation. Steel pipe connects the two tunnels and conveys water by gravity flow to a storage tank several hundred feet south of the tunnel.[3] It is not known if the storage tank mentioned above still exists today.

IMPACTS AND MITIGATION MEASURES

Significance Criteria

A project will normally have a significant adverse impact on cultural resources if it will disrupt or adversely affect a prehistoric or historic archaeological site or a property of historic or cultural significance to a community or ethnic or social group; or a paleontological site except as a part of a scientific study.

Appendix K of the CEQA Guidelines specifically addresses the threshold criteria for archaeological impacts. Appendix K states that "Public Agencies should seek to avoid damaging effects on an archaeological resource whenever feasible. If avoidance is not feasible, the importance of the site shall be evaluated using the criteria outlined in Section III (of Appendix K)." Appendix K also provides guidelines to avoid damage to archaeological resources.

Paleontological Resources

❖ ***GRADING AND EXCAVATION ACTIVITIES ASSOCIATED WITH FUTURE DEVELOPMENT PROJECTS MAY RESULT IN IMPACTS TO UNDOCUMENTED PALEONTOLOGICAL RESOURCES.***

Significance: Potentially significant. Mitigation measures that include inspections and monitoring would reduce the significance of impacts to less than significant levels.

Impact Analysis: The Puente Formation has a history of producing significant fossils in most areas where it is exposed. It should be noted that the potential for discovery is a measure of the likelihood for the discovery of fossils during excavations into the Puente and Pleistocene rock units. Potential for discovery does not take into consideration the significance of individual fossils present within the project area, because it is impossible to accurately predict what individual fossils would be discovered. The significance of a fossil can only be determined after it is collected and analyzed. A high potential indicates that fossils are likely to be discovered during the development of the project. A moderate potential suggests that fossils may be found during development. The extent of the impacts is directly related to the amount of

[3] Source: Page 2-41, *Northern Foothills Development and Infrastructure Study*, prepared by LSA Associates, November 1998.

excavation which occurs . The more excavation there is, the more likely there would be a significant impact to paleontological resources.

Pleistocene alluvial deposits exposed within the project area have a history of producing significant fossil remains at numerous locations in Los Angeles County. The history of fossil production indicates a moderate to high potential for the discovery of significant fossils. The areas underlain by igneous and metamorphic rocks, however, does not have the potential to contain significant fossils.

Grading operations associated with individual development projects within the Puente Formation and Pleistocene alluvial deposits may result in the destruction of fossils, unless proper mitigation measures are undertaken. The destruction of these fossils would represent a significant adverse impact on the region's paleontological resources, however, with implementation of proper mitigation measures, the significance of the impacts are reduced to less than significant levels.

Mitigation Measures: The following mitigation measures shall be applied only in areas underlain by the Puente Formation and Pleistocene age deposits (refer to Exhibit 5.6-3, *Geologic Map*). No additional paleontological resource mitigation on other areas of the project site would be required.

CR1. Prior to grading in areas of the Puente Formation and Pleistocene age deposits, the applicant(s) shall retain a qualified paleontologist to perform field surveys of individual development sites, in order to determine if significant fossils are exposed in any area of development.

CR2. The applicant(s) shall retain a qualified paleontologist to perform on-site inspections of all construction excavations and, if necessary, salvage exposed fossils. The paleontologist shall have the authority to divert or redirect grading in the area(s) of an exposed fossil to facilitate evaluation and, if necessary, salvage fossils. Grading monitoring in these rock units shall initially be on a full time basis (i.e., all major excavations shall be monitored). If it is determined that an abundance of fossils is not expected or if subsurface conditions are different than anticipated, the duration of monitoring may be decreased in accordance with good paleontological practices.

CR3. Due to the small nature of some fossils present within the Puente Formation and Pleistocene deposits, matrix samples shall be collected for processing through fine mesh screens during salvaging activities.

CR4. Upon completion of all laboratory and field work, all final mitigation reports shall be filed with the repository and the City of San Dimas. Monthly progress reports shall be filed with the applicant(s) and available to the City of San Dimas.

CR5. Collected paleontological resources shall be donated to a public, nonprofit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County.

Cultural Resources

❖ ***GRADING AND EXCAVATION ACTIVITIES ASSOCIATED WITH FUTURE DEVELOPMENT PROJECTS MAY RESULT IN IMPACTS TO CULTURAL RESOURCES.***

Significance: Potentially significant. Mitigation measures that include site-specific surveys would reduce the significance of impacts to less than significant levels.

Impact Analysis: As previously stated, less than one percent (25 acres) of the approximately 3,000 acres has been examined for cultural resources by qualified archaeologists. Thus, the extent of cultural resources in the project area has not been thoroughly researched and analyzed.

Future developments could impact archaeological site CA-LAN-825. These developments would be required to evaluate the condition and importance of the sites, which could include test excavation and archival research. In addition, future developments have the potential to impact the water tunnels, steel pipe and storage tank. Developments impacting these resources would be required to formally record the site and conduct an evaluation of the resources.

Grading operations associated with future development projects may result in the destruction of resources, unless proper mitigation measures are undertaken. The destruction of these resources would represent a significant adverse impact on the region's cultural resources, however, with the implementation of proper mitigation measures, the significance of the impacts are reduced to less than significant levels.

Mitigation Measures:

CR6. Individual property owners/applicants shall be responsible for cultural resources studies specific to each individual parcel to be developed. The owner/applicant shall be responsible for implementing mitigation measures to properly manage any cultural resources discovered.

Site-specific cultural resources studies must include the following: a) completion of a literature review of the particular project area; b) consultation with the appropriate Native American group, if required; c) reconnaissance of the project area; and 4) mitigative treatment of any cultural resources discovered.

CR7. Any projects with the potential to impact archaeological site CA-LAN-825 shall evaluate their condition and importance through text excavation and archival research.

CR8. Archaeological site CA-LAN-825 must be relocated and a site record supplement generated for the site. Evaluation of the site may necessitate further mitigative treatment.

CR9. The tunnels, steel pipe and storage tank described by LSA Associates (1998: 2-41) shall be formally recorded and evaluated by the proponent of any project with the potential to disturb them. Further mitigative treatment may be necessary.

CUMULATIVE IMPACTS

❖ ***CUMULATIVE DEVELOPMENT MAY IMPACT IMPORTANT CULTURAL RESOURCES IN THE ABSENCE OF ANY MITIGATION.***

Significance: Potentially significant. Evaluated and mitigated on a project-by-project basis.

Impact Analysis: Potential impacts would be site specific and an evaluation of potential impacts would be conducted on a project-by-project basis. This is especially true of those developments located in areas considered to a high sensitivity for cultural (archaeological, paleontological, and historical) resources. Each incremental development is required to comply with all applicable State and Federal regulations concerning preservation, salvage, or handling of cultural resources. Given this, potential cumulative effects upon cultural resources would not be significant.

Mitigation Measures: No mitigation measures are required.

UNAVOIDABLE SIGNIFICANT IMPACTS

With imposition of the recommended mitigation measures, no unavoidable significant impacts would occur with implementation of the proposed project.

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5.10 PUBLIC SERVICES AND UTILITIES

The purpose of this Section is to identify the current public services and utilities which serve the project area and analyze potential project-generated impacts to these services. Information within the is Section is based on the *Northern Foothills Development and Infrastructure Study*, prepared by LSA Associates and correspondence from public services and agencies (refer to Appendix 14.2, *Correspondence*).

EXISTING CONDITIONS

Fire Service

Fire protection services for the Northern Foothills area of San Dimas are provided through a joint agreement between the U.S. Forest Service and the Los Angeles County Fire Department (LACFD). Each of these agencies would respond in the event of a wildland fires within the project area.

U.S. Forest Service

The San Dimas foothills area is currently served by the San Dimas Forest Service Ranger Station, which is located above San Dimas Reservoir. This station has one fire truck on location, which is the first response vehicle to fires within the project area. In the event of a major fire, or during high-risk periods, additional resources would be automatically sent to the area to augment the local resources.

A part-time fire company is stationed at the San Dimas Station during the most dangerous times of the year for fire. The San Dimas Station has one four-wheel-drive truck with a crew of three fire fighters to operate the equipment. Located at the Big Dalton Station, just outside the project area, is a full-time crew with equipment responsible for fire suppression within the area.

Los Angeles County Fire Department

The Northern Foothills project area is currently served by County Fire Station Number 86, which is located at 520 South Amelia, in the City of Glendora. This station currently has seven full-time firefighters. The equipment serving this station includes one engine (with three firefighters) and one ladder truck (with four firefighters). In the event of a fire in the San Dimas foothills, Fire Station 86 is the first to respond, with assistance from the two engine companies at Fire Station Number 64 located at 164 Walnut Avenue in the City of San Dimas. In the event of a call for rescue, the paramedic unit from Station 64 would respond with one or both of the engine companies from Station 86.

Fire Hazards

The Northern Foothills area is substantially more susceptible to fires than other areas of the San Dimas, due to the location of fire-prone vegetation, less convenient access by fire-fighting equipment, steep topography, and seasonal conditions that exacerbate fire hazard conditions. In response to this threat, hillside fire maintenance and protection is provided to the City of San Dimas through a joint agreement with the Los Angeles County Fire Department (LACFD), the Los Angeles County Department of Forester and Fire Warden (CDFFW), and the U.S. Forest Service. As development encroaches further into the hillsides toward the Angeles National Forest, the threat of fire caused by the proximity of people to wildland areas increases. Apart from the obvious detrimental effects of wildland fires in the northern portion of the City, secondary impacts include other fires created from airborne ash, allocation of suburban fire services to outlying fringe areas, potential blockage of transportation and emergency evacuation routes, and severe erosion during the subsequent wet season.

The earliest recorded major fire in the San Dimas foothills occurred in 1896. In 1919, a fire occurred burning the entire Experimental Forest. The next most recent major fire was the Johnstone Fire of 1960. This fire burned a total of over 20,000 acres, with approximately 3,200 acres burned within the project area. A fire in 1981 burned approximately 600 acres of the project area, and was caused by an incendiary device.

The most recent data for fire history in this area covers the years 1985-1989, with 1990-1995 data currently being collected and mapped. The most recent data show a 100- to 299.9-acre fire in 1989, of which approximately 150 acres were within the boundaries of the project area and was caused by children playing with matches. The data on the fire history of the Northern Foothills area demonstrate that given the natural chaparral-covered hillsides, this area is prone to regular fires. It is impossible to accurately predict the exact fire cycle, such as a major fire every 10, 20, 40, or 100 years. However, it is expected that the cycle of major fires will continue, and that the area will be subject to episodes of fire on an ongoing basis.

The project area is located within an area described by the Forester and Fire Warden as Fire Zone 4, which is a Very High Fire Hazard Severity Zone (VHFHSZ). The Fire Department has specific requirements, based upon Fire Codes and Ordinances, regarding development within the VHFHSZ.

Police Service

The Los Angeles County Sheriff's Department provides law enforcement service to an approximately 190 square mile area, and a population of approximately 84,000 persons. Currently, the Los Angeles County Sheriff's Department, San Dimas Station, provides law enforcement services to the City of San Dimas under a service contract. The San Dimas Station is located a 122 North San Dimas Avenue and is located approximately three (3) miles southwest of the project area. In addition to providing law enforcement services to the City of San Dimas, the San Dimas Station also provides services to the unincorporated county areas north of the San Bernardino Freeway (I-10),

including the Cities of Covina, Azusa, Glendora, La Verne, and Claremont, as well as the San Gabriel Mountains and the Angeles National Forest area.

The Los Angeles County Sheriff's Department fields three (3) patrol shifts within the City of San Dimas, which includes twenty-three (23) sworn peace officers assigned to work patrol within the city limits. Two (2) civilian community officers handle report calls and parking enforcement. Presently, routine response times average fifteen (15) minutes, and emergency response times are less than four (4) minutes within the City of San Dimas.

Water Resources and Facilities

There are currently nine water tanks, one reservoir, and one groundwater well within the Northern Foothills project area. These facilities are owned and operated by several different agencies, including the Southern California Water Company, U.S. Forest Service, and the County of Los Angeles.

Southern California Water Company

The Southern California Water Company (SCWC) is responsible for serving water to privately owned lands within the Northern Foothills project area. The SCWC currently owns and operates two water tanks and one groundwater well within the project area. One of the water tanks is the Terrebonne tank, set at an elevation of 1,645 feet above mean sea level (msl), with a capacity of 300,000 gallons. This tank was designed and constructed to serve only the "Terrebonne Tract" of homes. The other water tank is the Eaglecliff tank, which is set at an elevation of 1,255 feet above msl, and has a capacity of 1.5 million gallons. This tank was designed to serve the adjacent residential areas down to and beyond the San Dimas Wash and is also operating at capacity.

The one groundwater well (Malone Well) within the project area is located adjacent to Whitebluff Drive. This well is used to augment the Eaglecliff water tank, and aides in serving the area. The SCWC currently has an 8-inch water main that ends at the MWD site along Sycamore Canyon Road.

As of 1998, water demand for the City of San Dimas was approximately 12,937 acre-feet. Average daily demand is approximately 11.5 million gallons per day (gpd) and maximum day demand is approximately 22.3 million gpd.

U.S. Forest Service Facilities

The U.S. Forest Service currently owns and operates two water tanks within the foothills area. These tanks have a capacity of 10,000 gallons each, and are primarily used for wildland fire suppression activities. Both of the tanks are located within the Angeles National Forest, one adjacent to the Ranger facility at Johnstone Peak set at

approximately 3,160 feet above msl, and one at the intersection of Bluebird Motorway and Sycamore Flats Motorway, constructed at approximately 2,860 feet above msl.

Los Angeles County

Los Angeles County maintains one water tank to serve Camp Glen Rockey. The tank, which is set at an elevation of 1,450 feet above msl, is not designed to serve any lands other than the Camp facility.

Other Private Water Facilities

There are several other water storage tanks located within the project area that are private or used exclusively to support a single facility. Two water tanks are located directly north of the MWD site along Sycamore Canyon Road, within the Sycamore Canyon Boarding and Training Stables. A third water tank is situated across Sycamore Canyon Road from the MWD facility. The fourth tank is set along Wildwood Motorway adjacent to the City of Glendora. This tank is set at an elevation of approximately 1,320 feet above msl, and serves the equestrian center and adjacent City of Glendora residential areas.

Shay Reservoir is located within the boundary of the future Horsethief Canyon Park at an elevation of 1,630 feet. This facility is empty and has been abandoned. The reservoir is constructed of formed and poured concrete with a gable roof structure covered with corrugated tin. Conversations with local property owners indicated that the reservoir was constructed as a WPA project to serve the surrounding area.

Groundwater

Portions of the lower foothills of the project area are within the Foothill Groundwater Basin, which extends only into the areas of rolling hills, as the mountainous portions do not have readily accessible groundwater supplies. Groundwater occurs at 900 to 1,200 feet below ground surface (bgs).[1] Two water tunnels exist in the upper reaches of Sycamore Canyon and currently convey water via steel pipes along the west slope of Sycamore Canyon. Water from this system is currently not used for domestic purposes.

Reservoirs and groundwater wells are located at the addresses indicated in Table 5.10-1, *Existing Reservoirs and Groundwater Wells*, below. The groundwater wells listed in Table 5.10-1 accounted for approximately 4,855.6 acre-feet of water in 1998.

[1] Source: County of Los Angeles, Department of Public Works, *1993-1994 Hydrologic Report.*

TABLE 5.10-1
EXISTING RESERVOIRS AND GROUNDWATER WELLS

Well Name	Street Address	Reservoir Name	Street Address	Reservoir Capacity
Artesia #2	713 E. Foothill Boulevard, San Dimas	Baseline	709 E. Baseline Road, San Dimas	40,000 gal
Artesia #3	1127 N. San Dimas Canyon Road, San Dimas	Eaglecliff	1947 Fernridge Drive, San Dimas	1,500,000 gal
Baseline #3	709 E. Baseline Road, San Dimas	Highway	715 E. Foothill Boulevard, San Dimas	214,000 gal
Baseline #4	636 E. Baseline Road, San Dimas	Terrebonne	1532 N. Terrebonne Avenue, San Dimas	257,000 gal
City Well	2180 N. San Dimas Canyon Road, San Dimas			
Highway #1	713 E. Foothill, San Dimas			
Malone #1	2085 N. San Dimas Canyon Road, San Dimas			
Malone #2	2083 N. San Dimas Canyon Road, San Dimas			

Source: Southern California Water Company, February 1, 1999.

Wastewater

The City of San Dimas owns, and the Los Angeles County Department of Public Works Consolidated Sewer Maintenance District (CSMD) maintains, the local sanitary sewers within the project area. The City of San Dimas is located within the jurisdictional boundary of Sanitation District 22. Local collector sewer lines, which are tributary to the District's trunk network, are operated and maintained by the Los Angeles County Department of Public Works. Wastewater originating from San Dimas is processed at the San Jose Creek Water Reclamation Plant (WRP) located adjacent to the City of Industry. The San Jose Creek WRP has a design capacity of 100 million gallons per day (mgd) and currently processes an average flow of 89.5 mgd. Wastewater flows that exceed the capacity of the San Jose Creek WRP, and all sludge, are diverted to and treated at the Joint Water Pollution Control Plant (JWPCP) located in the City of Carson. These facilities have been interconnected to form a regional treatment system.

The nearest Districts' trunk sewers are the Sunflower Trunk Sewer located in Base Line Road between San Dimas Avenue and San Dimas Canyon Road, and the Lone Hill Trunk Sewer located in Amelia Avenue at Base Line Road. The 12-inch diameter sunflower Trunk Sewer has a peak capacity of 2.5 million gallons per day (mgd) and conveyed a peak flow of 0.2 mgd when last measured in 1996. The 8-inch diameter

Lone Hill Trunk Sewer has a peak capacity of 0.6 mgd and conveyed a peak flow of 0.05 mgd when last measured in 1996.

Existing development within the Northern Foothills project area is currently being served with sewer service, including the homes within Terrebonne, Camp Glenn Rockey, and the other developed commercial and residential areas. Because existing development is limited to the lower portions of the project area, sewer services have not been extended into the middle or upper portions of the foothills, nor does the City currently have plans to do so.

Electricity

The City of San Dimas is within the service area of the Southern California Edison Company (SCE). Currently, SCE electrical facilities within the project area consist of 12kV underground and above ground electrical lines. Existing electrical facilities within the vicinity of the Terebonne development are placed underground. Above ground electrical lines are located along San Dimas and Sycamore Canyon Roads within the project area. Additional above ground electrical lines lead from the southern portion of the project area and traverse the hillside to the repeater station located on Johnstone Peak.

Natural Gas

The City of San Dimas is within the service area of the Southern California Gas Company. Existing service lines are located in the developed portions of the project area.

Solid Waste

Solid waste collection and disposal is handled by the San Dimas Disposal Company, which is franchised by the City of San Dimas to haul and dispose of all residential and commercial refuse within the City. The waste is transported approximately four (4) miles to Spadra Landfill in the City of Pomona. The landfill is operated by the County Sanitation Districts of Los Angeles. The Spadra Landfill is anticipated to close in approximately mid-1999. The next closest landfill operated by the Sanitation Districts is the Puente Hills Landfill. Currently both landfills close early on a regular basis due to permit-imposed tonnage restrictions.

Schools

The project area is located within the jurisdictional boundaries of the Bonita Unified School District (BUSD). The BUSD encompass the City of San Dimas and the western portion of the City of La Verne, and provides educational facilities for K-12 students. No school facilities currently exist within the project area.

The schools most likely to serve the project area include Oak Mesa Elementary, Allen Avenue Elementary, La Verne Heights Elementary, Ramona Middle School, Bonita High School and San Dimas High School.

According to the BUSD, the enrollment in most classrooms has reached the maximum number of students allowed by law, especially in the kindergarten through third grade classrooms as a result of the class size reduction limitation of 20 students per teacher.[2]

Recreational Facilities

Within the City of San Dimas, there is a total of 14 City-operated recreational facilities, including 12 parks, a Swim and Racquet Club and the Sportsplex. The three community facilities include: Sportsplex, Horsethief Canyon Park and the Swim and Racquet Club. The 11 neighborhood facilities include: Kiwanis Korner, Ladera Sera Park, Loma Vista Park, Lone Hill Park, Merchant Park, Pioneer Park, Rhoades Park, Terrebonne Park, Via Verde Park, Civic Center Park and Briggs Point. In addition, there are two County regional parks within the City limits: Bonelli Park and San Dimas Canyon Community Regional Park.

Recreational facilities located within the Northern Foothills project area include: Horsethief Canyon Park, San Dimas Canyon Community Regional Park, San Dimas Canyon Golf Course and Terrebonne Park.

The project area includes the San Dimas Canyon Community Regional Park, which is a vital natural area and recreational resource to the surrounding communities. This park is approximately 137 acres and consists of wooded picnic areas, rustic outdoor cooking facilities, comfort stations, camping for youth groups, a play area, nature trails, a ball diamond, a service yard and parking. There is also a nature museum where rescued animals native to the area can be studied and viewed.

Trails

Three types of trails have been developed in the City of San Dimas: 1) equestrian, 2) bicycle and 3) hiking. Within the Northern Foothills project area, City and County equestrian trails, County hiking trail and County bicycle route exist along San Dimas Canyon Road. There is a City equestrian trail located in the southern portion of the project area, which parallels Foothill Boulevard and connects with the San Dimas Canyon Golf Course and San Dimas Creek. In addition, informal equestrian trails exist throughout the project area on private property.

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[2] Source: Communication from Michele McClowry, Assistant Superintendent, Business Services, Bonita Unified School District dated January 25, 1999.

Communications

Telephone service in the City of San Dimas is provided by General Telephone (GTE). Facilities within the City consist of aerial, buried and underground or a combination of any of the different types. GTE has existing aerial and underground facilities within the project area. Cable television service is provided by Century Communications.

IMPACTS AND MITIGATION MEASURES

Significance Criteria

A project will normally have a significant adverse impact on utilities if it results in any of the following:

- interfere with emergency response plans or emergency evacuation plans;
- breach published national, state or local standards related to solid waste or litter control;
- use fuel, water or energy in a wasteful manner;
- encourage activities which result in the use of large amounts of fuel, water or energy; or
- extend a sewer trunk line with capacity to serve new development.

In addition, any development that would require a substantial modification or upgrade of existing infrastructure will have a significant impact on the environment.

Cost of Public Services

In addition to the risks associated with hillside development, the costs, both public and private, of hillside development can be substantial. Hillside development usually calls for high initial expenditures for improvements such as roads and utilities, and can commit a municipality to maintenance costs far in excess of those common to flat land developments. The construction of roads on steep slopes often calls for substantial grading, extra-wide rights-of-way to accommodate road slopes, retaining walls, and steeply sloping embankments, which can also require expensive long-term maintenance.

Because of the typically low densities present in hillside developments, the per unit cost of utilities is generally higher than for flat land subdivisions. In addition, as development moves up a hillside to higher elevations, it becomes increasingly more difficult and expensive to provide water storage facilities that are at an appropriate elevation to maintain adequate service pressures.[3] In addition, simple activities, such

[3] Typically, a grade differential of 100 feet is required between water storage facilities and the highest building being served in order to provide adequate service pressure. In hillside situations, pumping to maintain service pressures, as might be accomplished in a large valley area, is generally not cost effective.

as trash pickup, are often more expensive in hillside areas due to low densities and the increased time it takes for trash trucks to move along steep roadways.

NORTHERN FOOTHILLS IMPLEMENTATION PROGRAM

Section 5 of the *Northern Foothills Development and Infrastructure Study*, prepared by LSA Associates, includes a section on visual intrusiveness of new development in the project area. The following text has been excerpted from the study and includes both the guiding principle with regard to infrastructure planning, finance and construction.

Infrastructure Planning, Financing, and Construction

General Principle

It is the ultimate responsibility of individual developers (including construction of a single-family dwelling on an existing lot of record) to define the infrastructure needed to serve their project, and to finance and construct needed roadway, water, sewage disposal, and utility facilities as part of their projects.

Implementing Policies and Actions

1. *The City shall encourage landowners within development feasibility zones to work together to cooperatively plan for, finance, and construct backbone infrastructure to serve each development feasibility zone.*

    A. *Establishment of assessment districts to finance the capital costs of providing required infrastructure will be considered by the City on a case-by-case basis where the majority of landowners within a development feasibility zone have agreed to work together toward infrastructure planning and financing, and where establishment of such an assessment district is essential to the economic feasibility of development. The use of assessment districts to fund maintenance of community facilities is not appropriate within the Northern Foothills.*

2. *Provide for alternative infrastructure in areas where municipal systems cannot reasonably be extended.*

    A. *Within areas outside of development feasibility zones, the use of on-site wells and water storage will be considered where adequate flow and storage capacity for daily, peak day, peak hour, and minimum fire protection needs can be provided.*

Where such on-site well and water storage is permitted, the owner whose land is so served will be required to provide adequate assurance that the well and storage facility will be kept properly maintained at all times. In addition, such landowners will be required to record a deed restriction that prohibits further subdivision of the property, and provides an acknowledgment of this special circumstance. Such owners will also be required to indemnify the City or any other service provider against any liability regarding water service and availability of fire flow.

B. *Either municipal sewage collection or on-site sewage disposal shall be available for each development, including construction of a single family house on a lot of record. If municipal sewage collection is not available, and if on-site sewage disposal cannot be provided in accordance with applicable health regulations, construction of a permanent habitation shall not be permitted. The General Plan development potential of such a parcel may, however, be used for purposes of transfer of development rights.*

Visual Intrusiveness of New Development

General Principle

Steep hillside areas, such as those existing within the Northern Foothills Area are inherently unstable platforms for development. As a result, the priority between development and preserving natural landforms needs to be given to preserving natural landforms in order to recognize and live within the limits placed by natural environmental constraints, protect public health and safety from the potential damaging effect of hillside alteration, and to contribute to the open space character of the area.

Implementing Policies and Actions

1. *The visual intrusiveness of new development shall be minimized. Rather than relying on substantial landform modification to create artificial building pads, new development shall be designed to fit quietly into the natural character of the area.*

   q. *Overhead utilities (e.g., electrical, telephone, etc.) shall only be permitted under the following circumstances:*

      - *within the right-of-way of roadways connecting development areas;*

- *to serve development of a single dwelling unit on an existing lot of record; and*

- *within the rights-of-way of roadways where all lots are 5 acres in size or greater.*

In cases where aboveground utilities are permitted within the right-of-way of a roadway, connections to individual dwellings shall be underground. Utilities shall continue to be underground within subdivisions and parcel maps along roadways serving parcels smaller than 5 acres, as currently required. Where overhead utilities are permitted, their adverse visual impact on surrounding properties is to be mitigated through sensitive placement. Clear cutting of vegetation for an overhead utility corridor shall not be permitted.

Fire Services

❖ ***DEVELOPMENT OF FUTURE PROJECTS WITHIN THE NORTHERN FOOTHILLS PROJECT AREA WOULD INCREASE THE DEMAND FOR FIRE PROTECTION SERVICES BEYOND EXISTING CONDITIONS.***

Significance: Significant.

Impact Analysis: Most of the parcels within the project area are within or adjacent to areas containing moderate to dense native growth and vegetation. Development within these fire prone areas may increase the threat of wildland fires by introducing additional permanent population and visitors to the area. Conversely, wildfires originating in the Angeles National Forest area could threaten adjacent residential uses.

In the design of hillside development, the relationship between topography and fire behavior is a critical factor in the design of new development. Homes located in narrow canyons and saddles, for example, are especially fire-prone because of the existence of "natural chimneys" in these areas where winds are funneled into these canyons and eddies. Studies have also shown the homes located where a canyon meets a ridge are more likely to burn than other ridge-top homes. Homes located on narrow ridges without adequate setback are often lost to fire because flames and convection heat hit the homes directly.

It should be noted, however, that there is currently one public ingress/egress on Terrebone Avenue. This single access to the project area presents a potential hazard problem associated with a large scale evacuation (i.e., hillside fire). Although residents could exit through via the Sycamore Flats Motorway to Sycamore Canyon Road, there is the potential for heavy congestion during an evacuation on this roadway as this exit is also the primary ingress/egress for several residents and the Los Angeles Probation Camp. According to the Los Angeles Sheriff's Department, San Dimas Station,

Sycamore Canyon Road is also partially blocked by Fire Department and emergency vehicles in the event of a large brush fire. Vehicles exiting the Terrebonne tract via this emergency exit would exacerbate this current condition.

The Fire Department has indicated that existing fire protection services, facilities and staff are adequate for existing development in the project area; however, the Department notes that each additional development creates greater demands on these existing resources. Thus, the proposed project would impact the ability of the Fire Department to provide adequate fire protection to both existing and new project residents. In addition, the Fire Department has indicated that the size, complexity and projected use of development within the project area may necessitate multiple ingress/egress access for traffic circulation and emergency response issues. There is the potential that the Fire Department could require future development projects to provide a second, or in some cases, a third means of access. The specific number of access routes would be reviewed by the Fire Department on a project-by-project basis. In conclusion, future development within the project area would result in unavoidable significant impacts to the Los Angeles County Fire Department's ability to adequately access and provide fire protection services to area residents.

Mitigation Measures:

Fire-Resistant Design and Materials Guidelines

PSU1. Roofing. Roofs shall be of noncombustible class "A" materials, such as clay or concrete shake, cinder, metal or tile. Open ends of roofs, such as tile roofs, shall be capped with noncombustible material to prevent bird nest or other combustible material from lodging within the roof.

PSU2. Glass. The size and number of glazed openings on the side of the house facing the downhill side or other unique fire hazard areas shall be held to a minimum and shall be glazed with extra-strength glass (thick, safety tempered and/or double-panned). Glass areas shall not exceed 50 percent of any wall.

Access Requirements

Roads must provide access for fire suppression equipment and for evacuation of residents in the event of fire.

PSU3. Traffic roadways shall be at least 26 feet wide and passable in all weather. The roadway curb-to-curb width shall be reduced to 16 feet, where permitted by the City. (Refer to Access Implementing Policy and Action #1, bullets one and two) in Section 5.3, *Circulation*).

Water Supply

PSU4. Fire flow and hydrant locations shall be provided so that adequate water is available in the event of fire. Planned water supplies, piping and hydrants shall be installed and in working order prior to construction involving combustible materials. All development proposals must demonstrate conclusively that the development can be served with adequate water capacity.

PSU5. In the event that individual property owners install a water well, water from the well or other sources, such a pool, shall be available to the Fire Department for fire-fighting purposes.

Los Angeles County Fire Department

PSU6. Future development projects shall be reviewed by the Los Angeles County Fire Department. Specific department requirements for access, fire flows, hydrants or other fire and life safety requirements will be addressed at the entitlement phase.

PSU7. Residential projects shall meet fire flow requirements in accordance with relevant City building codes, fire codes and requirements of the Los Angeles County Fire Department.

PSU8. Fire sprinkler systems shall be installed in all residential buildings, where feasible.

PSU9. As required by Section 1117.2.1 of the Los Angeles County Fire Code, a fuel modification plan, a landscape plan and an irrigation plan shall be submitted with any subdivision of land or prior to any new construction, remodeling, modification or reconstruction where such activities increase the square footage of the existing structure by at least 50 percent within a 12-month period, and where said structure or subdivision is located within an area designated as a Very High Fire Hazard Severity Zone or within Fire Zone 4. Said plans shall be reviewed and approved by the Forestry Division of the Los Angeles County Fire Department for reasonable fire safety.

PSU10. Future development projects shall be required to comply with all applicable code and ordinance requirements for Fire Zone 4 pertaining to construction, access, water mains, fire hydrants, fire flows and brush clearance.

Police Service

❖ ***DEVELOPMENT OF FUTURE PROJECTS WITHIN THE NORTHERN FOOTHILLS PROJECT AREA WOULD INCREASE THE DEMAND ON POLICE SERVICES BEYOND EXISTING CONDITIONS.***

Significance: Less than significant.

Impact Analysis: Implementation of the proposed project would create an increased demand for police services within San Dimas. Although it is projected that the proposed addition in residential dwelling units would increase the number of law enforcement services required, no significant impacts are anticipated that would result in an unacceptable level of law enforcement services for the project area or the City of San Dimas. It should be noted that the proposed project would result in a decrease in the number of residential units currently approved for the project area, therefore reducing the impact to police services to a less than significant level.

Mitigation Measures: No mitigation measures are required.

Water Resources and Facilities

- ***DEVELOPMENT OF FUTURE PROJECTS WITHIN THE NORTHERN FOOTHILLS PROJECT AREA WOULD INCREASE THE EXISTING DEMAND FOR DOMESTIC WATER WHICH WOULD REQUIRE THE EXTENSION OF WATER FACILITIES (I.E., PRIVATE WATER WELLS, GROUNDWATER WELLS AND DISTRIBUTION LINES) TO THE HIGHER DEVELOP ABLE REGIONS OF THE PROJECT AREA.***

Significance: Less than significant impact with mitigation. Proposed water system design (i.e.,groundwater wells and pipelines) would be required to be constructed and maintained pursuant to Southern California Water Company (SCWC) and State Department of Health Services (DHS) requirements and standards.

Impact Analysis: According to the SCWC, the City of San Dimas has sufficient water supplies to serve development within the project area during normal, single-dry, and multiple-dry water years. At this time the City of San Dimas system does not require an assessment for impact fees associated with water services, however, future facilities required to serve future development projects would be constructed by the developer under either refundable or non-refundable (depending upon the improvement type) agreements with SCWC. Therefore, the increase in domestic water consumption associated with the proposed project is considered less than significant.

The SCWC currently has an 8-inch water main that ends at the MWD site along Sycamore Canyon Road which could be easily lengthened to provide service further into the foothills area, should it be needed. Extending water lines to the remote areas of the project area is possible, but could result in expensive costs. This expense would be dependent upon the length and size of the water lines to be extended, and the flows and appurtenances required by local agencies concerned with fire service. Waterlines within streets; waterline appurtenances including hydrants and house services; pumping facilities; pressure regulating facilities; and terminal reservoir at the high point of the project for fire protection and reliability may be required for individual

development projects. The elevations of the areas to be served may dictate the installation of local facilities for pumping and/or pressure regulation. Accurate and detailed development plans would be necessary to determine the individual project needs on a project-by-project basis.

In addition, individual development projects may have the option to utilize groundwater resources within the project area, if determined feasible through additional investigation. It should be noted that some groundwater along the foothills of the San Gabriel Mountains is reported to contain concentrations of fluorides and/or nitrates exceeding safe drinking water standards. However, construction of new groundwater wells and/or utilization of existing wells within the project area would be required to comply with applicable State and SCWC standards and requirements, as well as Title 11 of the Los Angeles County Code. Individual applicants would also be required to provide "rights" to the Upper San Gabriel Water Master for said groundwater, as a majority of the basin has be adjudicated. Utilization of groundwater resources would decrease the cost associated with the extension of water facilities.

Mitigation Measures:

PSU11. The City of San Dimas shall adopt the implementing policies and actions for Infrastructure Planning, Financing, and Construction in the *Northern Foothills Development and Infrastructure Study*. Future development proposals shall be reviewed to determine their compliance with the policies and actions.

PSU12. The project applicant(s) shall obtain the necessary permit(s) from the Public Health Programs and Services Department of the Bureau of Environmental Protects pursuant to Title 11 of the Los Angeles County Code (adopted by the City of San Dimas) and the California Water Code, prior to drilling groundwater wells. Construction of the groundwater wells shall be consistent with the California Department of Water Resources' Bulletin 74.

PSU13. The project applicant(s) shall consult the Upper San Gabriel Water Master prior to applying for a water well permit and provide "rights" to said groundwater.

PSU14. Prior to tentative map approval and issuance of building permits, as applicable, the project applicant(s) shall analyze and demonstrate the feasibility of construction water tanks and extending water lines to serve the development pursuant to the requirements of the Southern California Water Company and subject to review and approval by the City of San Dimas.

Wastewater

- ***DEVELOPMENT OF FUTURE PROJECTS WITHIN THE NORTHERN FOOTHILLS PROJECT AREA WOULD RESULT IN AN INCREASED DEMAND FOR WASTEWATER SERVICES THAT WOULD REQUIRE THE EXTENSION OF SEWER LINES OR THE INSTALLATION OF SEPTIC SYSTEMS.***

Significance: Less than significant impact with mitigation.

Impact Analysis:

Sewage Systems

A portion of the project area is located outside the jurisdictional boundaries of the County Sanitation Districts of Los Angeles (Districts) and would require annexation into District No. 22 prior to establishing sewer service to future developments within this area. Due to the project area's location, sewage flow originating for the project area would be transported to the local sewers, which are not maintained by the Districts.

The Districts are empowered by the California Health and Safety Code to charge a fee for the privilege of connecting (directly or indirectly) to the Districts' Sewage System or increasing the existing strength and/or quantity of wastewater attributable to a particular parcel or operation already connected. The connection fee is required to construct an incremental expansion of the Sewage System to accommodate the proposed project, which would mitigate the impact of this project on the present sewage system. Payment of a connection fee would be required before a permit to connect to the sewer would be issued.

It should be noted that if there area no local sewer lines existing within an area suitable for development, it would be the responsibility of the developer(s) to convey any wastewater generated by individual projects to the nearest local sewer and/or Districts trunk sewer. However, in many areas of the project area, extension of sewer lines may not be economically and/or physically feasible. Therefore, on-site sewage disposal systems (i.e., septic tanks/seepage ponds) would be required.

Septic Systems

In general, it is not cost effective to provide sewer lines and provide municipal sewage treatment for lots greater than .05 to 1 acre in size. This is because of the high per unit cost of constructing sewage lines, along with the increased potential of providing on-site private waste disposal via septic tanks. However, the feasibility of using septic tanks is reduced on slopes in excess of 15 percent since lines in the septic tank leach field need to run relatively flat. In addition, in hillside areas, soil depth is often limited, requiring a greater number of leach lines and a larger leach field than might otherwise be necessary on flatter ground. To compensate, there is often the temptation to try to

"regrade" slopes to provide areas suitable for leach field installation. However, this requires increased landform modification, which in turn increases the risks of slope instability and the loss of visual and biological resources.

While the extension of sewer systems into the higher elevations of the foothills is physically possible, it would be prohibitively expensive to do so. Because of the high costs associated with sewer extension and the development densities that could be physically accommodated within the area's steep hillside to support these costs, it is most likely that individual homes would install septic tanks. The area needed for placement of a septic tank leach field would be a key factor in minimum lot sizes in the hills.

One of the criteria by which a septic filter field is judged the United States Department of Agriculture, Soil Conservation Service, *Report and General Soil Map, Los Angeles County, December, 1969, the Soil Limitation Rating for Septic Tank Filter Fields* (see Table 5.10-2, below). These criteria state:

> *"The septic tank filter field is a part of the septic tank absorption system for on-site sewage disposal. It is a subsurface tile system laid in such a way that effluent from the septic tank is distributed with reasonable uniformity into the natural soil. Three degrees of limitation are used: slight, moderate, and severe.*
>
> *Criteria and standards used for rating soils are made on the basis of soil limitations. The soil limitation rating is based on soil depth, slope, permeability, percolation rate, water table, soil drainage, and overflow or flooding hazards. The most limiting part of the soil is used in determining the rating."*

Given the criteria identified in Table 5.10-2, prior to the installation of any septic tank and/or septic tank filter field, site-specific soils report would need to be prepared.

TABLE 5.10-2
SOIL LIMITATION RATING CRITERIA FOR SEPTIC TANK FILTER FIELDS

Soil Property or Quality	Degree of Soil Limitation		
	Slight	Moderate	Severe
Permeability (in./hr.)	More than 1.0	1.0 through 0.63	Less than 0.63
Percolation rate (min/in)	faster than 45	45 through 75	slower than 75
Depth to seasonal water table (ft.)	More than 4	2 through 4	less than 2
Drainage Class 1	excessively, somewhat excessively, well [2]	moderately well, somewhat poorly	poorly, very poorly
Depth to impervious bedrock or hardpan or permanent water table (ft.)	More than 6	4 through 6	less than 4
Slope (%)	5 or less	5 through 9	more than 9
Overflow hazard (frequency in years)	none	less than 1 in 10	1 in 10 or more
Overflow duration (hr.)	None	48 or less	more than 48

1 Soil Survey Manual, pp. 196-172
2 Coarse-textured material may allow contamination of water supply.
Source: United States Department of Agriculture, Soil Conservation Service, 1969.

Also, refer to Section 5.6, *Geology*, which provides an impact discussion and mitigation regarding the potential to install septic systems.

Mitigation Measures:

PSU15. Refer to Mitigation Measure PSU11.

PSU16. Prior to the installation of a private sewer or septic system, the project applicant(s) shall consult with the California Regional Water Quality Control Board (RWQCB) on a project-by-project basis to obtain waste discharge requirements.

PSU17. Prior to tentative map approval and issuance of building permits, as applicable, the project applicants(s) shall analyze and demonstrate the feasibility of constructing on-site sewage disposal systems (i.e., septic tanks/seepage ponds) for any given subdivision pursuant to the requirements of the Uniform Plumbing Code and subject to review and approval by the City of San Dimas.

PSU18. Prior to the approval of any on-site sewage disposal systems or the issuance of drilling permits, soil testing and applicable geological reports shall be submitted to the County of Los Angeles Department of Health Services and to the City of San Dimas for review and approval (refer to Section 5.6, *Geology*).

Electricity

- ***DEVELOPMENT OF FUTURE PROJECTS WITHIN THE NORTHERN FOOTHILLS PROJECT AREA WOULD RESULT IN ADDITIONAL ELECTRICAL DEMANDS BEYOND EXISTING CONDITIONS AND WOULD REQUIRE THE EXTENSION OF ELECTRICAL FACILITIES INTO THE PROJECT AREA.***

Significance: Less than significant impact with mitigation.

Impact Analysis: SCE currently has the capacity to serve future developments. However, future developments within the project area would require the extension of existing electrical facilities to any potentially developable areas. Potentially developable areas located along the southern portion of the project area could possibly be served through the extension of underground facilities that would be installed at the expense of the developer. In the higher elevations of the project area where undergrounding of electrical lines may be economically and physically infeasible, above ground electrical lines could be installed. In the event above ground lines would be installed to serve future developments, the developer would be required to underground the electrical lines at the development site and to each dwelling unit to the satisfaction of SCE and the City of San Dimas. Installation of above ground or underground electrical facilities (i.e., underground and/or above ground lines and concrete-mounted transformers) would be evaluated on an individual project basis, in consultation with SCE and the City of San Dimas.

Mitigation Measures:

PSU19. Refer to Mitigation Measure PSU11.

PSU20. The City of San Dimas shall adopt the implementing policies and actions for Visual Intrusiveness, as they relate to overhead utilities, in the *Northern Foothills Development and Infrastructure Study*. Future development proposals shall be reviewed to determine their compliance with the policies and actions.

PSU21. Prior to the issuance of building permit(s), the applicant(s) shall consult SCE and the City of San Dimas to determine the feasibility of placing electrical facilities above ground or underground.

Natural Gas

- ***DEVELOPMENT OF FUTURE PROJECTS WITHIN THE NORTHERN FOOTHILLS PROJECT AREA WOULD RESULT IN CONSUMPTION OF NATURAL GAS BEYOND EXISTING CONDITIONS AND WOULD REQUIRE THE EXTENSION OF GAS DISTRIBUTION FACILITIES.***

Significance: Less than significant impact with mitigation.

Impact Analysis: The Gas Company has existing distribution facilities within the southern portion of the project area. While The Gas Company has the capacity to supply future growth within the project area, distribution facilities would need to be extended from existing facilities located within the vicinity of the project area. It should be noted that while undeveloped areas within the southern portion of the project area could be both economically and physically feasible to extend gas distribution facilities to support future growth, many potential development areas located at high elevations may be required to utilize alternative forms of energy (i.e., propane, electricity). However, it would be the responsibility of the developer to provide the necessary infrastructure (i.e., gas distribution lines, regulation facilities, or propane tanks) to support future development. The ability to provide gas service either through underground facilities or propane tanks would be evaluated on a project-by-project basis, in consultation with The Gas Company and the City of San Dimas.

Mitigation Measures:

PSU22. Refer to Mitigation Measure PSU11.

PSU23. Prior to the issuance of building permit(s), the applicant(s) shall consult with The Gas Company and the City of San Dimas to determine the feasibility (both physically and economically) of extending underground gas distribution facilities to future development areas.

Solid Waste

❖ ***DEVELOPMENT OF FUTURE PROJECTS WITHIN THE NORTHERN FOOTHILLS PROJECT AREA WOULD RESULT IN INCREASED PROJECTED SOLID WASTE GENERATION.***

Significance: Less than significant impact with mitigation.

Impact Analysis: Development of future projects within the Northern Foothills project area would result in an increase of solid waste generation. The County of Los Angeles is facing a serious disposal crisis, both in terms of daily capacity and long-term disposal capacity available, which involves efforts to minimize the amount of wastes generated. Wastes generated from new development projects may displace the wastes currently hauled to regional landfills, accelerate the landfill closures or cause distance sites to be utilized. As a result, the proposed project could have a significant cumulative effect on solid waste management in Los Angeles County. However, the project proposes a reduction in the number of dwelling units currently approved for the project area, thereby reducing the amount of solid waste generated on-site. With the reduction in the intensity of land uses within the project area and adherence with the California Integrated Waste Management Act (AB 939) that requires cities to divert 50 percent of the waste stream away from disposal by the years 2000, impacts associated with solid waste generation would be less than significant.

Mitigation Measures:

PSU24. Prior to the issuance of building permit(s), the applicant(s) shall consult with the local waste hauler to determine the feasibility of accessing the development site. Should accessibility not be achievable, the project applicant(s) shall (1) work with the City of San Dimas and the trash hauler to identify locations where trash could be picked up, or (2) be required to have individual property owners responsible for delivering their own rubbish to the local landfill.[4]

PSU25. Future developments, as applicable, shall incorporate storage and collection of recyclables into each project design and refuse collection contracts shall include collection of recyclables. Individual projects, as applicable, shall reserve space appropriate for the support of recycling, adequate storage areas and access for recycling vehicles, as appropriate.

Schools

❖ ***DEVELOPMENT OF FUTURE PROJECTS WITHIN THE NORTHERN FOOTHILLS PROJECT AREA WOULD GENERATE ADDITIONAL STUDENTS BEYOND EXISTING CONDITIONS.***

Significance: Less than significant impact with mitigation.

Impact Analysis: The Bonita Unified School District has indicated that student enrollment would be expected to increase by 63 students as a result of the proposed project. The District has indicated that the additional students would further impact facilities already operating at or beyond capacity. However, as discussed in Section 6.2, *Growth Inducing Impacts*, the proposed project is consistent with the growth projections in the City's General Plan. Thus, no new growth inducing impacts to elementary educational facilities would result from implementation of the proposed project beyond those already contemplated and analyzed in the City's General Plan and General Plan EIR. In addition, the imposition of the mitigation identified below would ensure no new growth inducing impacts to educational facilities would occur.

It is important to note the recent passage of SB 50 (1998) and Proposition 1A. SB 50 authorized a $9.2 billion K-12 school and higher education bond to be presented to the state's voters on November 3,1998. In addition, SB 50 revised developer fee and mitigation procedures for school facility purposes and reformed the state program that distributes state bond funds to K-12 school districts. On November 3, 1998, state voters approved Proposition 1A, a $9.2 billion bond measure, which provides funding for higher education facilities, K-12 facilities, modernization of older schools, additional funding for districts in hardship situations and funding for class size reduction. With the passage of Proposition 1A, the Mira powers of local governments

[4] The City of San Dimas has an ordinance that presently requires mandatory trash pick up.

were suspended on November 4, 1998 until 2006, which is the length of time the state bond money would be available to local school districts. As a result of this, school districts would continue to levy a school fee under existing rules (Government Code Section 65995, 65995.5 and 65995.7), which is currently up to $1.93 per square foot for residential construction and $0.31 per square foot for commercial and industrial development. SB 50 also established three levels of school fees: Level One, Level Two and Level Three Fees. Level One Fees are the statutory fees of $1.93 per square foot for residential projects and $0.31 per square foot for commercial and industrial projects, which can be adjusted for inflation every two years beginning in 2000. Level Two Fees allow school districts to impose fees beyond the base statutory cap, under specific circumstances. Level Three Fees come into play is the state runs out of bond funds after 2006, which would allow school districts to impose 100 percent of the cost of the school facility or mitigation minus any local dedicated school monies. The school fee amounts provided for in Government Code Sections 65995, 65995.5 and 65995.7 would constitute full and complete mitigation for school facilities.

Mitigation Measures:

PSU26. Individual development projects within the project area shall pay school fees to the Bonita Unified School District in accordance with Government Code Sections 65995, 65995.5 and 65995.7. The project applicant shall provide the City of San Dimas with evidence of school fee payment prior to the issuance of permits.

❖ ***DEVELOPMENT OF FUTURE PROJECTS WITHIN THE NORTHERN FOOTHILLS PROJECT AREA WOULD CREATE NEW TRANSPORTATION (PEDESTRIAN AND BUS) IMPACTS FOR THE BONITA UNIFIED SCHOOL DISTRICT.***

Significance: Less than significant impact with mitigation.

Impact Analysis: Given the steep terrain of the project area, there is the potential that bus service would not be available to students in the higher elevations. In addition, the backbone roadway system proposed for the project area may not be wide enough to allow school buses adequate travel width or turning distances. Thus, potential students may need to walk directly to school, walk to bus locations in the lower elevations of the project area, or have their parents drive them to school.

Mitigation Measures:

PSU27. Project applicants shall work with the Bonita Unified School District to identify the most appropriate locations for bus routes and stops, if feasible.

PSU28. Project applicants shall work with the Bonita Unified School District to identify the most appropriate "Safe Route to School" for students generated by the project. Future project residents shall be notified of the "Safe Route to School."

Parks and Recreation

❖ ***DEVELOPMENT OF FUTURE PROJECTS WITHIN THE NORTHERN FOOTHILLS PROJECT AREA WOULD CREATE ADDITIONAL DEMAND ON PARKS AND RECREATIONAL FACILITIES.***

Significance: Less than significant impact with mitigation.

Impact Analysis: Individual development projects would involve hillside grading causing changes in the natural vegetation and topography of the project area. These changes in topography and natural vegetation would have an impact on the visual qualities and biological resources of the project area, the park setting (San Dimas Canyon Community Regional Park), and the experience of the park user. However, project development would include vast areas of undisturbed open space. Visual impacts on nature trails, and the preservation of existing trails and the natural topography would be incorporated into individual design concepts (refer to Section 5.2, *Aesthetics*) in order to preserve the natural character of the project area.

As previously discussed, the only formal equestrian trail in the project area parallels Foothill Boulevard and San Dimas Canyon Road, where it connects with the San Dimas Canyon Golf Course and San Dimas Creek. In addition, a number of informal equestrian trails exist throughout the project area on private property. There is the potential for future development to further assist in the creation of new trails in the project area. These new trails (i.e., equestrian, hiking, bicycle) trails could be incorporated into project design concepts or planned as part of future roadways, with the intent of creating a formal trail system to be utilized by the public and reducing the use on informal trails on private property. Connection with exiting or planned regional trail systems associated with adjacent jurisdictions would be assessed prior to the construction of such facilities.

Mitigation Measures:

PSU29. Prior to the approval of future development projects within the project area, the project applicant(s) shall consult the City of San Dimas to determine if the proposed development would impact existing equestrian and/or hiking trails. The City of San Dimas shall coordinate planning efforts with the Los Angeles County Department of Parks and Recreation if the City intends to designate trails for the project area or connect trails between adjacent jurisdictions.

PSU30. Future development projects that include equestrian trails shall be reviewed by the Equestrian Commission.

Communications

- ***DEVELOPMENT OF FUTURE PROJECTS WITHIN THE NORTHERN FOOTHILLS PROJECT AREA WOULD RESULT IN THE NEED FOR ADDITIONAL COMMUNICATION SERVICES.***

Significance: Less than significant impact with mitigation.

Impact Analysis: GTE has existing aerial and underground facilities within the project area. The existing facilities may not have the capacity to accommodate growth, however, GTE has the ability to provide adequate facilities in order to support the anticipated future growth. It should be noted that it is the developer's responsibility to provide a path for future communication facilities (i.e., trench and/or telephone conduit, manholes, etc.). The cost of any required undergrounding of existing aerial telephone facilities would be the responsibility of the developer. The ability to provide communication services (i.e., telephone and cable services) through underground and/or aboveground facilities, would be evaluated on a project-by-project basis, in consultation with the appropriate service providers and the City of San Dimas.

Mitigation Measures:

PSU31. Refer to Mitigation Measure PSU20.

PSU32. Prior to the issuance of building permit(s), the project applicant(s) shall consult the appropriate communication providers and the City of San Dimas to determine the feasibility of placing communication facilities underground or aboveground on an individual project basis.

CUMULATIVE IMPACTS

- ***CUMULATIVE DEVELOPMENT WOULD INCREASE DEMAND FOR SERVICES AND UTILITIES. THERE WOULD BE AN INCREASED DEMAND FOR THE LOS ANGELES COUNTY SHERIFF'S DEPARTMENT, SAN DIMAS AND LOS ANGELES COUNTY FIRE DEPARTMENTS, AND OTHER PUBLIC SERVICES. INCREASED CONSUMPTION AND GENERATION RATES ARE ANTICIPATED FOR ELECTRICITY, NATURAL GAS, WATER, WASTEWATER, SOLID WASTE, TELEPHONE, AND CABLE/TV.***

Significance: Less than significant. Analysis has concluded that cumulative development is subject to standards and requirements of reviewing agencies and no additional mitigation is required.

Impact Analysis: Although there would be a substantial service and utility demand increase attributable to the extent of the cumulative development, the overall potential for service-related cumulative effects to occur is not considered significant. This conclusion is primarily based on a rationale that: 1) already constructed residential and non-residential development would only have occurred after having satisfied all development specific requisite permit, code, policy, and other City of San Dimas development requirements and contributed their fair share of impact fees in order to ensure their participation in addressing area wide (cumulative) growth and service-related demand issues; and 2) by having done the latter, each specific development would in effect be self mitigating with regard to placing a potentially significant demand upon an area's public services and utilities.

Mitigation Measures: No mitigation beyond adherence to standards and requirements of applicable reviewing agencies is required.

UNAVOIDABLE SIGNIFICANT IMPACTS

Implementation of the proposed project would not result in unavoidable significant impacts related to police service, water resources and facilities, wastewater, electricity, natural gas, solid waste, schools, parks and recreation, and communication systems. However, the ability of the Fire Department to provide adequate service to all reaches of the project area remains a significant impact resulting from project implementation, even with imposition of mitigation measures.

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6.0 Long-Term Implications of the Proposed Project

6.0 LONG-TERM IMPLICATIONS OF THE PROPOSED PROJECT

6.1 IRREVERSIBLE ENVIRONMENTAL CHANGES THAT WOULD BE INVOLVED IN THE PROPOSED ACTION SHOULD IT BE IMPLEMENTED

Approval of the proposed project would cause irretrievable environmental changes. Implementation of the proposed project would result in the following significant environmental changes (however many of these impacts can be reduced to less than significant levels):

- commitment of land which will be used to add additional residential land uses and associated infrastructure;
- generation of long-term air quality impacts resulting from vehicular traffic and energy demands;
- increased in impervious ground surfaces and urban pollutants carried by runoff into the San Dimas and Big Dalton Washes;
- increased requirements for public services and utilities by the project's residents representing a permanent commitment of these resources;
- utilizations of various raw materials, such as lumber, sand and gravel for construction. (Some of these raw materials are already being depleted worldwide. The energy consumed in developing and maintaining the project area for urban uses may be considered a permanent investment. However, the project's demand for these resources is not considered unusually high or otherwise significant); and
- incremental increases in traffic levels on the surrounding circulation system within the project vicinity, resulting in associated increases in noise levels.

6.2 GROWTH-INDUCING IMPACTS

Pursuant to the California Environmental Quality Act (CEQA), Section 15126(g), the following discussion identifies ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. According to CEQA, growth-inducing impacts should be assessed in terms of whether a proposed project influences

the rate, location, and the amount of growth. Projects that remove obstacles to population growth, or allowed or encouraged growth that would not otherwise have occurred if the project was not built, would be growth-inducing. Potential growth-inducing impacts are also assessed based on a project's consistency with adopted plans that have addressed growth management from a local and regional standpoint.

Potential growth-inducing impacts from the proposed project are analyzed below as they relate to population, housing and employment factors. Also refer to Section 5.1, Land Use and Relevant Planning, for additional analyses

Population

The City of San Dimas is located in eastern Los Angeles County, one of six counties which make up the Southern California Association of Governments (SCAG) region. According to SCAG (1995), the six-county region (Los Angeles, Orange, Riverside, San Bernardino, Ventura, and Imperial Counties) contained a population of 14.6 million persons in 1990. The most recent estimates for the SCAG region, provided by the California Department of Finance (January 1998) indicated a population of 16.3 million persons. The populations projection for the year 2010 for the SCAG region is an estimated 20.5 million persons, representing a population increase of approximately 25 percent (4.2 million persons) between 1998 and 2010. According to SCAG, the growth in population for the region is a result of natural increases and net in-migration.[1]

According to the California Department of Finance estimates, the 1990 population in the City of San Dimas was 32,398. The City's population as of January 1, 1998 is estimated to be 36,400 with an average household size of 3.072 persons.[2]

Housing

According to the Department of Finance estimates, approximately 35,278 dwelling units were located within the City of San Dimas as of January 1998, with a 4.63 percent vacancy rate. Implementation of the proposed project would result in direct impacts to the housing environment as a maximum of up to 127 residential units are proposed. This impact, however has been addressed at the General Plan level and the project does not propose an increase in the amount of population or associated jobs or housing beyond that currently approved for by the city in the General Plan, and has been accounted for in the regional growth projections.

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1 Natural Increase: the excess of births over deaths. Net in-migration: the total number of people entering the region minus the people leaving the region.

2 California Department of Finance, Report E-5, January 1998.

Employment

As of October 1998, the City of San Dimas has an estimated employment level of 18,010 persons.[3] These figures translate into an unemployment rate of 2.9 percent. Estimates of employment in the Los Angeles-Long Beach Metropolitan Statistical Area (MSA) (which includes all of Los Angeles County) were obtained from the Labor Market Information Division of the California State Employment development Department. According to these statistics, there were 4.6 million jobs in the MSA as of October 1998. This figure represents an increase of 961,000 jobs or over October 1997. As of October 1998, Los Angeles County's unemployment rate was 6.3 percent which was higher than the State and United States unemployment rate for the same period (5.9 percent and 4.4 percent, respectively).

Jobs/Housing Balance

In May 1995, SCAG released the Regional Comprehensive Plan and Guide (RCPG). The RCPG is a compilation of the summaries of Plans for the Southern California Region. It establishes a broad set of goals for the region, and identifies strategies for agencies at all levels to use in guiding their decision making toward implementation of the proposals.[4] At the regional level, the emphasis has primarily been placed on achieving a balance of employment and housing opportunities within the various SCAG subregions. This regional concept, referred to as jobs/housing balance, encourages the designation and zoning of sufficient vacant land for residential use with appropriate standards to ensure adequate housing is available to serve the needs derived from the local employment base. Jobs/housing balance helps improve regional mobility (traffic), reduce vehicle miles traveled and thereby improves air quality. It is not expected that the balance between jobs and housing will necessarily be achieved within individual cities; however, cities can contribute to the achievement of subregional goals for the distribution of jobs and housing through their General Plan land use policies.

The project area is located in the San Gabriel subregion. The subregion can be considered to have more jobs when compared to housing opportunities (jobs rich and housing poor) with a jobs to housing ratio of 1.3 in 1990 increasing to 1.5 in the year 2015.[5]

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[3] Employment data obtained from the California Employment Development Department, Labor Market Information division. Data is based on the 1997 benchmark and is not seasonally adjusted. County data is for October 1998.

[4] Regional Comprehensive Plan and Guide, Southern California Association of Governments, May 1995, Page 1.

[5] Regional Comprehensive Plan and Guide, Southern California Association of Governments, May 1995, Page 3-6.

Conclusion

The City of San Dimas will continue to pursue a jobs/housing balance through balanced land use policies that encourage both residential and commercial development. Although jobs/housing balance is a useful concept, it is important to note that jobs/housing ratio is most appropriate for large area analysis across counties or subregions and is less appropriate for small area analysis. The main concern with applying the ratio to small areas is that it is unlikely that small areas will be able to provide much of a match between the housing needs of its employees and the employment needs of its residents, and maintain such a balance over time within a dynamic market economy. Since the project would result in the increase of housing units within a housing poor environment, the project would not adversely affect the current or projected jobs/housing balance.

The proposed project would not increase the population, housing or employment forecasts above those approved in the City's General Plan and analyzed in the General Plan EIR. The growth associated with the proposed project is consistent with General Plan projections and related environmental impacts were previously analyzed in the General Plan EIR. Thus, the proposed project would accommodate planned growth projections and not directly induce growth in the area or in the City of San Dimas.

7.0 Alternatives to the Proposed Project

7.0 ALTERNATIVES TO THE PROPOSED PROJECT

The California Environmental Quality Act (CEQA) requires that Environmental Impact Reports *"...describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives."* (CEQA Guidelines, Section 15126(d)). The CEQA Guidelines direct that the selection of alternatives be governed by *"a rule of reason."* The alternatives selected for review in the EIR may be limited to those that *"would avoid or substantially lessen any of the significant effects of the project"* and would *"feasibly attain most of the basic objectives of the project."* The selection of alternatives and their discussion must *"foster meaningful public participation and informed decision making"* (CEQA Guidelines Section 15126(d)(5)).

As part of the *Northern Foothills Development and Infrastructure Study* prepared by LSA Associates, four development alternatives and their potential maximum development yield were developed. These include: A) Existing Strategy - 127 dwelling units; B) Reduced Density - 106 dwelling units; C) Additional Reduced Density - 80 dwelling units; and D) Further Reduced - 48 dwelling units. These four development scenarios serve as the base in selection of a CEQA Proposed Project and Alternatives to the CEQA Proposed Project for this EIR.

For purposes of this EIR, the CEQA Proposed Project is the Existing Strategy development scenario, which proposes a maximum of up to 127 dwelling units. The Reduced Density, Additional Density and Further Reduced Density development scenarios were selected as Alternatives to the CEQA Proposed Project, and will be analyzed in this Section.

In accordance with CEQA Guidelines Section 15126(d), this Section describes a range of reasonable alternatives to the proposed project that could feasibly attain the basic objectives of the proposed project, while evaluating the comparative merits of each alternative. Potential environmental impacts associated with six alternatives are compared to impacts from the proposed project below. These alternatives include: 1) No Project - No Development Alternative; 2) No Project - Existing General Plan Alternative; 3) Reduced Density Alternative; 4) Additional Reduced Density Alternative; 5) Further Reduced Density Alternative; and 6) Transfer of Development Rights Alternative.

The ***No Project - No Development Alternative*** would not allow any further development beyond what exists today. No additional development would be permitted in the project area.

The ***No Project - Existing General Plan Alternative*** would permit development to occur under the existing general plan designations and policies. Under this alternative, a maximum of 195 dwelling units would be permitted.

The ***Reduced Density Alternative*** would apply similar development standards as the proposed project. Under this alternative, a maximum of 106 dwelling units would be permitted.

The ***Additional Reduced Density Alternative*** would apply more stringent development standards than the proposed project. Under this alternative, a maximum of 80 dwelling units would be permitted.

The ***Further Reduced Density Alternative*** would apply the most stringent development standards of any of the alternatives proposed. Under this alternative, a maximum of 48 dwelling units would be permitted.

The ***Transfer of Development Rights Alternative*** would be permit development densities to be transferred within the project area. Under this alternative, a maximum of up to 127 dwelling units would be permitted.

Table 7.0-1 provides a comparison of the dwelling unit potential for the proposed project (Existing Strategy), the No Project - Existing General Plan Alternative, the Reduced Density Alternative, the Additional Reduced Density Alternative and the Further Reduced Density Alternative.

TABLE 7.0-1
DEVELOPMENT POTENTIAL OF ALTERNATIVES

APN	Acres	Avg. Slope	Within Dev. Feasibility Zone[1]	Proposed Project (Existing Strategy) DUs[2]	Existing GP Alt. DUs	Reduced Density Alt. DUs[3]	Addnl. Reduced Density Alt. DUs[5]	Further Reduced Density Alt. DUs[4]
8665-001-001	0.84	59.98	yes	1	1	1	1	1
8665-001-002	9.64	24.71	yes	1	1	1	1	1
8665-001-003	29.52	46.70	yes	5	5	4	2	1
8665-001-004	40.00	42.99	yes	8	8	6	4	2
8665-001-005	36.70	52.75	yes	7	7	5	3	1
8665-001-006	6.38	39.34	yes	1	1	1	1	1
8665-001-007	3.38	48.65	yes	1	1	1	1	1
8665-001-008	0.93	36.94	yes	1	1	1	1	1
8665-001-009	27.06	47.93	yes	5	5	4	2	1
8665-001-010	0.67	71.78	yes	1	1	1	1	1
8665-001-011	1.61	52.06	yes	1	1	1	1	1

APN	Acres	Avg. Slope	Within Dev. Feasibility Zone[1]	Proposed Project (Existing Strategy) DUs[2]	Existing GP Alt. DUs	Reduced Density Alt. DUs[3]	Addnl. Reduced Density Alt. DUs[5]	Further Reduced Density Alt. DUs[4]
8678-013-003	40.00	39.82	portion	3	8	3	3	2
8678-029-015	40.00	67.37	portion	6	8	4	3	1
8678-029-017	5.00	49.46	portion	1	1	1	1	1
8678-029-018	65.55	61.00	portion	10	13	7	5	3
8678-030-001	80.00	62.17	no	4	16	4	2	1
8678-030-004	40.00	40.99	portion	5	8	4	3	2
8678-030-005	38.55	38.14	portion	6	7	5	3	2
8678-030-006	119.50	40.87	portion	11	23	9	7	3
8678-030-007	38.70	39.14	portion	3	7	3	3	2
8678-030-010	5.00	51.02	no	1	1	1	1	1
8678-030-011	5.00	72.46	no	1	1	1	1	1
8678-030-012	5.00	68.61	no	1	1	1	1	1
8678-030-013	5.00	44.33	no	1	1	1	1	1
8678-030-014	10.00	71.91	no	1	2	1	1	1
8678-030-016	4.70	60.61	no	1	1	1	1	1
8678-030-020	2.34	85.92	no	1	1	1	1	1
8678-030-021	2.29	65.00	no	1	1	1	1	1
8678-030-024	40.00	44.15	portion	3	8	3	2	1
8678-030-029	80.00	62.17	portion	9	16	7	5	1
8678-030-032	0.73	6.27	yes	1	1	1	1	1
8678-030-033	158.42	48.45	portion	19	31	15	11	3
8678-030-300	80.00	59.38	no	4	8	3	2	1
TOTAL	**1,022.48**			**127**	**195**	**106**	**80**	**48**

Notes:

1. Development Feasibility Zones are illustrated in 5.4 of the *Northern Foothills Development and Infrastructure Study*, prepared by LSA Associates.
2. Represents densities in the existing development strategy: 1 du/5 ac within the development feasibility zones and 1du/20 ac outside these areas.
3. Within development feasibility zones: 1 du/5 ac on lands under 35% slope and 1 du/20 ac on land with 35% and greater slopes. 1 du/20 on lands outside of development feasibility zones.
4. 1 du/10 ac within development feasibility zone and 1 du/40 ac outside of these areas.
5. Represents a slope/density formula for lands within and outside development feasibility zones.

Throughout the following analysis, impacts of alternatives are examined for each of the issue areas examined in Section 5 of this EIR. In this manner, each alternative can be compared to the proposed project on an issue-by-issue basis.

An EIR must identify an "environmentally superior" alternative and where the No Project Alternative is identified as environmentally superior, the EIR is then required to identify as environmentally superior an alternative from among the others evaluated. Each alternative's impacts are compared to the proposed project (Northern Foothills Implementation Program). However, only those impacts found significant and unavoidable are relevant in making the final determination of whether an alternative is environmentally superior or inferior to the proposed project. Only the impacts involving landform alteration were found significant and unavoidable. Section 7.7 identifies the environmentally superior alternative.

Project Objectives of the Northern Foothills Implementation Program

The following paragraph is restated from Section 3.3 of this EIR.

As a part of the Northern Foothills Development and Infrastructure Study, a guiding principle was developed. The guiding principle seeks to: 1) preserve sensitive resources in place, 2) adapt future hillside development to the natural hillside topography, and 3) maximize view opportunities to, as well as from development. The overall project objective is to fit future projects into their hillside setting rather than altering the hillside to fit the project. While individual property rights within the Northern Foothills Area must be acknowledged and recognized, the priority between development and natural resource values should be given to protecting the resource.

7.1 NO PROJECT - NO DEVELOPMENT ALTERNATIVE

DESCRIPTION OF ALTERNATIVE

In accordance with the State CEQA Guidelines, the "No Project" Alternative was evaluated as a potential project option. The No Project - No Development Alternative assumes that neither the land use designation nor zoning would be changed, that the project site would remain in its current condition, and that no development would occur. Undeveloped land would continue to be the primary land use, and there would be no additional dwelling units constructed.

IMPACT COMPARISON TO PROPOSED PROJECT

Land Use and Relevant Planning

Under the No Project - No Development Alternative, the general and zoning land use designations would not be changed to Northern Foothills, and existing general plan and zoning regulations would remain in place. In addition, no development occur within the project area, which would ensure that the natural environment remains. However, it is not the intent of the City to preclude development from occurring within the project area. In this regard, the No Project - No Development Alternative is considered environmentally inferior to the proposed project.

Aesthetics

The visual character of the site, development along the southern project boundary and primarily undeveloped throughout the remainder of the project area, would remain the same, and no site grading would be required. In addition, lighting impacts would be eliminated, as no new light sources would be introduced into the project area. Compared to the proposed project, the No Project - No Development Alternative is considered environmentally superior.

Circulation

The No Project - No Development Alternative would not create a need for new roads within the project area and would not increase project-related traffic above current levels. In this regard, the No Project - No Development Alternative is considered environmentally superior to the proposed project.

Air Quality

No new long-term sources of air pollution would result from increased traffic and the increased use of energy sources. Relative to the proposed project, the No Project - No Development Alternative is considered environmentally superior.

Noise

The noise increases created by project-related traffic would not occur under this alternative. Relative to the proposed project, the No Project - No Development Alternative is considered environmentally superior.

Geology

The No Project - No Development Alternative would not involve additional development in the project area. Consequently, no new structures would be subject

to seismic hazards, such as ground shaking, landslides, liquefaction or seismically induced settling. Compared to the proposed project, the No Project - No Development Alternative is considered environmentally superior.

Hydrology and Drainage

The No Project - No Development Alternative would not involve additional development in the project area. Thus, no new sources of stormwater runoff would be created. Compared to the proposed project, the No Project - No Development Alternative is considered environmentally superior.

Biological Resources

The impacts to plants and wildlife would be eliminated under this alternative. In this regard, the No Project - No Development Alternative is considered environmentally superior to the proposed project.

Cultural Resources

Since no development is associated with this alternative, it does not have the potential to disturb existing cultural resources. However, existing sites identified as significant or potentially significant may not be the subject of further study in the near future. These future studies could produce additional knowledge of peoples who have lived in the area. Also, any additional subsurface artifacts may not soon be discovered and studied, although they would be preserved for future study. Relative to the proposed project, this alternative is considered neither environmentally superior or inferior.

Public Services and Utilities

Fire and Police Protection

The current uses in the project area generate minimal demand for fire and police protection services, with the exception of wildlife fire protection. No new residences would be constructed in the upper portions of the project area, which are difficult to access. In this regard, the No Project - No Development Alternative is considered environmentally superior to the proposed project.

Water and Sewer

The No Project - No Development Alternative would not involve additional development in the project area. Consequently, the need to drill new water wells, install individual septic systems, or extend water and sewer lines into the project area would not occur under this alternative. Compared to the proposed project, the No Project - No Development Alternative is considered environmentally superior.

Schools

The No Project - No Development Alternative would not generate additional school children and would not place demands on the school district serving the site. Thus, this alternative would not further stress currently strained resources. Compared to the proposed project, the No Project - No Development Alternative is considered environmentally superior.

Parks and Recreation

Since no new residents would be generated by this alternative, no new demands would be placed on local and regional park facilities in the area. In this regard, the No Project - No Development Alternative is considered environmentally superior to the proposed project.

Utilities

The No Project - No Development Alternative would not increase the demand for utility services beyond existing levels. Extending utility services into the upper portions of the project area is a concern to the service providers. In this regard, the No Project - No Development Alternative is considered environmentally superior to the proposed project.

Conclusion

The No Project - No Development Alternative would eliminate significant aesthetic, circulation, biological resources, geologic, hydrology and drainage, and public service and utilities impacts associated with the proposed project. However, this alternative does not meet the objectives established for the proposed project.

7.2 NO PROJECT - GENERAL PLAN ALTERNATIVE

DESCRIPTION OF ALTERNATIVE

Under this alternative, it is assumed that the project area would be developed under the existing general plan and zoning designations. As shown in Table 7.0-1, a maximum of 195 dwelling units would be permitted under the No Project - General Plan Alternative assuming one dwelling unit per five acres. This represents 68 more dwelling units than that proposed for the Northern Foothills Implementation Program.

IMPACT COMPARISON TO PROPOSED PROJECT

Land Use and Relevant Planning

Implementation of this alternative would maintain the project area's existing general plan and zoning designations.

Currently, the adopted objectives for the Northern Foothills area speak to the preservation of the natural landscape, while providing for rural residential development. The problem is that a policy of "preserving the natural landscape" cannot be literally applied to the project area, because any development within the rugged Northern Foothills would result in losses in natural landscape and biological habitat.

A goal of the General Plan is to revisit the development standards for the Northern Foothills area. As a result, a development moratorium was enacted by the City in 1997 and continues through June 1999. The purpose of the moratorium is to allow the City time to create new development standards for the project area.

Implementation of the No Project - General Plan Alternative would create residential uses that would be consistent with uses within the City, as well as with the neighboring cities of Glendora and La Verne. However, implementation of this alternative would not be consistent with the General Plan goal to develop development standards specifically for and suitable for hillside development in the project area. In this regard, the No Project - General Plan Alternative is considered environmentally inferior to the proposed project.

Aesthetics

Under the proposed project, additional visual and grading standards would be developed to guide future development in the project area. Given that more residential units would be permitted under the existing general plan designation and would be built according to existing City standards, there is the potential for future development under this alternative to produce greater landform alteration and visual impacts than the proposed project. In this regard, the No Project - General Plan Alternative is considered environmentally inferior to the proposed project.

Circulation

Development within the project area would require the installation of on-site roads to provide access for future residents under either this alternative or the proposed project. In this regard, on a long-term circulation basis, the No Project - General Plan Alternative is considered neither environmentally superior or inferior to the proposed project.

This alternative would result in more new trips on the local road system when compared to the proposed project. Given that the existing road system is operating at acceptable service levels, the roadway system could accommodate the additional trips generated by this alternative and was previously analyzed in the General Plan EIR, the No Project - General Plan Alternative is considered neither environmentally superior or inferior to the proposed project.

Air Quality

More vehicular trips would be generated under this alternative than for the proposed project, and this in turn, would produce greater mobile and energy source emissions. While no significant air quality impacts were identified for the proposed project, this alternative would result in slightly more local and regional air pollutant emissions. Thus, the No Project - General Plan Alternative is considered environmentally inferior to the proposed project.

Noise

Given that more dwelling units are proposed under this alternative, long-term noise levels associated with vehicular traffic would be greater than the noise levels under the proposed project, because more project-related trips would occur. In this regard, the No Project - General Plan Alternative is environmentally inferior to the proposed project.

Geology

Under this alternative, more people living in residences would be exposed to seismic hazards than the proposed project. Although, the seismic hazards for this alternative are similar to those for the proposed project. Thus, the No Project - General Plan Alternative is neither environmentally superior or inferior to the proposed project.

Hydrology and Drainage

Under this alternative, stormwater runoff and flood control improvements would be installed similar to those under the proposed project. Improvements, such as on-site detention facilities, debris basins and private or transfer drains, would protect the project area and downstream properties from flood hazards. This alternative, like the proposed project, would facilitate local and regional flood control improvements. In this regard, the No Project - General Plan Alternative is considered neither environmentally superior or inferior to the proposed project.

Biological Resources

The conversion of vacant land, and the preservation of on-site biological resources would be similar to the proposed project. In this regard, the No Project - General Plan Alternative is considered neither environmentally superior or inferior to the proposed project.

Cultural Resources

Similar to the proposed project, future development under this alternative would involve grading and construction activities that have the potential to disturb existing archaeological and paleontological resources. Relative to the proposed project, the impacts resulting from the No Project - General Plan Alternative on these resources are considered neither environmentally superior or inferior.

Public Services and Utilities

Fire and Police Protection

Given the residential density of this alternative, the demand for fire and police protection would be greater than for the proposed project. Approximately 68 additional residences would be permitted under this alternative. These residential units could be constructed throughout the project area, including the upper portions that are difficult to access. In this regard, the No Project - General Plan Alternative is considered environmentally inferior to the proposed project.

Water and Sewer

Given that more residential units are permitted under this alternative, the need to drill new water wells, install individual septic systems, or extend water and sewer lines into the project area would be greater than for the proposed project. In this regard, the No Project - General Plan Alternative is considered environmentally inferior to the proposed project.

Schools

The No Project - General Plan Alternative would generate more students than the proposed project, which would place additional demands on the local school district. In addition, providing bus service to school children located in the upper portions of the project area may not be possible and alternative methods to insure children are safely transported to school may be necessary. In this regard, the No Project - General Plan Alternative is considered environmentally inferior to the proposed project.

Parks and Recreation

Adequate local and regional park facilities exist in the project area, and could accommodate the additional residents generated by this alternative. In this regard, the No Project - General Plan Alternative is considered neither environmentally superior or inferior to the proposed project.

Utilities

Extending utility services into the upper portions of the project area is a concern to the service providers. The No Project - General Plan Alternative would increase the demand for utility services beyond existing levels and at greater levels than the proposed project. Thus, the No Project - General Plan Alternative is considered environmentally inferior to the proposed project.

Conclusion

The No Project - General Plan Alternative results in greater impacts to land use, aesthetics, air quality, noise, biological resources, fire and police protection, water and sewer, schools and utilities. In addition, selection of this alternative would not result in new city zoning and standards specifically tailored to the Northern Foothills area. Thus, the No Project - General Plan Alternative does not meet the objectives established for the proposed project.

7.3 REDUCED DENSITY ALTERNATIVE

DESCRIPTION OF ALTERNATIVE

Under this alternative, a maximum of 106 dwelling units would be permitted. For future development within the Development Feasibility Zone, 1 dwelling unit per five acres would be allowed for sites with slopes less than 35 percent, and 1 dwelling unit per 20 acres would be allowed for sites with slopes greater than 35 percent. Development outside of the Development Feasibility Zone would remain the same as the proposed project: 1 dwelling unit per 20 acres.

IMPACT COMPARISON TO PROPOSED PROJECT

Land Use and Relevant Planning

As with the proposed project, this alternative would result in a general plan and zoning redesignation of the project area to Northern Foothills, with new residential development standards. Under either this alternative or the proposed project, new residential standards would be adopted that more specifically address development in

the hillside area. In this regard, the Reduced Density Alternative is considered neither environmentally superior or inferior to the proposed project.

Aesthetics

Under the proposed project, additional visual and grading standards would be developed to guide future development in the project area. Given that fewer residential units would be permitted under this alternative, less landform alteration and visual impacts would occur. In this regard, the Reduced Density Alternative is considered environmentally superior to the proposed project.

Circulation

Development within the project area would require the installation of on-site roads to provide access for future residents under either this alternative or the proposed project. In this regard, on a long-term circulation basis, the Reduced Density Alternative is considered neither environmentally superior or inferior to the proposed project.

This alternative would result in slightly fewer new trips (approximately 210) on the local road system when compared to the proposed project. Given that the existing road system is operating at acceptable service levels and could accommodate the additional trips generated by this alternative, the Reduced Density Alternative is considered neither environmentally superior or inferior to the proposed project.

Air Quality

Fewer vehicular trips would be generated under this alternative than for the proposed project, and this in turn, would produce less mobile and energy source emissions. While no significant air quality impacts were identified for the proposed project, this alternative would result in slightly fewer local and regional air pollutant emissions. Thus, the Reduced Density Alternative is considered environmentally superior to the proposed project.

Noise

Given that 21 fewer dwelling units are proposed under this alternative, long-term noise levels associated with vehicular traffic would be slightly less than the noise levels under the proposed project, because less project-related trips would occur. In this regard, the Reduced Density Alternative is environmentally superior to the proposed project.

Geology

Under this alternative, fewer people living in residences would be exposed to seismic hazards than the proposed project. However, the seismic hazards for this alternative are similar to those for the proposed project. Thus, the Reduced Density Alternative is neither considered environmentally superior or inferior to the proposed project.

Hydrology and Drainage

Under this alternative, stormwater runoff and flood control improvements would be installed similar to those under the proposed project. Improvements, such as on-site detention facilities, debris basins and private or transfer drains, would protect the project area and downstream properties from flood hazards. This alternative, like the proposed project, would facilitate local and regional flood control improvements. In this regard, the Reduced Density Alternative is considered neither environmentally superior or inferior to the proposed project.

Biological Resources

The conversion of vacant land, and the preservation of on-site biological resources would be similar to the proposed project. In this regard, the Reduced Density Alternative is considered neither environmentally superior or inferior to the proposed project.

Cultural Resources

Similar to the proposed project, future development under this alternative would involve grading and construction activities that have the potential to disturb existing archaeological and paleontological resources. Relative to the proposed project, the impacts resulting from the Reduced Density Alternative on these resources are considered neither environmentally superior or inferior.

Public Services and Utilities

Fire and Police Protection

Given that 21 fewer residential units are permitted under this alternative, the demand for fire and police protection would be slightly less than for the proposed project. As with the proposed project, the residential units could be constructed throughout the project area, including the upper portions that are difficult to access. Given that the demand would be less, the Reduced Density Alternative is considered environmentally superior to the proposed project.

Water and Sewer

Given that 21 fewer residential units are permitted under this alternative, the need to drill new water wells, install individual septic systems, or extend water and sewer lines into the project area would be slightly less than for the proposed project. However, the installation of water and sewer systems under either alternative is a key factor for future development. Thus, the Reduced Density Alternative is considered neither environmentally superior or inferior to the proposed project.

Schools

The Reduced Density Alternative would generate slightly fewer students than the proposed project. In addition, providing bus service to school children located in the upper portions of the project area may not be possible and alternative methods to insure children are safely transported to school may be necessary. In this regard, the Reduced Density Alternative is considered neither environmentally superior or inferior to the proposed project.

Parks and Recreation

Adequate local and regional park facilities exist in the project area, and could accommodate the additional residents generated by this alternative. In this regard, the Reduced Density Alternative is considered neither environmentally superior or inferior to the proposed project.

Utilities

The Reduced Density Alternative would increase the demand for utility services beyond existing levels and at levels slightly less than those for the proposed project. However, extending utility services into the upper portions of the project area is a concern to the service providers. Given that the extension of utility lines is a concern to the providers, the Reduced Density Alternative is considered neither environmentally superior or inferior to the proposed project.

Conclusion

The Reduced Density Alternative results in fewer impacts to aesthetics, air quality, noise, and fire and police protection. This alternative represents a 16 percent reduction in the maximum development potential as compared to the proposed project; retains the existing maximum development intensity of 1 dwelling unit per 5 acres for flatter, more developable parcels; provides reasonable opportunities for landowners to develop their properties; and meets the objectives established for the proposed project.

7.4 ADDITIONAL REDUCED DENSITY ALTERNATIVE

DESCRIPTION OF ALTERNATIVE

Under this alternative, a maximum of 80 dwelling units would be permitted. For future development within the Development Feasibility Zone, 1 dwelling unit per 10 acres would be allowed for sites with slopes less than 35 percent, and 1 dwelling unit per 40 acres would be allowed for sites with slopes greater than 35 percent. Development outside of the Development Feasibility Zone would be allowed at a density of 1 dwelling unit per 40 acres.

IMPACT COMPARISON TO PROPOSED PROJECT

Land Use and Relevant Planning

As with the proposed project, this alternative would result in a general plan and zoning redesignation of the project area to Northern Foothills, with new residential development standards. Under either this alternative or the proposed project, new residential standards would be adopted that more specifically address development in the hillside area. In this regard, Additional Reduced Density Alternative is considered neither environmentally superior or inferior to the proposed project.

Aesthetics

Under either this alternative or the proposed project, additional visual and grading standards would be developed to guide future development in the project area. Given that 47 fewer residential units would be permitted under this alternative, less landform alteration and visual impacts would occur. In this regard, the Additional Reduced Density Alternative is considered environmentally superior to the proposed project.

Circulation

Development within the project area would require the installation of on-site roads to provide access for future residents under either this alternative or the proposed project. In this regard, on a long-term circulation basis, the Additional Reduced Density Alternative is considered neither environmentally superior or inferior to the proposed project.

This alternative would result in fewer new trips (approximately 470) on the local road system when compared to the proposed project. Given that the existing road system is operating at acceptable service levels and could accommodate the additional trips generated by this alternative, the Additional Reduced Density Alternative is considered neither environmentally superior or inferior to the proposed project.

Air Quality

Fewer vehicular trips would be generated under this alternative than for the proposed project, and this in turn, would produce less mobile and energy source emissions. While no significant air quality impacts were identified for the proposed project, this alternative would result in fewer local and regional air pollutant emissions. Thus, the Additional Reduced Density Alternative is considered environmentally superior to the proposed project.

Noise

Given that 47 fewer dwelling units are proposed under this alternative, long-term noise levels associated with vehicular traffic would be less than the noise levels under the proposed project, because less project-related trips would occur. In this regard, the Additional Reduced Density Alternative is environmentally superior to the proposed project.

Geology

Under this alternative, fewer people living in residences would be exposed to seismic hazards than the proposed project. However, the seismic hazards for this alternative are similar to those for the proposed project. Thus, the Additional Reduced Density Alternative is neither considered environmentally superior or inferior to the proposed project.

Hydrology and Drainage

Under this alternative, stormwater runoff and flood control improvements would be installed similar to those under the proposed project. Improvements, such as on-site detention facilities, debris basins and private or transfer drains, would protect the project area and downstream properties from flood hazards. This alternative, like the proposed project, would facilitate local and regional flood control improvements. In this regard, the Additional Reduced Density Alternative is considered neither environmentally superior or inferior to the proposed project.

Biological Resources

The conversion of vacant land, and the preservation of on-site biological resources would be similar to the proposed project. Given that 40 percent fewer homes would be permitted, the impacts to biological resources would be less than those for the proposed project. In this regard, the Additional Reduced Density Alternative is considered environmentally superior to the proposed project.

Cultural Resources

Similar to the proposed project, future development under this alternative would involve grading and construction activities that have the potential to disturb existing archaeological and paleontological resources. Relative to the proposed project, the impacts resulting from the Additional Reduced Density Alternative on these resources are considered neither environmentally superior or inferior.

Public Services and Utilities

Fire and Police Protection

Given that 47 fewer residential units are permitted under this alternative, the demand for fire and police protection would be less than for the proposed project. As with the proposed project, the residential units could be constructed throughout the project area, including the upper portions that are difficult to access. Given that the demand would be less, the Additional Reduced Density Alternative is considered environmentally superior to the proposed project.

Water and Sewer

Given that 47 fewer residential units are permitted under this alternative, the need to drill new water wells, install individual septic systems, or extend water and sewer lines into the project area would be less than for the proposed project. However, the installation of water and sewer systems under either alternative is a key factor for future development. Thus, the Additional Reduced Density Alternative is considered neither environmentally superior or inferior to the proposed project.

Schools

The Additional Reduced Density Alternative would generate fewer students than the proposed project. In addition, providing bus service to school children located in the upper portions of the project area may not be possible and alternative methods to insure children are safely transported to school may be necessary. However, given that fewer students would be generated under this alternative, the Additional Reduced Density Alternative is considered environmentally superior to the proposed project.

Parks and Recreation

Adequate local and regional park facilities exist in the project area, and could accommodate the additional residents generated by this alternative. In this regard, the Additional Reduced Density Alternative is considered neither environmentally superior or inferior to the proposed project.

Utilities

The Additional Reduced Density Alternative would increase the demand for utility services beyond existing levels and at levels less than those for the proposed project. However, extending utility services into the upper portions of the project area is a concern to the service providers. Given that the extension of utility lines is a concern to the providers, the Additional Reduced Density Alternative is considered neither environmentally superior or inferior to the proposed project.

Conclusion

The Additional Reduced Density Alternative results in fewer impacts to aesthetics, air quality, noise, biological resources, fire and police protection and schools. This alternative represents a 40 percent reduction in the maximum development potential as compared to the proposed project, and meets the objectives established for the proposed project.

7.5 FURTHER REDUCED DENSITY ALTERNATIVE

DESCRIPTION OF ALTERNATIVE

Under this alternative, a total of 48 dwelling units would be permitted. For the Further Reduced Density Alternative, the density of future development is determined primarily on slope of the site, as illustrated in Table 7.5-1. In addition, development densities are more restrictive than those proposed for the Northern Foothills Implementation Program.

TABLE 7.5-1
FURTHER REDUCED DENSITY ALTERNATIVE
MAXIMUM DEVELOPMENT INTENSITY

Proposed Maximum Development Intensity		Maximum Dwelling Units
Within Development Feasibility Zone	**Outside Development Feasibility Zone**	
1 du/5 ac (slope < 15%) 1 du/10 ac (slope 15 < 25%) 1 du/20 ac (slope 25 < 35%) 1 du/existing lot (slope >35%)	1 du/10 ac (slope < 15%) 1 du/20 ac (slope 15 < 25%) 1 du/40 ac (slope 25 < 35%) 1 du/existing lot (slope > 35%)	48

IMPACT COMPARISON TO PROPOSED PROJECT

Land Use and Relevant Planning

As with the proposed project, this alternative would result in a general plan and zoning redesignation of the project area to Northern Foothills, with new residential development standards. Under either this alternative or the proposed project, new residential standards would be adopted that more specifically address development in the hillside area. The Further Reduced Density Alternative would establish very specific development standards related to the slope of a project site. These standards are more stringent than those for the proposed project. In this regard, the Further Reduced Density Alternative is considered environmentally inferior to the proposed project.

Aesthetics

Given that only 48 residential units would be permitted under this alternative, the landform alteration, aesthetic and light and glare impacts would be significantly less than those for the proposed project. In this regard, the Further Reduced Density Alternative is considered environmentally superior to the proposed project.

Circulation

Development within the project area would require the installation of on-site roads to provide access for future residents under either this alternative or the proposed project. In this regard, on a long-term circulation basis, the Reduced Density Alternative is considered neither environmentally superior or inferior to the proposed project.

This alternative would result in fewer new trips on the local road system when compared to the proposed project. Given that the existing road system is operating at acceptable service levels and could accommodate the additional trips generated by this alternative, the Further Reduced Density Alternative is considered neither environmentally superior or inferior to the proposed project.

Air Quality

Fewer vehicular trips would be generated under this alternative than for the proposed project, and this in turn, would produce less mobile and energy source emissions. While no significant air quality impacts were identified for the proposed project, this alternative would result in lower local and regional air pollutant emissions. Thus, the Further Reduced Density Alternative is considered environmentally superior to the proposed project.

Noise

Given that 79 fewer dwelling units are proposed under this alternative, long-term noise levels associated with vehicular traffic would be less than the noise levels under the proposed project, because less project-related trips would occur. In this regard, the Further Reduced Density Alternative is environmentally superior to the proposed project.

Geology

Under this alternative, fewer people living in residences would be exposed to seismic hazards than the proposed project. However, the seismic hazards for this alternative are similar to those for the proposed project. Thus, the Further Reduced Density Alternative is neither environmentally superior or inferior to the proposed project.

Hydrology and Drainage

Significantly less stormwater runoff would be generated by this alternative as compared to the proposed project given the residential densities permitted under this alternative. While stormwater runoff and flood control improvements would be installed ,the type of improvements would differ from those required for the proposed project. This alternative, like the proposed project, would facilitate local and regional flood control

improvements. In this regard, the Reduced Density Alternative is considered environmentally superior to the proposed project.

Biological Resources

As with the proposed project, this alternative would preserve on-site biological resources. However, since only 48 residential units would be permitted within the project area, the impacts to biological resources would be significantly less than those for the proposed project. In this regard, the Further Reduced Density Alternative is considered environmentally superior to the proposed project.

Cultural Resources

Similar to the proposed project, future development under this alternative would involve grading and construction activities that have the potential to disturb existing archaeological and paleontological resources. Relative to the proposed project, the impacts resulting from the Further Reduced Density Alternative on these resources are considered neither environmentally superior or inferior.

Public Services and Utilities

Fire and Police Protection

Given that 79 fewer residential units are permitted under this alternative, the demand for fire and police protection would be significantly less than for the proposed project. As with the proposed project, the residential units could be constructed throughout the project area, including the upper portions that are difficult to access. Given that the demand would be less, the Further Reduced Density Alternative is considered environmentally superior to the proposed project.

Water and Sewer

Given that 79 fewer residential units are permitted under this alternative, the need to drill new water wells, install individual septic systems, or extend water and sewer lines into the project area would be significantly less than for the proposed project. Thus, the Further Reduced Density Alternative is considered environmentally superior to the proposed project.

Schools

The Further Reduced Density Alternative would generate significantly fewer students than the proposed project. In addition, providing bus service to school children located in the upper portions of the project area may not be possible and alternative methods to insure children are safely transported to school may be necessary.

However, given the small number of students generated, the Further Reduced Density Alternative is considered environmentally superior to the proposed project.

Parks and Recreation

Adequate local and regional park facilities exist in the project area, and could accommodate the additional residents generated by this alternative. In this regard, the Further Reduced Density Alternative is considered neither environmentally superior or inferior to the proposed project.

Utilities

The Further Reduced Density Alternative would increase the demand for utility services beyond existing levels and at levels significantly less than those for the proposed project. However, extending utility services into the upper portions of the project area is a concern to the service providers. Given that fewer residential units are permitted, the Further Reduced Density Alternative is considered environmentally superior to the proposed project.

Conclusion

The Further Reduced Density Alternative results in fewer impacts to aesthetics, air quality, noise, hydrology and drainage, biological resources, fire and police protection, water and sewer, schools and utilities. The Further Reduced Density Alternative represents a 62 percent reduction in the maximum development potential as compared to the proposed project, and meet the objectives established for the proposed project.

7.6 TRANSFER OF DEVELOPMENT RIGHTS ALTERNATIVE

DESCRIPTION OF ALTERNATIVE

The transfer of development rights (TDR) involves the selling and subsequent transfer of the "right" to develop a certain intensity of use from one property to another in the private marketplace. An example is if properties "A" and "B" each had the right to develop five dwelling units, and property owner "A" sold that right to property owner "B," owner "B" would have the right to develop ten dwelling units, while property "A" would be retained in permanent open space, thus have not rights to be developed.

For the TDR Alternative to work, a system needs to be in place. The system operates under the premise that there is a need for a private marketplace for development rights, which implies that there is both willing sellers and willing buyers. Owners within areas designated to "send" development rights must be willing to sell these rights at a price that owners in areas eligible to "receive" development rights are willing to pay. In order to have value, the development rights that are to be bought and sold must

have certainty. Buyers of such development rights must know that if they purchase the right to build five dwelling units on their property, they will be able to develop five more units than they could have developed have they not purchased the development rights. At the same time, the seller must know how many development rights he/she has to sell. Thus, the selling and buying landowners must know the exact number of dwelling units they can build both before and after the transfer (sale) of development rights.

Under this alternative, a maximum of up to 127 dwelling units would be permitted.

IMPACT COMPARISON TO PROPOSED PROJECT

Land Use and Relevant Planning

Under this alternative, the general plan and zoning redesignations to Northern Foothills would occur. In addition, this alternative would establish a new city procedure and process addressing the Transfer of Development Rights among property owners within the Northern Foothills project area. However, the number of residential units permitted within the project area would remain the same, and future development projects would be subject to the development standards created specifically for the Northern Foothills project area.

Implementation of the Transfer of Development Rights Plan Alternative would create residential uses that would be consistent with uses within the City, as well as with the neighboring cities of Glendora and La Verne. In this regard, the Transfer of Development Rights Alternative is considered neither environmentally superior or inferior to the proposed project.

Aesthetics

Under the proposed project, additional visual and grading standards would be developed to guide future development in the project area. Development under this alternative would be subject to the same visual and grading standards as the proposed project. Given that more residential units could potentially be clustered together, there is the potential to create greater landform alteration impacts to accommodate the development. From a visual standpoint, residential units would be clustered together versus being constructed throughout the project area. This in turn, would result in greater amounts of open space and thus, viewsheds, being preserved. Overall, the Transfer of Development Rights Alternative is considered environmentally superior to the proposed project.

Circulation

Development within the project area would require the installation of on-site roads to provide access for future residents under either this alternative or the proposed project. In this regard, on a long-term circulation basis, the Transfer of Development Rights Alternative is considered neither environmentally superior or inferior to the proposed project.

This alternative would result in an equivalent number of new trips on the local road system as the proposed project. Given that the existing road system is operating at acceptable service levels, could accommodate the additional trips generated by this alternative and was previously analyzed in the General Plan EIR, the Transfer of Development Rights Plan Alternative is considered neither environmentally superior or inferior to the proposed project.

Air Quality

An equivalent number of vehicular trips would be generated under this alternative as with the proposed project, and this in turn, would an result in an equivalent amount of mobile and energy source emissions. This alternative would result in the same amount of local and regional air pollutant emissions. Thus, the Transfer of Development Rights Alternative is considered neither environmentally superior or inferior to the proposed project.

Noise

Long-term noise levels associated with vehicular traffic would be the same as the noise levels under the proposed project, because an equivalent number of project-related trips would occur. In this regard, the Transfer of Development Rights Alternative is considered neither environmentally superior or inferior to the proposed project.

Geology

Under this alternative, an equivalent number of residents would be exposed to seismic hazards as those under the proposed project. The seismic hazards for this alternative are similar to those for the proposed project. Thus, the Transfer of Development Rights Alternative is neither environmentally superior or inferior to the proposed project.

Hydrology and Drainage

As with the proposed project, stormwater runoff and flood control improvements would be necessary. Improvements such as on-site detention facilities, debris basins and private or transfer drains, would protect the project area and downstream properties from flood hazards. The specific on-site improvements may vary from those

required for development under the proposed project, given the potential for more clustering of residential uses to preserve open space. This alternative, like the proposed project, would facilitate local and regional flood control improvements. In this regard, the No Project - General Plan Alternative is considered neither environmentally superior or inferior to the proposed project.

Biological Resources

Under this alternative, a similar number of residential units would be permitted; however, the location and siting of the units may differ from that permitted under the proposed project. The premise of TDRs is to concentrate and cluster development and preserve open space and natural resources, rather than spreading development over the project area. In clustering development, more vacant land remains undeveloped, and thus, fewer impacts to biological resources would result. In this regard, the Transfer of Development Rights Alternative is considered environmentally superior to the proposed project.

Cultural Resources

Similar to the proposed project, future development under this alternative would involve grading and construction activities that have the potential to disturb existing archaeological and paleontological resources. Relative to the proposed project, the impacts resulting from the Transfer of Development Rights Alternative on these resources are considered neither environmentally superior or inferior.

Public Services and Utilities

Fire and Police Protection

Under this alternative, greater clustering of residential units and preservation of open space is encouraged. This in turn could result in future development consolidated into development pockets that would more easily accessible to both the fire and sheriff's departments than development permitted under the proposed project. In this regard, the Transfer of Development Rights Alternative is considered environmentally superior to the proposed project.

Water and Sewer

Since a greater clustering of residential units would occur under this alternative, there is a greater opportunity to extend water and sewer lines to the proposed project versus the installation of individual water wells or septic systems. However, there is a need to install water and sewer systems under either this alternative or the proposed project. Thus, the Transfer of Development Rights Alternative is considered neither environmentally superior or inferior to the proposed project.

Schools

The Transfer of Development Rights Plan Alternative would generate an equivalent number of students as the proposed project. Under this alternative, the clustering of development may provide a greater opportunity to consolidate bus stops for the school children, as well as provide more easily accessible bus stop locations. In this regard, the Transfer of Development Rights Alternative is considered environmentally superior to the proposed project.

Parks and Recreation

This alternative would result in a similar number of residents as the proposed project. Adequate local and regional park facilities exist in the project area, and could accommodate the additional residents generated by this alternative. In this regard, the Transfer of Development Rights Alternative is considered neither environmentally superior or inferior to the proposed project.

Utilities

Extending utility services into the upper portions of the project area is a concern to the service providers. The Transfer of Development Rights Alternative would increase the demand for utility services beyond existing levels and at the same level as the proposed project. However, the potential for clustering development would make extending the lines less of a concern to utility providers, since more residential units would be located together versus spread out throughout the project area. Thus, the Transfer of Development Rights Alternative is considered environmentally superior to the proposed project.

Conclusion

The Transfer of Development Rights Alternative results in fewer impacts to aesthetics, biological resources, fire and police protection, schools and utilities. The advantage of the Transfer of Development Rights Alternative is that it can preserve sensitive areas in open space without requiring the public purchase of lands or conservation easements. This is a substantial benefit to the community at large. This alternative also meets the objectives established for the proposed project.

7.7 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The proposed project involves the redesignation of land within the Northern Foothills project area to permit a maximum of up to 127 dwelling units on the 972 vacant acres, depending upon the City Council's final determination of density. The proposed project involves a General Plan Amendment and Zone Change/Specific Plan. The project generates impacts related to land use and relevant planning, landform

alteration, aesthetics, access and circulation, air quality, noise, hydrology and drainage, biological resources, cultural resources, and public services and utilities. All impacts except landform alteration and fire protection could be mitigated to less than significant levels.

Table 7.7-1 provides an overview of the alternatives analyzed in this section and a comparison of each alternative's impact in relation to the proposed project.

The No Project - No Development Alternative would eliminate all environmental impacts entirely. While the No Project - No Development Alternative is considered an environmentally superior alternative, it is rejected for the reasons that it is considered infeasible and it does not meet the objectives established for the proposed project.

The No Project - General Plan Alternative would allow buildout of the project area under the existing general plan and zoning designations. While several of the environmental categories result in similar impacts to the proposed project, most would register a greater impact than under the proposed. The No Project - General Plan Alternative is rejected for the reasons that it results in greater environmental impacts and it does not meet the objectives established for the proposed project.

The Reduced Density Alternative only slightly reduces the environmental impacts from those anticipated for the proposed project. Therefore, the Reduced Density Alternative is not considered an environmentally superior alternative to the proposed project.

The Additional Reduced Density Alternative results in fewer impacts to aesthetics, air quality, noise, biological resources, fire and police protection and schools. This alternative represents a 40 percent reduction in the maximum development potential as compared to the proposed project. However, the Additional Reduced Density Alternative is not considered an environmentally superior alternative to the proposed project.

The Further Reduced Density Alternative results in fewer impacts to aesthetics, air quality, noise, hydrology and drainage, biological resources, fire and police protection, water and sewer, schools and utilities. This alternative represents a 62 percent reduction in the maximum development potential as compared to the proposed project, and meet the objectives established for the proposed project. The Further Reduced Density Alternative is considered the environmentally superior alternative.

The Transfer of Development Rights Alternative results in fewer impacts to aesthetics, biological resources, fire and police protection, schools and utilities. This alternative has the potential to preserve larger areas of sensitive habitat and open space, and meets the objectives established for the proposed project. While, the Transfer of

Development Rights Alternative has the potential to be more environmentally sensitive than the proposed project, it is not considered the environmentally superior alternative.

TABLE 7.7-1
COMPARISON OF ALTERNATIVES

Issue	No Project-No Development Alt.	No Project-General Plan Alt.	Reduced Density Alt.	Additional Reduced Density Alt.	Further Reduced Density Alt.	Transfer of Development Rights Alt.
# of Units	0	195	106	80	48	127
Land Use & Relevant Planning	>	>	=	=	>	=
Aesthetics	<	>	<	<	<	<
Circulation	<	=	=	=	=	=
Air Quality	<	>	<	<	<	=
Noise	<	>	<	<	<	=
Geology	<	=	=	=	=	=
Hydrology & Drainage	<	=	=	=	<	=
Biological Resources	<	>	=	<	<	<
Cultural Resources	=	=	=	=	=	=
Fire & Police Protection	<	>	<	<	<	<
Water and Sewer	<	>	=	=	<	=
Schools	<	>	=	<	<	<
Parks & Recreation	<	>	=	=	=	=
Utilities	<	>	=	=	<	<

= Impact is equivalent to impact of proposed project (neither environmentally superior or inferior).
< Impact is less than impact of proposed project (environmentally superior).
> Impact is greater than impact of proposed project (environmentally inferior).

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8.0 Inventory of Mitigation Measures

8.0 INVENTORY OF MITIGATION MEASURES

LAND USE AND RELEVANT PLANNING

LU1. The City shall review all future proposals on a case-by-case basis to ensure that incremental impacts do not occur with any future development. If necessary, the City shall require additional environmental evaluations and clearances, and impose site-specific mitigation to further reduce any potential impacts.

AESTHETICS

Landform Alteration

AES1. The City of San Dimas shall adopt the implementing policies and actions for Visual Intrusiveness for New Development in the *Northern Foothills Development and Infrastructure Study*. Future development proposals shall be reviewed to determine their compliance with the policies and actions.

AES2. Grading for all future development proposals in the Northern Foothills project area shall be designed in accordance with all applicable grading criteria for Visual Intrusiveness for New Development in the *Northern Foothills Development and Infrastructure Study*.

In addition to those standards imposed by other City ordinances and by the Northern Foothills Zoning, grading in the Northern Foothills area shall be subject to the following standards:

AES3. Grading shall not exceed the minimum necessary to accommodate structures properly, as determined by the planning director or designee.

AES4. Grading practices shall reflect the natural topography of the land.

AES5. Creation of level area (i.e., pads) by grading shall be minimized.

AES6. Grading on hillside areas or close to ridgelines shall incorporate the breaking of hard edges left by cut and fill operations to provide a more rounded appearance that closely resembles the natural contours of the land.

AES7. Grading within residential subdivisions shall be finished so that it is responsive to the original configuration of the land, as well as the adjacent contours.

AES8. All graded slopes (cut or fill), including roadsides, shall undergo a permanent revegetation in a timely manner to minimize any change of erosion and siltation. Backdrop landscaping shall be provided, with heavy complements of drought and fire resistant trees and shrubs, sufficient to reduce erosion and present a natural, undisturbed appearance.

AES9. Created slopes within the residential areas or any subdivision shall have more variety and texture in their appearance than engineered and uniform slopes. Not only shall these planes be undulating in appearance, but they should also have slopes that vary in gradient.

AES10. Created slopes, either cut or fill, that are adjacent to roadways shall be graded in such a way that an undulating appearance in the graded plan is provided for a more pleasing roadscape.

Aesthetics

AES11. All future development proposals in the Northern Foothills project area shall be designed in accordance with all applicable criteria for Visual Intrusiveness for New Development in the *Northern Foothills Development and Infrastructure Study*.

AES12. Wherever possible, structures shall be built with rooftops lower in elevation than any adjacent ridgelines. A specific setback from the ridge may be required by the City of San Dimas to protect the ridgeline viewshed. Ridgeline setbacks shall be determined on a project-by-project basis.

AES13. Except for window surfaces, the use of polished or reflecting exterior building materials and finishes shall be avoided.

AES14. On downhill sites, decks shall be located and designed to avoid tall and highly visible supports. Exposed areas under decks shall be screened with lattice, or similar treatments composed of fire-resistant materials.

AES15. Individual residential units located within viewsheds shall be oriented to avoid creating a line of solid development.

AES16. Open vistas shall be protected by such means as adequate setbacks, open space, building height limits, and view corridors pursuant to the *San Dimas Municipal Code*.

AES17. Natural scenic features such as mature trees, rock outcroppings, watercourses, and views shall be integrated into individual project design subject to the approval by the City of San Dimas.

AES18. Individual developments shall incorporate adequate landscape screening in order to minimize project views to off-site uses, as demonstrated in a Landscape Plan requiring review and approval by the City of San Dimas Development Plan Review Board (DPRB) on a project-by-project basis prior to the issuance of building permits.

AES19. The architecture of structures in the hillside areas shall be consistent with the overall natural environmental qualities of the site; the architecture shall meld itself to the topography rather than dominate it. The following hillside architecture and urban design guidelines shall be employed in addition to those applicable throughout the City. The Development Plan Review Board shall determine that the architecture and urban design are satisfactory.

A. Residential units shall be asymmetrically massed, with the horizontal portions far greater than the vertical proportions.

B. Massing and proportions shall be consistent with the topography.

C. Hillside architecture shall not dominate the environment; its forms and colors shall blend into the natural surroundings. The exterior finishes, textures and colors of hillside structures shall be restrained through the encouragement of earth-tone colors and the discouragement of reflective materials or finishes. Preference shall be given to the use of earth-tone colors and materials for roofs due to their visual impact.

D. For a lower, more horizontal profile, structures shall be encouraged to be designed so that rooflines run parallel to the slope, rather than intersecting it.

Light and Glare

AES20. Lighting for all future development proposals in the Northern Foothills project areas shall be designed in accordance with all applicable lighting criteria for Visual Intrusiveness for New Development in the *Northern Foothills Development and Infrastructure Study.*

AES21. Exterior lighting for buildings shall be the minimum necessary to provide for safety for pedestrians and other non-vehicular uses around the primary building on a parcel. Landscaping shall be used to reduce the long-range visibility of night lighting.

AES22. Proper lighting techniques to direct light on-site and away from other properties, as determined by the City of San Dimas, shall be required to reduce light and glare (including directional lighting, use of non-reflective glass, use of appropriate types of lighting fixtures, and earthtone building materials).

AES23. Windows with highly reflective treatments shall be avoided and windows shall be located as to avoid highly reflective sun orientations to surrounding properties.

CIRCULATION

CIR1. Modify the footnote for Access Implementing Policies and Actions #1 to read as follows:

"The 26-foot width is currently permitted for access roads, which do not directly serve development. The proposed revision would permit new development to front on 26-foot wide access roads, provided that additional on-site parking is made available."

CIR2. Modify the wording for the third bullet point under Access Implementing Policies and Actions #1 to read as follows:

"Revise City roadway standards to provide an exception to current requirements for street paving along private roadways which will ultimately serve a maximum of four dwellings, based on the maximum density allowable in the General Plan. Such limited use roadways should be permitted to be hard packed (e.g., decomposed granite) as approved by the City Engineer, provided that adequate maintenance is guaranteed to ensure that the roadway will be regularly graded and kept clear of ruts and debris. Maximum grade shall be determined based on existing topographic conditions."

CIR3. The City of San Dimas shall adopt the implementing policies and actions, as amended in Circulation Mitigation Measures CIR1 and CIR2, for Access and Infrastructure Planning, Financing and Construction in the *Northern Foothills Development and Infrastructure Study*. Future development proposals shall be reviewed to determine their compliance with the policies and actions.

CIR4. For the three proposed roadways of the "backbone" road system, the maximum grade shall not exceed 12 to 15 percent, unless existing topography dictates an exception for short roadway segments.

CIR5. A detailed study of Sycamore Flat Motorway is required. The study shall analyze the potential for the roadway grade not to exceed 12 to 15 percent. This maximum grade may not be attainable on all portions of the Sycamore Flat Motorway; however, every effort shall be made to achieve this objective, and to minimize the length and steepness of grades. The study shall also analyze ways in which the radius of the sharpest curves could be increased, and the grades could be improved beyond eliminating the need for the frequent dips to intercept drainage on the existing dirt road. In addition, the study shall determine the need and location, if warranted, for the following: guardrails on sharp curves, warning signs to inform drivers of the curves, and signs posting maximum safe speed.

CIR6. Future roadways shall be constructed per the roadway standards illustrated on Exhibit 5.3-3, *Proposed Roadway Standards*.

AIR QUALITY

Long-Term Air Quality Impacts

AQ1. In order to reduce emissions associated with both mobile and stationary sources, all future development projects submitted to the City for consideration shall adhere to the programs and policies contained in the City of San Dimas General Plan and mitigation measures outlined in the General Plan EIR.

General Plan EIR Mitigation Measures

AQ2. Dust control measures required by the SCAQMD to be implemented during construction shall be actively enforced by City Staff. Such measures include maintaining adequate soils moisture, as well as removing any soil spillage onto traveled roadways through site housekeeping procedures.

AQ3. Reducing interference with existing traffic and preventing truck queuing around local receptors shall be incorporated into any project construction permits. The permits shall limit operation to daytime periods of better dispersion that minimizes localized pollutant accumulation.

GEOLOGY

G1. The applicant(s) shall submit a geotechnical report for review and approval by the Director of Public Works. This report will primarily involve assessment of potential soil related constraints and hazards such as slope instability, settlement, liquefaction, or related secondary seismic impacts, where determined to be appropriate by the Director of Public Works. The report shall also include an evaluation of potentially expansive soils and recommend construction procedures and/or design criteria to minimize the effect of these soils on the proposed developments. All reports shall recommend appropriate mitigation measures and be completed in the manner specified by the City of San Dimas Subdivision Ordinance (Title 17).

G2. The applicant(s) shall submit a report by an engineering geologist indicating the ground surface acceleration and potential ground surface rupture from earth movement for the various PDAs. All structures within the development shall be constructed in compliance with the g-factors as indicated by the geologist's report. Calculations for footings and structural members to withstand anticipated g-factors shall be submitted for review and approval by the Director of Public Works.

G3. Future development projects shall comply with the California Building Code (Title 24 of the California Code of Regulations) and the San Dimas Building Code.

G4. All grading and improvements on the subject property shall be made in accordance with Grading Ordinance (Municipal Code Chapter 15.04) and to the satisfaction of the director of Public Works. Grading shall be in substantial compliance with a tentative tract map and the proposed grading that is approved by the Planning Commission. Surety to guarantee the completion of the project grading and drainage improvements, including erosion control, shall be posted to the satisfaction of the Director of Public Works and the City Attorney.

G5. The applicant(s) shall exercise special care during the construction phase of the project to prevent any off-site situation. The applicant shall provide erosion control measures and shall construct temporary

desiltation/detention basins of a type, size and location as approved by the Director of Public Works. The basins and erosion control measures shall be shown and specified on the grading plan and shall be constructed to the satisfaction of the Director of Public Works prior to the start of any other grading operations. Prior to the removal of any basins or erosion control devices so constructed, the area served shall be protected by additional drainage facilities, slope erosion control measures and other methods as may be required by the Director of Public Works. The applicant shall maintain the temporary basins and erosion control devices until the Director of Public Works approves of the removal of said facilities.

G6. The applicant(s) shall submit a grading plan, in compliance with City standards, for review and approval by the Director of Public Works. All grading work must be in compliance with the approved plan and completed to the satisfaction of the Director of Public Works. All slopes within this project shall be graded no steeper than 2:1, unless otherwise approved by the Director of Public Works.

G7. The applicant shall submit a grading, drainage and retaining wall plan with a geotechnical soils report for review and approval by the Director of Public Works.

G8. Any grading required outside of a PDA boundary will require the applicant(s) to either obtain slope easements or off-site grading agreements in a form suitable for recording from the affected applicant(s).

G9. Given the amount of slope instability (i.e., landsliding) within the project area and the project proximity to major earthquake faults, the hazards associated with strong ground motion and possible surface rupture, in-depth, site-specific geotechnical studies shall be required to evaluate whether development within any of the 10 PDAs is not geotechnically feasible. At a minimum such studies should follow CDMG: Special Publication 17 (dated 1977), *Guidelines for Evaluating and Mitigating Seismic Hazards in California*. It is suggested that the scope of work presented in these "guidelines" be performed prior to any form of foundation investigation, unless such an investigation is to establish setbacks from known geologic hazards.

On-Site Disposal Systems

G10. All septic systems (i.e., trench/leach fields and seepage pits) shall be installed at locations pursuant to the requirements of the Los Angeles County Health Department.

Cumulative Impacts

G11. Site-specific geological evaluations shall be conducted on a project-by-project basis addressing remedial grading techniques, building setbacks, or special foundations for seismic areas, to the satisfaction of the appropriate jurisdiction Engineer.

HYDROLOGY AND DRAINAGE

Surface Hydrology

H1. The project applicant(s) shall provide and engineering hydrologic analysis of the development site watershed. Should the analysis indicate that the proposed development project would impact downstream facilities (i.e., inadequate capacity of the downstream storm drain system), construction of an on-site detention basin could be used as mitigation. On-site detention facilities, if necessary, shall be designed to provide the appropriate storm volume for the storm frequency indicated by the LACPW and the City of San Dimas City Engineer. Storm drain plans shall be subject to review and approval by the San Dimas City Engineer prior to the issuance of grading permits.

H2. In connection with site plan and design review, all required drainage improvements associated with individual developments shall be designed in accordance with the LACPW and the City of San Dimas design standards and shall be reviewed and approved by the City of San Dimas City Engineer prior to the commencement of grading.

Watershed Debris Production

H3. Prior to issuance of grading/building permits, the project applicant(s) shall provide site-specific engineering hydrologic analysis, to the satisfaction of the San Dimas City Engineer, to determine if debris basin(s) are necessary to reduce bulk flow. If determined necessary, the debris basin(s) shall be designed and constructed at the downstream ends of undeveloped drainage areas pursuant to LACPW methods and standards and subject to final design approval by the San Dimas City Engineer.

Flooding

H4. Project applicant(s) shall comply with the requirements of the LACPW to minimize flooding risks associated with stream or riverbed excavation, to prevent any impediment to the flow of storm runoff, and to ensure restoration of disrupted flood control facilities.

Proposed Roadways

H5. Drainage system design requirements for the future developments and all future roadways shall follow the minimum criteria for Private Drains (PD) or Miscellaneous Transfer Drains (MTD) defined by LACPW. General criteria includes, but is not limited to:

A. Any roadcrossing of natural drainages shall be designed to accommodate adequate capacity to convey the 50-year clear water discharge, or greater.

B. Minimum stormdrain pipe size diameter is 24 inches, but if conveys debris then 48 inches; and

C. Stormdrain flow velocity is limited to 20 feet per second (fps) if exceeded must use special pipe with additional concrete thickness.

H6. Project applicant(s) shall allow canyon slopes to drain along their natural path and not divert flows from one watershed to another. Drainage facilities located within the proposed roadways shall be implemented pursuant to the requirements of the LACPW and the City of San Dimas.

Water Quality

H7. Refer to Mitigation Measure G5, of Section 5.6, *Geology, Soils, and Seismicity*.

Cumulative Impacts

H8. Site-specific hydrology assessments subject to review and approval by the appropriate jurisdiction shall be prepared on a project-by-project basis to determine necessary mitigation in order reduce potential impacts to less than significant levels.

BIOLOGICAL RESOURCES

Vegetation

Native Grassland

BIO1. Impacts to native grassland shall be mitigated by the restoration of native grassland on the cut/fill slopes, other areas disturbed by construction activities, and additional areas supporting non-native vegetation, shall be reseeded with native grassland plant species Revegetation shall occur at a ration of 2:1. That is, for every acre of native grassland removed, two acres of habitat shall be replaced. Restoration shall consist of hydroseeding with appropriate native bunchgrasses and forbs and include the following:

A. Establishment of restoration/revegetation sites shall be conducted between September 1 and November 30. Introduction of hydroseed mix and container plants shall be immediately after preparation of the restoration sites.

B. Revegetation shall be considered successful at three years if the percent cover and species diversity of the restored and/or created habitat areas are similar to percent cover and species diversity of adjacent existing habitats, as determined by quantitative testing of existing and restored and/or created habitat areas.

C. Monitoring shall be conducted for three years to ensure successful establishment of the restored areas by native grasses and forbs. If success standards are not met, remedial measures, including hydroseeding or introduction of additional container stock shall be implemented as directed by the City of San Dimas and the project biologist.

Habitat Replacement - Mixed Willow Riparian Forest and Coast Live Oak Riparian Forest

BIO2. Impacts on wetlands and/or riparian habitats shall be mitigated as part of the mitigation required for any CDFG Section 1601 Streambed Alteration Agreement and/or ACOE Permit that may be processed for future development projects. As part of the permit/agreement, a conceptual streambed/riparian related mitigation plan would need to be developed. The objective of the mitigation is to ensure no net loss of habitat values from projects. The mixed willow riparian forest and coast live oak riparian forest are vegetation types that would be impacted by

future development projects within the project area and shall require permitting. The mitigation plan shall include the following elements:

A. Responsibilities and qualifications of the personnel to implement/supervise the plan;
B. Plant material and seed mixes;
C. Site preparation and planting implementation;
D. Performance criteria;
E. Monitoring and maintenance plan;
F. Long-term preservation of the site;
G. Agency coordination; and
H. Construction document preparation.

BIO3. In addition, the native trees may also fall under the jurisdiction of the City of San Dimas Tree Ordinance. A detailed tree survey shall be completed in the impact areas prior to implementation of future development projects. The tree replacement shall consist of a minimum of two 15-gallon native tree specimens for each removal, unless approved otherwise by the City of San Dimas. Native tree mitigation programs shall include:

A. A minimum of two 15-gallon native trees shall be planted on-site as replacement for one tree removed.

B. The Landscape Architect/designer for the project shall design replacement trees into landscape plans and shall be subject to review by the City of San Dimas.

C. Planting specification shall consider the following:

- The newly planted trees shall be planted high, as much as 3/4 above the new adjacent grade.
- Amending the backfill soil with wood shavings, etc. However, it is not recommended when existing soil is high in natural organic matter with a sandy loam texture.
- In regards to the need of planting amendments and drainage systems, recommendations shall be based on soil tests of this project and approved by the City.

D. Any City approved work within the driplines of saved trees, including branch removal, shall be under the inspection of a qualified arborist.

E. Copies of the "Tree Report", the "Tree Ordinance" and the "City approved Grading Plans" shall be maintained on-site during all site construction.

Coastal Sage Scrub

BIO4. To mitigate for impacts to coastal sage scrub, the following measure shall be incorporated into any future development projects that include the removal of coastal sage scrub habitat types.

A. All cut and fill slopes, other areas disturbed by construction activities, and additional areas supporting non-native vegetation, shall be reseeded with coastal sage scrub plant species. Revegetation shall occur at a ration of 2:1. That is, for every acre of coastal sage scrub removed, two acres of habitat shall be replaced. Revegetation shall be implemented in stages. The initial stage shall begin during site grubbing and shall consist of crushing/mulching scrub, within areas to be graded, with a dozer. The crushed/mulched material along with the top four to six inches (10 to 15 cm) of topsoil shall then be removed in one operation with a loader or dozer and stockpiled nearby as directed by the project biologist. Soil stockpiles shall be stored at depths no greater than seven feet (2 m) until revegetation sites are prepared and shall be maintained free of contamination (storage depths may require adjustment based upon length of storage). Stockpiles shall be stored no longer than six months. Once a restoration site is prepared (roughened by sheep's foot or similar equipment) the stockpiled soil shall be spread to a depth of approximately one foot (30 cm). Appropriate scrub container stock shall be incorporated into the revegetation areas as outlined in the detailed mitigation/restoration plan to be developed by the project biologist. In addition, container stock consisting of native bunchgrasses shall be incorporated into the planting. The redistributed material, along with the container stock, shall be watered by a temporary irrigation system until established, as determined by the project biologist.

B. Crushed plant material and soil to be stockpiled shall be obtained from various locations on-site. Areas to be revegetated shall be determined by the project biologist based upon such factors as the configuration of the cut and/or fill slopes and proximity to areas of intact scrub communities.

C. The timing of the stockpiling of plant material and topsoil shall be dictated by the grading/construction schedule. Reintroduction of stockpiled material to revegetation sites shall be conducted between September 1 and November 30. Container stock shall be planted during the same time period.

D. Performance standards shall be developed and apply for the revegetation of coastal sage scrub. Generally these standards include 75 percent coverage by redistributed vegetative materials, seeded species, and container stock (whichever of the three or combination is used) at the end of five years. In addition, a 50 percent survival of any container stock originally planted is expected. If 50 percent survival has not been achieved, replanting with appropriate size container stock necessary to achieve this standard shall be performed.

E. Monitoring of the revegetation areas shall be conducted for five (5) years to ensure successful colonization of the restored areas by scrub species. If success standards are not met, remedial measures, including hand seeding, hydroseeding, or introduction of additional container stock shall be implemented as directed by the City and the project biologist.

Wildlife

BIO5. Refer to Mitigation Measures BIO1 through BIO4.

Special Status Biological Resources

Plants

BIO6. To fully document the potential impacts to sensitive plant species, focused surveys for the following state or federally listed threatened or endangered plant species shall be conducted during the optimal survey period prior to any development approvals from the City for any project.

Braunton's milkvetch
Nevin's barberry
Thread-leaved brodiaea

In addition, focused surveys may also be warranted for sensitive species that are not currently classified as endangered, threatened, or proposed for listing, but which may be listed in the future or would be of concern to state and federal resource agencies during future environmental

review processes for projects. The following species may require focus surveys if specific project locations contain appropriate habitat:

Slender Mariposa lily
Plummer's Mariposa lily
San Gabriel Mountains dudleya
Many-Stemmed dudleya
Pious daisy
Robinson's peppergrass
Rayless ragwort

Focused surveys shall be conducted using the USFWS' survey protocol. In addition, surveys for federally listed species shall be conducted by qualified biologists that possess valid section 10(a)(1)(a) permits issued by USFWS.

Should focused surveys find a state or federally listed threatened or endangered species, or a substantial population of other lower status special status plant species on-site, mitigation would need to be coordinated with the USFWS, CDFG, and/or CNPS and may include habitat preservation off-site or population relocation to off-site natural open space areas.

Wildlife

BIO7. To fully document the potential impacts to sensitive wildlife species, focused surveys for the following state or federally listed threatened or endangered wildlife species shall be conducted during the optimal survey period prior to any development approvals from the City for any project.

Quino checkerspot butterfly
Santa Ana sucker
Arroyo southwestern toad
California red-legged frog
Southwestern willow flycatcher
Least Bell's vireo
Bank swallow (nesting)
Coastal California gnatcatcher
Raptor (nesting)

In addition, focused surveys may also be warranted for sensitive species that are not currently classified as endangered, threatened, or proposed for listing, but which may be listed in the future or would be of concern to state and federal resource agencies during future environmental review processes for projects. The following species may require focus surveys if future project locations contain appropriate habitat:

Arroyo chub	*San Bernardino mountain kingsnake*	*Grasshopper sparrow*
Santa Ana speckled dace	*Coast patchnose snake*	*Tricolored blackbird*
Coast range newt	*Two-striped garter snake*	*Pallid bat*
Large-blotched ensantina	*Loggerhead shrike*	*Townsend's western big-eared bat*
Western spadefoot	*California horned lark*	*San Diego black-tailed jackrabbit*
Mountain yellow-legged frog	*San Diego cactus wren*	*Dulzura California pocket mouse*
Southwestern pond turtle	*Yellow warbler*	*Pallid San Diego pocket mouse*
San Diego horned lizard	*Yellow-breasted chat*	*Los Angeles pocket mouse*
Coastal western whiptail	*Summer tanager*	*San Diego desert woodrat*
Silvery legless lizard	*Southern California rufous-crowned sparrow*	*Southern grasshopper mouse*
San Bernardino ring-necked snake	*Bell's sage sparrow*	*American badger*

Focused surveys shall be conducted using the USFWS' survey protocol. In addition, surveys for federally listed species shall be conducted by qualified biologists that possess valid section 10(a)(1)(a) permits issued by USFWS.

Should surveys find a state or federally listed threatened or endangered species, or a substantial population of the other lower status special status wildlife species on-site, mitigation shall need to be coordinated with the USFWS and CDFG. Mitigation may include habitat preservation off-site or habitat replacement through enhancement or restoration of on-site or off-site resources.

BIO8. Prior to approval of projects, a Resources Management Plan (RMP) shall be submitted to and approved by the City of San Dimas. The RMP shall contain procedures and performance standards that must be executed to protect, replace, or manage biological resources affected or potentially affected by construction and occupation of the development. The RMP shall contain a summary of mitigation milestones that shall identify the schedule of completion, and the party or parties responsible for their implementation.

CULTURAL RESOURCES

Paleontological Resources

The following mitigation measures shall be applied only in areas underlain by the Puente Formation and Pleistocene age deposits (refer to Exhibit 5.6-3, *Geologic Map*). No additional paleontological resource mitigation on other areas of the project site would be required.

CR1. Prior to grading in areas of the Puente Formation and Pleistocene age deposits, the applicant(s) shall retain a qualified paleontologist to perform field surveys of individual development sites, in order to determine if significant fossils are exposed in any area of development.

CR2. The applicant(s) shall retain a qualified paleontologist to perform on-site inspections of all construction excavations and, if necessary, salvage exposed fossils. The paleontologist shall have the authority to divert or redirect grading in the area(s) of an exposed fossil to facilitate evaluation and, if necessary, salvage fossils. Grading monitoring in these rock units shall initially be on a full time basis (i.e., all major excavations shall be monitored). If it is determined that an abundance of fossils is not expected or if subsurface conditions are different than anticipated, the duration of monitoring may be decreased in accordance with good paleontological practices.

CR3. Due to the small nature of some fossils present within the Puente Formation and Pleistocene deposits, matrix samples shall be collected for processing through fine mesh screens during salvaging activities.

CR4. Upon completion of all laboratory and field work, all final mitigation reports shall be filed with the repository and the City of San Dimas. Monthly progress reports shall be filed with the applicant(s) and available to the City of San Dimas.

CR5. Collected paleontological resources shall be donated to a public, nonprofit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County.

Cultural Resources

CR6. Individual property owners/applicants shall be responsible for cultural resources studies specific to each individual parcel to be developed. The owner/applicant shall be responsible for implementing mitigation measures to properly manage any cultural resources discovered.

Site-specific cultural resources studies must include the following: a) completion of a literature review of the particular project area; b) consultation with the appropriate Native American group, if required; c) reconnaissance of the project area; and 4) mitigative treatment of any cultural resources discovered.

CR7. Any projects with the potential to impact archaeological site CA-LAN-825 shall evaluate their condition and importance through text excavation and archival research.

CR8. Archaeological site CA-LAN-825 must be relocated and a site record supplement generated for the site. Evaluation of the site may necessitate further mitigative treatment.

CR9. The tunnels, steel pipe and storage tank described by LSA Associates (1998: 2-41) shall be formally recorded and evaluated by the proponent of any project with the potential to disturb them. Further mitigative treatment may be necessary.

PUBLIC SERVICES AND UTILITIES

Fire Service

Fire-Resistant Design and Materials Guidelines

PSU1. Roofing. Roofs shall be of noncombustible class "A" materials, such as clay or concrete shake, cinder, metal or tile. Open ends of roofs, such as tile roofs, shall be capped with noncombustible material to prevent bird nest or other combustible material from lodging within the roof.

PSU2. Glass. The size and number of glazed openings on the side of the house facing the downhill side or other unique fire hazard areas shall be held to a minimum and shall be glazed with extra-strength glass (thick, safety tempered and/or double-panned). Glass areas shall not exceed 50 percent of any wall.

Access Requirements

Roads must provide access for fire suppression equipment and for evacuation of residents in the event of fire.

PSU3. Traffic roadways shall be at least 26 feet wide and passable in all weather. The roadway curb-to-curb width shall be reduced to 16 feet,

where permitted by the City. (Refer to Access Implementing Policy and Action #1, bullets one and two) in Section 5.3, *Circulation*).

Water Supply

PSU4. Fire flow and hydrant locations shall be provided so that adequate water is available in the event of fire. Planned water supplies, piping and hydrants shall be installed and in working order prior to construction involving combustible materials. All development proposals must demonstrate conclusively that the development can be served with adequate water capacity.

PSU5. In the event that individual property owners install a water well, water from the well or other sources, such a pool, shall be available to the Fire Department for fire-fighting purposes.

Los Angeles County Fire Department

PSU6. Future development projects shall be reviewed by the Los Angeles County Fire Department. Specific department requirements for access, fire flows, hydrants or other fire and life safety requirements will be addressed at the plan check phase and must be complied with prior to approval of a tentative map.

PSU7. Residential projects shall meet fire flow requirements in accordance with relevant City building codes, fire codes and requirements of the Los Angeles County Fire Department.

PSU8. Fire sprinkler systems shall be installed in all residential buildings, where feasible.

PSU9. As required by Section 1117.2.1 of the Los Angeles County Fire Code, a fuel modification plan, a landscape plan and an irrigation plan shall be submitted with any subdivision of land or prior to any new construction, remodeling, modification or reconstruction where such activities increase the square footage of the existing structure by at least 50 percent within a 12-month period, and where said structure or subdivision is located within an area designated as a Very High Fire Hazard Severity Zone or within Fire Zone 4. Said plans shall be reviewed and approved by the Forestry Division of the Los Angeles County Fire Department for reasonable fire safety.

PSU10. Future development projects shall be required to comply with all applicable code and ordinance requirements for Fire Zone 4 pertaining to construction, access, water mains, fire hydrants, fire flows and brush clearance.

Water Resources and Facilities

PSU11. The City of San Dimas shall adopt the implementing policies and actions for Infrastructure Planning, Financing, and Construction in the *Northern Foothills Development and Infrastructure Study*. Future development proposals shall be reviewed to determine their compliance with the policies and actions.

PSU12. The project applicant(s) shall obtain the necessary permit(s) from the Public Health Programs and Services Department of the Bureau of Environmental Protects pursuant to Title 11 of the Los Angeles County Code (adopted by the City of San Dimas) and the California Water Code, prior to drilling groundwater wells. Construction of the groundwater wells shall be consistent with the California Department of Water Resources' Bulletin 74.

PSU13. The project applicant(s) shall consult the Upper San Gabriel Water Master prior to applying for a water well permit and provide "rights" to said groundwater.

PSU14. Prior to tentative map approval and issuance of building permits, as applicable, the project applicant(s) shall analyze and demonstrate the feasibility of construction water tanks and extending water lines to serve the development pursuant to the requirements of the Southern California Water Company and subject to review and approval by the City of San Dimas.

Wastewater

PSU15. Refer to Mitigation Measure PSU11.

PSU16. Prior to the installation of a private sewer or septic system, the project applicant(s) shall consult with the California Regional Water Quality Control Board (RWQCB) on a project-by-project basis to obtain waste discharge requirements.

PSU17. Prior to tentative map approval and issuance of building permits, as applicable, the project applicants(s) shall analyze and demonstrate the feasibility of constructing on-site sewage disposal systems (i.e., septic tanks/seepage ponds) for any given subdivision pursuant to the requirements of the Uniform Plumbing Code and subject to review and approval by the City of San Dimas.

PSU18. Prior to the approval of any on-site sewage disposal systems or the issuance of drilling permits, soil testing and applicable geological reports shall be submitted to the County of Los Angeles Department of Health Services and to the City of San Dimas for review and approval (refer to Section 5.6, *Geology*).

Electricity

PSU19. Refer to Mitigation Measure PSU11.

PSU20. The City of San Dimas shall adopt the implementing policies and actions for Visual Intrusiveness, as they relate to overhead utilities, in the *Northern Foothills Development and Infrastructure Study*. Future development proposals shall be reviewed to determine their compliance with the policies and actions.

PSU21. Prior to the issuance of building permit(s), the applicant(s) shall consult SCE and the City of San Dimas to determine the feasibility of placing electrical facilities above ground or underground.

Natural Gas

PSU22. Refer to Mitigation Measure PSU11.

PSU23. Prior to the issuance of building permit(s), the applicant(s) shall consult with The Gas Company and the City of San Dimas to determine the feasibility (both physically and economically) of extending underground gas distribution facilities to future development areas.

Solid Waste

PSU24. Prior to the issuance of building permit(s), the applicant(s) shall consult with the local waste hauler to determine the feasibility of accessing the development site. Should accessibility not be achievable, the project applicant(s) shall (1) work with the City of San Dimas and the trash hauler to identify locations where trash could be picked up, or (2) be

required to have individual property owners responsible for delivering their own rubbish to the local landfill.[1]

PSU25. Future developments, as applicable, shall incorporate storage and collection of recyclables into each project design and refuse collection contracts shall include collection of recyclables. Individual projects, as applicable, shall reserve space appropriate for the support of recycling, adequate storage areas and access for recycling vehicles, as appropriate.

Schools

PSU26. Individual development projects within the project area shall pay school fees to the Bonita Unified School District in accordance with Government Code Sections 65995, 65995.5 and 65995.7. The project applicant shall provide the City of San Dimas with evidence of school fee payment prior to the issuance of permits.

PSU27. Project applicants shall work with the Bonita Unified School District to identify the most appropriate locations for bus routes and stops, if feasible.

PSU28. Project applicants shall work with the Bonita Unified School District to identify the most appropriate "Safe Route to School" for students generated by the project. Future project residents shall be notified of the "Safe Route to School."

Parks and Recreation

PSU29. Prior to the approval of future development projects within the project area, the project applicant(s) shall consult the City of San Dimas to determine if the proposed development would impact existing equestrian and/or hiking trails. The City of San Dimas shall coordinate planning efforts with the Los Angeles County Department of Parks and Recreation if the City intends to designate trails for the project area or connect trails between adjacent jurisdictions.

PSU30. Future development projects that include equestrian trails shall be reviewed by the Equestrian Commission.

Communications

PSU31. Refer to Mitigation Measure PSU20.

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[1] The City of San Dimas has an ordinance that presently requires mandatory trash pick up.

PSU32. Prior to the issuance of building permit(s), the project applicant(s) shall consult the appropriate communication providers and the City of San Dimas to determine the feasibility of placing communication facilities underground or aboveground on an individual project basis.

9.0 Inventory of Significance After Mitigation

9.0 INVENTORY OF SIGNIFICANCE AFTER MITIGATION

Land Use and Relevant Planning

No unavoidable significant impacts related to land use and relevant plans and policies have been identified.

Aesthetics

Implementation of the proposed project would not result in unavoidable significant impacts related to aesthetics, light or glare. However, the permanent alteration of on-site topographic features remains a significant impact resulting from project implementation, even with the imposition of mitigation measures.

Circulation

Implementation of the proposed project would not result in any significant adverse impacts with respect to access.

Air Quality

Implementation of the proposed project would not result in unavoidable significant long-term impacts related to air quality.

Noise

Implementation of the proposed project would not result in unavoidable significant long-term impacts related to noise.

Geology

Implementation of the proposed project would not result in unavoidable significant impacts related to geology and soils.

Hydrology and Drainage

Implementation of the proposed project would not result in unavoidable significant impacts related to hydrology and drainage.

Biological Resources

No unavoidable significant impacts with respect to biological resources would occur with implementation of the proposed project.

Cultural Resources

With imposition of the recommended mitigation measures, no unavoidable significant impacts would occur with implementation of the proposed project.

Public Services and Utilities

Implementation of the proposed project would not result in unavoidable significant impacts related to police service, water resources and facilities, wastewater, electricity, natural gas, solid waste, schools, parks and recreation, and communication systems. However, the ability of the Fire Department to provide adequate service to all reaches of the project area remains a significant impact resulting from project implementation, even with imposition of mitigation measures.

10.0 Effects Found Not To Be Significant

10.0 EFFECTS FOUND NOT TO BE SIGNIFICANT

The City of San Dimas conducted an Initial Study in December 1998 to determine significant effects of the project. In the course of this evaluation, certain impacts of the project were found to be less than significant due to the inability of a project of this scope to create such impacts or the absence of project characteristics producing effects of this type. In accordance with California Environmental Quality Act Guidelines Section 15128, the following section provides a brief description of effects found to be less than significant.

The Initial Study prepared for the proposed project identified the following issue areas as less than significant impacts or no impacts:

- Population and Housing;
- Vehicle Trips and Traffic Congestion;
- Parking;
- Air Quality;
- Noise:
- Energy and Mineral Resources;
- Cultural Resources; and.
- Recreation.

A copy of the Initial Study is located in Appendix 14.1 of the EIR. Refer to the Initial Study for a more detailed discussion and explanation of the impact determination.

Section 5.0 of this document provides a more detailed description of the project's environmental impacts, proposed mitigation measures and the level of impact significance. This EIR focused environmental analysis on the following issues areas:

- Land Use & Relevant Planning;
- Aesthetics;
- Circulation and Access;
- Long-Term Air Quality;
- Long-Term Noise
- Geology
- Hydrology and Drainage;
- Biological Resources
- Cultural Resources; and
- Public Services and Utilities.

In all but two instances, landform alteration and fire protection, the conclusion was reached that either the impacts would not be significant or that with the imposition of available mitigation measures, the impacts would be reduced to less than significant levels.

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11.0 Organizations and Persons Consulted

11.0 ORGANIZATION AND PERSONS CONSULTED

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13.0 Mitigation Monitoring Program

13.0 MITIGATION MONITORING PROGRAM

Section 2.0 of this DEIR identifies the mitigation measures that will be implemented to reduce the impacts associated with the project. The California Environment Quality Act (CEQA) was amended in 1989 to add Section 21081.6, which requires a public agency to adopt a monitoring and reporting program for assessing and ensuring compliance with any required mitigation measures applied to proposed development. As stated in Section 21081.6 of the Public Resources Code,

> *". . . the public agency shall adopt a reporting or monitoring program for the changes to the project which it has adopted, or made a condition of project approval, in order to mitigate or avoid significant effects on the environment."*

Section 21081.6 provides general guidelines for implementing mitigation monitoring programs and indicates that specific reporting and/or monitoring requirements, to be enforced during project implementation, shall be defined prior to final certification of the EIR.

The mitigation monitoring table below lists those mitigation measures that may be included as conditions of approval for the project. These measures correspond to those outlined in Section 2.0 and discussed in Section 5.0. To ensure that the mitigation measures are properly implemented, a monitoring program has been devised which identifies the timing and responsibility for monitoring each measure. Both the City of San Dimas and the property owners within the Northern Foothills project area will have the responsibility for implementing the measures, and the various City of San Dimas departments will have the primary responsibility for monitoring and reporting the implementation of the mitigation measures.

NORTHERN FOOTHILLS IMPLEMENTATION PROGRAM EIR
MITIGATION MONITORING AND REPORTING CHECKLIST

Mit./ Cond. No.	Mitigation Measure/Conditions of Approval	Monitoring and Reporting Process	Monitoring Milestone	Party Responsible for Monitoring	VERIFICATION OF COMPLIANCE		
					Initials	Date	Remarks
LAND USE AND RELEVANT PLANNING							
LU1	The City shall review all future proposals on a case-by-case basis to ensure that incremental impacts do not occur with any future development. If necessary, the City shall require additional environmental evaluations and clearances, and impose site-specific mitigation to further reduce any potential impacts.	Development Plan/Tentative Tract Map Review	Prior to Approval of Development Plan/Tentative Tract Map	City of San Dimas			
LANDFORM ALTERATION							
AES1	The City of San Dimas shall adopt the implementing policies and actions for Visual Intrusiveness for New Development in the *Northern Foothills Development and Infrastructure Study*. Future development proposals shall be reviewed to determine their compliance with the policies and actions.	Development Plan/Tentative Tract Map Review	Prior to Approval of Development Plan/Tentative Tract Map	City of San Dimas			
AES2	Grading for all future development proposals in the Northern Foothills project area shall be designed in accordance with all applicable grading criteria for Visual Intrusiveness for New Development in the *Northern Foothills Development and Infrastructure Study*.	Development Plan/Tentative Tract Map Review	Prior to Issuance of Grading Permit	City of San Dimas			
AES3	Grading shall not exceed the minimum necessary to accommodate structures properly, as determined by the planning director or designee.	Development Plan/Tentative Tract Map Review	Prior to Issuance of Grading Permit	City of San Dimas			
AES4	Grading practices shall reflect the natural topography of the land.	Development Plan/Tentative Tract Map Review	Prior to Issuance of Grading Permit	City of San Dimas			
AES5	Creation of level area (i.e., pads) by grading shall be minimized.	Development Plan/Tentative Tract Map Review	Prior to Issuance of Grading Permit	City of San Dimas			
AES6	Grading on hillside areas or close to ridgelines shall incorporate the breaking of hard edges left by cut and fill operations to provide a more rounded appearance that closely resembles the natural contours of the land.	Development Plan/Tentative Tract Map Review	Prior to Issuance of Grading Permit	City of San Dimas			

NORTHERN FOOTHILLS IMPLEMENTATION PROGRAM EIR
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Mit./ Cond. No.	Mitigation Measure/Conditions of Approval	Monitoring and Reporting Process	Monitoring Milestone	Party Responsible for Monitoring	VERIFICATION OF COMPLIANCE		
					Initials	Date	Remarks
AES7	Grading within residential subdivisions shall be finished so that it is responsive to the original configuration of the land, as well as the adjacent contours.	Development Plan/Tentative Tract Map Review	Prior to Issuance of Grading Permit	City of San Dimas			
AES8	All graded slopes (cut or fill), including roadsides, shall undergo a permanent revegetation in a timely manner to minimize any change of erosion and siltation. Backdrop landscaping shall be provided, with heavy complements of drought and fire resistant trees and shrubs, sufficient to reduce erosion and present a natural, undisturbed appearance.	Development Plan/Tentative Tract Map Review	Prior to Issuance of Grading Permit	City of San Dimas			
AES9	Created slopes within the residential areas or any subdivision shall have more variety and texture in their appearance than engineered and uniform slopes. Not only shall these planes be undulating in appearance, but they should also have slopes that vary in gradient.	Development Plan/Tentative Tract Map Review	Prior to Issuance of Grading Permit	City of San Dimas			
AES10	Created slopes, either cut or fill, that are adjacent to roadways shall be graded in such a way that an undulating appearance in the graded plan is provided for a more pleasing roadscape.	Development Plan/Tentative Tract Map Review	Prior to Issuance of Grading Permit	City of San Dimas			
AESTHETICS							
AES11	All future development proposals in the Northern Foothills project area shall be designed in accordance with all applicable criteria for Visual Intrusiveness for New Development in the *Northern Foothills Development and Infrastructure Study*.	Development Plan/Tentative Tract Map Review	Prior to Approval of Development Plan/Tentative Tract Map	City of San Dimas			
AES12	Wherever possible, structures shall be built with rooftops lower in elevation than any adjacent ridgelines. A specific setback from the ridge may be required by the City of San Dimas to protect the ridgeline viewshed. Ridgeline setbacks shall be determined on a project-by-project basis.	Development Plan/Tentative Tract Map Review	Prior to Issuance of Building Permit	City of San Dimas			
AES13	Except for window surfaces, the use of polished or reflecting exterior building materials and finishes shall be avoided.	Development Plan/Tentative Tract Map Review	Prior to Issuance of Building Permit	City of San Dimas			

NORTHERN FOOTHILLS IMPLEMENTATION PROGRAM EIR
MITIGATION MONITORING AND REPORTING CHECKLIST

Mit./ Cond. No.	Mitigation Measure/Conditions of Approval	Monitoring and Reporting Process	Monitoring Milestone	Party Responsible for Monitoring	VERIFICATION OF COMPLIANCE		
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AES14	On downhill sites, decks shall be located and designed to avoid tall and highly visible supports. Exposed areas under decks shall be screened with lattice, or similar treatments composed of fire-resistant materials.	Development Plan/Tentative Tract Map Review	Prior to Issuance of Building Permit	City of San Dimas			
AES15	Individual residential units located within viewsheds shall be oriented to avoid creating a line of solid development.	Development Plan/Tentative Tract Map Review	Prior to Issuance of Building Permit	City of San Dimas			
AES16	Open vistas shall be protected by such means as adequate setbacks, open space, building height limits, and view corridors pursuant to the *San Dimas Municipal Code*.	Development Plan/Tentative Tract Map Review	Prior to Issuance of Building Permit	City of San Dimas			
AES17	Natural scenic features such as mature trees, rock outcroppings, watercourses, and views shall be integrated into individual project design subject to the approval by the City of San Dimas.	Development Plan/Tentative Tract Map Review	Prior to Issuance of Building Permit	City of San Dimas			
AES18	Individual developments shall incorporate adequate landscape screening in order to minimize project views to off-site uses, as demonstrated in a Landscape Plan requiring review and approval by the City of San Dimas Development Plan Review Board (DPRB) on a project-by-project basis prior to the issuance of building permits.	Development Plan/Tentative Tract Map Review	Prior to Issuance of Building Permit	City of San Dimas			
AES19	The architecture of structures in the hillside areas shall be consistent with the overall natural environmental qualities of the site; the architecture shall meld itself to the topography rather than dominate it. The following hillside architecture and urban design guidelines shall be employed in addition to those applicable throughout the City. The Development Plan Review Board shall determine that the architecture and urban design are satisfactory. A. Residential units shall be asymmetrically massed, with the horizontal portions far greater than the vertical proportions.	Development Plan/Tentative Tract Map Review	Prior to Issuance of Building Permit	City of San Dimas			

NORTHERN FOOTHILLS IMPLEMENTATION PROGRAM EIR
MITIGATION MONITORING AND REPORTING CHECKLIST

Mit./ Cond. No.	Mitigation Measure/Conditions of Approval	Monitoring and Reporting Process	Monitoring Milestone	Party Responsible for Monitoring	VERIFICATION OF COMPLIANCE		
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AES19 (cont.)	B. Massing and proportions shall be consistent with the topography. C. Hillside architecture shall not dominate the environment; its forms and colors shall blend into the natural surroundings. The exterior finishes, textures and colors of hillside structures shall be restrained through the encouragement of earth-tone colors and the discouragement of reflective materials or finishes. Preference shall be given to the use of earth-tone colors and materials for roofs due to their visual impact. D. For a lower, more horizontal profile, structures shall be encouraged to be designed so that rooflines run parallel to the slope, rather than intersecting it.						
LIGHT AND GLARE							
AES20	Lighting for all future development proposals in the Northern Foothills project areas shall be designed in accordance with all applicable lighting criteria for Visual Intrusiveness for New Development in the *Northern Foothills Development and Infrastructure Study*.	Development Plan/Tentative Tract Map Review	Prior to Approval of Development Plan/Tentative Tract Map	City of San Dimas			
AES21	Exterior lighting for buildings shall be the minimum necessary to provide for safety for pedestrians and other non-vehicular uses around the primary building on a parcel. Landscaping shall be used to reduce the long-range visibility of night lighting.	Development Plan/Tentative Tract Map Review	Prior to Issuance of Building Permit	City of San Dimas			
AES22	Proper lighting techniques to direct light on-site and away from other properties, as determined by the City of San Dimas, shall be required to reduce light and glare (including directional lighting, use of non-reflective glass, use of appropriate types of lighting fixtures, and earthtone building materials).	Development Plan/Tentative Tract Map Review	Prior to Issuance of Building Permit	City of San Dimas			
AES23	Windows with highly reflective treatments shall be avoided and windows shall be located as to avoid highly reflective sun orientations to surrounding properties.	Development Plan/Tentative Tract Map Review	Prior to Issuance of Building Permit	City of San Dimas			

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Mit./ Cond. No.	Mitigation Measure/Conditions of Approval	Monitoring and Reporting Process	Monitoring Milestone	Party Responsible for Monitoring	VERIFICATION OF COMPLIANCE		
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CIRCULATION							
CIR1	Modify the footnote for Access Implementing Policies and Actions #1 to read as follows: "The 26-foot width is currently permitted for access roads, which do not directly serve development. The proposed revision would permit new development to front on 26-foot wide access roads, provided that additional on-site parking is made available."	General Plan Amendment & Zone Change/Specific Plan for Northern Foothills	Following City Council Adoption of General Plan Amendment & Zone Change/Specific Plan	City of San Dimas			
CIR2	Modify the wording for the third bullet point under Access Implementing Policies and Actions #1 to read as follows: "Revise City roadway standards to provide an exception to current requirements for street paving along private roadways which will ultimately serve a maximum of four dwellings, based on the maximum density allowable in the General Plan. Such limited use roadways should be permitted to be hard packed (e.g., decomposed granite) as approved by the City Engineer, provided that adequate maintenance is guaranteed to ensure that the roadway will be regularly graded and kept clear of ruts and debris. Maximum grade shall be determined based on existing topographic conditions."	General Plan Amendment & Zone Change/Specific Plan for Northern Foothills	Following City Council Adoption of General Plan Amendment & Zone Change/Specific Plan	City of San Dimas			
CIR3	The City of San Dimas shall adopt the implementing policies and actions, as amended in Circulation Mitigation Measures CIR1 and CIR2, for Access and Infrastructure Planning, Financing and Construction in the *Northern Foothills Development and Infrastructure Study*. Future development proposals shall be reviewed to determine their compliance with the policies and actions.	Development Plan/Tentative Tract Map Review	Prior to Approval of Development Plan/Tentative Tract Map	City of San Dimas			
CIR4	For the three proposed roadways of the "backbone" road system, the maximum grade shall not exceed 12 to 15 percent, unless existing topography dictates an exception for short roadway segments.	Development Plan/Tentative Tract Map Review	Prior to Issuance of Grading/Building Permits	City of San Dimas			

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MITIGATION MONITORING AND REPORTING CHECKLIST

Mit./ Cond. No.	Mitigation Measure/Conditions of Approval	Monitoring and Reporting Process	Monitoring Milestone	Party Responsible for Monitoring	VERIFICATION OF COMPLIANCE		
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CIR5	A detailed study of Sycamore Flat Motorway is required. The study shall analyze the potential for the roadway grade not to exceed 12 to 15 percent. This maximum grade may not be attainable on all portions of the Sycamore Flat Motorway; however, every effort shall be made to achieve this objective, and to minimize the length and steepness of grades. The study shall also analyze ways in which the radius of the sharpest curves could be increased, and the grades could be improved beyond eliminating the need for the frequent dips to intercept drainage on the existing dirt road. In addition, the study shall determine the need and location, if warranted, for the following: guardrails on sharp curves, warning signs to inform drivers of the curves, and signs posting maximum safe speed.	Development Plan/Tentative Tract Map Review	Prior to Issuance of Grading/Building Permits	City of San Dimas			
CIR6	Future roadways shall be constructed per the roadway standards illustrated on Exhibit 5.3-3, *Proposed Roadway Standards*.	Development Plan/Tentative Tract Map Review	Prior to Issuance of Grading/Building Permits	City of San Dimas			
AIR QUALITY							
AQ1	In order to reduce emissions associated with both mobile and stationary sources, all future development projects submitted to the City for consideration shall adhere to the programs and policies contained in the City of San Dimas General Plan and mitigation measures outlined in the General Plan EIR.	Dust Control Compliance	During Grading and Construction	City of San Dimas			
AQ2	Dust control measures required by the SCAQMD to be implemented during construction shall be actively enforced by City Staff. Such measures include maintaining adequate soils moisture, as well as removing any soil spillage onto traveled roadways through site housekeeping procedures. (General Plan EIR Mitigation Measure)	Dust Control Compliance	During Grading and Construction	City of San Dimas			
AQ3	Reducing interference with existing traffic and preventing truck queuing around local receptors shall be incorporated into any project construction permits. The permits shall limit operation to daytime periods of better dispersion that minimizes localized pollutant accumulation. (General Plan EIR Mitigation Measure)	Construction Compliance	During Grading and Construction	City of San Dimas			

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Mit./ Cond. No.	Mitigation Measure/Conditions of Approval	Monitoring and Reporting Process	Monitoring Milestone	Party Responsible for Monitoring	VERIFICATION OF COMPLIANCE		
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GEOLOGY							
G1	The applicant(s) shall submit a geotechnical report for review and approval by the Director of Public Works. This report will primarily involve assessment of potential soil related constraints and hazards such as slope instability, settlement, liquefaction, or related secondary seismic impacts, where determined to be appropriate by the Director of Public Works. The report shall also include an evaluation of potentially expansive soils and recommend construction procedures and/or design criteria to minimize the effect of these soils on the proposed developments. All reports shall recommend appropriate mitigation measures and be completed in the manner specified by the City of San Dimas Subdivision Ordinance (Title 17).	Development Plan/Tentative Tract Map Review	Prior to Issuance of Grading Permit	City of San Dimas			
G2	The applicant(s) shall submit a report by an engineering geologist indicating the ground surface acceleration and potential ground surface rupture from earth movement for the various PDAs. All structures within the development shall be constructed in compliance with the g-factors as indicated by the geologist's report. Calculations for footings and structural members to withstand anticipated g-factors shall be submitted for review and approval by the Director of Public Works.	Development Plan/Tentative Tract Map Review	Prior to Issuance of Grading Permit	City of San Dimas			
G3	Future development projects shall comply with the California Building Code (Title 24 of the California Code of Regulations) and the San Dimas Building Code.	Development Plan/Tentative Tract Map Review	Prior to Issuance of Grading Permit	City of San Dimas			
G4	All grading and improvements on the subject property shall be made in accordance with Grading Ordinance (Municipal Code Chapter 15.04) and to the satisfaction of the director of Public Works. Grading shall be in substantial compliance with a tentative tract map and the proposed grading that is approved by the Planning Commission. Surety to guarantee the completion of the project grading and drainage improvements, including erosion control, shall be posted to the satisfaction of the Director of Public Works and the City Attorney.	Development Plan/Tentative Tract Map Review	Prior to Issuance of Grading Permit	City of San Dimas			

NORTHERN FOOTHILLS IMPLEMENTATION PROGRAM EIR
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					Initials	Date	Remarks
G5	The applicant(s) shall exercise special care during the construction phase of the project to prevent any off-site situation. The applicant shall provide erosion control measures and shall construct temporary desiltation/detention basins of a type, size and location as approved by the Director of Public Works. The basins and erosion control measures shall be shown and specified on the grading plan and shall be constructed to the satisfaction of the Director of Public Works prior to the start of any other grading operations. Prior to the removal of any basins or erosion control devices so constructed, the area served shall be protected by additional drainage facilities, slope erosion control measures and other methods as may be required by the Director of Public Works. The applicant shall maintain the temporary basins and erosion control devices until the Director of Public Works approves of the removal of said facilities.	Development Plan/Tentative Tract Map Review	Prior to Issuance of Grading Permit	City of San Dimas			
G6	The applicant(s) shall submit a grading plan, in compliance with City standards, for review and approval by the Director of Public Works. All grading work must be in compliance with the approved plan and completed to the satisfaction of the Director of Public Works. All slopes within this project shall be graded no steeper than 2:1, unless otherwise approved by the Director of Public Works.	Development Plan/Tentative Tract Map Review	Prior to Issuance of Grading Permit	City of San Dimas			
G7	The applicant(s) shall submit a grading plan, in compliance with City standards, for review and approval by the Director of Public Works. All grading work must be in compliance with the approved plan and completed to the satisfaction of the Director of Public Works. All slopes within this project shall be graded no steeper than 2:1, unless otherwise approved by the Director of Public Works.	Development Plan/Tentative Tract Map Review	Prior to Issuance of Grading Permit	City of San Dimas			
G8	Any grading required outside of a PDA boundary will require the applicant(s) to either obtain slope easements or off-site grading agreements in a form suitable for recording from the affected applicant(s).	Development Plan/Tentative Tract Map Review	Prior to Issuance of Grading Permit	City of San Dimas			

NORTHERN FOOTHILLS IMPLEMENTATION PROGRAM EIR
MITIGATION MONITORING AND REPORTING CHECKLIST

Mit./ Cond. No.	Mitigation Measure/Conditions of Approval	Monitoring and Reporting Process	Monitoring Milestone	Party Responsible for Monitoring	VERIFICATION OF COMPLIANCE		
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G9	Given the amount of slope instability (i.e., landsliding) within the project area and the project proximity to major earthquake faults, the hazards associated with strong ground motion and possible surface rupture, in-depth, site-specific geotechnical studies shall be required to evaluate whether development within any of the 10 PDAs is not geotechnically feasible. At a minimum such studies should follow CDMG: Special Publication 17 (dated 1977), *Guidelines for Evaluating and Mitigating Seismic Hazards in California*. It is suggested that the scope of work presented in these "guidelines" be performed prior to any form of foundation investigation, unless such an investigation is to establish setbacks from known geologic hazards.	Development Plan/Tentative Tract Map Review	Prior to Issuance of Grading Permit	City of San Dimas			
On-Site Disposal Systems							
G10	All septic systems (i.e., trench/leach fields and seepage pits) shall be installed at locations pursuant to the requirements of the Los Angeles County Health Department.	Development Plan/Tentative Tract Map Review	Prior to Issuance of Grading/Building Permits	City of San Dimas & Los Angeles County Health Dept.			
Cumulative							
G11	Site-specific geological evaluations shall be conducted on a project-by-project basis addressing remedial grading techniques, building setbacks, or special foundations for seismic areas, to the satisfaction of the appropriate jurisdiction Engineer.	Development Plan/Tentative Tract Map Review	Prior to Issuance of Grading Permit	City of San Dimas			

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Mit./ Cond. No.	Mitigation Measure/Conditions of Approval	Monitoring and Reporting Process	Monitoring Milestone	Party Responsible for Monitoring	VERIFICATION OF COMPLIANCE Initials	Date	Remarks
HYDROLOGY AND DRAINAGE							
Surface Hydrology							
H1	The project applicant(s) shall provide and engineering hydrologic analysis of the development site watershed. Should the analysis indicate that the proposed development project would impact downstream facilities (i.e., inadequate capacity of the downstream storm drain system), construction of an on-site detention basin could be used as mitigation. On-site detention facilities, if necessary, shall be designed to provide the appropriate storm volume for the storm frequency indicated by the LACPW and the City of San Dimas City Engineer. Storm drain plans shall be subject to review and approval by the San Dimas City Engineer prior to the issuance of grading permits.	Site-Specific Hydrologic Analysis, As Required	Prior to Issuance of Grading Permit	City of San Dimas & Los Angeles County Dept. of Public Works			
H2	In connection with site plan and design review, all required drainage improvements associated with individual developments shall be designed in accordance with the LACPW and the City of San Dimas design standards and shall be reviewed and approved by the City of San Dimas City Engineer prior to the commencement of grading.	Development Plan/Tentative Tract Map Review	Prior to Issuance of Grading Permit	City of San Dimas & Los Angeles County Dept. of Public Works			
Watershed Debris Production							
H3	Prior to issuance of grading/building permits, the project applicant(s) shall provide site-specific engineering hydrologic analysis, to the satisfaction of the San Dimas City Engineer, to determine if debris basin(s) are necessary to reduce bulk flow. If determined necessary, the debris basin(s) shall be designed and constructed at the downstream ends of undeveloped drainage areas pursuant to LACPW methods and standards and subject to final design approval by the San Dimas City Engineer.	Development Plan/Tentative Tract Map Review	Prior to Issuance of Grading/Building Permits	City of San Dimas & Los Angeles County Dept. of Public Works			
Flooding							
H4	Project applicant(s) shall comply with the requirements of the LACPW to minimize flooding risks associated with stream or riverbed excavation, to prevent any impediment to the flow of storm runoff, and to ensure restoration of disrupted flood control facilities.	Development Plan/Tentative Tract Map Review	Prior to Issuance of Grading/Building Permits	City of San Dimas & Los Angeles County Dept. of Public Works			

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Mit./ Cond. No.	Mitigation Measure/Conditions of Approval	Monitoring and Reporting Process	Monitoring Milestone	Party Responsible for Monitoring	VERIFICATION OF COMPLIANCE		
					Initials	Date	Remarks
Proposed Roadways							
H5	Drainage system design requirements for the future developments and all future roadways shall follow the minimum criteria for Private Drains (PD) or Miscellaneous Transfer Drains (MTD) defined by LACPW. General criteria includes, but is not limited to: A. Any roadcrossing of natural drainages shall be designed to accommodate adequate capacity to convey the 50-year clear water discharge, or greater. B. Minimum stormdrain pipe size diameter is 24 inches, but if conveys debris then 48 inches; and C. Stormdrain flow velocity is limited to 20 feet per second (fps) if exceeded must use special pipe with additional concrete thickness.	Development Plan/Tentative Tract Map Review	Prior to Issuance of Grading/Building Permits	City of San Dimas & Los Angeles County Dept. of Public Works			
H6	Project applicant(s) shall allow canyon slopes to drain along their natural path and not divert flows from one watershed to another. Drainage facilities located within the proposed roadways shall be implemented pursuant to the requirements of the LACPW and the City of San Dimas.	Development Plan/Tentative Tract Map Review	Prior to Issuance of Grading/Building Permits	City of San Dimas & Los Angeles County Dept. of Public Works			
Water Quality							
H7	Refer to Mitigation Measure G5, of Section 5.6, *Geology, Soils, and Seismicity*.	Development Plan/Tentative Tract Map Review	Prior to Issuance of Grading/Building Permits	City of San Dimas			
Cumulative							
H8	Site-specific hydrology assessments subject to review and approval by the appropriate jurisdiction shall be prepared on a project-by-project basis to determine necessary mitigation in order reduce potential impacts to less than significant levels.	Development Plan/Tentative Tract Map Review	Prior to Issuance of Grading/Building Permits	City of San Dimas & Los Angeles County Dept. of Public Works			

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Mit./ Cond. No.	Mitigation Measure/Conditions of Approval	Monitoring and Reporting Process	Monitoring Milestone	Party Responsible for Monitoring	VERIFICATION OF COMPLIANCE		
					Initials	Date	Remarks
BIOLOGICAL RESOURCES							
Vegetation: Native Grassland							
BIO1	Impacts to native grassland shall be mitigated by the restoration of native grassland on the cut/fill slopes, other areas disturbed by construction activities, and additional areas supporting non-native vegetation, shall be reseeded with native grassland plant species Revegetation shall occur at a ration of 2:1. That is, for every acre of native grassland removed, two acres of habitat shall be replaced. Restoration shall consist of hydroseeding with appropriate native bunchgrasses and forbs and include the following: A. Establishment of restoration/revegetation sites shall be conducted between September 1 and November 30. Introduction of hydroseed mix and container plants shall be immediately after preparation of the restoration sites. B. Revegetation shall be considered successful at three years if the percent cover and species diversity of the restored and/or created habitat areas are similar to percent cover and species diversity of adjacent existing habitats, as determined by quantitative testing of existing and restored and/or created habitat areas. C. Monitoring shall be conducted for three years to ensure successful establishment of the restored areas by native grasses and forbs. If success standards are not met, remedial measures, including hydroseeding or introduction of additional container stock shall be implemented as directed by the City of San Dimas and the project biologist.	Development Plan/Tentative Tract Map Review	Prior to Issuance of Grading/Building Permits and Annual Monitoring	City of San Dimas, United States Fish & Wildlife Service, and California Department of Fish & Game			

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					Initials	Date	Remarks
Vegetation: Habitat Replacement - Mixed Willow Riparian Forest and Coast Live Oak Riparian Forest							
BIO2	Impacts on wetlands and/or riparian habitats shall be mitigated as part of the mitigation required for any CDFG Section 1601 Streambed Alteration Agreement and/or ACOE Permit that may be processed for future development projects. As part of the permit/agreement, a conceptual streambed/riparian related mitigation plan would need to be developed. The objective of the mitigation is to ensure no net loss of habitat values from projects. The mixed willow riparian forest and coast live oak riparian forest are vegetation types that would be impacted by future development projects within the project area and shall require permitting. The mitigation plan shall include the following elements: A. Responsibilities and qualifications of the personnel to implement/supervise the plan; B. Plant material and seed mixes; C. Site preparation and planting implementation; D. Performance criteria; E. Monitoring and maintenance plan; F. Long-term preservation of the site; G. Agency coordination; and H. Construction document preparation.	CDFG Section 1601 Streambed Alteration Agreement and ACOE Permit	Prior to Issuance of Grading/Building Permits	City of San Dimas, United States Fish & Wildlife Service, and California Department of Fish & Game			
BIO3	In addition, the native trees may also fall under the jurisdiction of the City of San Dimas Tree Ordinance. A detailed tree survey shall be completed in the impact areas prior to implementation of future development projects. The tree replacement shall consist of a minimum of two 15-gallon native tree specimens for each removal, unless approved otherwise by the City of San Dimas. Native tree mitigation programs shall include: A. A minimum of two 15-gallon native trees shall be planted on-site as replacement for one tree removed.	Site-Specific Tree Survey, As Required	Prior to Issuance of Grading/Building Permits and During Construction	City of San Dimas, United States Fish & Wildlife Service, and California Department of Fish & Game			

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BIO3 (cont.)	B. The Landscape Architect/designer for the project shall design replacement trees into landscape plans and shall be subject to review by the City of San Dimas. C. Planting specification shall consider the following: • The newly planted trees shall be planted high, as much as 3/4 above the new adjacent grade. • Amending the backfill soil with wood shavings, etc. However, it is not recommended when existing soil is high in natural organic matter with a sandy loam texture. • In regards to the need of planting amendments and drainage systems, recommendations shall be based on soil tests of this project and approved by the City. D. Any City approved work within the driplines of saved trees, including branch removal, shall be under the inspection of a qualified arborist. E. Copies of the "Tree Report", the "Tree Ordinance" and the "City approved Grading Plans" shall be maintained on-site during all site construction.						
Vegetation: Coastal Sage Scrub							
BIO4	To mitigate for impacts to coastal sage scrub, the following measure shall be incorporated into any future development projects that include the removal of coastal sage scrub habitat types.	Development Plan/Tentative Tract Map Review	Prior to Issuance of Grading/Building Permits	City of San Dimas, United States Fish & Wildlife Service, and California Department of Fish & Game			

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BIO4 (cont.)	A. All cut and fill slopes, other areas disturbed by construction activities, and additional areas supporting non-native vegetation, shall be reseeded with coastal sage scrub plant species. Revegetation shall occur at a ration of 2:1. That is, for every acre of coastal sage scrub removed, two acres of habitat shall be replaced. Revegetation shall be implemented in stages. The initial stage shall begin during site grubbing and shall consist of crushing/mulching scrub, within areas to be graded, with a dozer. The crushed/mulched material along with the top four to six inches (10 to 15 cm) of topsoil shall then be removed in one operation with a loader or dozer and stockpiled nearby as directed by the project biologist. Soil stockpiles shall be stored at depths no greater than seven feet (2 m) until revegetation sites are prepared and shall be maintained free of contamination (storage depths may require adjustment based upon length of storage). Stockpiles shall be stored no longer than six months. Once a restoration site is prepared (roughened by sheep's foot or similar equipment) the stockpiled soil shall be spread to a depth of approximately one foot (30 cm). Appropriate scrub container stock shall be incorporated into the revegetation areas as outlined in the detailed mitigation/restoration plan to be developed by the project biologist. In addition, container stock consisting of native bunchgrasses shall be incorporated into the planting. The redistributed material, along with the container stock, shall be watered by a temporary irrigation system until established, as determined by the project biologist. B. Crushed plant material and soil to be stockpiled shall be obtained from various locations on-site. Areas to be revegetated shall be determined by the project biologist based upon such factors as the configuration of the cut and/or fill slopes and proximity to areas of intact scrub communities. C. The timing of the stockpiling of plant material and topsoil shall be dictated by the grading/construction schedule. Reintroduction of stockpiled material to revegetation sites shall be conducted between September 1 and November 30. Container stock shall be planted during the same time period.						

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BIO4 (cont.)	D. Performance standards shall be developed and apply for the revegetation of coastal sage scrub. Generally these standards include 75 percent coverage by redistributed vegetative materials, seeded species, and container stock (whichever of the three or combination is used) at the end of five years. In addition, a 50 percent survival of any container stock originally planted is expected. If 50 percent survival has not been achieved, replanting with appropriate size container stock necessary to achieve this standard shall be performed. E. Monitoring of the revegetation areas shall be conducted for five (5) years to ensure successful colonization of the restored areas by scrub species. If success standards are not met, remedial measures, including hand seeding, hydroseeding, or introduction of additional container stock shall be implemented as directed by the City and the project biologist.						
Wildlife							
BIO5	Refer to Mitigation Measures BIO1 through BIO4.	Development Plan/Tentative Tract Map Review	Prior to Issuance of Grading/Building Permits	City of San Dimas, United States Fish & Wildlife Service, and California Department of Fish & Game			

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Special Status Biological Resources: Plants							
BIO6	To fully document the potential impacts to sensitive plant species, focused surveys for the following state or federally listed threatened or endangered plant species shall be conducted during the optimal survey period prior to any development approvals from the City for any project. *Braunton's milkvetch* *Nevin's barberry* *Thread-leaved brodiaea* In addition, focused surveys may also be warranted for sensitive species that are not currently classified as endangered, threatened, or proposed for listing, but which may be listed in the future or would be of concern to state and federal resource agencies during future environmental review processes for projects. The following species may require focus surveys if specific project locations contain appropriate habitat: *Slender Mariposa lily* *Plummer's Mariposa lily* *San Gabriel Mountains dudleya* *Many-Stemmed dudleya* *Pious daisy* *Robinson's peppergrass* *Rayless ragwort* Focused surveys shall be conducted using the USFWS' survey protocol. In addition, surveys for federally listed species shall be conducted by qualified biologists that possess valid section 10(a)(1)(a) permits issued by USFWS. Should focused surveys find a state or federally listed threatened or endangered species, or a substantial population of other lower status special status plant species on-site, mitigation would need to be coordinated with the USFWS, CDFG, and/or CNPS and may include habitat preservation off-site or population relocation to off-site natural open space areas.	Site-Specific Focused Surveys, As Required	Prior to Approval of Development Plan/Tentative Tract Map	City of San Dimas, United States Fish & Wildlife Service, and California Department of Fish & Game			

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Mit./ Cond. No.	Mitigation Measure/Conditions of Approval	Monitoring and Reporting Process	Monitoring Milestone	Party Responsible for Monitoring	VERIFICATION OF COMPLIANCE Initials	Date	Remarks
Special Status Biological Resources: Wildlife							
BIO7	To fully document the potential impacts to sensitive wildlife species, focused surveys for the following state or federally listed threatened or endangered wildlife species shall be conducted during the optimal survey period prior to any development approvals from the City for any project. *Quino checkerspot butterfly* *Santa Ana sucker* *Arroyo southwestern toad* *California red-legged frog* *Least Bell's vireo* *Bank swallow (nesting)* *Coastal California gnatcatcher* *Raptor (nesting)* In addition, focused surveys may also be warranted for sensitive species that are not currently classified as endangered, threatened, or proposed for listing, but which may be listed in the future or would be of concern to state and federal resource agencies during future environmental review processes for projects. The following species may require focus surveys if future project locations contain appropriate habitat: *Arroyo chub; San Bernardino mountain kingsnake; Grasshopper sparrow; Santa Ana speckled dace; Coast patchnose snake; Tricolored blackbird; Coast range newt; Two-striped garter snake; Pallid bat; Large-blotched ensantina; Loggerhead shrike; Townsend's western big-eared bat; Western spadefoot; California horned lark; San Diego black-tailed jackrabbit; Mountain yellow-legged frog; San Diego cactus wren; Dulzura California pocket mouse; Southwestern pond turtle; Yellow warbler; Pallid San Diego pocket mouse; San Diego horned lizard; Yellow-breasted chat; Los Angeles pocket mouse; Coastal western whiptail; Summer tanager; San Diego desert woodrat; Silvery legless lizard; Southern California rufous-crowned sparrow; Southern grasshopper mouse; San Bernardino ring-necked snake; Bell's sage sparrow; or American badger.*	Site-Specific Focused Surveys, As Required	Prior to Approval of Development Plan/Tentative Tract Map	City of San Dimas, United States Fish & Wildlife Service, and California Department of Fish & Game			

Mit./ Cond. No.	Mitigation Measure/Conditions of Approval	Monitoring and Reporting Process	Monitoring Milestone	Party Responsible for Monitoring	VERIFICATION OF COMPLIANCE Initials	Date	Remarks
BIO7 (cont.)	Focused surveys shall be conducted using the USFWS' survey protocol. In addition, surveys for federally listed species shall be conducted by qualified biologists that possess valid section 10(a)(1)(a) permits issued by USFWS. Should surveys find a state or federally listed threatened or endangered species, or a substantial population of the other lower status special status wildlife species on-site, mitigation shall need to be coordinated with the USFWS and CDFG. Mitigation may include habitat preservation off-site or habitat replacement through enhancement or restoration of on-site or off-site resources.						
BIO8	Prior to approval of projects, a Resources Management Plan (RMP) shall be submitted to and approved by the City of San Dimas. The RMP shall contain procedures and performance standards that must be executed to protect, replace, or manage biological resources affected or potentially affected by construction and occupation of the development. The RMP shall contain a summary of mitigation milestones that shall identify the schedule of completion, and the party or parties responsible for their implementation.	Development Plan/Tentative Tract Map Review	Prior to Approval of Development Plan/Tentative Tract Map	City of San Dimas, United States Fish & Wildlife Service, and California Department of Fish & Game			
PALEONTOLOGICAL RESOURCES							
The following mitigation measures shall be applied only in areas underlain by the Puente Formation and Pleistocene age deposits (refer to Exhibit 5.6-3, *Geologic Map*). No additional paleontological resource mitigation on other areas of the project site would be required.							
CR1	Prior to grading in areas of the Puente Formation and Pleistocene age deposits, the applicant(s) shall retain a qualified paleontologist to perform field surveys of individual development sites, in order to determine if significant fossils are exposed in any area of development.	Site-Specific Paleontological Study, As Required	Prior to Issuance of Grading Permit	City of San Dimas			
CR2	The applicant(s) shall retain a qualified paleontologist to perform on-site inspections of all construction excavations and, if necessary, salvage exposed fossils. The paleontologist shall have the authority to divert or redirect grading in the area(s) of an exposed fossil to facilitate evaluation and, if necessary, salvage fossils. Grading monitoring in these rock units shall initially be on a full time basis (i.e., all major excavations shall be monitored). If it is determined that an abundance of fossils is not expected or if subsurface conditions are different than anticipated, the duration of monitoring may be decreased in accordance with good paleontological practices.	On-Site Inspections During Grading Operations	During Grading and Construction	City of San Dimas			

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CR3	Due to the small nature of some fossils present within the Puente Formation and Pleistocene deposits, matrix samples shall be collected for processing through fine mesh screens during salvaging activities.	Development Plan/Tentative Tract Map Review	Prior to Issuance of Grading Permit	City of San Dimas			
CR4	Upon completion of all laboratory and field work, all final mitigation reports shall be filed with the repository and the City of San Dimas. Monthly progress reports shall be filed with the applicant(s) and available to the City of San Dimas.	Development Plan/Tentative Tract Map Review	Prior to Issuance of Grading Permit	City of San Dimas			
CR5	Collected paleontological resources shall be donated to a public, nonprofit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County.	Development Plan/Tentative Tract Map Review	Prior to Issuance of Grading Permit	City of San Dimas			
CULTURAL RESOURCES							
CR6	Individual property owners/applicants shall be responsible for cultural resources studies specific to each individual parcel to be developed. The owner/applicant shall be responsible for implementing mitigation measures to properly manage any cultural resources discovered. Site-specific cultural resources studies must include the following: a) completion of a literature review of the particular project area; b) consultation with the appropriate Native American group, if required; c) reconnaissance of the project area; and 4) mitigative treatment of any cultural resources discovered.	Site-Specific Cultural Resources Study, As Required	Prior to Approval of Development Plan/Tentative Tract Map	City of San Dimas			
CR7	Any projects with the potential to impact archaeological site CA-LAN-825 shall evaluate their condition and importance through text excavation and archival research.	Site-Specific Cultural Resources Study, As Required	Prior to Approval of Development Plan/Tentative Tract Map	City of San Dimas			
CR8	Archaeological site CA-LAN-825 must be relocated and a site record supplement generated for the site. Evaluation of the site may necessitate further mitigative treatment.	Development Plan/Tentative Tract Map Review	Prior to Issuance of Grading Permit	City of San Dimas			
CR9	The tunnels, steel pipe and storage tank described by LSA Associates (1998: 2-41) shall be formally recorded and evaluated by the proponent of any project with the potential to disturb them. Further mitigative treatment may be necessary.	Development Plan/Tentative Tract Map Review	Prior to Approval of Development Plan/Teritative Tract Map	City of San Dimas			

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FIRE SERVICE							
Fire-Resistant Design and Materials Guidelines							
PSU1	Roofing. Roofs shall be of noncombustible class "A" materials, such as clay or concrete shake, cinder, metal or tile. Open ends of roofs, such as tile roofs, shall be capped with noncombustible material to prevent bird nest or other combustible material from lodging within the roof.	Development Plan Review	Prior to Issuance of Building Permits	City of San Dimas			
PSU2	Glass. The size and number of glazed openings on the side of the house facing the downhill side or other unique fire hazard areas shall be held to a minimum and shall be glazed with extra-strength glass (thick, safety tempered and/or double-panned). Glass areas shall not exceed 50 percent of any wall.	Development Plan Review	Prior to Issuance of Building Permits	City of San Dimas			
Access Requirements							
PSU3	Traffic roadways shall be at least 26 feet wide and passable in all weather. The roadway curb-to-curb width shall be reduced to 16 feet, where permitted by the City. (Refer to Access Implementing Policy and Action #1, bullets one and two) in Section 5.3, *Circulation*).	Development Plan/Tentative Tract Map Review	Prior to Approval of Development Plan/Tentative Tract Map	City of San Dimas & Los Angeles County Fire Department			
Water Supply							
PSU4	Fire flow and hydrant locations shall be provided so that adequate water is available in the event of fire. Planned water supplies, piping and hydrants shall be installed and in working order prior to construction involving combustible materials. All development proposals must demonstrate conclusively that the development can be served with adequate water capacity.	Development Plan/Tentative Tract Map Review	Prior to Approval of Development Plan/Tentative Tract Map	City of San Dimas & Los Angeles County Fire Department			
PSU5	In the event that individual property owners install a water well, water from the well or other sources, such a pool, shall be available to the Fire Department for fire-fighting purposes.	Development Plan/Tentative Tract Map Review	Prior to Approval of Development Plan/Tentative Tract Map	City of San Dimas & Los Angeles County Fire Department			

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Los Angeles County Fire Department							
PSU6	Future development projects shall be reviewed by the Los Angeles County Fire Department. Specific department requirements for access, fire flows, hydrants or other fire and life safety requirements will be addressed at the plan check phase and must be complied with prior to approval of a tentative map.	Development Plan/Tentative Tract Map Review	Prior to Approval of Development Plan/Tentative Tract Map	City of San Dimas & Los Angeles County Fire Department			
PSU7	Residential projects shall meet fire flow requirements in accordance with relevant City building codes, fire codes and requirements of the Los Angeles County Fire Department.	Development Plan/Tentative Tract Map Review	Prior to Issuance of Building Permit	City of San Dimas & Los Angeles County Fire Department			
PSU8	Fire sprinkler systems shall be installed in all residential buildings, where feasible.	Development Plan/Tentative Tract Map Review	Prior to Issuance of Building Permit	City of San Dimas & Los Angeles County Fire Department			
PSU9	As required by Section 1117.2.1 of the Los Angeles County Fire Code, a fuel modification plan, a landscape plan and an irrigation plan shall be submitted with any subdivision of land or prior to any new construction, remodeling, modification or reconstruction where such activities increase the square footage of the existing structure by at least 50 percent within a 12-month period, and where said structure or subdivision is located within an area designated as a Very High Fire Hazard Severity Zone or within Fire Zone 4. Said plans shall be reviewed and approved by the Forestry Division of the Los Angeles County Fire Department for reasonable fire safety.	Development Plan/Tentative Tract Map Review	Prior to Issuance of Grading/Building Permits	City of San Dimas & Los Angeles County Fire Department			
PSU10	Future development projects shall be required to comply with all applicable code and ordinance requirements for Fire Zone 4 pertaining to construction, access, water mains, fire hydrants, fire flows and brush clearance.	Development Plan/Tentative Tract Map Review	Prior to Issuance of Grading/Building Permits	City of San Dimas & Los Angeles County Fire Department			

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WATER RESOURCES AND FACILITIES							
PSU11	The City of San Dimas shall adopt the implementing policies and actions for Infrastructure Planning, Financing, and Construction in the *Northern Foothills Development and Infrastructure Study.* Future development proposals shall be reviewed to determine their compliance with the policies and actions.	Development Plan/Tentative Tract Map Review	Prior to Approval of Development Plan/Tentative Tract Map	City of San Dimas			
PSU12	The project applicant(s) shall obtain the necessary permit(s) from the Public Health Programs and Services Department of the Bureau of Environmental Protects pursuant to Title 11 of the Los Angeles County Code (adopted by the City of San Dimas) and the California Water Code, prior to drilling groundwater wells. Construction of the groundwater wells shall be consistent with the California Department of Water Resources' Bulletin 74.	Development Plan/Tentative Tract Map Review	Prior to Issuance of Grading/Building Permits	City of San Dimas			
PSU13	The project applicant(s) shall consult the Upper San Gabriel Water Master prior to applying for a water well permit and provide "rights" to said groundwater.	Development Plan/Tentative Tract Map Review	Prior to Issuance of Grading/Building Permits	City of San Dimas			
PSU14	Prior to tentative map approval and issuance of building permits, as applicable, the project applicant(s) shall analyze and demonstrate the feasibility of construction water tanks and extending water lines to serve the development pursuant to the requirements of the Southern California Water Company and subject to review and approval by the City of San Dimas.	Site-Specific Analysis, As Required	Prior to Approval of Tentative Tract Map and Issuance of Building Permit	City of San Dimas			
WASTEWATER							
PSU15	Refer to Mitigation Measure PSU11.	Development Plan/Tentative Tract Map Review	Prior to Approval of Development Plan/Tentative Tract Map	City of San Dimas			
PSU16	Prior to the installation of a private sewer or septic system, the project applicant(s) shall consult with the California Regional Water Quality Control Board (RWQCB) on a project-by-project basis to obtain waste discharge requirements.	Development Plan/Tentative Tract Map Review	Prior to Approval of Development Plan/Tentative Tract Map	City of San Dimas & Regional Water Quality Control Board			

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PSU17	Prior to tentative map approval and issuance of building permits, as applicable, the project applicants(s) shall analyze and demonstrate the feasibility of constructing on-site sewage disposal systems (i.e., septic tanks/seepage ponds) for any given subdivision pursuant to the requirements of the Uniform Plumbing Code and subject to review and approval by the City of San Dimas.	Site-Specific Analysis, As Required	Prior to Approval of Tentative Tract Map and Issuance of Building Permit	City of San Dimas			
PSU18	Prior to the approval of any on-site sewage disposal systems or the issuance of drilling permits, soil testing and applicable geological reports shall be submitted to the County of Los Angeles Department of Health Services and to the City of San Dimas for review and approval (refer to Section 5.6, *Geology*).	Development Plan/Tentative Tract Map Review	Prior to Approval of Tentative Tract Map and Issuance of Building Permit	City of San Dimas & Los Angeles County Dept. of Health Services			
ELECTRICITY							
PSU19	Refer to Mitigation Measure PSU11.	Development Plan/Tentative Tract Map Review	Prior to Approval of Development Plan/Tentative Tract Map	City of San Dimas			
PSU20	The City of San Dimas shall adopt the implementing policies and actions for Visual Intrusiveness, as they relate to overhead utilities, in the *Northern Foothills Development and Infrastructure Study*. Future development proposals shall be reviewed to determine their compliance with the policies and actions.	Development Plan/Tentative Tract Map Review	Prior to Issuance of Grading/Building Permits	City of San Dimas			
PSU21	Prior to the issuance of building permit(s), the applicant(s) shall consult SCE and the City of San Dimas to determine the feasibility of placing electrical facilities above ground or underground.	Development Plan/Tentative Tract Map Review	Prior to Issuance of Grading/Building Permits	City of San Dimas			
NATURAL GAS							
PSU22	Refer to Mitigation Measure PSU11.	Development Plan/Tentative Tract Map Review	Prior to Approval of Development Plan/Tentative Tract Map	City of San Dimas			
PSU23	Prior to the issuance of building permit(s), the applicant(s) shall consult with The Gas Company and the City of San Dimas to determine the feasibility (both physically and economically) of extending underground gas distribution facilities to future development areas.	Development Plan/Tentative Tract Map Review	Prior to Issuance of Building Permit	City of San Dimas			

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SOLID WASTE							
PSU24	Prior to the issuance of building permit(s), the applicant(s) shall consult with the local waste hauler to determine the feasibility of accessing the development site. Should accessibility not be achievable, the project applicant(s) shall (1) work with the City of San Dimas and the trash hauler to identify locations where trash could be picked up, or (2) be required to have individual property owners responsible for delivering their own rubbish to the local landfill.[1]	Development Plan/Tentative Tract Map Review	Prior to Issuance of Building Permit	City of San Dimas			
PSU25	Future developments, as applicable, shall incorporate storage and collection of recyclables into each project design and refuse collection contracts shall include collection of recyclables. Individual projects, as applicable, shall reserve space appropriate for the support of recycling, adequate storage areas and access for recycling vehicles, as appropriate.	Development Plan/Tentative Tract Map Review	Prior to Issuance of Building Permit	City of San Dimas			
SCHOOLS							
PSU26	Individual development projects within the project area shall pay school fees to the Bonita Unified School District in accordance with Government Code Sections 65995, 65995.5 and 65995.7. The project applicant shall provide the City of San Dimas with evidence of school fee payment prior to the issuance of permits.	Statutory Fees	Upon Issuance of Building Permit	City of San Dimas & Bonita Unified School District			
PSU27	Project applicants shall work with the Bonita Unified School District to identify the most appropriate locations for bus routes and stops, if feasible.	Development Plan/Tentative Tract Map Review	Prior to Certificate of Occupancy	City of San Dimas & Bonita Unified School District			
PSU28	Project applicants shall work with the Bonita Unified School District to identify the most appropriate "Safe Route to School" for students generated by the project. Future project residents shall be notified of the "Safe Route to School."	Development Plan/Tentative Tract Map Review	Prior to Certificate of Occupancy	City of San Dimas & Bonita Unified School District			

[1] The City of San Dimas has an ordinance that presently requires mandatory trash pick up.

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MITIGATION MONITORING AND REPORTING CHECKLIST

Mit./ Cond. No.	Mitigation Measure/Conditions of Approval	Monitoring and Reporting Process	Monitoring Milestone	Party Responsible for Monitoring	VERIFICATION OF COMPLIANCE		
					Initials	Date	Remarks
PARKS AND RECREATION							
PSU29	Prior to the approval of future development projects within the project area, the project applicant(s) shall consult the City of San Dimas to determine if the proposed development would impact existing equestrian and/or hiking trails. The City of San Dimas shall coordinate planning efforts with the Los Angeles County Department of Parks and Recreation if the City intends to designate trails for the project area or connect trails between adjacent jurisdictions.	Development Plan/Tentative Tract Map Review	Prior to Approval of Development Plan/Tentative Tract Map	City of San Dimas & Los Angeles County Dept. of Parks and Recreation			
PSU30	Future development projects that include equestrian trails shall be reviewed by the Equestrian Commission.	Development Plan/Tentative Tract Map Review	Prior to Approval of Development Plan/Tentative Tract Map	City of San Dimas			
COMMUNICATIONS							
PSU31	Refer to Mitigation Measures PSU20.	Development Plan/Tentative Tract Map Review	Prior to Approval of Development Plan/Tentative Tract Map	City of San Dimas			
PSU32	Prior to the issuance of building permit(s), the project applicant(s) shall consult the appropriate communication providers and the City of San Dimas to determine the feasibility of placing communication facilities underground or aboveground on an individual project basis.	Development Plan/Tentative Tract Map Review	Prior to Issuance of Building Permit	City of San Dimas			

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14.0 Response to Comments

14.0 COMMENTS AND RESPONSES

14.1 INTRODUCTION

In accordance with Sections 15088, 15089 and 15132 of the California Environmental Quality Act (CEQA) Guidelines, the City of San Dimas has prepared the Final Environmental Impact Report (EIR) for the proposed Northern Foothills Implementation Program. This Comments and Responses section, combined with the Draft EIR, comprise the Final EIR.

The following is an excerpt from the CEQA Guidelines, Section 15132, Contents of Final Environmental Impact Report:

"The Final EIR shall consist of:

(a) The Draft EIR or a version of the draft.

(b) Comments and recommendations received on the Draft EIR either verbatim or in summary.

(c) A list of persons, organizations and public agencies commenting on the Draft EIR.

(d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process.

(e) Any other information added by the Lead Agency."

Comments regarding the Draft Program EIR for the Northern Foothills Implementation Program were received during the 45-day public review period, which was open from March 3, 1999 to April 16, 1999.

This Comments and Responses sections includes all of the above required components and shall be attached to the revised Draft EIR to make up the Final EIR. All correspondence from those agencies or individuals commenting on the Draft EIR is reproduced on the following pages. The individual comments have been consecutively numbered for ease of reference. Following each comment letter are responses to each numbered comment. A response is provided for each comment raising significant environmental issues. Added or modified text is shaded (example), while deleted text will have a strike out (~~example~~) through the text.

In addition, text excerpted from the Draft EIR for ease of commentor reference will be bracketed between a set of double lines, as the example shows below.

"Text from Draft EIR"

14.2 LIST OF COMMENTORS

Written comments on the Draft EIR were received from the following agencies and/or individuals:

A. Ruth I. Charles, County Sanitation Districts of Los Angeles County

B. Norman Cortez, County of Los Angeles Department of Public Works

C. The Michael and Naomi Grady Revocable Living Trust

D. C. F. Raysbrook, State of California, Department of Fish and Game

E. Jason Marshall, State of California, Department of Conservation

F. Ili Lobaco, City of La Verne

G. Deborah Rosenthal, Rosenthal & Zimmerman

H. Karen J. Lee, Morrison & Foerster

I. Raina Marie Fulton, United States Dept. of Agriculture, Forest Service

J. Francie Stepp-Bolling, San Dimas Resident

K. Margo Knapp, San Dimas Resident

L. J. David Stein, Southern California Association of Governments

M. Stephen J. Buswell, Caltrans District 7

N. Michael W. Wilkinson, County of Los Angeles Fire Department

O. Terry Roberts, State Clearinghouse

P. David Yamahara, County of Los Angeles, Department of Public Works

Q. Jim A. Bartel, United States Department of the Interior, Fish and Wildlife Service

Oral comments were received at the Planning Commission hearing on March 29,1999. The Planning Commission hearing was designated at the time to offer testimony on the Draft Program EIR. Oral testimony was given by the following individuals and/or agencies:

1. John Watkins, Glendora Resident
2. Jack Kenkowski, San Dimas Resident
3. John Falstead, San Dimas Resident
4. Karen Furtis, Angeles National Forest
5. Mark Leuzinger, San Dimas Resident and representative of San Dimas Foothills Conservancy
6. Karen Justice, San Dimas Resident

LETTER A

COUNTY SANITATION DISTRICTS
OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
Telephone: (562) 699-7411, FAX: (562) 699-5422

CHARLES W. CARRY
Chief Engineer and General Manager

RECEIVED
MAR 1 1 1999
ROBERT BEIN, WM FROST

March 9, 1999

File No: 22-00.04-00

Ms. Collette L. Morse, AICP
Project Manager
Robert Bein, William Frost & Associates
14725 Alton Parkway
Irvine, CA 92618-2069

Dear Ms. Morse:

Northern Foothills Implementation Program, San Dimas

The County Sanitation Districts of Los Angeles County (Districts) received a Draft Program Environmental Impact Report for the subject project on March 3, 1999. We offer the following comments regarding sewerage service:

- Not all of the City of San Dimas is located within the jurisdictional boundaries of District No. 22. Individual developments associated with the proposed project may be outside the jurisdictional boundaries of the Districts and will require annexation into District No. 22 before sewerage service can be provided. For specific information regarding the annexation procedures and fees, please contact Ms. Margarita Cabrera, extension 2708. **A1**

- All other information concerning Districts' facilities and sewerage service contained in the document is currently complete and accurate. **A2**

If you have any questions, please contact the undersigned at (562) 699-7411, extension 2717.

Very truly yours,

Charles W. Carry

Ruth I. Charles

Ruth I. Charles
Engineering Technician
Planning & Property Management Section

RIC:eg

c: M. Cabrera

L:\WILLSERV\nfoothillsimplem

Recycled Paper

A. RESPONSES TO COMMENTS FROM RUTH I. CHARLES, ENGINEERING TECHNICIAN, COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY, DATED MARCH 9, 1999.

A1. The first paragraph under the Wastewater subheading on page 5.10-16 has addressed this comment and acknowledges that not all of the City of San Dimas, including portions of the project area, is located within the jurisdictional boundaries of District No. 22. The text from page 5.10-16 has been restated below for ease of commentor reference.

"Sewage Systems

A portion of the project area is located outside the jurisdictional boundaries of the County Sanitation Districts of Los Angeles (Districts) and would require annexation into District No. 22 prior to establishing sewer service to future developments within this area. Due to the project area's location, sewage flow originating for the project area would be transported to the local sewers, which are not maintained by the Districts."

A2. Comment so noted.

LETTER B

RECEIVED

MAR 1 8 1999

ROBERT BEIN, WM FROST

COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
Telephone: (626) 458-5100

HARRY W. STONE, Director

ADDRESS ALL CORRESPONDENCE TO:
P.O. BOX 1460
ALHAMBRA, CALIFORNIA 91802-1460

March 16, 1999

IN REPLY PLEASE
REFER TO FILE: W-9

Ms. Collette L. Morse
Robert Bein, William Frost & Associates
14725 Alton Parkway
Irvine, CA 92618-2069

Dear Ms. Morse:

REVIEW OF ENVIRONMENTAL DOCUMENTS
NORTHERN FOOTHILLS IMPLEMENTATION PROGRAM
DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR)
CITY OF SAN DIMAS

As requested, we have reviewed the DEIR and have no comments to offer.

If you have any questions, please contact Hu Yi at (626) 458-7174.

Very truly yours,

HARRY W. STONE
Director of Public Works

NORMAN CORTEZ
Civil Engineer I
Waterworks and Sewer Maintenance Division

HY:tm
SM7824

B. RESPONSES TO COMMENTS FROM NORMAN CORTEZ, CIVIL ENGINEER I, COUNTY OF LOS ANGELES, DEPARTMENT OF PUBLIC WORKS, DATED MARCH 16, 1999.

No environmental issues are raised; therefore, no response is necessary.

LETTER C

Michael Grady, Trustee,
Naomi Grady, Trustee,
The Michael and Naomi Grady
Revocable Living Trust,
dated 20 July 1993

3143 Lida Lane
Sparks, Nevada 89434
[775] 626-2151

Received
MAR 2 2 1999
City of San Dimas
Planning Division

19 March 1999

VIA Certified U.S. Mail, Return Receipt Requested

Planning Commission
City of San Dimas
245 E. Bonita Avenue
San Dimas, CA 91733

Re: General Plan Amendment 99-1
Zone Change Case 99-1
Municipal Code Text Amendment 99-1

Gentlemen:

Michael Grady is the underlying owner of 3 parcels totaling approximately 20 acres, lying within the Northern Foothills Infrastructure Study area. The title to the property is currently vested in The Michael and Naomi Grady Revocable Living Trust, dated 20 July 1993, of which Michael and Naomi Grady are co-trustees. The following are the APNs for the three parcels:

A.P.N. 8678-030-011
A.P.N. 8678-030-014
A.P.N. 8678-030-016

We herein include and incorporate by reference any and all previous written and oral communications concerning the Northern Foothills Infrastructure Study and its application to the above cited pacels, said written and oral communications made to present or former City of San Dimas city staff members, to members of the City Council and City Planning Commission of the City of San Dimas, and/or to members of LSA Associates, Inc., the consulting firm hired by the City of San Dimas to conduct the Northern Foothills Infrastructure Study.

As Trustees of the above-named Trust, we oppose any rezoning of the above-cited parcels as being, among other things, an unconstitutional diminution and taking of the fruitful and beneficial use of the above properties, effectively removing them from the market and/or diminishing their value to the owner and to any prospective purchaser, said appropriation and taking being contemplated without demonstrable compelling need therefore and without compensation to owners.

Sincerely,

Michael Grady, Trustee

Michael Grady, Trustee
The Michael and Naomi Grady Revocable Living Trust,
dated 20 July 1993

Naomi Grady, Trustee

Naomi Grady, Trustee
The Michael and Naomi Grady Revocable Living Trust,
dated 20 July 1993

C. RESPONSES TO COMMENTS FROM MICHAEL AND NAOMI GRADY, THE MICHAEL AND NAOMI GRADY REVOCABLE LIVING TRUST, DATED MARCH 19, 1999.

No environmental issues are raised; therefore, no response is necessary.

LETTER D

STATE OF CALIFORNIA-THE RESOURCES AGENCY GRAY DAVIS, *Governor*

DEPARTMENT OF FISH AND GAME
South Coast Region
4949 Viewridge Avenue
San Diego, California 92123
(619) 467-4201
FAX (619) 467-4299

April 8, 1999

Mr. Larry Stevens
AICP, Planning Director
City of San Dimas
245 East Bonita Avenue
San Dimas, California 91773

Northern Foothills Implementation Program
Draft Program Environmental Impact Report
SCH 98121072, Los Angeles County

Dear Mr. Stevens:

The Department of Fish and Game (Department) has reviewed the Draft Program Environmental Impact Report (DPEIR) for the proposed project referenced above. The project as proposed would provide for the construction of up to 127 dwelling units on 979 identified vacant acres of land within the 3,000 acre Northen Foothills study area in and adjacent to the City of San Dimas as defined in the DPEIR. The study area also includes portions of the Angeles National Forest, existing residential, parks, a golf course and other non-open space use areas. The PDEIR also discusses several alternatives of varying dwelling densities for the proposed project.

At this time the Department cannot provide specific comments regarding impacts to biological resources since the level of detail on impacts to these resources is minimal in the PDEIR. It is anticipated that subsequent impact reviews under CEQA will be forthcoming as the proposed adopted project alternative is decided upon. D1

The following general comments have been prepared pursuant to the Department's authority as Trustee Agency with jurisdiction over natural resources affected by the project (CEQA Section 15386) and pursuant to our authority as a Responsible Agency under CEQA Section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (Fish and Game Code Section 2050 et seq.), and Fish and Game Code Section 1600 et seq.

Proposed Layout of Residential Development

Exhibit 5.8.1 shows that the potential development footprint would be scattered among approximately eight separated locations within the study area. Some of D2

these areas contain drainages and southern coast live oak riparian forest, coastal sage scrub, and chaparral vegetative communities.

1. The type of footprint configuration as described above could increase adverse impacts to biological resources by:

   a. fragmenting and isolating remaining undeveloped areas supporting wildlife habitat values;

   b. creating a greater potential for adverse encounters between residences and local wildlife such as mule deer, coyotes, black bears, mountain lions, bobcats, cottontail rabbits, rattlesnakes, etc.; and

   c. increasing edge effects resulting in adverse impacts to wildlife from intrusion by humans and their pets into surrounding habitats.

D2

2. It has been the Department's experience that the continual build out of development into areas adjacent to the National Forests of Southern California have severely limited the Forest Service's and Department's efforts to manage wildlife habitat utilizing effective techniques such as controlled burning of old growth chaparral. This problem results in the gradual degradation of wildlife habitat quality and increases the fuel load and the probability of catastrophic wildfires which further increases erosion on steep slopes and the degradation of upland habitat and watersheds.

   1. To avoid the potential adverse impacts to wildlife, as described above, the City should seriously consider adopting the no project (no development) alternative. Alternatively, the reduced density option as described in the DPEIR (implemented in a clustered configuration within a previously disturbed location) would reduce adverse impacts to biological resources.

   2. An alternative that the Department recommends the DPEIR discuss is the evaluation of development and infilling within the City Limits as an environmentally preferred alternative to satisfy the need for increased housing. This would avoid the majority of the long term environmental, economic and social liabilities associated with development within outlying areas subject to the hazards of steep slopes and wildfires.

D3

Mr. Larry Stevens
April 8, 1999
Page 3

Thank you for this opportunity to provide comment. Questions regarding this letter should be directed to Mr. Scott Harris, Wildlife Biologist, at (818) 360-8140.

Sincerely,

William E. Tippets

for C.F. Raysbrook
Regional Manager

cc: Mr. Scott Harris
Department of Fish and Game
Long Beach, California

Ms. Morgan Wehtje
Department of Fish and Game
Long Beach, California

Ms. Mary Meyer
Department of Fish and Game
Ojai, California

: Mr. Maurice Cardenas
Department of Fish and Game
Santa Barbara, California

Ms. Leslie MacNair
Department of Fish and Game
Long Beach, California

Mr. Jim Bartel
U.S. Fish and Wildlife Service
Carlsbad, California

U.S. Army Corps of Engineers
Los Angeles, California

State Clearinghouse
Sacramento, California

D. RESPONSES TO COMMENTS FROM C. F. RAYSBROOK, REGIONAL MANAGER, STATE OF CALIFORNIA, DEPARTMENT OF FISH AND GAME, DATED APRIL 8, 1999.

D1. The Department of Fish and Game is correct in assuming that future development projects may the subject of further environmental review, if determined necessary by the City.

D2. The Potential Development Areas were identified in a previous study, *Northern Foothills Development and Infrastructure Study*, prepared by LSA Associates for the City of San Dimas. These Potential Development Areas, or Development Feasibility Areas as they are called in the Northern Foothills Development and Infrastructure Study, were defined prior to commencement of the Draft EIR. It should be noted that the Draft EIR made no changes to the description of these areas and included the location and definition of these areas.

The City of San Dimas would recommend that the commentor refer to Section 3.0, *Development Analysis*, of the *Northern Foothills Development and Infrastructure Study*, which provides a more detailed description of how the Development Feasibility Areas were defined. The discussion begins on page 3-1 and continues through page 3-24. Development Feasibility Areas were defined by several factors including topography and availability of water. Key pages to refer to include pages 3-1, 3-15 and 3-17; Tables 3.A and 3.D and Figure 3.1.

The City acknowledges the Department's comments regarding potential impacts to biological resources. The Draft EIR was prepared as a Program EIR, and analyzed broad impacts associated with implementation of the proposed project. Specific issues, such as those listed in the Department's letter, would be analyzed as future development projects are submitted to the City for review. Section 1.1, *Purpose of the EIR*, provides a full description of the CEQA Guidelines definition of a Program EIR and how a Program EIR is to be used by a lead agency.

D3. The City acknowledges the Department's concerns regarding development in areas adjacent to National Forests.

The Draft EIR has been prepared in accordance with CEQA. Sufficient detail has been provided for the City Council to determine the adequacy of the environmental review of the proposed project and alternatives to the proposed project. As is required by CEQA, the City of San Dimas will consider the information in the EIR along with other information which may

be presented during their review of the proposed General Plan Amendment and Zone Change/Specific Plan in making an informed decision regarding the proposed project. The City Council has the prerogative to certify the Final EIR and approve one of the alternatives as "the project."

The City acknowledges the Department's request to analyze another alternative looking at allowing development as infill within the City Limits. However, it is worth pointing out that the Northern Foothills project area is located within the City limits. In addition, the City analyzed a range of feasible alternatives in the Draft EIR. The City has elected not to include the Department's suggestion for another alternative.

LETTER E

State of California **The Resources Agency**

MEMORANDUM

To: Project Manager
Resources Agency

Date: April 13, 1999

Mr. Larry Stevens, Planning Director
City of San Dimas
245 East Bonita Avenue
San Dimas, CA 91773

Received
APR 1[illegible] 1999
City of San Dimas
Planning Division

From: **Department of Conservation**
Office of Governmental and Environmental Relations

Subject: Draft Program Environmental Impact Report for Northern Foothills Implementation Program, City of San Dimas **SCH #98121072**

The Department of Conservation's Division of Mines and Geology (Division) has reviewed the DEIR for the above referenced project. The Division, among other roles, maps and classifies mineral deposits. The Division also distributes maps and reports to local governments to facilitate land use planning and mineral resource conservation. The State Mining and Geology Board may *designate* mineral deposits where the deposits are deemed to have regional or statewide significance and their availability is jeopardized by incompatible land uses. Such designation triggers certain required land use and conservation actions by the affected local jurisdiction. We offer the following comments for your consideration with respect to mineral resources conservation and the Northern Foothills Implementation Program.

The project area as shown in Exhibit 5.6-3 of the DEIR includes an area along San Dimas Wash that has been mapped MRZ-2 for aggregate resources (DMG Special Report 143, Part VI; MRZ-2 zones include areas of known mineral significance). On page 5.6-15, paragraph 4, it is concluded, "...given the limited extent and current level of development in and around the San Dimas Wash, the economic potential of these deposits is considered to be low." This is consistent with the fact that the SMGB has not designated mineral deposits within the project area. Nevertheless, the DEIR should include the fact that part of the project area has been mapped MRZ-2, and that there are areas immediately outside the project boundary, which <u>have</u> been designated by the SMGB. Also, the final EIR should discuss any growth-inducing and cumulative impacts of this project, and their mitigation, on the continued availability of significant mineral resources in the Claremont-Upland Production-Consumption Region. E1

On a minor technical note, the first sentence on page 5.6-15, paragraph 3, should be corrected. The sentence reads, "Due to the presence...opal, and corbantes(sic)...." "Corbantes" should be changed to "carbonates." E2

Thank you for the opportunity to provide comments on the DEIR. If you have any questions about the above comments, or require technical assistance or information, please contact Senior Geologist Robert Hill at (916) 327-6977.

Jason Marshall
Assistant Director

cc: Robert Hill
Division of Mines and Geology

E. RESPONSES TO COMMENTS FROM JASON MARSHALL, ASSISTANT DIRECTOR, STATE OF CALIFORNIA, DEPARTMENT OF CONSERVATION, DATED APRIL 13, 1999.

E1. The fourth paragraph on page 5.6-15 of the Draft EIR will be revised to read as follows:

"The Quaternary age alluvial deposits within San Dimas Wash contain clean, coarse aggregate material to depths of 30 to 70 feet (CDMG, 1987). Alluvial materials from San Dimas Wash are carried to and mix with alluvium in the San Gabriel (alluvial) fan to the west, that is mined for aggregate. Some areas along the San Dimas Wash within the project area have been mapped as MRZ-2 for aggregate resources. It should be noted that the MRZ-2 zone extends along the San Dimas Wash, including areas outside of the project area. However, given the limited extent and current level of development in and around the San Dimas Wash, the economic potential of these deposits is considered to be low. Given the fine-grained nature of the rocks comprising the Puente Formation within the project area, there is no potential for these deposits to contain aggregate materials."

It is important to note that the Draft EIR was prepared as a Program EIR, and analyzed broad impacts associated with implementation of the proposed project. Specific issues, such as those listed in the Department's letter, would be analyzed as future development projects are submitted to the City for review. Section 1.1, *Purpose of the EIR*, provides a full description of the CEQA Guidelines definition of a Program EIR and how a Program EIR is to be used by a lead agency.

E2. The first sentence in the third paragraph on page 5.6-15 of the Draft EIR will be revised to read as follows:

"Due to the presence of chalcedony, opal, and ~~corbantes~~ carbonates found in vesicle fillings and disseminated within the volcanic rocks, the deleterious nature of these substances (for production of aggregate for Portland cement) makes them generally unsuitable for exploitation as aggregate."

LETTER F

CITY OF LA VERNE
CITY HALL

3660 "D" Street, LaVerne, California 91750

April 14, 1999

City of San Dimas
Attention: Lawrence L. Stevens, AICP
Planning Director
245 East Bonita Avenue
San Dimas, CA 91773

Received
APR 14 1999
City of San Dimas
Planning Division

SUBJECT: Draft Environmental Impact Report for the Northern Foothills Implementation Program

Dear Mr. Stevens:

We appreciate the opportunity to comment on your draft environmental impact report for the Northern Foothills Implementation Program.

We agree with the finding of the report detailing the significant environmental impacts that will result from implementation of the project. As a neighboring community we are, of course, concerned about the proposed development of the area. Our specific concerns are as follows:

Population and Housing - Because the project may be a catalyst for development of the area, we agree with the Draft EIR recommendation of lowering the allowable units for development. The *Northern Foothills Development and Infrastructure Study* (November 1998) permits a maximum of 127 dwelling on the 972 acres. Although the density has been lowered from 195 dwelling to 127 dwellings, there should be a case-by-case review of future development possibly to the point of reducing the total allowable units to 48, as recommended in the *Further Reduced Density Alternative.* F1

Hydrology and Drainage - Because of the general topography of the area, increase in water runoff and landslides are quite probable. As stated in your report, "Project buildout will result in the creation of increased impervious ground surfaces on-site. This may result in significantly higher volumes and velocities of storm runoff...". Case-by-case analysis of developments should be required to assure adjacent and neighboring residents of minimized impacts. F2

Biological Resources - We agree with the Draft EIR that every effort must be made to ensure the protection of biological life in the area. Sensitive development through a thorough case-by-case review must include the preservation of vegetation and wildlife that is identified as F3

federally endangered, federally threatened, California endangered, and a species of special concern.

Air Quality - As stated in your report, "grading operations would expose soils to short-term erosion by wind and water" and, " the proposed project potentially may result in significant erosion and/or displacement of soils." Development of the project, including grading for pads and infrastructure, will increase the likelihood of particulate matter. This will expose sensitive receptors to pollutants. Care should be given to reduce particulate matter to the greatest extent possible to protect neighboring residents from irritating pollutants. F4

Hazards, Risk of Upset and Human Health - Because of the project's proximity to development in La Verne, it is imperative that any proposed development in the project area be readily accessible to emergency vehicles, particularly fire emergency teams. It is important that our residents, along with all residents located in the proposed project area, be afforded the safety of quick, unobstructed emergency services. F5

Aesthetics - Although no development is proposed at this time, we are concerned about the severe alteration of the natural character of the area. Although the report indicates that structures shall be sited to fit into the hillside's contour, development should be minimized to allow the least amount of grading possible. This includes grading for pads and infrastructure. Sensitivity should include the massing of the planned structures so that they are as unobtrusive as much as possible. As foothill communities, our hillsides areas are aesthetic qualities that should be preserved to the greatest extent possible. F6

Cultural Resources - The project area included the habitation of Gabrielinos. Such a presence increases the likelihood that artifacts of their life may be found. Individual developments must guarantee the proper care in handling any materials found. This also applies to any paleontological artifacts uncovered. F7

We would appreciate being kept informed regarding any and all development of the area including individual projects and infrastructure improvements.

Thank you for consideration of our comments.

Respectfully submitted,

Hal G. Fredericksen
Community Development Director

Ili Lobaco

By Ili Lobaco
Graduate Planning Intern

F. RESPONSES TO COMMENTS FROM ILI LOBACO, GRADUATE PLANNING INTERN, CITY OF LA VERNE, DATED APRIL 14, 1999.

F1. Comment so noted. As stated on page 3-10 of the Draft EIR:

> "It is anticipated that future development may be the subject of additional environmental review on an individual project-by-project basis, in accordance with the provisions of Section 15168 of CEQA, as determined by the City of San Dimas."

F2. Comment so noted. Refer to Response F1 regarding additional environmental review of future development projects.

F3. Comment so noted.

F4. Comment so noted. Specific impacts, such as those created by particulates, would be evaluated as future development projects are submitted to the City for review, as stated in Response F1.

F5. Comment so noted. Fire protection services are addressed in Section 5.10, *Public Services and Utilities*, of the Draft EIR. As stated in the Draft EIR, implementation of the proposed project would result in significant impacts to fire protection services, even with the imposition of mitigation measures. However, as future development projects are submitted to the City for review, specific details regarding fire protection services, including access issues, can be further addressed.

F6. Comment so noted. Mitigation measures AES1 through AES10 in the Draft EIR address landform alteration impacts and mitigation measures AES11 through AES19 address aesthetic impacts.

F7. Comment so noted. Mitigation measures CR1 through CR9 in the Draft EIR address this concern.

LETTER G

ROSENTHAL & ZIMMERMAN

ATTORNEYS AT LAW

695 TOWN CENTER DRIVE SUITE 1410
COSTA MESA, CALIFORNIA 92626-7187
TELEPHONE: (714) 557-4005
FAX: (714) 540-3219

DEBORAH M. ROSENTHAL
MARC A. ZIMMERMAN
CRISTINE M. TRAPP

18387 LEWIS STREET, SUITE 201
GARDEN GROVE, CALIFORNIA 92640
TELEPHONE: (714) 740-2329
FAX: (714) 740-2306

April 16, 1999

225.001

By Messenger

City of San Dimas
Planning Department
245 East Bonita Avenue
San Dimas, CA 91773

RECEIVED
APR 19 1999
City of San Dimas

Re: Northern Foothills Implementation Project

Dear Planning Department:

These comments are submitted on behalf of Mr. Oscar Menjivar, the owner of 40 acres within the proposed Northern Foothills Implementation area, Assessor's Parcel No. 8678-030-024. Mr. Menjivar received the property from his mother, as part of her estate. As an owner, his primary interest is in maintaining the value of his inheritance against unwarranted and politically-motivated depreciation under the guise of "environmental analysis."

We have carefully reviewed the draft EIR for the Northern Foothills Implementation Project ("DEIR") on behalf of Mr. Menjivar. It is our conclusion that the DEIR violates the requirements of CEQA in a number of significant respects including: (1) failure to use an appropriate baseline; (2) failure to conduct an appropriate alternatives analysis; (3) reliance on infeasible or illegal mitigation measures; and (4) reliance on an inconsistent project description. As described below, substantial revision of the DEIR and recirculation pursuant to Section 15088.5 of the CEQA Guidelines are necessary to comply with the requirements of CEQA. **G1**

Without an adequate comparison of the proposed project to existing conditions and realistic alternatives, the DEIR fails the most basic purpose of CEQA: it does not provide concerned citizens and decision-makers with information about the environmental consequences of project decisions before they are made. *Laurel Heights Improvement Assn. v. Regents of University of California* (1993) 6 Cal.4th 1112 (*Laurel Heights II*). In this case, the problem is especially egregious, because the decision to slash existing development rights was clearly made long before the DEIR was prepared for political rather than environmental reasons. **G2**

INADEQUATE PROJECT DESCRIPTION

A stable project description is the *sine qua non* of CEQA. *County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185. The mandate for a "stable" project description includes the requirement that the description be sufficiently detailed and definite that the public can tell what is being proposed. In this case, the DEIR states that the project "involves" a General Plan Amendment and Zone Change/Specific Plan. DEIR 3-6. It continues that the "Zone Change/Specific Plan would create either a new zone a specific plan to implement the policies and requirements of the General Plan and the adopted Development Strategy." DEIR 3-7. The DEIR also lists a series of six local approvals or permits for which the EIR would be used, but does not clarify which are part of the Project. DEIR 3-11. In other words, it is unclear what approvals are part of the "project" or how it will be implemented. G3a

The project description in this case is even more problematic because the documents reflecting the General Plan and Zone Change/Specific Plan were apparently unavailable until after the DEIR was prepared. The DEIR therefore analyzed a "development strategy" as contained in the Northern Foothills Development and Infrastructure Study without knowing how the strategy would be applied, even at the General Plan level. Preparation of the EIR prior to drafting the documents which are being analyzed is a fundamental violation of CEQA. G3b

Even if it were appropriate to analyze the adopted Northern Foothills Study, the proposed land use regulations go beyond the Study and the information which was available when the DEIR was prepared. The April 7, 1999 Planning Commission Staff Report relies on the DEIR, but states that the proposed Specific Plan standards "have been supplemented by additional standards and details common to most of the other specific plans in the City which were not mentioned in the Northern Foothills Study." The fact that these additional standards may be contained in other specific plans does not exempt the City from reviewing them in the EIR for *this* specific plan. G3c

For the purposes of CEQA, it also appears that the City has put the cart before the horse in proceeding with implementation of the Northern Foothills Study. According to the DEIR, the purpose of the Project is to implement the "adopted" Northern Foothills Development Strategy. DEIR 3-8. Although the Development Strategy itself meets the definition of a "project" under CEQA, it was apparently adopted without CEQA review. Now the City compounds that error, by purporting to analyze the environmental impacts of selected Study recommendations, long after the document was adopted by the local legislative body. Under these circumstances, the DEIR serves as nothing more than a *post hoc* rationalization of past action in violation of CEQA. G3d

IMPROPER ENVIRONMENTAL BASELINE

The DEIR purports to describe the environmental setting, impacts and mitigation measures for the Project in Chapter 5.0. This section is extremely confusing, interspersing portions of the Northern Foothills Development and Infrastructure Study throughout the text without explaining their function or relationship to the proposed Project. The DEIR then inconsistently measures the impacts of the Project against the existing General Plan rather than existing physical conditions in determining whether Project impacts are significant. **G4a**

This procedure violates CEQA. Under Section 15125(a) of the CEQA Guidelines, as revised in 1998,

> "An EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published ... This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant." **G4b**

In addition to the environmental baseline, Section 15125(e) provides that the EIR *may* contain a comparison of the proposed project against the existing land use regulations:

> "Where a proposed project is compared with an adopted plan, the analysis shall examine the existing physical conditions at the time the notice of preparation is published ... as well as the potential future conditions discussed in the plan."

In determining significance, therefore, the DEIR is required to base its significance determination on existing physical conditions, not on the prior General Plan or Zoning, even if it includes such a comparison. **G4c**

The Northern Foothills DEIR contains a comparison between the Project and existing physical conditions in most categories. However, in more than one category, it then compares the Project to the adopted General Plan for the purpose of determining whether the impact will be significant. For instance, in evaluating the significance of impacts on land use, the DEIR concludes that "[g]iven that the proposed project would provide less residential units than previously analyzed and intended by the City, it can be concluded that the proposed project would result in less incremental development and cumulative impact." DEIR 5.1-19. The DEIR contains similarly improper conclusions with respect to air quality and police service. *See, e.g.*, DEIR 5.4-10; 5.10-14.

The Project Description is also inadequate because it fails to acknowledge the fact that a substantial portion of the Study area is *already* developed at significantly higher densities than allowed under either the existing General Plan or the proposed General Plan Amendment. Even with careful review of the DEIR, it is virtually impossible to evaluate the relationship between the developed areas of the Project and those proposed for stringent downzoning of the remainder. Almost the only clearly defined and consistent element of the Project is the City's determination to remove development rights from those owners in the Northern Foothill area who have not already developed their land. G5

INACCURATE DETERMINATION OF SIGNIFICANT ENVIRONMENTAL IMPACTS

The central elements in the proposed Project are the designation of "development feasibility areas" and the assignment of maximum development densities to various gradients within these areas. A small portion of Mr. Menjivar's 40-acre property is located within a "development feasibility area," while the parcel is assigned an average slope of 44.15%, with a proposed maximum density of 3 dwelling units rather than the 8 units allowed under the existing General Plan or the 17 units permitted under the current zoning.

Neither the Northern Foothills Study nor the DEIR explain the basis for designation of the "development feasibility areas." At one point, the Study suggests that the feasibility areas generally include areas of less than 35% slope, but that does not seem to relate to the designation on Mr. Menjivar's property. His property contains a relatively large area of less than 20% slope, ringed by much steeper slopes. If the development feasibility areas were based solely on topography, the amount of developable acreage on the Menjivar property would have been substantially larger. G6

The City documents also fail to explain how the "average slopes" are determined and the analytic usefulness of this calculation. The assignment of a 44 15% average slope to the Menjivar property is wholly unrelated to the amount of relatively flat land which it contains. In fact, the average slope calculation appears designed to penalize property owners with sizable areas of flat land by including the steeper undevelopable slopes in the calculations.

From the information provided by the City, it is also impossible to determine how the proposed densities are determined, even based on the incorrect development feasibility designations. In Mr. Menjivar's case, for instance, the amount of land within the boundaries of the development feasibility area appears to be approximately 10 acres. Assuming clustering at 1 dwelling unit per acre, it would support up to 10 units, with a gross density of .25 units per acre. Yet, without explanation, the City proposes to limit development to a maximum of 3 dwelling units or less.

The density calculations are clearly unsupported by evidence in the record where even the City has not applied them consistently. As described above, Mr. Menjivar owns a 40-acre lot with an average slope of 44.15%. His property is assigned 8 units under the existing General Plan, but only 3 units under the proposed Project. Assessor's Parcel No. 8665-001-004 also consists of 40 acres and is assigned 8 units under the existing General Plan. This parcel has an average slope of 42.99% and approximately the same acreage within a potential development area as the Menjivar property. However, in sharp contrast to the Menjivar property, the virtually identical parcel is assigned 8 lots under the proposed Project. A smaller parcel with a larger average slope and a smaller potential development area, Assessor's Parcel N. 8665-001-005, is assigned 7 units under the proposed Project. G6

In summary, there is no substantial support in the record for excluding the bulk of Mr. Menjivar's property from the development feasibility zone. There is no support for distinguishing between the densities allowed on developed land as opposed to undeveloped land within the Northern Foothills Study Area. There is no support for basing a finding of significant aesthetic impacts from development which is admittedly not visible from much of the City. Until the City can identify the factual bases for these determinations, it cannot find that the EIR was prepared in compliance with CEQA.

BIASED ALTERNATIVES ANALYSIS

Under CEQA, the purpose of the alternatives analysis is to identify alternatives "which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project. ... An EIR is not required to consider alternatives which are infeasible." CEQA Guidelines Section 15126.6. The DEIR plays fast and loose with this requirement, applying a striking anti-development bias instead of reasoned analysis to its consideration of alternatives. G7

The DEIR compares the proposed Project to the existing General Plan and Zoning designations, which could allow no more than 65 more units scattered over the 972-acre Study area. It concludes that the existing General Plan is environmentally inferior to the proposed Project on the sole grounds that it could result in slightly more development.[1] DEIR 7-8 *et seq.* However, the DEIR completely ignores the fact that the proposed Project and the existing General Plan have the *same* significant environmental impacts. In other words, there is no

[1] The DEIR also finds that the existing General Plan is environmentally inferior in the category of land use on the incoherent grounds that is not consistent with the General Plan goal to create special development standards for the Project area. DEIR 7-8. Nothing in the existing General Plan prevents development of special standards through zoning or other requirements.

difference in the significant environment impacts of the proposed Project and the existing General Plan, except that the latter allows marginally more development than the former.[2]

In comparing the aesthetic impacts of the proposed Project to the existing General Plan, the DEIR also ignores the fact that much of the developable area is not visible from outside the development envelopes under either scenario. Neither plan would have significant aesthetic impacts, even at substantially higher densities. The DEIR simply assumes that the aesthetic impacts would be worse if more development is allowed, without any supporting evidence in the record.

The DEIR also ignores the requirement that alternatives be feasible. CEQA Guidelines Section 15126.6. Feasible is defined as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social and technological factors." Pub.Res.Code Section 21061.1. Given the extraordinary cost of required infrastructure, there is no possibility that the proposed Project is economically feasible, much less any of the reduced density alternatives considered in the DEIR.

G7

The sketchy Transfer of Development Rights ("TDR") alternative is also designed to be infeasible. The DEIR recognizes that a TDR program does not work unless owners of recipient sites can develop *more* density than otherwise permitted. The TDR approach allows such owners to enjoy economies of scale by constructing more dense development, thereby making it economically feasible for them to acquire development rights from other owners.

The TDR alternative in the DEIR limits dwelling units to a maximum of 127 units. By including the same density cap as the proposed Project, there is no incentive for property owners to acquire development rights from their neighbors — they can't use the additional development rights. In other words, the DEIR proposes to establish a sham TDR program with plenty of donor sites but no private recipients.

Finally, the DEIR ignores the CEQA Guideline provision which prohibits a lead agency from reducing

> "the proposed number of housing units as a mitigation measure or alternative to lessen a particular significant effect on the environment if that agency determines that there is another feasible, specific mitigation measure or alternative that would

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[2] The DEIR does not discuss consistency between the proposed reduction in dwelling units and the Housing Element of the General Plan.

provide a comparable lessening of the significant effect. CEQA Guidelines Section 15041.

In other words, a simple desire to limit residential property rights is not enough to support the proposed downzoning. There are numerous feasible mitigation measures or alternatives which would avoid significant environmental impacts, if any, of the existing General Plan. These include, but are not limited to, grading restrictions, clustering requirements and road gradient and width waivers. G7

RELIANCE ON INFEASIBLE MITIGATION MEASURES

CEQA places strict limits on the mitigation measures which may be required by a local legislative body. Under CEQA Guidelines Section 15041, mitigation measures must be "feasible" and consistent with applicable constitutional requirements such as the "nexus" and "rough proportionality" standards established by case law. In this case, the DEIR is rife with infeasible, illegal and disproportionate mitigation measures.

The DEIR relies heavily on "clustering" as a mechanism for reducing purported environmental, especially aesthetic, impacts. However, as proposed, clustering is a sham. Under ordinary circumstances, landowners are encouraged to cluster residential units on small lots through density bonuses, which permit more development than might otherwise be allowed. In return for offering density bonuses, the public agency obtains more open space and lower cost infrastructure. G8

In this case, landowners are allowed no increase in density in return for clustering; they are simply allowed to build the same number of units on smaller lots. Even the opportunity to build on smaller lots may be illusory, because the proposal for 1 acre minimum lots in a clustered development is also subject to a proposed maximum allowable development density of 1 unit per 5 acres. Northern Foothills Study 5-3; 5-8. In other words, landowners receive no economic benefit from the clustering proposal. As a result, the proposed mitigation measure is infeasible to implement.

The "clustering" approach is also undercut by another purported mitigation measure: potential reductions in minimum road widths and other standards for development which is limited to four dwelling units. Road construction is undoubtedly the largest single cost in hillside development, and is identified as the most environmentally damaging aspect of the proposed Project by the Northern Foothills Study. Rather than allow construction of less intrusive roads in combination with clustering, the Project proposes to force a landowner to choose between maximizing development potential and reducing impacts. The DEIR offers no

justification for limiting relaxed road standards to 4-unit developments, other than its general anti-development bias.

The DEIR also relies heavily on requiring conservation easements as mitigation for reduced road requirements, purportedly to limit development to 4 units in perpetuity. There is absolutely no "nexus" between the requirement for dedication of a conservation easement over private property and reduced road standards. The requirements for conservation easements therefore violate both established case law and CEQA. G8

In fact, when coupled with reductions in allowable density, most of the mitigation measures appear designed to prevent *any* development in the Northern Foothills, beyond that which has already occurred. As the City is well aware, there is no possibility that the reduced density development will be able economically to support the required mitigation measures. As currently proposed, the project itself and those mitigation measures requiring the construction of infrastructure are simply infeasible, in violation of CEQA.

CONCLUSION

Mr. Menjivar appreciates this opportunity to comment on the DEIR for the Northern Foothills Implementation Project. He is aware of the concerns which have been expressed about development in the area, and believes that a resolution may be possible which addresses those concerns without depriving the private owners of the value of their properties. He looks forward to discussing these approaches with representatives of the City.

We request that this letter be included in the administrative record of this matter and be the subject of written responses to comments for inclusion in the Final EIR for the Project. We are available to discussing these responses and the developability of Mr. Menjivar's property at your convenience.

Very truly yours,

Deborah M. Rosenthal

Deborah M. Rosenthal, AICP

DMR:eas
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bcc: Karen J. Lee, Esq.

G. RESPONSES TO COMMENTS FROM DEBORAH M. ROSENTHAL, AICP, ROSENTHAL & ZIMMERMAN, DATED APRIL 16, 1999.

G1. The City of San Dimas does not support the viewpoint of the commentor with regard to recirculation of the Draft EIR. Section 15088.5 of the CEQA Guidelines specifies the conditions under which a Draft EIR must be recirculated prior to certification of the Final EIR. Applicable portions of Section 15088.5 are cited below.

"(a) A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. As used in this section, the term "information" can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement. "Significant new information" requiring recirculation include, for example, a disclosure statement that:

(1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.

(2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.

(3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.

(4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

(b) Recirculation is not required when the new information added to the EIR merely clarifies or amplifies or make insignificant modifications in an adequate EIR."

As shown throughout the Comments and Responses on the Draft EIR, no new significant information has come to light, no new analysis has been conducted and no new mitigation measures have been developed. Revisions to the Final EIR are considered minor modifications and clarification and no substantial changes or new information warrants recirculation.

In addition, the City of San Dimas does not concur with the statements regarding the "failure to use an appropriate baseline," "failure to conduct an appropriate alternatives analysis," "reliance on infeasible or illegal mitigation measures," or "reliance on an inconsistent project description." Responses to these specific statements will be further addressed in Responses G2 through G8.

G2. The commentor states "without an adequate comparison of the proposed project to existing conditions and realistic alternatives...it does not provide concerned citizens and decision-makers with information about the environmental consequences of project decisions before they are made" and references the *Laurel Heights Improvement Association v. Regents of University of California* (1993) court decision. The commentor also questions "the decision to slash existing development rights....long before the DEIR was prepared."

With regard to the *Laurel Heights II* court case, the California Supreme Court determined that the EIR was inadequate in certain respects and directed the Regents of the University of California to prepare and certify an adequate EIR (see Laurel Heights Improvement Association of San Francisco Inc. v. Regents of the University of California (Supreme Court 1993) 6 Cal. 4th 1112 [26 Cal. Rptr. 2d 231]).[1] Based on the Court's decision, the Regents prepared and circulated a new draft EIR. The petitioner and other members of the public commented on the new draft document, and the Regents prepared and made public a final EIR that included responses to comments. The Association and others requested that the EIR be recirculated for additional public comment, in light of certain responses.

As stated in Response G1, the City of San Dimas does not agree with the commentor regarding the need for recirculation. As shown in Response G1, the requirements regarding the need for recirculation are listed, and as shown throughout the Responses to Comments, no conditions have arisen that would warrant recirculation pursuant to the *Laurel Heights II* court case or pursuant to CEQA Guidelines Section 15088.5.

With respect to the second comment, Section 3.2, *Background and History*, of the Draft EIR provides an overview of the development moratorium in the Northern Foothills. In May 1997, at a City Council study session with the Planning Commission, it was recommended that a moratorium be imposed on development in the northern foothills, until potential revisions to existing City regulations could be reviewed and considered for revision. The

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1 Source: *Guide to the California Environmental Quality Act (CEQA)*, 1996, Ninth Edition, Michael H. Remy, Tina A. Thomas, James G. Moose and Whitman F. Manley.

development moratorium was enacted and has been extended until July 22, 1999.

After the moratorium was enacted, the City hired LSA Associates to prepare the *Northern Foothills Development and Infrastructure Study.* As stated on page 1-9 of the Draft EIR, "the purpose of the report was to identify physical and environmental attributes of the study area, assess the condition of available public services and facilities, and to analyze the policy content for future development within the study area. The report identifies development, infrastructure and policy issues." This document served as the starting point in defining the "worst case" condition to be analyzed in the Draft EIR, and as a starting point for the General Plan Amendment and Specific Plan text. The *Northern Foothills Development and Infrastructure Study* has been incorporated by reference into the Draft EIR, pursuant to Section 15148 of the CEQA Guidelines (refer to Section 1.6, *Incorporation by Reference*, of the Draft EIR).

A review of existing development standards for the northern foothills area and the creation of new development standards was determined necessary by the City Council in 1997. Only when potential new development standards were discussed in the *Northern Foothills Development and Infrastructure Study* was it appropriate to prepare an Environmental Impact Report analyzing the potential impacts of the change in development standards for the project area. This is the course the City of San Dimas took for the EIR. And as stated in the previous paragraph, the Northern Foothills Development and Infrastructure Study provided the "worst case" project description for the Draft EIR.

It is important to note that the City Council received and approved the *Northern Foothills Development and Infrastructure Study,* but has not made any decisions regarding implementation of this study. The Planning Commission and City Council will be determining how to implement the study with the proposed General Plan Amendment and Specific Plan.

G3a. The commentor states that "a stable project description is the *sine qua non* of CEQA" and references the *County of Inyo v. City of Los Angeles* 1977 court case.

Section 3.0, *Project Description*, of the Draft EIR provides a detailed narrative of the Project Location and Setting, Background and History, Project Objectives, Project Characteristics, Phasing and Agreements, Permits and Approvals. The commentor's concerns for detail and stability within the project description is based in part on the County of Inyo vs. City of Los Angeles (1977) 71 Cal App. 3d 185,193. The basis for that decision has no

nexus to the proposed project. The proposed project description is accurate and consistent throughout the Draft EIR.

In Inyo, an EIR drafted by the City of Los Angeles referred to the project in question differently in different parts of the document. The project that the City was supposed to be analyzing, pursuant to a court order (see County of Inyo vs. Yorty (3d Dist. 1973) 32 Cal.Appd.3d 795 [108 Cal.Rptr. 377]), was a proposal to increase the City's extraction of groundwater from the Owens Valley for export to Los Angeles. The document that resulted, however, did not focus its analysis on that proposal. The EIR incorrectly defined the project to include only the extraction of groundwater for use on City-owned lands located in Inyo and Mono Counties. In other parts of the document, though, the City defined the project far more broadly. At one point, it was defined, in the Court's words, as "one part of the larger operation of the Los Angeles Aqueduct System." Later, the project was treated as the whole of the Los Angeles Aqueduct System. (71 Cal.App.3d at 190 [139 Cal.Rptr. 396].)

The primary harm caused by "the incessant shifts among different project descriptions" was that the inconsistency confused the public and commenting agencies, thus vitiating the usefulness of the project "as a vehicle for intelligent public participation." The Court added that "[a] curtailed, enigmatic or unstable project description draws a red herring across the path of public input." (71 Cal.App.3d at 197-198 [139 Cal.Rptr. 396].)

The purpose of the Northern Foothills Implementation Program Draft EIR is to present an analysis of the environmental effects expected to result from implementation of the Development Strategy. Due to the fact that specific characteristics of individual projects which may result from this Program are unknown at this time, potential environmental impacts are addressed in general terms.

The EIR has been prepared as a Program EIR in accordance with Section 15168 of the California Environmental Quality Act (CEQA) Guidelines, addressing the environmental effects of the proposed project. Section 15168 states the following:

"(a) General. A Program EIR is an EIR which may be prepared on a series of actions that can be characterized as one large project and are related either:

(1) Geographically,
(2) A logical parts in the chain of contemplated actions,

(3) In connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program, or
(4) As individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways.

(b) Advantages. Use of a Program EIR can provide the following advantages. The Program EIR can:

(1) Provide an occasion for a more exhaustive consideration of effects and alternatives than would be practical in an EIR on an individual action,
(2) Ensure consideration of cumulative impacts that might be slighted in a case-by-case analysis,
(3) Avoid duplicative reconsideration of basic policy consideration,
(4) Allow the Lead Agency to consider broad policy alternatives and program-wide mitigation measures at an early time when the agency has greater flexibility to deal with basic problems or cumulative impacts, and
(5) Allow reduction in paperwork.

(c) Use with Later Activities. Subsequent activities in the program must be examined in the light of the Program EIR to determine whether an additional environmental documentation must be prepared.

(1) If a later activity would have effects that were not examined in the Program EIR, a new Initial Study would need to be prepared leading to either an EIR or a Negative Declaration.
(2) If the agency finds that pursuant to Section 15162, no new effects could occur or no new mitigation measures would be required, the agency can approve the activity as being within the scope of the project covered by the Program EIR, and no new environmental document would be required.
(3) An agency shall incorporate feasible mitigation measures and alternatives developed in the Program EIR into subsequent actions in the program.
(4) Where the subsequent activities involve site specific operations, the agency should use a written checklist or similar device to document the evaluation of the site and the activity to determine whether the environmental effects of the operations were covered in the Program EIR.
(5) A Program EIR will be most helpful in dealing with subsequent activities if it deals with the effects of the program as specifically and comprehensively as possible. With a good and detailed analysis of the program, many subsequent activities could be found to be within the scope of the project described in the Program EIR, and no further environmental documents would be required."

The commentor has correctly quoted text from page 3-6 of the Draft EIR, but has only excerpted a portion. The text on pages 3-8 through 3-10 of the Draft EIR go on to further define the changes to the general plan and zoning ordinance. That text is restated below for ease of commentor reference.

"The recommendation of the Northern Foothills Development Strategy is to amend the General Plan and Zoning Ordinance as follows:

General Plan Revisions

- *Amend the land use designation of all privately-owned lands within the Northern Foothills project area that are currently designated Single Family Residential to Very Low Estate, with the exception of the Terrebonne Tract, to a new designation of "Northern Foothills." Retain the existing "Park" and "Open Space" land use designations for the National Forest, Camp Glen Rocky, Horsethief Canyon Park, San Dimas Wash, San Dimas Canyon Golf Course and other publicly-owned lands.*

- *Amend the land use designation of the National Forest Service property (APN 8678-030-301) to "Northern Foothills."*

- *Add new text to the General Plan that outline development policies and requirements specific to the Northern Foothills project area.*

Zoning Ordinance Revisions

- *Create a new zone to apply to lands within the Northern Foothills project area. The new zoning shall include standards/requirements for, but not limited to, slope density, minimum lot sizes, building height, building envelope, landscaping, and street geometrics.*

- *In place of the current slope density formula contained in the SF-H zone, use the following minimum size requirements.*

Average natural slope[1] < 20%	• *2 acres in a non-clustered land division* • *1 acre in a clustered land division*
Average natural slope 20 to 48%	*Within Development Feasibility Zone:* • *5 acres in a non-clustered land division* • *1 acre in a clustered land division* *Outside of Development Feasibility Zone:* • *10 acres in a non-clustered land division* • *2 acres within a clustered land division*
Average natural slope > 48%	• *20 acres in a non-clustered land division* • *2 acres within a clustered land division*

1 "Average natural slope" will be calculated over the natural ground prior to development using the same formula that is currently contained in the City's Zoning Ordinance.

- *In the zone of the Northern Foothills area, include the following text zone following the above text regarding minimum lot sizes.*

"The establishment of minimum lot sizes within the Northern Foothills is intended to set minimum lot size only. The density of new development whether it is within a clustered or a non-clustered project, shall not be permitted to exceed the maximum density allowed by the San Dimas General Plan."

- *Establish standards which measure building height from the "average of the lowest point of contact and the highest point of contact with the ground to the highest point of the structure" to the following:*

  - *"The building envelope for all structures shall be as follows:*

    Downhill Lot. An overall maximum height of 20 feet is permitted as measured from finished grade, from the minimum front setback extending towards the rear of the lot. The maximum height at the side setbacks shall be 15 feet extending towards the center of the lot at a 45-degree angle to a maximum height of 20 feet as measured from finished grade.

    Uphill Lot. A maximum height of 15 feet is permitted at the minimum front setback, and shall extend up and toward the rear of the lot at a 45-degree angle to a maximum overall height of 20 feet, as measured from finished grade. The maximum height at the side setbacks shall be 15 feet extending towards the center of the lot at a 45-degree angle to a maximum height of 20 feet, as measured from finished grade.

    Cross Slope Lots. A maximum height of 20 feet is permitted, as measured from finished grade, from the minimum front setback extending towards the rear of the lot. The maximum height at the side setbacks shall be 15 feet extending towards the center of the lot at a 45-degree angle to a maximum height of 20 feet as measured from the finished grade."

- *Establish landscaping requirements for the Northern Foothills area to require landscaping of all slopes in excess of 5 feet in vertical height.*

- *Revise the special hillside street geometric standards within the SF-H zone as they affect the Northern Foothills area to permit the use of access roads, 26 feet wide, to provide direct access to residential lots.*

- *Apply the Private Horse Overlay zone or its equivalent to all privately owned lands."*

With regard to the approvals listed on page 3-11, the statement at the top of the page identifies them as "a list of the various agencies and the associated approval and permits potentially required for the proposed project."

To further clarify what approvals are part of the "project" and what approvals would be required of future development proposals, the text on page 3-11 of the Draft EIR will be revised to read as follows:

NORTHERN FOOTHILLS IMPLEMENTATION PROGRAM

Agency	Approval/Permit
City of San Dimas	Final EIR Certification
	General Plan Amendment
	Zone Change

FUTURE DEVELOPMENT PROPOSALS

Agency	Approval/Permit
City of San Dimas	Environmental Review and Clearance (Negative Declaration, Mitigated Negative Declaration, EIR)
	Tentative Tracts and Parcels Maps
	Site Plan Approval(s)
	Landscape Plan Approval(s)
Regional Water Quality Control Board	Water Discharge Permit
California Department of Fish & Game and/or City of San Dimas	1603 Agreement
Army Corps of Engineers	404 Permit
Local Utility Companies	Infrastructure Service Fees
	Connections

G3b. As stated in Response G3a, the development strategy for the Northern Foothills Implementation Program provided sufficient detail to define the "worst case" condition in terms of density and general policy changes for analysis in the Draft EIR. The project description as described in Section 3.4, *Project Characteristics*, of the Draft EIR is accurate and valid. The policies in the *Northern Foothills Development and Infrastructure Study* and some of the mitigation measures in the Draft EIR provide the policy guidance and/or standards for the General Plan Amendment and Zone Change/Specific Plan.

G3c. The project description set forth in the Draft EIR is a complete and accurate description of the project. The reference to additional standards and details in the proposed Specific Plan relate to the procedural and administrative standards, and not additional development regulations not analyzed in the Draft EIR. The proposed Specific Plan provides for the same density, set backs, building heights and building envelopes as described in the Draft EIR.

Section 5.1, *Land Use and Relevant Planning*, provides an analysis of the proposed project's consistency with relevant plans and policies, including the City of San Dimas General Plan and Zoning Ordinance. The analysis on pages 5.1-17 and 5.1-18 of the Draft EIR acknowledge the General Plan Amendment and Zone Change/Specific Plan. The analysis concluded that less than significant impacts would result from project implementation and that no mitigation measures are required. The text from pages 5.1-17 and 5.1-18 is restated for ease of commentor reference.

"**Relevant Plans and Policies**

❖ ***FUTURE RESIDENTIAL DEVELOPMENT OF THE 972 VACANT ACRES WOULD BE CONSISTENT WITH RELEVANT PLANS AND POLICIES OF THE CITY OF SAN DIMAS.***

Significance: Less than significant.

Impact Analysis: The proposed project would be consistent with the San Dimas General Plan and Zoning Ordinance, and Angeles National Forest Land and Resources Management Plan. The project would not conflict with any adopted environmental plans or goals of the community.

San Dimas General Plan

The following discusses project consistency with the Land Use, Circulation, Conservation, and Open Space Elements.

❖ *Land Use Element:* The vacant 972 acres anticipated for single family detached residential development are designated by the City General Plan and Land Use Element as Single Family Residential Estate Very Low. The City has always intended for the 972 acres to be developed for residential purposes. The proposed project will develop the 972 acres at a lower overall density than originally anticipated with the General Plan. Given that the proposed project would not develop a total number of units that exceed permitted densities for the 972 acres, it is concluded that the proposed project would not be in conflict with the City's General Plan and Land Use Element. Existing land uses elsewhere within the project area would continue to operate as currently

developed. Those areas designated Open Space and Park would not be affected by the proposed project. The City intends for these particular areas to ultimately remain in open space.

It should be noted that to better guide and regulate future development within the Northern Foothill project area, an Amendment to the General Plan (GPA) is being proposed. The GPA would amend the General Plan to create a "Northern Foothills" land use designation and define development policies and requirements that are specific to the Northern Foothills study area that are consistent with the Development Strategy described in the San Dimas Northern Foothills Development and Infrastructure Study.

- *Circulation Element:* The project does not propose any improvements to Foothill Boulevard or Terrebonne Avenue that would conflict with the Circulation Element classifications of these roadways. These roadways would continue to be classified as "Major" and "Collector", respectively.

- *Conservation and Open Space Elements:* The proposed project affects those vacant areas within the project area that are designated Single Family Residential Estate Very Low. Those areas designated Open Space and Park would not be affected by the proposed project. The City intends for these particular areas to ultimately remain in open space. Horsethief Canyon Park and the San Dimas Canyon Golf Course would continue to be defined as Parks in the Open Space Element. The equestrian trail proposed along the southern portions of the project area would continue to be required. Likewise, the streetscape image of Foothill Boulevard through enhanced landscaping, medians, land use controls, and other streetscape elements would continue to be required in the future.

San Dimas Zoning Ordinance

The 972 acres anticipated for residential development are zoned by the City Zoning Ordinance as Single Family Hillside (Private Horse Overlay). The City has always intended for the 972 acres to be developed with detached single family residential units. Accordingly, it is concluded that the project would not be in conflict with the City's Zoning Ordinance. Existing land uses elsewhere within the project area would continue to operate as currently developed. Those areas zoned Open Space would not be affected by the proposed project. The City intends for these particular areas to ultimately remain in open space.

In addition to the aforementioned GPA, a Zone Change/Specific Plan is also being proposed for the project area to create either a new zone or specific plan to better implement the regulations and standards established with the Development Strategy described in the San Dimas Northern Foothills Development and Infrastructure Study.

Angeles National Forest Land and Resources Management Plan

The proposed project would not conflict with the Angeles National Forest Land and Resources Management Plan, which only affects lands within the San Dimas Experimental Forest and Fern Canyon Research Natural Area. These areas would not be affected by future residential construction anticipated for the 972 acres of vacant lands, as these vacant lands are outside the National Forest area.

Mitigation Measures: No mitigation measures are required."

G3d. With regard to actions the City Council took regarding the *Northern Foothills Development and Infrastructure Study*, the Council received and approved the study and recommended that staff proceed with the General Plan Amendment, Zone Change and Environmental Impact Report. In addition, the Council directed staff to further investigate the Reduced Density Alternative, which proposes a maximum of 106 dwelling units, and the Additional Reduced Density Alternative, which proposes a maximum of 80 dwelling units. The City of San Dimas refutes the commentor's concerns that "the City has put the cart before the horse in proceeding with implementation of the Northern Foothills Study." The study provides a factual foundation of what potential changes could occur in the project area before proceeding with the environmental analysis. As stated in Responses G2 and G3b, there was sufficient detail available with the *Northern Foothills Development and Infrastructure Study* to define the parameters for analysis in the EIR. The Draft EIR does not serve as a "post hoc rationalization." Instead, the Draft EIR defines the project, provides a review of the projected impacts, recommends mitigation measures and analyzes alternatives to the proposed project in accordance with CEQA.

G4a. Each sub-section within Section 5.0, *Description of Environmental Setting, Impacts and Mitigation Measures*, does in fact include a description of the environmental setting as it relates to the specific environmental topic, identification of impacts and a listing of recommended mitigation measures. Where appropriate, relevant implementing policies and actions in the *Northern Foothills Development and Infrastructure Study* have been stated, since they provide additional policy guidance and/or development standards regarding future development within the project area.

Where policies and actions from the *Northern Foothills Development and Infrastructure Study* have been excerpted and included in the Draft EIR, an introductory paragraph is included before the text.

An example of the introductory paragraph is on page 5.2-10 of the Draft EIR, which is restated below for ease of commentor reference.

"NORTHERN FOOTHILLS IMPLEMENTATION PROGRAM

Section 5 of the *Northern Foothills Development and Infrastructure Study*, prepared by LSA Associates, includes a section on visual intrusiveness of new development in the project area. The following text has been excerpted from the study and includes both the guiding principle with regard to visual character and recommends policies and action items for the City of San Dimas."

G4b. As stated in Response G4a, the Draft EIR does include a description of the physical environmental conditions as they existed at the time the notice of preparation was prepared. Environmental setting discussions are found in Section 3.1, *Project Location and Setting*, as well as within various sub-sections in Section 5.0, *Description of Environmental Setting, Impacts and Mitigation Measures*. These descriptions serve as the baseline environmental conditions.

G4c. The commentor quotes text from page 5.1-19 of the Draft EIR, however it is important to understand the statement in its entirety and the subject of the analysis. In this case, the paragraph the text was quoted from was dealing with cumulative impacts. The statement is accurate and correct. Specific land use impacts associated with implementing the proposed project are discussed on pages 5.1-13 through 5.1-18 of the Draft EIR.

With regard to air quality and a discussion of project impacts over existing conditions, the following text from pages 5.4-9 and 5.4-10 of the Draft EIR will be modified to read as follows:

"Mobile Sources

Motor vehicles would constitute the primary source of pollutant emissions associated with buildout of the proposed project area. Implementation of the proposed project would result in an increase in mobile source emissions over existing conditions; however, this increase is not anticipated to generate any new significant air quality impacts. And while ~~Although~~ the proposed project would involve additional vehicle traffic and resultant pollutant emissions beyond existing conditions, this traffic and associated emissions increase was anticipated in the City of San Dimas General Plan EIR. In fact, the General Plan EIR analysis indicated that *"[g]rowth in the City of San Dimas will impact air quality almost exclusively through the vehicular traffic generated by the development."* The General Plan EIR goes

on to say that *"[t]he anticipated incremental City of San Dimas development does not create a significant air quality impact on a local or regional scale."* Since the proposed project would result in a decrease in the intensity of the existing land use designations within the project area, that were previously analyzed in the General Plan EIR, the proposed project would not result in significant air quality impacts beyond those previously anticipated for the project area (refer to Sections 5.1, *Land Use/Relevant Planning*)."

The impact discussion on page 5.10-14 of the Draft EIR does provide a comparison of the proposed project to existing conditions. The following text is restated from page 5.10-14 for ease of commentor reference

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"**Police Service**

- ***DEVELOPMENT OF FUTURE PROJECTS WITHIN THE NORTHERN FOOTHILLS PROJECT AREA WOULD INCREASE THE DEMAND ON POLICE SERVICES BEYOND EXISTING CONDITIONS.***

Significance: Less than significant.

Impact Analysis: Implementation of the proposed project would create an increased demand for police services within San Dimas. Although it is projected that the proposed addition in residential dwelling units would increase the number of law enforcement services required, no significant impacts are anticipated that would result in an unacceptable level of law enforcement services for the project area or the City of San Dimas."

G5. Section 3.1, *Project Location and Setting*, notes existing development within the 3,000-acre study area. It is worth pointing out that the environmental setting for existing development within the study area has very different characteristics (e.g., topography, geology, vegetation) than the vacant land.

Section 3.4, *Project Characteristics*, focuses the environmental analysis to the 972 vacant acres within the overall 3,000 acres of the study area. The proposed General Plan Amendment and Zone Change/Specific Plan would not pertain to existing developed areas within the study area.

G6. A significant portion of the commentor's concerns focus on the definition of Development Feasibility Areas. It should be noted that the Draft EIR made no changes to the description of these areas and included the location and definition of these areas as described in the *Northern Foothills*

Development and Infrastructure Study. The Development Feasibility Zones were defined prior to commencement of the Draft EIR. In addition, property owners and the public had the opportunity to comment on the Development Feasibility Zones and the content of the *Northern Foothills Development and Infrastructure Study*.

The City of San Dimas would recommend that the commentor refer to Section 3.0, *Development Analysis*, of the *Northern Foothills Development and Infrastructure Study*, which provides a more detailed description of how the Development Feasibility Areas were defined. The discussion begins on page 3-1 and continues through page 3-24. Development Feasibility Areas were defined by several factors including topography and availability of water. Key pages to refer to include pages 3-1, 3-15 and 3-17; Tables 3.A and 3.D and Figure 3.1.

With regard to the commentor's statement that "there is no substantial support in the record for excluding the bulk of Mr. Menjivar's property from the development feasibility zone" and "there is no support for distinguishing between the densities allowed on developed land as opposed to undeveloped land," the City of San Dimas would once again recommend that the property owner refer to the *Northern Foothills Development and Infrastructure Study*. The City of San Dimas has substantial evidence in the record regarding the definition of the Development Feasibility Areas. These specific concerns do not raise any environmental concerns.

With regard to the significant aesthetic impacts, the Draft EIR concluded that significant landform alteration impacts would be associated with the construction of infrastructure and future residences within the project area, which would permanently alter the on-site topographic features. The Draft EIR concluded that aesthetic impacts, with the imposition of mitigation measures, would be reduced to a less than significant level.

As stated in Response G2, the project description has been accurately defined. In addition, the analysis in the Draft EIR was prepared in accordance with CEQA and applicable CEQA sections have been cited throughout the Draft EIR. Refer to Section 1.1, *Purpose of the EIR*, of the Draft EIR for a full citation of pertinent CEQA Sections that guided preparation of the EIR.

G7. Section 7.0, *Alternatives to the Proposed Project*, provides a full description of how alternatives were selected for analysis in the Draft EIR. The alternatives have been sufficiently defined to allow for meaningful evaluation, analysis and comparison. The following text highlighting this

has been excerpted from page 7-1 of the Draft EIR for ease of commentor reference.

"As part of the *Northern Foothills Development and Infrastructure Study* prepared by LSA Associates, four development alternatives and their potential maximum development yield were developed. These include: A) Existing Strategy - 127 dwelling units; B) Reduced Density - 106 dwelling units; C) Additional Reduced Density - 80 dwelling units; and D) Further Reduced - 48 dwelling units. These four development scenarios serve as the base in selection of a CEQA Proposed Project and Alternatives to the CEQA Proposed Project for this EIR.

For purposes of this EIR, the CEQA Proposed Project is the Existing Strategy development scenario, which proposes a maximum of up to 127 dwelling units. The Reduced Density, Additional Density and Further Reduced Density development scenarios were selected as Alternatives to the CEQA Proposed Project, and will be analyzed in this Section.

In accordance with CEQA Guidelines Section 15126(d), this Section describes a range of reasonable alternatives to the proposed project that could feasibly attain the basic objectives of the proposed project, while evaluating the comparative merits of each alternative. Potential environmental impacts associated with six alternatives are compared to impacts from the proposed project below. These alternatives include: 1) No Project - No Development Alternative; 2) No Project - Existing General Plan Alternative; 3) Reduced Density Alternative; 4) Additional Reduced Density Alternative; 5) Further Reduced Density Alternative; and 6) Transfer of Development Rights Alternative."

"The ranges of alternatives required in an EIR is governed by a 'rule of reason' that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice." (CEQA Guidelines, §15126.6(f); *see also Goleta II, supra,* 52 Cal.3d at 565, 576 [276 Cal.Rptr. 410]; *Save Our Residential Environment vs. City of West Hollywood* (2d Dist. 1992) 9 Cal.App.4th 1745, 1751 [12 Cal.Rptr.2d 308]; *Del Mar Terrace, supra,* 10 Cal.App.4th at 740 [12 Cal.Rptr.2d 785]; *Goleta I, supra,* 197 Cal.App.3d at 11771-1178 [243 Cal.Rptr. 339].)

An EIR need only examine in detail those alternatives that the lead agency determines could feasiblely attain most of the basic objectives of the project." "Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context) (CEQA Guidelines, §15126.6(f)).

It should be noted that the rigorous substantive standards for EIR adequacy have not been applied by all courts, particularly where a challenged plan-level EIR will be followed by more EIRs for individual projects. In *Al Larson Boat Shop, Inc. vs. Board of Harbor Commissioners* (2d Dist. 1993) 18 Cal.App.4th 729, 746-747 [22 Cal.Rptr. 2d 618], the Court of Appeal upheld a rather general alternatives analysis, consisting of only a total of four pages. The project at issue was the adoption of an updated "port master plan" that, among other things, defined the Port of Long Beach's five-year goal for building facilities sufficient to meet the increased demand for handling commercial cargo. The challenged EIR was a "first tier" EIR, to be followed by additional EIRs for site-specific projects. The EIR and plan described six anticipated port projects, including three minor landfills, which were intended to assist the Port in meeting its goal. The court held that EIRs for plan-level decisions (e.g., port master plans, general plans, etc.) need not address alternatives with the level of specificity appropriate in project-level EIRs. (18 Cal.App.4th at 746 [22 Cal.Rptr.2d 618].)

In Larson, the Court explained the governing rule as follows:

"No ironclad rules can be imposed regarding the level of detail required in the consideration of alternatives. EIR requirements must be 'sufficiently flexible to encompass vastly different projects with varying levels of specificity.' [Citation] The degree of specificity required in an EIR 'will correspond to the degree of specificity involved in the underlying activity which is described in the EIR.' [Citation.] Thus, '. . . an EIR for the adoption of a general plan . . . must focus on secondary effects of adoption, but need not be as precise as an EIR on the specific projects which might follow.'" (18 Cal.App.4th at 746 [22 Cal.Rptr.2d 618].)

The City of San Dimas has made a concerted attempt to provide a range of Alternatives that meet the intent of Section 15126.6 of the CEQA Guidelines. The alternatives accomplish objectives of the project and further reduce the significance of impacts when compared to the proposed project. Section 7.0 of the Draft EIR exceeds the criteria set forth in the Larson decision and fully complies with Section 15126.6 of the CEQA Guidelines.

With regard to the commentor's concerns regarding the No Project - General Plan Alternative, the discussion on pages 7-7 through 7-11 adequately describes the impacts of this alternative in comparison to the proposed project. The commentor is correct in stating that the proposed project and the General Plan Alternative would result in the same significant environmental impact to landform alteration. But the discussion on page 7-

8 under the heading of aesthetics explains why the General Plan Alternative would result in greater impacts than the proposed project. This discussion has been excerpted from page 7-8 for ease of commentor reference.

"Under the proposed project, additional visual and grading standards would be developed to guide future development in the project area. Given that more residential units would be permitted under the existing general plan designation and would be built according to existing City standards, there is the potential for future development under this alternative to produce greater landform alteration and visual impacts than the proposed project. In this regard, the No Project - General Plan Alternative is considered environmentally inferior to the proposed project."

While the proposed project and the No Project - General Plan Alternative would result in the same significant impact related to landform alteration, the No Project - General Plan Alternative results in greater impacts, which does not meet the intent of CEQA of identifying an environmentally superior alternative that reduce significant impacts.

With regard to the commentor's concerns regarding the Transfer of Development Rights Alternative, it is important to note that the City of San Dimas does not have a Transfer of Development Rights program in place at this time. Should this alternative be selected by the City Council, a program would have to be developed and approved by the City Council prior to land owners/developers utilizing the program. A description of this alternative and its assumptions are found on page 7-22 of the Draft EIR. For purposes of the alternatives analysis, the Transfer of Development Rights Alternative assumed no more dwelling units than that proposed for the project (127 dwelling units). This development maximum would be consistent with the project objectives, as outlined in Section 3.3 of the Draft EIR.

Pages 7-25 and 7-26 provide a conclusion of the impacts associated with the Transfer of Development Rights Alternatives. That statement has been excerpted for ease of commentor reference.

"The Transfer of Development Rights Alternative results in fewer impacts to aesthetics, biological resources, fire and police protection, schools and utilities. The advantage of the Transfer of Development Rights Alternative is that it can preserve sensitive areas in open space without requiring the public purchase of lands or conservation easements. This is a substantial benefit to the community at large. This alternative also meets the objectives established for the proposed project."

The Draft EIR has been prepared in accordance with CEQA. Sufficient detail has been provided for the City Council to determine the adequacy of the environmental review of the proposed project and alternatives to the proposed project. As is required by CEQA, the City of San Dimas will consider the information in the EIR along with other information which may be presented during their review of the proposed General Plan Amendment and Zone Change/Specific Plan in making an informed decision regarding the proposed project. The City Council has the prerogative to certify the Final EIR and approve one of the alternatives as "the project."

G8. It is important to restate that the EIR was prepared as a Program EIR in accordance with Section 15168 of the CEQA Guidelines (also refer to Response G3a). This Program EIR incorporates other existing environmental documentation and considers broad policy alternatives and program-wide mitigation measures at an early time when the City has greater flexibility to deal with basic problems or cumulative impacts. Subsequent development and individual projects would require site-specific environmental documentation subject to further review at a later date.

It is also important to remind the commentor of the City's development moratorium for the Northern Foothills area and the City Council's direction to revisit existing development standards and create new development standards, as appropriate, for the vacant land within the Northern Foothills study area.

With regarding to clustering, clustering in and of itself is not specifically identified as mitigation. Clustering is included as an implementing policy and action in the *Northern Foothills Development and Infrastructure Study*. Visual Intrusiveness Policy 1f encourages clustered development as a means to preserve the natural appearance and maximize the amount of open space. Mitigation measure AES1 does call for the City to adopt the implementing policies and actions for Visual Intrusiveness. Future developments would then be reviewed to determine their compliance with the policies and actions.

With regard to the "reduced road requirements," the City has chosen to maintain the rural character of the study area with the recommended roadway width of 26 feet. There is no specific mitigation measure that calls for requiring a conservation easement for reduced roadway width. There are specific mitigation measures addressing biological and cultural resources. These mitigation measures are appropriate for the projected impacts associated with future development within the study area.

The specifics regarding the installation of infrastructure for future development would need to be reviewed on a case-by-case basis. The infrastructure requirements would be consistent with the development intensity proposed.

With regard to feasible mitigation measures, Public Resources Code Section 21002 requires agencies to adopt feasible mitigation measures in order to substantially less or avoid otherwise significant adverse impacts. (Pub. Resources Code, §§ 21002, 21081, subd. (a)). For each significant impact, the EIR must identify specific mitigation measures. In formulating mitigation measures, a lead agency is subject to "the rule of reason." (Concerned Citizens of South Central Los Angeles v. Los Angeles Unified School District (2d Dist. 1994) 24 Cal.App. 4th 826, 841 [29 Cal.Rptr.2d 492]). "'CEQA does not require analysis of every *imaginable* alternative or mitigation measure; its concern is with feasible means of reducing environmental effects.'" (Id. [29 Cal.Rptr. 2d 492] (emphasis in original), citing Rio Vista Farm Bureau, supra, 5 Cal.App.4th at 376 [7 Cal.Rptr.2d 307].) When approving projects that are general in nature (e.g., a general plan amendment as opposed to a specific development plan), agencies must devise and approve whatever general mitigation measures are feasible to lessen or avoid projects' significant impacts.

The mitigation measures included in the Draft EIR acknowledge that the vacant land within the study area is in a very physically challenged and environmentally sensitive area. As shown in the Draft EIR, the study area has varied topography with slopes averaging 52 percent, biological diversity, a limited circulation system, and limited public services and utilities.

Approximately 102 mitigation measures are proposed in the Draft EIR to mitigate 43 identified impacts. These impacts would be mitigated to the maximum extent feasible with implementation of the proposed mitigation measures and would not produce significant impacts with mitigation, with the exception of landform alteration and fire protection.

The mitigation measures proposed in the Draft EIR are feasible and effectively reduce the level of impact significance to a less than significant level for all but two issues, landform alteration and fire protection. The mitigation measures would also serve as development standards for future development within the study area.

The mitigation measures in the Draft EIR are feasible, legal and proportionate for the projected impacts associated with the Northern Foothills Implementation Program.

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Re: Draft Program Environmental Impact Report for the Northern Foothills Implementation Program

Dear Sirs:

This letter presents comments on behalf of our client NJD, Ltd., (owner of 200 acres of the 972 vacant acres under study) on the Draft Program Environmental Impact Report for the Northern Foothills Implementation Program ("Draft EIR"). We respectfully request that this letter be included in the administrative record of this matter.

In general, we note that the environmental consulting firm has, for the most part, addressed the required topics required under the California Environmental Quality Act ("CEQA" - Public Resources Code §§ 21000-21177). Nonetheless, the following aspects of the Draft EIR must be addressed and revised in order to meet completely the requirements of CEQA.

The Project Description.

The sine qua non of compliance with CEQA is a stable Project description. Although changes can be made in the project during the CEQA process and an alternative to the "Project" can be adopted, the "Project" as described in the EIR must remain stable. In the Draft EIR it is impossible to determine exactly what Project is being examined. The following are but a few examples of the confusion: H1

* The Project Title is identified on the Notice of Completion as the Northern Foothills Implementation Program. Yet the Draft EIR never clearly explains what is being implemented. To the extent that the Implementation Program attempts to implement the Northern Foothills Development and Infrastructure Study by LSA ("LSA Study"), the Project description is insufficient. As recognized in the Draft EIR at page

1-9, that LSA Study only identified issues and did not set forth a specific course of action.[1] Nonetheless, Section 3.3 of the Draft EIR it appears that the "guiding principle" and policies discussed in the LSA Study may be the Project. Yet, in Section 3.4 the Project is either a set number of units on vacant areas with the Northern Foothills or "a General Plan Amendment and Zone Change/Specific Plan." In other sections of the document, those legislative actions appear to encompass the entirety of the area - not just the vacant land.

To the extent that the Project is really a General Plan Amendment and Zone Change/Specific Plan, the entire CEQA process has been subverted. At the April 7, 1999, hearing of the Planning Commission, the Planning Director stated that there was not even a draft Specific Plan text or General Plan text available as of that date. Without the text of these documents, it is not possible to evaluate the sufficiency of the Draft EIR. Not only does this lack of the text violate the CEQA mandate of a stable project description, it deprives the public of its right of review during the minimum time period this Draft EIR is open for public review. **H1**

Additionally, the Draft EIR does not make clear whether or not a Transfer of Development Rights program is part of the Project. On 5.8-20 of the Draft EIR's discussion of Project impacts, a purchase of development rights program is identified as an implementing policy for the preservation of natural resources.[2] On the other hand, such a program is also designated as an alternative to the Project (see, page 7-2). The discussion leaves the public further confused as to the actual components of the Project receiving CEQA analysis.

Unfortunately, the shifting, uncertain, ambiguous Project description requires that the revisions to the Draft EIR correcting this deficiency be recirculated for public comment.

Development Areas.

Exhibit 3.4-1 of the Draft EIR is a generalized map of the Potential Development Areas. The developable areas on NJD, Ltd.'s property, Canyon Oaks (identified as **H2**

[1] An additional infirmity in using the LSA Study as the Project, is that the LSA Study was not made available, and could not have been made available, during the scoping process. The document had not even been finalized during that time period.

[2] NJD, Ltd. fully approves of the inclusion of a transfer of development rights program within the project description in the Project and is of the view that such a program could well save the apparent intended down-zoning of almost 1000 acres of land from Constitutional infirmity.

Wildwood Canyon in the Draft EIR), have been more precisely identified by engineers and this information was presented to the EIR preparers during the scoping meeting.[3] Despite having access to this delineation, the more generalized inaccurate "developable bubble" is used in the Draft EIR. The preparers of the EIR have the obligation to use the most accurate information available. The document should be revised to reflect that information.

H2

Moreover, it is impossible to tell from either the Draft EIR or the incorporated LSA Study how the potential densities for the Potential Development Areas were determined. Although the Draft EIR states that the densities were determined from slope analyses, it contains no data about how the average slopes were determined. Were they averaged over each individual parcel? Were they computed on the basis of calculations of relatively flat areas within each individual parcel? Were they calculated based on the ownership of parcels so that parcels under one ownership were averaged together and then assigned individual densities? For instance, if one of NJD, Ltd.'s parcel, totaling 158.42 acres and designated as the potential site for 19 units (although presently designated for 31 units) had been treated the same as Parcels 8665-001-004 and 8665-001-005 on the basis of acreage and developable area, it should have had *no* reduction in units and, in fact, should have gained units.[4]

Clustering.

The EIR should recognize that it uses the term "clustering" in a non-standard way. Clustering is typically used in planned unit developments where residences are centralized into one area in order to enable the development to have shared common amenities such as local parks and to retain significant portions of the property in open space while minimizing the impact of necessary infrastructure such as roads and utility easements. One-acre lots are the antithesis of clustering and are commonly referred to as "large lot" developments. With "clustering," a community has the opportunity to

H3

[3] The Draft EIR fails to acknowledge this Concept Plan presented to the City, including at the scoping meeting. For some unknown reason, the City rejected NJD, Ltd.'s offer of access to and a tour of Canyon Oaks as well as discussion with NJD, Ltd.'s own technical consultants. In this respect the EIR fails to meet one of the functions of a Program EIR: "Provide an occasion for a more exhaustive consideration of effects and alternatives than would be practical in an EIR on an individual basis." CEQA *Guidelines* 15168 (b) (1).

[4] NJD, Ltd.'s own field studies have shown that Canyon Oaks (the aggregated parcels under NJD, Ltd.'s ownership within San Dimas) comfortably accommodates 91 units on 79 residential lots with a minimum lots size of 10,000 square feet and 12 lots of a minimum lot size of an acre, allowing the retention of 140.8 acres of open space (70% of the property) including 132.8 acres of *dedicated* open space.

obtain publicly dedicated open space. Under large lot developments, that opportunity disappears because most of the property is utilized for the home sites. Additional interior open space can be obtained in clustered developments by allowing two story homes. When a large lot requirement is combined with a requirement that the homes be one story in height, the result is a dramatic increase in the land actually used for private development and a dramatic decrease in the land available for dedication as public open space. Although recognizing the basic fact that larger pads are needed for single story homes than for two story homes, the Draft EIR does not fully address this environmental impact of requiring single story homes on large lots. H3

Sewers/Septic Tanks.

Sewage issues are inadequately and contradictorily addressed. For instance, on 5.6-26 the Draft EIR states that field reconnaissance showed that near surface conditions beneath the various potential development areas are conducive to use of trench leach fields for sewage disposal and recognizes that areas near major drainage courses are constrained. The Draft EIR suggests that for those properties development shall investigate the potential of extending sewer lines from the nearest trunk line into the development. On 5.10-17, however, the Draft EIR recognizes that "it is not cost effective to provide sewer lines and provide municipal sewage treatment for lots greater than .05 to 1 acre in size." That discussion also summarizes the problems associated with attempting to use septic tanks[5] in relatively flat areas or leach fields in hillside areas. The Draft EIR fails to recognize that these waste issues in combination with the required one-acre minimum lot sizes, render any development on many of the parcels economically and physically infeasible and, thereby, strip those properties of all economic use. Even where development may still be economically viable, the economic inability to install sewers acts as a strong disincentive to keep the homes off of the hillsides. The Draft EIR fails to discuss or even to recognize these impacts. H4

Aesthetic Impact.

The Draft EIR treats each of the Potential Development Areas identically - as though each site had equal visibility from the rest of San Dimas. Views of the Canyon Oaks development area from the rest of San Dimas, however, are blocked by the intervening major ridgeline.[6] Even two-story homes in this area would not be visible H5

[5] In fact, the Southern California Water Company's letter in response to the Notice of Preparation of the Draft EIR specifically commented: "Degradation of groundwater could result if septic tank disposal systems are permitted in the project area."

[6] The comment in the EIR that such an analysis is difficult absent a site plan or building elevations demonstrates the problem in the generalities of the analysis. First, or course, the Concept Plan for Canyon Oaks was presented to the City and to the consultants at the scoping

from virtually the entire remainder of the City. The Draft EIR should recognize that, as to these parcels, there would be no adverse aesthetic impact. In fact, because access to this property would come through the neighboring City of Glendora and the sewers, water, and other services would also come from that side, development of this area would not even lead to the scarring from roads and other infrastructure that can be expected with development of many of the other parcels. H5

Alternatives.

Further Reduced Density Alternative:

The Draft EIR reaches some erroneous conclusions about the Further Reduced Density Alternative. As to the *aesthetics* of this alternative, the Draft EIR fails to take into consideration the impact of the necessary infrastructure, especially roads and utilities, for with this alternative. Because under this scenario each legal parcel retains the right to develop at least one residential unit, the scarring by roads and utility easements remains the same as the 127 unit level of development. Even assuming that the issues discussed above (for instance, sewers) did not make the "right to develop" a paper right only, not connected with reality, access must be accorded to those properties. The size and pricing level of a home necessary to support the costs of development will necessitate adequate road access as well as utilities. Because of these facts, this alternative should be considered either environmentally inferior to or the same as development at a density of 127 units. H6

As to *noise* impacts, the Draft EIR considers only noise from traffic. It fails to consider the other kinds of noise impacts that come with large homes spread over the hillsides - noise such as from air conditioning units; swimming pool equipment; vehicular lawn mowers; etc. Even the assertion without fact that the traffic noise would be less fails to consider what impact the noise of vehicles commonly associated with equestrian and other large lot estates (such as pick-up trucks, horse trailers, etc.) could be. There is simply not enough data to reach the conclusion that this alternative is environmentally superior to the 127 unit discussion.

Similarly, there is no data to support the conclusion that this alternative is superior in *hydrology and drainage*. In fact, with fewer units to contribute to offset the cost, the economic facilitation of local and regional flood control improvements will be hampered. Moreover, as the Draft EIR's discussion on sewers, septic tanks, and leach fields makes clear, the septic tanks and leach fields will have an adverse impact on the hydrology and drainage.

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meeting. Additionally, the topographic maps show beyond cavil that the major ridge line blocks the view of the development areas on this property.

There is also insufficient data to support the conclusion that this alternative is environmentally superior in *fire and police* protection. Statistically, isolated homes are more likely to be targeted for burglary and vandalism. Therefore, the need for police services would actually increase with this alternative.

The conclusion regarding *water and sewer* is directly contradicted by the discussion of these impacts in the main analysis as well as by the letter from the Water Company in the appendix. H6

In regard to *parks and recreation*, this alternative would not allow any clustering. Therefore, there would be *no* opportunity to convert private open space into public open space. The alternative is environmentally inferior to the 127 unit proposal in this respect.

Finally, the alternative further decreases the ability of the City to meet its fair share of regional housing requirements.

Transfer of Development Rights Alternative:

This alternative is environmentally superior to any proposal not including a right to transfer development rights in regard to *circulation.* The Draft EIR is simply incorrect when it states that the same access roads would be required. Significantly fewer roads and driveways would be required if the units assigned to parcels at the higher elevations were transferred to recipient parcels, such as the NJD, Ltd. property or other Potential Development Areas. Additionally, if units were purchased by and transferred to these properties, the impact on local roads would be reduced. For instance, Canyon Oaks obtains its access from the adjacent city. H7

The same factors apply to the determination regarding *noise*. Moreover, in this alternative, the major ridgeline acts as a sound buffer to any local noise associated with housing or local parks. Therefore, this alternative is actually environmentally superior.

As to *parks and recreation*, this alternative offers the ability to increase public open space and to connect existing equestrian trails. It is therefore environmentally superior to the 127 unit proposal.

We agree with the Draft EIR comments set forth on page 7-25 through 7-26 concerning the advantages of this alternative and commend the preparers for their inclusion.

Environmentally Superior Alternative:

For the reasons discussed above, the Transfer of Development Rights Alternative should be designated the environmentally superior alternative. H8

Consideration of a New Alternative: Transfer of Development Rights with Traditional Clustering and Existing General Plan Densities:

Although an EIR need not address all possible alternatives, it is required to address a wide range of feasible alternatives. This requirement is particularly applicable to Program EIRs such as the present EIR. The current densities, as set forth in the General Plan and examined in the previous EIR, showed that all impacts of that density could be mitigated to less than significant levels. Under such circumstances, it is especially appropriate to examine as an alternative the existing densities with transfers of development rights. The LSA Study and the Draft EIR both recognize that depriving landowners of economic viable use of their properties is legally unacceptable. Creating a system of transferable development rights allows the City to encourage its goal while retaining value in the individual property owner's parcels. Properties on which development would have an undesired visual (or other) impact can be assigned bonus units for transferring the development rights. The obvious economic result is a market to increase density on suitable parcels and a market to sell density to enhance the value of minimally developable parcels. The obvious practical result is less scarring of the foothill areas by access roads and infrastructure requirements. In short, a win-win for the City and its citizens. Additionally, this alternative: H9

* would not negatively impact the City obligations in regard to regional housing needs;

* would be responsive to the concerns expressed by the County of Los Angeles Department of Parks and Recreation;

* would minimize the need for private wells; and

* would alleviate the concerns of the Fish & Wildlife Service regarding the movement of wildlife, the fragmentation of the natural environment, and other items as expressed in the Service's scoping letter.

We respectfully request analysis of this alternative.

Miscellaneous:

In addition to the major issues identified above, the Draft EIR has the following deficiencies that should be corrected:

(1) The photographs at Exhibit 5.2-2 do not identify from where the views were shot. H10

(2) The discussion of Wildwood Motorway ignores the reality that access to Canyon Oaks is through Glendora. Therefore the construction of another major entry road is not necessary. H11

(3) Citations in 1.1 are to the *Guidelines* adopted by the Resources Agency, not to CEQA, which is part of the *Public Resources Code* adopted by the legislature. H12

(4) In Section 1.4, item 11 is said to refer to "Other Organizations and Individuals Consulted." In fact, when Section 11 is reviewed, only federal state and local agencies were consulted. There were, apparently no consultations with "other organizations" and "individuals." This is unfortunate in that several of the options discussed in the EIR would clearly impact various organizations such as the San Dimas Conservancy and certainly would impact the landowners and the economic feasibility of development of their properties. H13

(5) The Draft EIR fails to consider adequately the negative impact of a reduction of density on the ability of the City to meet its regional fair share of housing needs. This is a particularly important defect in that the presently allowed densities were found to have no environmental impact that could not be mitigated to less than significant levels in the prior EIR. With no discussion of what has changed to render the findings and conclusions of that EIR inadequate, the Draft EIR's gratuitous comment that such an analysis not appropriate to smaller areas simply ignores the requirements of state law. H14

Very truly yours,

Karen J. Lee

Karen J. Lee

cc: City Clerk (for inclusion in the official record)
Members of the Planning Commission of the City of San Dimas
Collette L. Morse, RBF

H. RESPONSES TO COMMENTS FROM KAREN J. LEE, MORRISON & FOERSTER, LLP, DATED APRIL 14, 1999.

H1. The commentor states that "a stable project description is the *sine qua non* of CEQA." Section 3.0, *Project Description*, of the Draft EIR provides a detailed narrative of the Project Location and Setting, Background and History, Project Objectives, Project Characteristics, Phasing and Agreements, Permits and Approvals. Section 3.1, *Project Location and Setting*, notes existing development within the 3,000-acre study area. Section 3.4, *Project Characteristics*, focuses the environmental analysis to the 972 vacant acres within the overall 3,000 acres of the study area. The proposed General Plan Amendment and Zone Change/Specific Plan would not pertain to existing developed areas within the study area.

The development strategy for the Northern Foothills Implementation Program provided sufficient detail to define the "worst case" condition in terms of density and general policy changes for analysis in the Draft EIR. The project description as described in Section 3.4, *Project Characteristics*, of the Draft EIR is accurate, valid and consistent throughout the Draft EIR.

With regard to actions the City Council took regarding the *Northern Foothills Development and Infrastructure Study*, the Council received and approved the study and recommended that staff proceed with the General Plan Amendment, Zone Change and Environmental Impact Report. In addition, the Council directed staff to further investigate the Reduced Density Alternative, which proposes a maximum of 106 dwelling units, and the Additional Reduced Density Alternative, which proposes a maximum of 80 dwelling units. It was necessary for the City to determine what potential changes could occur in the project area before proceeding with the environmental analysis. As previously stated, sufficient detail was available with the *Northern Foothills Development and Infrastructure Study* to define the parameters for analysis in the EIR.

Section 3.4, *Project Characteristics*, does not define the project as "a set of number of units on vacant areas...or a General Plan Amendment and Zone Change/Specific Plan." Instead, Section 3.4 outlines the parameters of the development potential, policy changes for the General Plan and standards for the Zone Change. It is not an "either/or" situation, but an "and" situation, where all of the items discussed in Section 3.4 collectively define the project to be analyzed in the Draft EIR.

With regard to the Transfer of Development Rights, this program has not been included in the project description as defined in Section 3.4.

However, the City has the option of developing and implementing such a program. Given that such a program is a feasible alternative, it was analyzed as an alternative to the proposed project.

H2. The commentor is correct in stating that the NJD, Ltd. land use plan was presented to the City of San Dimas at the EIR Scoping Meeting held on January 20,1999. As stated at the scoping meeting and in subsequent correspondence from the City of San Dimas to Morrison & Foerster, the City of San Dimas has a development moratorium in place and is not accepting development applications until the moratorium is suspended. Given that a development moratorium is in place and that the City Council received and approved the *Northern Foothills Development and Infrastructure Study*, City staff proceeded pursuant to Council direction to prepare a General Plan Amendment, Zone Change and Environmental Impact Report for the study area. It is worth noting that no development proposal applications were on file at the City or have been submitted to the City since the General Plan Amendment, Zone Change and Environment Impact Report preparations began.

It should also be pointed out that on February 2, 1999, the City of San Dimas responded to two Morrison & Foerster letters dated January 14, 1999 and January 22, 1999. In the City's February 2, 1999 response, the City of San Dimas encouraged the Canyon Oaks project team to "present information related to your property which would facilitate environmental review of the ongoing project..." The City of San Dimas received no technical studies or other pertinent environmental information for the Canyon Oaks property.

The EIR has been prepared as a Program EIR in accordance with Section 15168 of the California Environmental Quality Act (CEQA) Guidelines, addressing the environmental effects of the proposed project. Section 15168 states the following:

"(a) General. A Program EIR is an EIR which may be prepared on a series of actions that can be characterized as one large project and are related either:

(1) Geographically,
(2) A logical parts in the chain of contemplated actions,
(3) In connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program, or
(4) As individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways.

(b) Advantages. Use of a Program EIR can provide the following advantages. The Program EIR can:

(1) Provide an occasion for a more exhaustive consideration of effects and alternatives than would be practical in an EIR on an individual action,
(2) Ensure consideration of cumulative impacts that might be slighted in a case-by-case analysis,
(3) Avoid duplicative reconsideration of basic policy consideration,
(4) Allow the Lead Agency to consider broad policy alternatives and program-wide mitigation measures at an early time when the agency has greater flexibility to deal with basic problems or cumulative impacts, and
(5) Allow reduction in paperwork.

(c) Use with Later Activities. Subsequent activities in the program must be examined in the light of the Program EIR to determine whether an additional environmental documentation must be prepared.

(1) If a later activity would have effects that were not examined in the Program EIR, a new Initial Study would need to be prepared leading to either an EIR or a Negative Declaration.
(2) If the agency finds that pursuant to Section 15162, no new effects could occur or no new mitigation measures would be required, the agency can approve the activity as being within the scope of the project covered by the Program EIR, and no new environmental document would be required.
(3) An agency shall incorporate feasible mitigation measures and alternatives developed in the Program EIR into subsequent actions in the program.
(4) Where the subsequent activities involve site specific operations, the agency should use a written checklist or similar device to document the evaluation of the site and the activity to determine whether the environmental effects of the operations were covered in the Program EIR.
(5) A Program EIR will be most helpful in dealing with subsequent activities if it deals with the effects of the program as specifically and comprehensively as possible. With a good and detailed analysis of the program, many subsequent activities could be found to be within the scope of the project described in the Program EIR, and no further environmental documents would be required."

As stated above, a Program EIR was prepared. This type of CEQA document was selected given that no specific development proposals were included as a part of the project. Specific development proposal applications can be submitted to the City after the development moratorium is terminated and could potentially be subject to additional environmental review as stated in Section 3.6, *Agreements, Permits and Approvals*, of the Draft EIR.

"It is anticipated that future development may be the subject of additional environmental review on an individual project-by-project basis, in accordance with the provisions of Section 15168 of CEQA, as determined by the City of San Dimas."

The commentor also has concerns about the definition of Development Feasibility Areas. It should be noted that the Draft EIR made no changes to the description of these areas and included the location and definition of these areas as described in the *Northern Foothills Development and Infrastructure Study*. The Development Feasibility Zones were defined prior to commencement of the Draft EIR. In addition, property owners and the public had the opportunity to comment on the Development Feasibility Zones and the content of the *Northern Foothills Development and Infrastructure Study*.

The City of San Dimas would recommend that the commentor refer to Section 3.0, *Development Analysis*, of the *Northern Foothills Development and Infrastructure Study*, which provides a more detailed description of how the Development Feasibility Areas were defined. The discussion begins on page 3-1 and continues through page 3-24. Development Feasibility Areas were defined by several factors including topography and availability of water. Key pages to refer to include pages 3-1, 3-15 and 3-17; Tables 3.A and 3.D and Figure 3.1.

H3. The City acknowledges the commentor's statements regarding clustering.

Section 5.2, *Aesthetics*, of the Draft EIR reviewed landform alteration, aesthetics, and light and glare impacts. The impact discussion on pages 5.2-16 through 5.2-19 focus on landform alteration, and includes a discussion of single-family homes on large lots. Text from page 5.2-17 that specifically discusses this issue has been excerpted for ease of commentor reference and emphasis in bold added to highlight the specific passage.

"Landform Alteration

❖ ***CONSTRUCTION OF INFRASTRUCTURE AND FUTURE RESIDENCES WITHIN THE PROJECT AREA WOULD RESULT IN THE PERMANENT ALTERATION OF ON-SITE TOPOGRAPHIC FEATURES.***

Significance: Significant.

Impact Analysis: The potential development of a maximum of up to 127 dwelling units within the project area would change the topography of portions of the project area. Grading to provide a circulation system and buildable areas would alter the current landforms. These alterations are permanent and would continue throughout the life of the proposed project.

It is important to note that no site development is proposed at this time. In addition, no grading of residential lots is proposed as a part of the Zone

Change/Specific Plan. Future residential developments would be required to submit Development Plans and Tentative Maps to the City for review and approval, and would be subject to the criteria of the City's Northern Foothills Zone.

The proposed policies of the Northern Foothills Implementation Program set forth the need for future development to be sensitive to the topography of the project area. As discussed in Policy #1, the visual intrusiveness shall be minimized. It is the intent of this policy to have further development fit into the natural character of the site, rather than creating artificial building pads that would require substantial landform alteration. Policy 1.c. further defines that structures shall be sited to fit into the hillside's contour, preserve views of natural hillside areas and ridgelines, retain views from the maximum number of units, and maintain the natural character of the project area. Policy 1.d. outlines the criteria to minimize the impacts from installing roadways in the project area. Streets are to follow the natural contour of the hillside, and are to minimize the amount of cut and fill required for the roadway. Policy 1.f. permits the use of clustering development as a way to preserve the natural appearance of the hillside and to maximize the amount of open space. Under the clustering concept, dwelling units would be grouped in the more level portions of the site, while steeper areas are preserved in a natural state.

Policy 1.i requires that proposed single-family residential units be single-story. However, single-story homes typically require a larger pad area than a multi-story home of the same size. Thus, in steeply sloped areas, such as the Northern Foothills, the landform modification needed to create a building pad for the single-story home would be greater than a multi-story home of the same size. In some cases, the grading required to create the larger building pad for the single-story home would create a greater visual impact. However, with proper hillside management (i.e., landscaping, re-vegetation with native plants), these impacts would be reduced to less than significant levels."

H4. Once again, it is worth pointing out that the Draft EIR was prepared as a Program EIR and that specific development projects have not been identified.

Given the physical constraints of the study area, it was important to investigate the option of either extending sewer lines to future development within the study area or installing on-site septic tanks in the Draft EIR.

The analysis contained in Section 5.6, *Geology and Soils*, focuses on the capability of soils in the study area to accommodate septic systems. The commentor correctly quotes text from page 5.6-27 of the Draft EIR. A larger portion of text from the page has been excerpted for ease of commentor reference to illustrate soil capability for septic systems.

"**On-Site Disposal Systems**

- ***NEAR SURFACE CONDITIONS BENEATH THE POTENTIAL DEVELOPMENT AREAS (PDAs) MAY BE CONDUCIVE TO THE USAGE OF ON-SITE DISPOSAL SYSTEMS.***

Significance: Less than significant impact with mitigation.

Impact Analysis: Proposed residential development within the project area would likely include the use of on-site sewage disposal systems. These systems, that include trench/leach fields and or seepage pits would require approval by the Los Angeles County Department of Health or other local health authority/agency. The factors to be assessed in evaluating the type and extent of the use of a particular disposal system include: the nature and depth of the surface soils, depth to impervious strata/bedrock, depth to groundwater, natural or finished ground slope in the disposal area, percolation rate of the soil/bedrock, lot size, required setbacks, drainage courses or any other pertinent factors.

According to a field reconnaissance in conjunction with an evaluation of existing soil and geologic data, near surface conditions beneath the various PDAs are conducive to the use of trench leach fields for sewage disposal. Given the fractured nature of much of the bedrock within the project area, the use of seepage pits also appears to be a reasonable alternative. However, major constraints to the use of such systems within the limits of the PDAs include topographic conditions (i.e., steep slopes), areas underlain by unstable landslides, and location of nearby major drainage courses, and spring flow in Wildwood and Sycamore Canyons. Future developments would be required to locate on-site sewage disposal systems a distance deemed appropriate by the Los Angeles County Department of Health away from the above mentioned constraint areas. If it is determined that on-site septic systems are not feasible due to existing site conditions, the applicant(s) shall investigate the potential of extending sewer lines from the nearest trunk line into the proposed development. However, the suitability of extending sewer lines into the project area would require geotechnical evaluation addressing soils, landslides, and seismicity associated with any proposed sewage pipeline. Consultation and approval from the local sewage service would also be required prior to connection to any existing facility (refer to Section 5.10, *Public Services and Utilities*)."

Section 5.10, *Public Services and Utilities*, includes a discussion of both sewage systems and septic systems under the Wastewater subheading. The impact analysis in this section analyzes the option of installing either type of system. The Draft EIR does not recommend one system over the other. It will be necessary for future development proposals to investigate which system is most appropriate for the development and the development intensity. Determination of the most appropriate system is addressed in Mitigation Measures G10 and PSU15 through PSU18.

H5. Refer to Response H2 regarding the NJD, Ltd. land use plan.

With regard to aesthetics, the Draft EIR acknowledges the varied terrain of the study area and the potential for development in valleys to not be visible. The following text specifically addressing this issue has been excerpted from page 5.2-19 of the Draft EIR for ease of commentor reference.

"From most locations within the City of San Dimas, the lower slopes of the Northern Foothills project area are not readily visible due to intervening structures and landscaping within the valley area. In addition, many of the more developable portions of the project area are in small valley-like settings, where development would not be highly visible when viewed from most areas within the City."

While this passage does not specifically identify the Canyon Oaks site, the Draft EIR does address that sites, such as the Canyon Oaks site, would not be visible given their location in a valley and blocked by surrounding ridgelines.

In addition, no project approvals have been secured for the Canyon Oaks project from the City of Glendora. Thus, there is no documented evidence that the City of Glendora would permit the extension of roads, services and utilities from Glendora to the portion of the Canyon Oaks site that lies within the City of San Dimas. Analysis of these extensions would need to be analyzed by the City of Glendora.

H6. Section 15126.6(d) of the CEQA Guidelines discusses the level of detail required for alternatives analysis. The Section is restated below.

"(3) Evaluation of alternatives. The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis and comparison with the proposed project. A matrix displaying the major characteristics and significant environmental effect of each alternative may be used to summarize the comparison. If the alternative would cause one or more significant effects in addition to those caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed. (*County of Inyo v. City of Los Angeles*, 124 Cal.App.3d 1)"

With regards to circulation, the analysis on page 7-19 indicated the impacts for the Further Reduced Density Alternative would be comparable to those for the proposed project.

While the construction of roads and infrastructure were not specifically called out in the aesthetics discussion on page 7-19 of the Draft EIR, it is

implied that they would need to be constructed to serve the 48 dwelling units. However, a significantly reduced number of dwelling units would be permitted under the Further Reduced Density Alternative, thus resulting in fewer overall landform alteration, aesthetic and light and glare impacts than the proposed project.

With regard to noise, the discussion in the alternatives section is consistent with the focus of long-term noise impacts analyzed in Section 5.5, *Noise*, of the Draft EIR. Once again, it is important to point out that the Draft EIR was prepared as a Program EIR. It is more appropriate to look at noise sources, such as those listed in the comment, when future development projects are brought forward to the City and undergo additional environmental analysis, if determined necessary by the City.

The hydrology and drainage discussion on page 7-20 of the Draft EIR acknowledges that stormwater runoff and flood control improvements would be necessary, but that the type of improvements necessary under the Further Reduced Density would differ from those required for the proposed project. The improvements would be commensurate with the 48 dwelling units permitted under this alternative. The conclusion that less stormwater runoff would be generated and that this alternative is considered environmentally superior to the proposed project remains valid.

With regard to police protection, the sheriff's department did not indicate the providing police protection services would be a problem. Fewer homes would result in fewer calls for service. The conclusion on page 7-20 of the Draft EIR remains valid.

With regard to fire protection, the fire department indicated that the development intensity for the proposed project (127 dwelling units) would significantly impact the ability of the department to adequately access and provide services to the area residents. This conclusion is stated on page 5.10-12 of the Draft EIR. Given that significantly fewer residences would be permitted under this alternative, the significant impacts on the fire department would be greatly reduced. The conclusion on page 7-20 of the Draft EIR remains valid.

As stated in Response H4, the Draft EIR analyzed the option of extending sewer lines or installing septic systems, as well as extending water lines or drilling water wells. Specifics regarding the type of system selected would be analyzed as future development projects are submitted to the City for review. The conclusion on page 7-21 of the Draft EIR is adequate for the alternatives analysis and consistent with the water and sewer analysis in Section 5.10, *Public Services and Utilities*.

With regard to parks and recreation, the City acknowledges the commentor's concern regarding clustering, but does not concur with the conclusion that the Reduced Density Alternative is environmental inferior in this regard.

Refer to Response H14 for a discussion of fair share of regional housing requirements.

H7. For the alternatives analysis, it was assumed that the same backbone roadway system shown in Figure 5.3-2 would be required. Thus, the conclusion on page 7-23 of the Draft EIR regarding the installation of on-site roads remains valid. As stated on page 7-23, "the Transfer of Development Rights Alternative is considered neither environmentally superior or inferior to the proposed project."

With regard to noise, the specific location of dwelling units has not been determined, thus it is not possible to specifically identify if ridgelines would reduce noise impacts. This level of analysis would be conducted when specific development projects are submitted to the City for review. Given that the same number of dwelling units are proposed under the Transfer of Development Rights Alternative, similar noise impacts are anticipated. The conclusion on page 7-23 of the Draft EIR remains valid.

With regard to parks and recreation, there is the potential to increase public open space under this Alternative, but the specifics are unknown at this time. The analysis on page 7-25 of the Draft EIR focused on the number of residents created under this alternative, which is similar to proposed project and would create similar demands on local and regional parks.

H8. The City does not concur with the commentor that the Transfer of Development Rights Alternative should be selected as the environmentally superior alternative. As stated on page 7-27 of the Draft EIR:

"The Further Reduced Density Alternative results in fewer impacts to aesthetics, air quality, noise, hydrology and drainage, biological resources, fire and police protection, water and sewer, schools and utilities. This alternative represents a 62 percent reduction in the maximum development potential as compared to the proposed project, and meet the objectives established for the proposed project. The Further Reduced Density Alternative is considered the environmentally superior alternative.

The Transfer of Development Rights Alternative results in fewer impacts to aesthetics, biological resources, fire and police protection, schools and utilities. This alternative has the potential to preserve larger areas of sensitive habitat and

open space, and meets the objectives established for the proposed project. While, the Transfer of Development Rights Alternative has the potential to be more environmentally sensitive than the proposed project, it is not considered the environmentally superior alternative."

The City's selection of the Further Reduced Density Alternative as the environmentally superior alternative remains valid.

H9. "The ranges of alternatives required in an EIR is governed by a 'rule of reason' that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice." (CEQA Guidelines, §15126.6(f); *see also Goleta II, supra,* 52 Cal.3d at 565, 576 [276 Cal.Rptr. 410]; *Save Our Residential Environment vs. City of West Hollywood* (2d Dist. 1992) 9 Cal.App.4th 1745, 1751 [12 Cal.Rptr.2d 308]; *Del Mar Terrace, supra,* 10 Cal.App.4th at 740 [12 Cal.Rptr.2d 785]; *Goleta I, supra,* 197 Cal.App.3d at 11771-1178 [243 Cal.Rptr. 339].)

An EIR need only examine in detail those alternatives that the lead agency determines could feasiblely attain most of the basic objectives of the project." "Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context) (CEQA Guidelines, §15126.6(f)).

It should be noted that the rigorous substantive standards for EIR adequacy have not been applied by all courts, particularly where a challenged plan-level EIR will be followed by more EIRs for individual projects. In *Al Larson Boat Shop, Inc. vs. Board of Harbor Commissioners* (2d Dist. 1993) 18 Cal.App.4th 729, 746-747 [22 Cal.Rptr. 2d 618], the Court of Appeal upheld a rather general alternatives analysis, consisting of only a total of four pages. The project at issue was the adoption of an updated "port master plan" that, among other things, defined the Port of Long Beach's five-year goal for building facilities sufficient to meet the increased demand for handling commercial cargo. The challenged EIR was a "first tier" EIR, to be followed by additional EIRs for site-specific projects. The EIR and plan described six anticipated port projects, including three minor landfills, which were intended to assist the Port in meeting its goal. The court held that EIRs for plan-level decisions (e.g., port master plans, general plans, etc.) need not address alternatives with the level of specificity appropriate in project-level EIRs. (18 Cal.App.4th at 746 [22 Cal.Rptr.2d 618].)

In Larson, the Court explained the governing rule as follows:

"No ironclad rules can be imposed regarding the level of detail required in the consideration of alternatives. EIR requirements must be 'sufficiently flexible to encompass vastly different projects with varying levels of specificity.' [Citation] The degree of specificity required in an EIR 'will correspond to the degree of specificity involved in the underlying activity which is described in the EIR.' [Citation.] Thus, '. . . an EIR for the adoption of a general plan . . . must focus on secondary effects of adoption, but need not be as precise as an EIR on the specific projects which might follow.'" (18 Cal.App.4th at 746 [22 Cal.Rptr.2d 618].)

The City of San Dimas has made a concerted attempt to provide a range of Alternatives that meet the intent of Section 15126.6 of the CEQA Guidelines The alternatives accomplish objectives of the project and further reduce the significance of impacts when compared to the proposed project. Section 7.0 of the Draft EIR exceeds the criteria set forth in the Larson decision and fully complies with Section 15126.6 of the CEQA Guidelines.

The City acknowledges the commentor's request to analyze an additional alternative. However, a reasonable range of alternatives has already been analyzed in the Draft EIR. The City has elected not to include the commentor's suggested alternative in the EIR. Sufficient detail has been provided for the City Council to determine the adequacy of the environmental review of the proposed project and alternatives to the proposed project. As is required by CEQA, the City of San Dimas will consider the information in the EIR along with other information which may be presented during their review of the proposed General Plan Amendment and Zone Change/Specific Plan in making an informed decision regarding the proposed project. The City Council has the prerogative to certify the Final EIR and approve one of the alternatives as "the project."

H10. A photograph key location was not included. The site photographs shown in the Draft EIR are included to provide the reader with a quick snapshot of visual conditions throughout the project area.

H11. The Circulation analysis was conducted under the premise that all new proposed roadways would be provided in the City of San Dimas and would not require connections with neighboring cities.

In addition, as stated in Response H5, no project approvals have been secured for the Canyon Oaks project from the City of Glendora. Thus, there is no documented evidence that the City of Glendora would permit the

extension of roads, services and utilities from Glendora to the portion of the Canyon Oaks site that lies within the City of San Dimas. Analysis of these extensions would need to be analyzed by the City of Glendora.

H12. Comment so noted. All references that cite CEQA, but instead are Sections from the CEQA Guidelines will be modified in Section 1.0

H13. Prior to commencement of the environmental process, the *Northern Foothills Development and Infrastructure Study* was being prepared by LSA Associates for the City of San Dimas. During the 1-1/2 year preparation of this study, numerous meetings were held with both property owners and the public to provide input into the study.

In addition to the agencies listed in Section 11.0 of the Draft EIR, the City of San Dimas has taken steps to maximize opportunities for interested individuals, parties and agencies to participate in the environmental process. Section 1.3, *EIR Scoping Process*, outlines the steps the City has taken to date, including a mailing of the Notice of Preparation and Initial Study and an EIR Scoping Meeting held on January 20,1999. Upon completion of the Draft EIR, interested parties were notified of its availability and provided an opportunity to comment during the 45-day public review period. In addition, public testimony was taken on the Draft EIR at a Planning Commission hearing held on March 29,1999.

H14. With regard to fair share housing, it is not the sole responsibility of development within the Northern Foothills area to meet all of the City's need. Instead, the fair share housing needs to be provided throughout the City.

Goal Statement H-3 of the 1989 Housing Element states "[a]chieve the development of new housing for all economic segments." Objective 3.1 goes on to say "[p]lan and facilitate the production of 850 housing units in the next five years." However, one of the findings in the 1989 Housing Element is that "[t]here is not sufficient development potential within the next five years to meet the total housing production need projected by SCAG."[2]

Section 3.9, Housing/Population, of the General Plan EIR focuses the impact analysis on impacts associated with implementation of the Land Use Element, as shown below.

---

[2] Source: Finding #7, page IV-4 of the 1989 Housing Element.

"3.9.2 Impacts

The City's updated Land Use Element provides for the possible development of an additional 850 housing units. Based on the average household size o rf2.98, the City's population could increase by about 2,500 persons. This population growth translates to an incremental increase of 8% through build out of the General Plan. Stated differently, the City presently has 93% of all the housing supply it is planned to encompass in the inventory.

Impacts are assumed to be minimal since development will be scattered throughout the City on infill residential sites. The list below indicates housing unit capacity on infill sites:

Infill Residential

Density	Dwelling Units
Very Low	92
Low	120
Low/Medium	229
Medium	6
High	28
Total	**475**

3.9.3 Mitigation Measures

Mitigation is unnecessary due to the limited population and housing growth planned through the 2020 build out. Over the 30-year build out period, the average annual growth rate is on the order of 40 dwelling units per year. Development in the hillside area may be subject to additional environmental review in the future."

The project proposes a maximum of 127 dwelling units, which is 68 fewer dwelling units than allowed under the existing general plan designations. The proposed project is consistent with the Land Use Element, as indicated on page 5.1-17 of the Draft EIR. While fewer residential units would be permitted under the proposed project, the project would still work toward the Housing Element goal of development of new housing for all economic segments.

United States Department of Agriculture
Forest Service
San Gabriel River Ranger District
110 N. Wabash Avenue
Glendora, CA 91741
(626) 335-1251 Voice
(626) 335-1251 Ext. 256 TTY
(626) 626 914-3790 FAX

File Code: 1920

Date: April 16, 1999

Lawrence L. Stevens
City of San Dimas
245 East Bonita Avenue
San Dimas, CA 91773

APR 1[illegible] 1999

City of San Dimas

Dear Mr. Stevens:

Thank you for the opportunity to respond to the Draft Program Environmental Impact Report for the Northern Foothills Implementation Program.

The Angeles National Forest, and the San Dimas Experimental Forest are located directly north of the project area. A portion of the project area is actually within the forest boundary. The San Dimas Experimental Forest holds a special designation for research purposes. Access to this area is authorized on a limited basis by permit only. We would not want to see any recreational use or access encouraged in this area. I1

We have found that an increase in residential development adjacent towildland areas generally results in an increase in the threat/potential of wildfire starts. We do have a concern regarding the road width proposed for the project. Our fire equipment may not be able to navigate these narrow roads during a fire situation if there are other vehicles impeding the traffic flow or are parked along the road. I2

The Forest Service may be interested in acquiring the private lands located within the forest boundary. I3

Should you have any questions, please contact me.

Sincerely,

Karen Fulton

for RAINA MARIE FULTON
District Ranger

I. RESPONSES TO COMMENTS FROM RAINA MARIE FULTON, DISTRICT RANGER, UNITED STATES DEPARTMENT OF AGRICULTURE, FOREST SERVICE, SAN GABRIEL RIVER RANGER DISTRICT, DATED APRIL 16, 1999.

I1. Comment so noted. Specific development projects have not been identified at this time. As future development projects are submitted to the City for review, the City would take this comment into consideration.

I2. As stated on page 5.3-8 of the Draft EIR, the proposed roadway width is 26 feet curb-to-curb with no on-street parking. The Forest Service's comment is consistent with the Fire Protection Impact Analysis on pages 5.10-11 and 5.10-12 of the Draft EIR. The summary remark is restated from page 5.10-12 for ease of commentor reference.

"In conclusion, future development within the project would result in unavoidable significant impacts to the Los Angeles County Fire Department's ability to adequately access and provide fire protection services to area residents."

I3. The City acknowledges the Forest Service's interest in acquiring private land located with the forest boundary and would encourage the Forest Service to do so. Implementation of the *Northern Foothills Development and Infrastructure Study* would result in text being added to the General Plan to encourage this.

4-16-99 LETTER

Received
APR 1 1999
City of San Dimas

Dear Planning Commission,

My name is Francie Stepp-Bolling. My address is 1411 N. Red Bluff Court, San Dimas, California 91773.

My family and I are very concerned about the plans for the northern foothills. I understand that you are trying to zone it so as to have minimal impact on the foothills animal and plant life. Please consider that more is not always better. San Dimas is still beautiful and small enough to maintain high quality life for it's residents.

Just take a look at Glendora's hillsides. The view from old foothill is appalling.

Speculators who bought with the idea to create residential tracts should not be allowed to build at all. They bought while the moritorium was in effect. They knew growth was and is not a popular concept in San Dimas. On the other hand long time owners should be allowed

to build a modest home that is designed to have ~~a~~ little visual effect to the other San Dimas residents.

And considering this type of building codes may need to be modified to accommodate the very small density, around 30 homes no more.

Please do not rush your decission. You have time on your side. If the city can find or raise funds to buy up the foothills then we would all be better off.

These hills would be perfect for education purpose ei; girls scouts, boy scouts and school programs.

Thank you for considering my thoughts.

Francis Stepp Bolling

J. RESPONSES TO COMMENTS FROM FRANCIE STEPP-BOLLING, DATED APRIL 16,1999.

No environmental issues are raised; therefore, no response is necessary.

The City of San Dimas acknowledges the commentor's desire to allow a maximum of 30 units within the project area. The Planning Commission and City Council will be reviewing the EIR, General Plan Amendment and Specific Plan. As a part of their review and ultimate decision, the Planning Commission and City Council will review the different development densities first identified in the *Northern Foothills Infrastructure and Development Study*, prepared by LSA Associates, and analyzed as alternatives to the proposed project (127 dwelling units) in Section 7.0, *Alternatives to the Proposed Project*, in the Draft Program EIR.

LETTER K

City of San Dimas
Planning Commission

Planned
APR 1 5 1999
City of San Dimas

April 14, 1999

RE: Zone change for Northern Foothills

Dear Sirs:

As a 20 year resident of north San Dimas, I have 2 points to make about future development.

1) The zone change that is needed is for all of the properties to be changed to W= Watershed. The runoff from these foothills is extensive in the years that we get rain. I **would** like to ask for your assurance that the engineers and environmental studies will be able to channel the runoff away from our homes. The reason that I won't ask for your assurance is because it means nothing. When the North San Dimas Ave., Maverick, Prairie tract was built, the runoff that ran through my back yard 9 months of the year disappeared. The residents of Shirlmar, Maverick, and San Dimas Avenue found this runoff **unexpectedly**. It caused the destruction of the corner of San Dimas Avenue and Foothill Blvd. repeatedly. It also eroded a new arroyo through the back yard of 103 Maverick. And this was just by adding a few houses at the bottom of the hills. Finally now there is a delicate balance in the watershed that can be maintained by two Public Works employees monitoring the flow on Dalepark, Shirlmar, Foothill and San Dimas Avenues every time we get a medium to heavy rain. If you would like to talk to long time residents about the flooding before this period, you are welcome to visit. Your allowing development of the foothills above our properties will lead to endless headaches for the City of San Dimas and heartache & property loss for the residents. (Do you remember the beautiful homes in Orange County falling off the cliffs after the re contoured land slipped into the condos built below? The contractors had gone out of business and there was no one to blame except the Planning Commission and the City Council) K1

2) I cannot believe that you will put the wants of 30 speculators above the needs of hundreds of long-time residents of San Dimas. I can only guess that you must have personal relationships with these people and you want to do them a "favor". To state that these people have an investment and need to get their money back is ridiculous. When you buy property on the side of a mountain with no roads, it means you are a speculator. Maybe you will make a lot of money, maybe you won't. You have already allowed all the hills in the Puddingstone/Via Verde area to be completely covered. The reason this is the last remaining acreage is because it has always been so unsuitable for developing. The few houses that could be built in the north foothills would scar the hillsides far beyond any monetary recompense. Why are you recommending the disfigurement of San Dimas? K2

Sincerely,

Margo Knapp

Margo Knapp
2739 Dalepark Dr.
San Dimas, CA 91773

K. RESPONSES TO COMMENTS FROM MARGO KNAPP, DATED APRIL 14, 1999.

K1. Hydrology and drainage issues are analyzed in Section 5.7 of the Draft EIR. Mitigation measures have been included in this section that would address the commentor's concerns. The hydrology mitigation measures have been restated from pages 8-8 and 8-9 of the Draft EIR for ease of commentor reference.

"Surface Hydrology

H1. The project applicant(s) shall provide and engineering hydrologic analysis of the development site watershed. Should the analysis indicate that the proposed development project would impact downstream facilities (i.e., inadequate capacity of the downstream storm drain system), construction of an on-site detention basin could be used as mitigation. On-site detention facilities, if necessary, shall be designed to provide the appropriate storm volume for the storm frequency indicated by the LACPW and the City of San Dimas City Engineer. Storm drain plans shall be subject to review and approval by the San Dimas City Engineer prior to the issuance of grading permits.

H2. In connection with site plan and design review, all required drainage improvements associated with individual developments shall be designed in accordance with the LACPW and the City of San Dimas design standards and shall be reviewed and approved by the City of San Dimas City Engineer prior to the commencement of grading.

Watershed Debris Production

H3. Prior to issuance of grading/building permits, the project applicant(s) shall provide site-specific engineering hydrologic analysis, to the satisfaction of the San Dimas City Engineer, to determine if debris basin(s) are necessary to reduce bulk flow. If determined necessary, the debris basin(s) shall be designed and constructed at the downstream ends of undeveloped drainage areas pursuant to LACPW methods and standards and subject to final design approval by the San Dimas City Engineer.

Flooding

H4. Project applicant(s) shall comply with the requirements of the LACPW to minimize flooding risks associated with stream or riverbed excavation, to prevent any impediment to the flow of storm runoff, and to ensure restoration of disrupted flood control facilities.

Proposed Roadways

H5. Drainage system design requirements for the future developments and all future roadways shall follow the minimum criteria for Private Drains (PD) or Miscellaneous Transfer Drains (MTD) defined by LACPW. General criteria includes, but is not limited to:

A. Any roadcrossing of natural drainages shall be designed to accommodate adequate capacity to convey the 50-year clear water discharge, or greater.

B. Minimum stormdrain pipe size diameter is 24 inches, but if conveys debris then 48 inches; and

C. Stormdrain flow velocity is limited to 20 feet per second (fps) if exceeded must use special pipe with additional concrete thickness.

H6. Project applicant(s) shall allow canyon slopes to drain along their natural path and not divert flows from one watershed to another. Drainage facilities located within the proposed roadways shall be implemented pursuant to the requirements of the LACPW and the City of San Dimas.

Water Quality

H7. Refer to Mitigation Measure G5, of Section 5.6, *Geology, Soils, and Seismicity.*

Cumulative Impacts

H8. Site-specific hydrology assessments subject to review and approval by the appropriate jurisdiction shall be prepared on a project-by-project basis to determine necessary mitigation in order reduce potential impacts to less than significant levels."

K2. Comment so noted. No environmental issues are raised; therefore, no response is necessary.

LETTER L

SOUTHERN CALIFORNIA

ASSOCIATION of GOVERNMENTS

Main Office

818 West Seventh Street

12th Floor

Los Angeles, California

90017-3435

t (213) 236-1800

f (213) 236-1825

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Officers: • President: Mayor, Bob Bartlett, City of Monrovia • First Vice President: Supervisor Yvonne Brathwaite Burke, Los Angeles County • Second Vice President: Mayor Ron Bates, City of Los Alamitos • Immediate Past President: Supervisor Judy Mikels, Ventura County

County of Imperial: Tom Veysey, Imperial County • David Dhillon, El Centro

County of Los Angeles: Yvonne Brathwaite Burke, Los Angeles County • Zev Yaroslavsky, Los Angeles County • Richard Alatorre, Los Angeles • Eileen Ansari, Diamond Bar • Bob Bartlett, Monrovia • Bruce Barrows, Cerritos • George Bass, Bell • Sue Bauer, Glendora • Hal Bernson, Los Angeles • Robert Bruesch, Rosemead • Laura Chick, Los Angeles •Gene Daniels, Paramount • John Ferraro, Los Angeles • Michael Feuer, Los Angeles • Ruth Galanter, Los Angeles • Eileen Givens, Glendale • Jackie Goldberg, Los Angeles • Ray Grabinski, Long Beach • Garland Hardeman, Inglewood • Mike Hernandez, Los Angeles • Nate Holden, Los Angeles • Keith McCarthy, Downey • Cindy Miscikowski, Los Angeles • David Myers, Palmdale • Pam O'Connor, Santa Monica • Jenny Oropeza, Long Beach • Bob Pinzler, Redondo Beach • Beatrice Proo, Pico Rivera • Mark Ridley-Thomas, Los Angeles • Diann Rung, Claremont • Richard Riordan, Los Angeles • Marcine Shaw, Compton • Rudy Svorinich, Los Angeles • Paul Talbot, Alhambra • Joel Wachs, Los Angeles • Rita Walters, Los Angeles • Dennis Washburn, Calabasas • Paul Zee, South Pasadena

County of Orange: William Steiner, Orange County • Ron Bates, Los Alamitos • Art Brown, Buena Park • Jan Debay, Newport Beach • Richard Dixon, Lake Forest • Charlene Hatakeyama, La Palma • Bev Perry, Brea

County of Riverside: James Venable, Riverside County • Jan Leja, Beaumont • Dick Kelly, Palm Desert • Ron Loveridge, Riverside • Andrea Puga, Corona • Ron Roberts, Temecula

County of San Bernardino: Kathy Davis, San Bernardino County • Bill Alexander, Rancho Cucamonga • Jim Bagley, Twentynine Palms • David Eshleman, Fontana • Lee Ann Garcia, Grand Terrace • Gwenn Norton-Perry, Chino Hills • John Starbuck, Highland

County of Ventura: Judy Mikels, Ventura County • Andrew Fox, Thousand Oaks • Toni Young, Port Hueneme

Riverside County Transportation Commission: Tom Mullen, Riverside County

Ventura County Transportation Commission: Bill Davis, Simi Valley

Printed on Recycled Paper 11/23/98

Received

APR 20 1999

City of San Dimas
Planning Division

April 15, 1999

Mr. Larry Stevens, AICP
Planning Director
City of San Dimas
245 East Bonita Avenue
San Dimas, CA 91773

RE: SCAG Clearinghouse I9900135 Northern Foothills Implementation Program Draft Environmental Impact Report

Dear Mr. Stevens:

We have reviewed the above referenced documents and determined that they are not regionally significant per Areawide Clearinghouse criteria. Therefore, the projects do not warrant clearinghouse comments at this time. Should there be a change in the scope of the projects, we would appreciate the opportunity to review and comment at that time.

A description of the projects will be published in the **April 1, 1999** Intergovernmental Review Report for public review and comment.

The project titles and SCAG Clearinghouse number should be used in all correspondence with SCAG concerning these projects. Correspondence should be sent to the attention of the Clearinghouse Coordinator. If you have any questions, please contact me at (213) 236-1917.

Sincerely,

J. DAVID STEIN
Manager, Performance Assessment
and Implementation

JDS:lj

Greetings Larry:
Hope all is well. I miss the Pac.

L. RESPONSES TO COMMENTS FROM J. DAVID STEIN, MANAGER, PERFORMANCE ASSESSMENT AND IMPLEMENTATION, SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS, DATED APRIL 15, 1999.

No environmental issues are raised; therefore, no response is necessary.

DEPARTMENT OF TRANSPORTATION
DISTRICT 7, ADVANCE PLANNING
IGR OFFICE 1-10C
120 SO. SPRING ST.
LOS ANGELES, CA 90012
TEL: (213) 897-0486 ATSS: 8- 647-0486
FAX: (213) 897-8906
E-mail: :NoraPiring/CAGOV@DOT

Received
APR 20 1999
City of San Dimas
Planning Division

April 12, 1999

MR. LARRY STEVENS, AICP
Planning Director
City of San Dimas
245 East Bonita Avenue
San Dimas, CA 91773

Re: IGR/CEQA #990327/NP
Draft Program EIR
Northern Foothills Implementation Program
City of San Dimas
Vic. LA-066/30-0.19
SCH NO. 98121072

Dear Mr. Stevens:

Caltrans acknowledges receipt of the above-named document. The development strategy proposed in the Northern Foothills Development and Infrastructure Study would permit a maximum of 127 dwelling units on the 972 vacant acres, depending upon the City Council's final determination of density.

We have the following comments:

When development occurs, a traffic study is needed to address the following information:

1) ADT, AM & PM peak-hour volumes on Routes 66 & 30 mainline, affected ramps, & controlling intersections for both the existing and future (year 2015) condition.

2) Level of service (LOS) for both the existing and future conditions with project + projected projects in year 2015.

Thank you for the opportunity to have commented on the project. If you have any questions, please feel free to contact the undersigned at (213) 897-4429 and refer to our IGR/CEQA #990327/NP.

Sincerely,

STEPHEN J. BUSWELL
Program Manager
IGR/CEQA

cc: **Moise Boyd**
State Clearinghouse

M. RESPONSES TO COMMENTS FROM STEPHEN J. BUSWELL, PROGRAM MANAGER, IGR/CEQA, STATE OF CALIFORNIA, DEPARTMENT OF TRANSPORTATION, DISTRICT 7, DATED APRIL 12, 1999.

Comment so noted. As future development projects are submitted to the City for review, the City would take this comment into consideration. In addition, as stated on page 3-10 of the Draft EIR:

"It is anticipated that future development may be the subject of additional environmental review on an individual project-by-project basis, in accordance with the provisions of Section 15168 of CEQA, as determined by the City of San Dimas."

LETTER N

COUNTY OF LOS ANGELES

FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294

(323) 890-4330

P. MICHAEL FREEMAN
FIRE CHIEF
FORESTER & FIRE WARDEN

Received

APR 22 1999

City of San Dimas
Planning Division

April 20, 1999

Lawrence L. Stevens, AICP
City of San Dimas
245 East Bonita Avenue
San Dimas, CA 91773

Dear Mr. Stevens:

SUBJECT: ENVIRONMENTAL IMPACT REPORT -- (CITY OF SAN DIMAS) DRAFT PROGRAM EIR FOR THE NORTHERN FOOTHILLS IMPLEMENTATION PROGRAM -- SCH #98121072 (EIR #628/1999)

The Draft Program Environmental Impact Report for the Northern Foothills Implementation Program has been reviewed by the Planning, Subdivision, and Forestry Divisions of the County of Los Angeles Fire Department. The following are their comments:

The statutory responsibilities of the County of Los Angeles Fire Department include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Fire Zone 4 or Very High Fire Hazard Severity Zones, archeological and cultural resources and the County Oak Tree Ordinance.

The areas germane to the statutory responsibilities of the County of Los Angeles Fire Department have been addressed.

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,

Michael A. Wilkinson

MICHAEL A. WILKINSON, CHIEF, FORESTRY DIVISION
PREVENTION BUREAU

MAW:lc

N. RESPONSES TO COMMENTS FROM MICHAEL A. WILKINSON, CHIEF, FORESTRY DIVISION, PREVENTION BUREAU, COUNTY OF LOS ANGELES FIRE DEPARTMENT, DATED APRIL 22, 1999.

No environmental issues are raised, therefore, no response is necessary.

LETTER O

STATE OF CALIFORNIA

Governor's Office of Planning and Research

1400 TENTH STREET SACRAMENTO, CALIFORNIA 95812-3044

Gray Davis
GOVERNOR

Received
APR 28 1999
City of San Dimas
Planning Division

April 22, 1999

Lawrence Stevens
Planning Director
City of San Dimas
245 East Bonita Avenue
San Dimas, CA 91773

Subject: Northern Foothills Implementation Program, Draft Program EIR
State Clearinghouse # 98121072

Dear Mr. Stevens:

The State Clearinghouse review period on the above Draft EIR closed on April 16, 1999. On April 20, we received a copy of the attached comment letter from the Department of Fish and Game, dated April 8,1 999, which was addressed to your attention.

Although the State Clearinghouse received this comment letter after the close of the state review period, we trust that you received the letter directly from the Department of Fish and Game before the April 16 closing date for comments. Therefore, we trust that you will honor the comment letter from the Department of Fish and Game as a timely comment letter.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above named project, please refer to the eight-digit State Clearinghouse number when contacting this office.

Sincerely,

Terry Roberts

Terry Roberts
Senior Planner
State Clearinghouse

Attachment
cc: Resources Agency

O. RESPONSES TO COMMENTS FROM TERRY ROBERTS, SENIOR PLANNER, STATE CLEARINGHOUSE, DATED APRIL 22, 1999.

The letter from the State Clearinghouse states that *"the review period on the above Draft EIR closed on April 16, 1999. On April 20, we received a copy of the attached comment letter from the Department of Fish and Game, dated April 8, 1999....Therefore, we trust that you will honor the comment letter from the Department of Fish and Game as a timely comment letter."*

The City of San Dimas received the Department of Fish and Game comment letter directly. Refer to Responses D1 through D3 for responses to the Department's comments.

No further response is necessary.

LETTER P

COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
Telephone: (626) 458-5100

HARRY W. STONE, Director

ADDRESS ALL CORRESPONDENCE TO:
P.O. BOX 1460
ALHAMBRA, CALIFORNIA 91802-1460

April 21, 1999

IN REPLY PLEASE
REFER TO FILE: P-2

Mr. Larry Stevens, ALCP, Planning Director
City of San Dimas
245 East Bonita Avenue
San Dimas, CA 91773

APR 2[illegible] 1999

Dear Mr. Stevens:

RESPONSE TO A DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) - NORTHERN FOOTHILLS IMPLEMENTATION PROGRAM

Thank you for the opportunity to provide comments on the DEIR for the proposed Northern Foothills Implementation Program. We reviewed the DEIR and offer the following comments:

Building and Safety/Land Development

The project may have an impact on County-owned drainage facilities. The applicant shall apply for permits or submit a drainage concept for review and approval prior to making any connection to County facilities. **P1**

This project has major impact to water quality and should incorporate permanent post construction Best Management Practice's to mitigate this impact. These plans must be reviewed and approved by this Department prior to issuance of any permits. **P2**

If you have any questions regarding the above comments, please contact Mr. Mo Kajbaf of our Building and Safety/Land Development Division at (626) 458-3822.

Environmental Programs

As projected in the Los Angeles County Countrywide Siting Element, which was approved by a majority of the cities in Los Angeles County in late 1997 and by the County Board of Supervisors in January 1998, a shortfall in permitted daily landfill capacity may be experienced in the County within the next few years. The construction activities associated with the proposed project will increase the generation of solid waste, and will negatively **P3**

impact the solid waste management infrastructure in the County. Therefore, the proposed DEIR must identify the measures the project proponent will implement to mitigate the impact during the construction phase of the project. Mitigation measures may include, but are not limited to, supporting the development of new or expansion of existing landfill sites, as well as implementation of waste reduction and recycling programs to divert the construction waste from the landfills. P3

The existing hazardous waste management (HWM) facilities in this County are inadequate to handle the hazardous waste currently being generated. The proposed project will generate household hazardous waste which could adversely impact existing HWM facilities. This issue should be addressed and mitigation measures provided. P4

If you have any questions regarding the above comments, please contact Mr. Chuk Agu of our Environmental Programs Division at (626) 458-2188.

If you have any questions regarding the environmental reviewing process of this Department, please contact Mr. Vik Bapna at the address on the first page or at (626) 458-4363.

Very truly yours,

HARRY W. STONE
Director of Public Works

For: DAVID YAMAHARA
Assistant Deputy Director
Planning Division

YC:sw/km
211

P. RESPONSES TO COMMENTS FROM DAVID YAMAHARA, ASSISTANT DEPUTY DIRECTOR, PLANNING DIVISION, COUNTY OF LOS ANGELES, DEPARTMENT OF PUBLIC WORKS, DATED APRIL 22, 1999.

P1. Section 5.7, *Hydrology and Drainage*, of the Draft EIR provides a review of drainage, flood control and water quality impacts associated with implementation of the proposed project. Mitigation measures H1 through H6 contained in the Draft EIR specifically respond to this comment.

P2. Water quality impacts and mitigation measures are discussed on page 5.7-16 of the Draft EIR. Text from page 5.7-16 of the Draft EIR has been excerpted for ease of commentor reference.

"Proposed developments that involve grading and construction would contribute to an increase in pollution discharge. As a result, individual development projects would be required to mitigate short-term construction impacts pursuant to the National Pollution Discharge Elimination System (NPDES) criteria and standards."

In addition, specific development projects have not been identified at this time. As future development projects are submitted to the City for review, the City would consider the comment regarding Best Management Practices (BMPs) and would require BMPs as a condition of project approval, as necessary.

P3. Mitigation measure PSU25 on page 5.10-21 of the Draft EIR addresses this comment. Mitigation measure PSU25 is restated below for ease of commentor reference.

"PSU25. Future developments, as applicable, shall incorporate storage and collection of recyclables into each project design and refuse collection contracts shall include collection of recyclables. Individual projects, as applicable, shall reserve space appropriate for the support of recycling, adequate storage areas and access for recycling vehicles, as appropriate."

P4. At this time, no specific development projects are proposed, and thus, hazardous waste would not be generated. Should individual development projects have the potential to generate hazardous waste, the City of San Dimas shall require proper disposal as a condition of project approval.

LETTER Q

United States Department of the Interior
Fish and Wildlife Service
Ecological Services
Carlsbad Fish and Wildlife Office
2730 Loker Avenue West
Carlsbad, California 92008

APR 27 1999

Lawrence L. Stevens
AICP, Planning Director
City of San Dimas
245 East Bonita Avenue
San Dimas, California 91773

Re: Draft Program Environmental Impact Report (DEIR) for the Proposed Northern Foothills Implementation Program, Los Angeles County, California

Dear Mr. Stevens:

We have reviewed the above referenced DEIR and appreciate your willingness to accept our comments concerning this project. The approximately 3,000-acre Northern Foothills Implementation Program (NFIP) study area is located north of Foothill Boulevard in the northern portion of the City of San Dimas (City), Los Angeles County. The area is generally bordered by the Angeles National Forest to the north and northeast, the City of La Verne to the southeast, residential areas to the south, and the City of Glendora immediately to the west. The primarily undeveloped site consists of habitats such as chaparral, coastal sage scrub, grassland, woodland, and riparian scrub.

The specific characteristics of individual projects resulting from the NFIP have not been specified at this time. Therefore, the EIR has been prepared as a Program EIR in accordance with the California Environmental Protection Act (CEPA). The Program EIR will be used as the master CEPA clearance document for plans and future development proposals. If the environmental effects, mitigation measures and scope of an individual future project is consistent with the Program EIR, additional CEPA documentation may not be required. However, if the plans or future development proposals are not consistent with either the allowed scope of an individual project or its environmental effects or does not incorporate required mitigation elements, a new Initial Study would need to be prepared leading to either an EIR or a Negative Declaration. Q1

The proposed action entails a General Plan Amendment and Zone Change/Specific Plan. Under the existing General Plan, the maximum development permitted within the NFIP area (one dwelling unit per 5 acres) would permit 195 dwelling units on 972 acres of the program area. Under the proposed amended General Plan, the proposed development strategy in the *Draft Northern Foothills Implementation Program Environmental Impact Report* (March 1999) would permit a maximum of 127 dwelling units on 972 acres. The overall objective is to fit site-specific projects into their hillside setting rather than altering the hillside to fit the project. As stated in the Initial Study, the priority between development and natural resource values should be given to protecting the resource. The

alternative configurations considered 195, 106, 80, 48 or zero dwelling units on 972 acres. The Zone Change/Specific Plan is a request to create a new zone or specific plan to implement the policies and requirements of the proposed amended General Plan and the adopted development strategy. Q1

We are concerned for the protection of fish and wildlife resources and their habitats. In this regard, we provide comments on public notices issued for a Federal permit or license affecting the Nation's waters pursuant to the Clean Water Act. We also administer the Endangered Species Act of 1973, as amended (Act). Section 7 of the Act requires all Federal agencies to consult with the Fish and Wildlife Service (Service) should it be determined that their action may affect a listed threatened or endangered species. Section 9 of the Act applies to non-Federal projects and prohibits the "take" (e.g., harm, harassment, pursuit, injury, kill) of federally listed wildlife species. Take is further defined in 50 CFR § 17.3, through the definition of harass and harm as follows: "Harass in the definition of 'take' of the Act means an intentional or negligent act or omission which creates the likelihood of injury to wildlife by annoying it to such an extent as to significantly disrupt normal breeding patterns which include, but are not limited to, breeding, feeding, or sheltering. Harm in the definition of 'take' in the Act means an act which actually kills or injures wildlife. Such an act may include significant habitat modification or degradation where it actually kills or injures wildlife by significantly impairing essential behavioral patterns, including breeding, feeding, or sheltering." Q2

If there is no Federal involvement, and a listed species would be affected either directly or indirectly by the project (i.e., take would occur), then an incidental take permit under section 10(a)(1)(B) of the Act is required prior to such take occurring. The application for an incidental take permit must be accompanied by a Habitat conservation plan. Briefly, the plan would need to specify: 1) the impact which will likely result from the taking; 2) what steps the applicant will take to minimize and mitigate such impacts, and the funding that will be available to implement such steps; 3) what alternative actions to such taking the applicant considered and the reasons why such alternatives are not being utilized; and 4) such other measures that the Secretary of the Interior may require as being necessary or appropriate for purposes of the plan.

The Natural Community Conservation Planning Act (NCCP) was enacted in 1991 to provide for regional protection and perpetuation of natural wildlife diversity while allowing compatible land use and appropriate development growth. The law provides an alternative to "single species" conservation through the formulation of regional, natural community-based, habitat protection programs. The coastal sage scrub plan in southern California is the first of the NCCP projects in the state. The NCCP plans have been developed to provide adequate mitigation for impacts to the federally threatened coastal California gnatcatcher (*Polioptila californica californica*) and other identified species' habitat. Planning for long-term protection and management of coastal sage scrub resources is implemented through participating land owners and jurisdictions enrolled in the program. The City of San Dimas is one of two cities in Los Angeles County that had enrolled for lands under its jurisdiction. As such, the City of San Dimas had assumed specific responsibilities regarding compliance with interim habitat loss approvals and participation in the preparation of a subregional NCCP Plan. However, this agreement has expired. We strongly support the participation the City of San Dimas in this program and would urge you to renew your NCCP planning agreement. Q3

General Comments

We commend the City of San Dimas for considering alternative zoning requirements that would reduce housing densities along the foothills of the San Gabriel Mountains. Wildlife resources in this area are relatively unique for the County of Los Angeles because of the lack of urban encroachment. Maintenance of the undeveloped nature of this area will enhance the City of San Dimas and Los Angeles County's unique and scarce wildlife amenities.

The Program DEIR is for the General Plan Amendment and Zone change associated with the amendment. Insufficient information has been provided to allow us to evaluate the impacts to biological resources associated with specific development projects that will be regulated by the City of San Dimas General Plan. Therefore, we conclude that the consideration or proposed implementation of the individual project elements will require further CEPA review and the appropriate disclosure and mitigation of impacts to sensitive and listed species. Pre-construction surveys for listed species, development of habitat conservation plans, as appropriate, and specific plan modifications to avoid adverse environmental impacts including those to listed species will be required. Q4

The project area supports chaparral, coastal sage scrub, chaparral/coastal sage scrub, mixed willow riparian woodland, southern coast live oak riparian woodland, grassland and other habitats. These ecological communities provide valuable habitats for migratory and resident birds, mammals, and other native animals and plants. San Dimas Creek and Sycamore Canyon Creek occur in the project area. The value of the surrounding upland habitats is enhanced by the presence of the water and riparian areas. These habitats likely provide water for a variety of other wildlife species that would be expected to inhabit the site, including mammals, reptiles, amphibians, and many species of resident and migratory birds. The proximity of these areas to the San Bernardino and Angeles National Forests makes the project lands particularly valuable for wildlife. Cumulative developments such as proposed for this project would fragment and isolate remaining undeveloped areas. Much of the remaining open space areas adjacent to both Forests will be adversely impacted as surrounding areas to the west, south, and east are urbanized. Insufficient discussion of the potential for cumulative impacts to wildlife, particularly to scarce species, has been provided. Q5

The project would eliminate significant amounts of wildlife use of the site through conversion of natural habitat to residential development, eliminate or significantly reduce the value of wildlife movement corridors, and result in other disturbances caused by human habitation of the site. Native wildlife would be subject to road-kill hazards due to the streets blocking wildlife movement routes. Q6

Specific Comments

Biological Resources, Section 5.8, page 19: According to the Program DEIR, habitat conservation plans "could" be prepared in conjunction with permit approvals for future development projects. If federally listed threatened or endangered species are found on future project sites, developers or project proponents must be advised that a habitat conservation plan and an incidental take permit (as described above) must be developed in conjunction with the Service. This effort should begin early in the project Q7

planning process. Participation of the City of San Dimas in the NCCP effort could alleviate this requirement for individual developers and ultimately speed the permit process. Q7

Mitigation Measures BIO1 through 5: If impacts to federally listed threatened or endangered species cannot be avoided, specific mitigation minimizational or avoidance measure associated with incidental take permits will likely differ from those described in the Program DEIR. Over 100 acres of potentially suitable coastal sage scrub and over 50 acres of riparian habitat have been described in the Program DEIR. These areas may support federally listed threatened or endangered species. Similar habitats in nearby Monrovia, Walnut and Bonelli Park have been found to support listed species. Q8

Mitigation Measures, Section BIO6 through 8: As stated in our January 21, 1999, comments on the Notice of Preparation, we are concerned about the potential for impact to threatened or endangered species and their habitat that occur in the project area. As specified in the Program DEIR, future projects will be required to implement focused surveys for Federal and state candidate, proposed or listed threatened or endangered species. We recommend that the Final Program EIR specify that the required surveys will address listed and unlisted species and their habitat throughout the implementation "life" of the Final Program EIR. Moreover, the Final Program EIR should specify that these focused surveys should be conducted using our survey protocols. Investigators conducting the surveys for federally listed species must be qualified biologists who possess valid section 10(a)(1)(a) permits issued by the Service. Q9

To avoid the potential impacts we discussed above, we recommend that the City of San Dimas strongly consider adopting the no project (i.e., no development) alternative. Alternatively, housing density in this area should be reduced to the maximum extent possible by selecting one of the alternatives with minimal new housing and maximizing the extent of conserved lands. Q10

Future development within the area covered by the NFIP will likely require additional environmental documentation pursuant to California Environmental Quality Act. Please keep us apprized of any new specific development proposals. We appreciate the opportunity to comment on this document. If you should have any questions pertaining to these comments, please contact Carol Gorbics of my staff at (760) 431-9440. Q11

Sincerely,

Jim A. Bartel
Assistant Field Supervisor

Attachment

cc: Bill Tippets, CDFG, San Diego, CA

Q. RESPONSES TO COMMENTS FROM JIM A. BARTEL, ASSISTANT FIELD SUPERVISOR, UNITED STATES DEPARTMENT OF THE INTERIOR, FISH AND WILDLIFE SERVICE, DATED APRIL 27, 1999.

Q1. Comment so noted.

Q2. Comment so noted. Specific development projects have not been identified at this time. As future development projects are submitted to the City for review, the City would take this comment into consideration.

Q3. The City acknowledges the commentor's suggestion to renew the City of San Dimas' participation in a NCCP planning agreement. Text on page 5.8-19 of the Draft EIR provides additional explanation of options the City may pursue in this area. The text from page 5.8-19 of the Draft EIR has been restated below for ease of commentor reference.

"Depending on whether the City re-enrolls in the program, the NCCP program in its current form may not be an appropriate or adequate mitigation/conservation program for impacts to habitat within the potential development areas. However, a separate Habitat Conservation Plan (HCP) for all or several portions of the potential development areas could be prepared in conjunction with permit approvals for the future development projects. HCPs are usually prepared to mitigate for impacts to state or federally listed threatened or endangered species. However, an HCP can be prepared in anticipation of the listing of various plant and wildlife species, to ensure project applicants of a program by which to mitigate and permit the loss of such species in compliance with state and federal Endangered Species Acts."

Q4. The City acknowledges the Fish and Wildlife Service's comments regarding potential impacts to biological resources. The Draft EIR was prepared as a Program EIR, and analyzed broad impacts associated with implementation of the proposed project. Specific issues, such as those listed in the comment letter, would be analyzed as future development projects are submitted to the City for review. Section 1.1, *Purpose of the EIR*, provides a full description of the CEQA Guidelines definition of a Program EIR and how a Program EIR is to be used by a lead agency.

Q5. The Draft EIR acknowledged that cumulative development in the vicinity of the proposed project has the potential to adversely impact biological resources. Cumulative biological resources are analyzed on page 5.8-31 of the Draft EIR. It is important to restate that the Draft EIR was prepared as Program EIR and that the cumulative impact analysis was based upon

buildout of the City's General Plan. The cumulative analysis in the Draft EIR appropriately discusses the impact to biological resources and acknowledges that future development projects would further investigate and mitigate project-specific impacts to the resources, as stated on page 5.8-31 of the Draft EIR.

"***Impact Analysis:*** Cumulative development within the northern portion of San Dimas would have the potential to adversely affect biological resources. Regional loss of native areas is considered a significant issue. Future development within the area would be required to mitigated potential impacts to biological resources to less than significant levels on a project-by-project basis."

Q6. Impacts to wildlife movement are analyzed on page 5.8-26 of the Draft EIR, which is restated below for ease of commentor reference.

"***Impact Analysis:*** The project area is expected to support local wildlife movement within the canyons and ridgeline between the Angeles National Forest and San Dimas Creek. Currently, the majority of the project area is open space. Potential development areas are located: near the upper portion of Shuler Canyon, and Shay Canyon; at the middle and the upper portion of Wildwood Canyon and Sycamore Canyon; and toward the lower portion of Ham Canyon. Development and human disturbance from future development areas would likely reduce the movement of wildlife through Wildwood Canyon, Sycamore Canyon, and Ham Canyon and concentrate wildlife movement into canyons and ridgelines outside of these areas. These impacts would be considered adverse on a local level. However, because the project area and the areas identified for potential development do not have the potential to link large areas of open space together, impacts to wildlife movement on-site are not considered regionally significant."

As shown in the impact analysis, the impacts to wildlife movement are not considered regionally significant.

Q7. Comment so noted.

Q8. The City acknowledges the Service's comment regarding incidental take permits and the potential that mitigation for the incidental take permit may differ from those recommended in the Draft EIR. Once again, the Draft EIR was prepared as a Program EIR. As future development projects are submitted to the City for review, the City would take this comment into consideration. In addition, as stated on page 3-10 of the Draft EIR:

"It is anticipated that future development may be the subject of additional environmental review on an individual project-by-project basis, in accordance with the provisions of Section 15168 of CEQA, as determined by the City of San Dimas."

Q9. Mitigation measures BIO6 and BIO7 will be revised as follows to accommodate the Service's comment.

Plants

BIO6. To fully document the potential impacts to sensitive plant species, focused surveys for the following state or federally listed threatened or endangered plant species shall be conducted during the optimal survey period prior to any development approvals from the City for any project within the potential development areas.

Braunton's milkvetch
Nevin's barberry
Thread-leaved brodiaea

In addition, focused surveys may also be warranted for sensitive species that are not currently classified as endangered, threatened, or proposed for listing, but which may be listed in the future or would be of concern to state and federal resource agencies during future environmental review processes for projects within the potential development areas. The following species may require focus surveys if specific project locations contain appropriate habitat:

Slender Mariposa lily
Plummer's Mariposa lily
San Gabriel Mountains dudleya
Many-Stemmed dudleya
Pious daisy
Robinson's peppergrass
Rayless ragwort

Focused surveys shall be conducted using the USFWS' survey protocol. In addition, surveys for federally listed species shall be conducted by qualified biologists that possess valid section 10(a)(1)(a) permits issued by USFWS.

Should focused surveys find a state or federally listed threatened or endangered species, or a substantial population of other lower status special status plant species on-site, mitigation would need to be coordinated with the USFWS, CDFG, and/or CNPS and may include

habitat preservation off-site or population relocation to off-site natural open space areas.

Wildlife

BIO7. To fully document the potential impacts to sensitive wildlife species, focused surveys for the following state or federally listed threatened or endangered wildlife species shall be conducted during the optimal survey period prior to any development approvals from the City for any project within the potential development area.

Quino checkerspot butterfly
Santa Ana sucker
Arroyo southwestern toad
California red-legged frog
Southwestern willow flycatcher
Least Bell's vireo
Bank swallow (nesting)
Coastal California gnatcatcher
Raptor (nesting)

In addition, focused surveys may also be warranted for sensitive species that are not currently classified as endangered, threatened, or proposed for listing, but which may be listed in the future or would be of concern to state and federal resource agencies during future environmental review processes for projects within the potential development areas. The following species may require focus surveys if future project locations contain appropriate habitat:

Arroyo chub	*San Bernardino mountain kingsnake*	*Grasshopper sparrow*
Santa Ana speckled dace	*Coast patchnose snake*	*Tricolored blackbird*
Coast range newt	*Two-striped garter snake*	*Pallid bat*
Large-blotched ensantina	*Loggerhead shrike*	*Townsend's western big-eared bat*
Western spadefoot	*California horned lark*	*San Diego black-tailed jackrabbit*
Mountain yellow-legged frog	*San Diego cactus wren*	*Dulzura California pocket mouse*
Southwestern pond turtle	*Yellow warbler*	*Pallid San Diego pocket mouse*
San Diego horned lizard	*Yellow-breasted chat*	*Los Angeles pocket mouse*
Coastal western whiptail	*Summer tanager*	*San Diego desert woodrat*
Silvery legless lizard	*Southern California rufous-crowned sparrow*	*Southern grasshopper mouse*
San Bernardino ring-necked snake	*Bell's sage sparrow*	*American badger*

Focused surveys shall be conducted using the USFWS' survey protocol. In addition, surveys for federally listed species shall be conducted by qualified biologists that possess valid section 10(a)(1)(a) permits issued by USFWS.

Should surveys find a state or federally listed threatened or endangered species, or a substantial population of the other lower status special status wildlife species on-site, mitigation shall need to be coordinated with the USFWS and CDFG. Mitigation may include habitat preservation off-site or habitat replacement through enhancement or restoration of on-site or off-site resources.

Q10. The City acknowledges the Service's request to adopt the No Project - No Development Alternative or an alternative that would minimize housing in the area.

The Draft EIR has been prepared in accordance with CEQA. Sufficient detail has been provided for the City Council to determine the adequacy of the environmental review of the proposed project and alternatives to the proposed project. As is required by CEQA, the City of San Dimas will consider the information in the EIR along with other information which may be presented during their review of the proposed General Plan Amendment and Zone Change/Specific Plan in making an informed decision regarding the proposed project. The City Council has the prerogative to certify the Final EIR and approve one of the alternatives as "the project."

Q11. Comment so noted.

ORAL TESTIMONY AT CITY OF SAN DIMAS PLANNING COMMISSION HEARING MARCH 29,1999.

Oral testimony was given by the following individuals:

1. John Watkins, Glendora Resident
2. Jack Dankowski, San Dimas Resident
3. Dan Halstead, San Dimas Resident
4. Karen Fortus, Angeles National Forest
5. Mark Leuzinger, San Dimas Resident and Representative of San Dimas Foothills Conservancy
6. Karen Justice, San Dimas Resident

1. RESPONSES TO COMMENTS FROM JOHN WATKINS, 2660 COUNTY CLUB DRIVE, GLENDORA, MARCH 29, 1999.

The concerns raised by Mr. Watkins include:

a. Traffic/Circulation - Opposed to access off of Cataract Avenue and requested traffic study be prepared.
b. Air Quality - Impacts from project traffic.
c. Noise - Impacts from project traffic.
d. Hydrology - Wanted to know how drainage would be handled.

Traffic/Circulation

The City acknowledges Mr. Watkin's opposition to access being taken off of Cataract Avenue. The roadways shown on Figure 5.3-2 are the proposed backbone roadway system for the project area. These three roadways are proposed in the approximate location of existing motorways or roads in the project area.

With regard to the conducting a traffic analysis, the Initial Study (Appendix 14.1 of the Draft EIR) concluded that the 127 dwelling units would add additional trips, but that the trips generated are consistent with previous traffic projections in the General Plan EIR. In addition, the service levels are roadways in the vicinity of the project area are operating at acceptable levels of service and have capacity to accommodate an additional 127 dwelling units. Thus, there is no need to prepare a traffic analysis for the proposed project.

Air Quality

Section 5.4 of the Draft EIR includes the air quality analysis for the proposed project. Section 5.4 provides a discussion of existing conditions, project impacts and any necessary mitigation measures to reduce the impact significance to less than significant. The Draft EIR concluded that implementation of the proposed project would not result in a significant air quality impacts with the imposition of the recommended mitigation measures.

Noise

Section 5.5 of the Draft EIR includes the noise analysis for the proposed project. Section 5.5 provides a discussion of existing conditions, project impacts and any necessary mitigation measures to reduce the impact

significance to less than significant. The Draft EIR concluded that implementation of the proposed project would not result in a significant noise impacts with the imposition of the recommended mitigation measures.

Hydrology and Drainage

Section 5.7 of the Draft EIR includes the hydrology and drainage analysis for the proposed project. Section 5.7 provides a discussion of existing conditions, project impacts and any necessary mitigation measures to reduce the impact significance to less than significant. A number of mitigation measures are recommended to ensure that future development proposals within the project area address hydrology and drainage impacts of their development.

2. RESPONSES TO COMMENTS FROM JACK DANKOWSKI, 839 KLAMATH COURT, SAN DIMAS , MARCH 29, 1999.

The concerns raised by Mr. Dankowski include:

a. Traffic/Circulation - Opposed to access off of Cataract Avenue and road through Morgan Ranch.
b. Radon Gas - EIR did not mention radon gas.
c. Transfer of Development Rights - What is it?

Traffic/Circulation

The City acknowledges Mr. Kenkowski's opposition to access being taken off of Cataract Avenue. The roadways shown on Figure 5.3-2 are the proposed backbone roadway system for the project area. These three roadways are proposed in the approximate location of existing motorways or roads in the project area. No new roadways are proposed to run through Morgan Ranch; the existing motorways in the area that provide access to the Ranch would remain as they are today.

Radon Gas

Radon is an invisible, odorless, inert gas that emits alpha particles known to cause lung cancer. Radon levels are highest in basements (areas in close proximity to the soil) that are poorly ventilated. According to the "EPA Map of Radon Zones," the County of Los Angeles has a predicted average indoor screening level of ≥ 2.0 Picocuries per liter (pCi/L) but ≤ 4 pCi/L for the first floor living area. The EPA recommends remedial actions when radon levels are greater than 4.0 pCi/L. Given the existing radon levels for Los Angeles County, it was not necessary to conduct a Radon Survey of the project area.

In addition, Commissioner Davis responded at the Planning Commission hearing that he is a realtor and studies of homes in the area have not detected radon gas.

Transfer of Development Rights

Lawrence Stevens, San Dimas Planning Director, provided an explanation of Transfer of Development Rights at the Planning Commission hearing for Mr. Dankowski.

3. RESPONSES TO COMMENTS FROM DAN HALSTEAD, 1516 SHIRLMAR AVENUE, SAN DIMAS, MARCH 29, 1999.

No comments were provided with regard to the Draft EIR or the environmental process.

4. RESPONSES TO COMMENTS FROM KAREN FORTUS, ANGELES NATIONAL FOREST, 110 N. WABASH AVENUE, GLENDORA, MARCH 29, 1999.

The concerns raised by Ms. Fortus include:

a. Access - Would like to see restricted access to the National Forest.
b. Fire - Potential for increase in fire hazards associated with development.

The comments raised by Ms. Furtis were included in the letter from Raina Marie Fulton of the Angeles National Forest (Letter I in this responses to comments section). Refer to Letter I and the responses that follow for the full response discussion to these comments.

5. RESPONSES TO COMMENTS FROM MARK LEUZINGER, 2592 TERREBONNE AVENUE, SAN DIMAS AND REPRESENTATIVE OF SAN DIMAS FOOTHILLS CONSERVANCY, MARCH 29, 1999.

The concerns raised by Mr. Leuzinger include:

a. Traffic/Circulation & Fire Protection - Grades on proposed roadways and ability of Fire Department to access area during emergencies. In addition, the 127 dwelling units would result in significant traffic impacts.
b. Aesthetics - Impacts to viewshed.
c. Biological Resources.

Traffic/Circulation & Fire Protection

With regard to the grades roadways, mitigation measure CIR4 identifies the maximum grade of the proposed roadways and mitigation measure CIR5 calls for further study of the Sycamore Flat Motorway, including grades of that proposed roadway. These two mitigation measures have been restated below for ease of commentor reference.

"CIR4. For the three proposed roadways of the "backbone" road system, the maximum grade shall not exceed 12 to 15 percent, unless existing topography dictates an exception for short roadway segments.

CIR5. A detailed study of Sycamore Flat Motorway is required. The study shall analyze the potential for the roadway grade not to exceed 12 to 15 percent. This maximum grade may not be attainable on all portions of the Sycamore Flat Motorway; however, every effort shall be made to achieve this objective, and to minimize the length and steepness of grades. The study shall also analyze ways in which the radius of the sharpest curves could be increased, and the grades could be improved beyond eliminating the need for the frequent dips to intercept drainage on the existing dirt road. In addition, the study shall determine the need and location, if warranted, for the following: guardrails on sharp curves, warning signs to inform drivers of the curves, and signs posting maximum safe speed."

In addition, the Draft EIR identified that impacts to fire protection services would be significant even with the imposition of mitigation measures. The impact discussion from pages 5.10-11 and 5.10-12 of the Draft EIR has been excerpted for ease of commentor reference.

"**Fire Services**

- ***DEVELOPMENT OF FUTURE PROJECTS WITHIN THE NORTHERN FOOTHILLS PROJECT AREA WOULD INCREASE THE DEMAND FOR FIRE PROTECTION SERVICES BEYOND EXISTING CONDITIONS.***

Significance: Significant.

Impact Analysis: Most of the parcels within the project area are within or adjacent to areas containing moderate to dense native growth and vegetation. Development within these fire prone areas may increase the threat of wildland fires by introducing additional permanent population and visitors to the area. Conversely, wildfires originating in the Angeles National Forest area could threaten adjacent residential uses.

In the design of hillside development, the relationship between topography and fire behavior is a critical factor in the design of new development. Homes located in narrow canyons and saddles, for example, are especially fire-prone because of the existence of "natural chimneys" in these areas where winds are funneled into these canyons and eddies. Studies have also shown the homes located where a canyon meets a ridge are more likely to burn than other ridge-top homes. Homes located on narrow ridges without adequate setback are often lost to fire because flames and convection heat hit the homes directly.

It should be noted, however, that there is currently one public ingress/egress on Terrebone Avenue. This single access to the project area presents a potential hazard problem associated with a large scale evacuation (i.e., hillside fire). Although residents could exit through via the Sycamore Flats Motorway to Sycamore Canyon Road, there is the potential for heavy congestion during an evacuation on this roadway as this exit is also the primary ingress/egress for several residents and the Los Angeles Probation Camp. According to the Los Angeles Sheriff's Department, San Dimas Station, Sycamore Canyon Road is also partially blocked by Fire Department and emergency vehicles in the event of a large brush fire. Vehicles exiting the Terrebonne tract via this emergency exit would exacerbate this current condition.

The Fire Department has indicated that existing fire protection services, facilities and staff are adequate for existing development in the project area; however, the Department notes that each additional development creates greater demands on these existing resources. Thus, the proposed project would impact the ability of the Fire Department to provide adequate fire protection to both existing and new project residents. In addition, the Fire Department has indicated that the size, complexity and projected use of development within the project area may necessitate multiple ingress/egress access for traffic circulation and emergency response issues. There is the potential that the Fire Department could require future development projects to provide a second, or in some cases, a third means of access. The specific number of access routes would be reviewed by the Fire

Department on a project-by-project basis. In conclusion, future development within the project would result in unavoidable significant impacts to the Los Angeles County Fire Department's ability to adequately access and provide fire protection services to area residents."

With regard to the addition of trips generated by 127 dwelling units, the Initial Study (Appendix 14.1 of the Draft EIR) concluded that the 127 dwelling units would add additional trips, but that the trips generated are consistent with previous traffic projections in the General Plan EIR. In addition, the service levels are roadways in the vicinity of the project area are operating at acceptable levels of service and have capacity to accommodate an additional 127 dwelling units.

Aesthetics

Section 5.2 of the Draft EIR provides a full discussion of impacts to landform alteration, aesthetics and light and glare. The Draft EIR concluded that landform alteration impacts would remain significant even with the imposition of mitigation measures.

Biological Resources

The Draft EIR was prepared as a Program EIR, and analyzed broad impacts associated with implementation of the proposed project. The level of analysis provided in the Draft EIR for biological resources is appropriate for a program-level EIR. It is important to note that future development projects would be subject to additional environmental review, as determined necessary by the City and stated on page 3-10 of the Draft EIR:

"It is anticipated that future development may be the subject of additional environmental review on an individual project-by-project basis, in accordance with the provisions of Section 15168 of CEQA, as determined by the City of San Dimas."

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6. RESPONSES TO COMMENTS FROM KAREN JUSTICE, 200 RODEO COURT, SAN DIMAS , MARCH 29, 1999.

The concerns raised by Ms. Justice include:

a. Biological Resources.
b. Erosion.
c. Traffic - Conflicts between automobiles and equestrians.
d. Septic Systems - Opposed to this type of system.
e. Fire Protection - Response times.
f. Utilities and Road Improvements - Costs associated with installing utilities and roads in the project area.

Biological Resources

The Draft EIR was prepared as a Program EIR, and analyzed broad impacts associated with implementation of the proposed project. The level of analysis provided in the Draft EIR regarding biological resources is appropriate for a program-level EIR. It is important to note that future development projects would be subject to additional environmental review, as determined necessary by the City and stated on page 3-10 of the Draft EIR:

"It is anticipated that future development may be the subject of additional environmental review on an individual project-by-project basis, in accordance with the provisions of Section 15168 of CEQA, as determined by the City of San Dimas."

Erosion

Erosion impacts are discussed in Section 5.7, *Hydrology and Drainage*, of the Draft EIR. Section 5.7 provides a discussion of existing conditions, project impacts and any necessary mitigation measures to reduce the impact significance to less than significant. A number of mitigation measures are recommended to ensure that future development proposals within the project area address hydrology and drainage impacts of their development.

Traffic

Ms. Justice raised the concern that increased development would result in increased traffic, which would lead to additional conflicts and/or hazards between automobiles and equestrians.

Section 5.10, *Parks and Recreation*, of the Draft EIR discusses equestrian trails. The Draft EIR acknowledges the potential for additional equestrian trails to be constructed throughout the project area, which could assist in reducing the conflicts between automobiles and equestrians. Text from page 5.10-23 of the Draft EIR discussing trails has been excerpted for ease of commentor reference.

"...the only formal equestrian trail in the project area parallels Foothill Boulevard and San Dimas Canyon Road, where it connects with the San Dimas Canyon Golf Course and San Dimas Creek. In addition, a number of informal equestrian trails exist throughout the project area on private property. There is the potential for future development to further assist in the creation of new trails in the project area. These new trails (i.e., equestrian, hiking, bicycle) trails could be incorporated into project design concepts or planned as part of future roadways, with the intent of creating a formal trail system to be utilized by the public and reducing the use on informal trails on private property. Connection with exiting or planned regional trail systems associated with adjacent jurisdictions would be assessed prior to the construction of such facilities."

In addition, Exhibit 5.3-3, *Proposed Roadway Standards*, in the Draft EIR provides an illustration of a conceptual street section with a horse trail.

Septic Systems

Section 5.10, *Public Services and Utilities*, includes a discussion of both sewage systems and septic systems under the Wastewater subheading. The impact analysis in this section analyzes the option of installing either type of system. The Draft EIR does not recommend one system over the other. It will be necessary for future development proposals to investigate which system is most appropriate for the development and the development intensity. Determination of the most appropriate system is addressed in Mitigation Measures G10 and PSU15 through PSU18.

Fire Protection

The Draft EIR identified that impacts to fire protection services would be significant even with the imposition of mitigation measures. The impact discussion from pages 5.10-11 and 5.10-12 of the Draft EIR has been excerpted for ease of commentor reference.

"**Fire Services**

- ***DEVELOPMENT OF FUTURE PROJECTS WITHIN THE NORTHERN FOOTHILLS PROJECT AREA WOULD INCREASE THE DEMAND FOR FIRE PROTECTION SERVICES BEYOND EXISTING CONDITIONS.***

Significance: Significant.

Impact Analysis: Most of the parcels within the project area are within or adjacent to areas containing moderate to dense native growth and vegetation. Development within these fire prone areas may increase the threat of wildland fires by introducing additional permanent population and visitors to the area. Conversely, wildfires originating in the Angeles National Forest area could threaten adjacent residential uses.

In the design of hillside development, the relationship between topography and fire behavior is a critical factor in the design of new development. Homes located in narrow canyons and saddles, for example, are especially fire-prone because of the existence of "natural chimneys" in these areas where winds are funneled into these canyons and eddies. Studies have also shown the homes located where a canyon meets a ridge are more likely to burn than other ridge-top homes. Homes located on narrow ridges without adequate setback are often lost to fire because flames and convection heat hit the homes directly.

It should be noted, however, that there is currently one public ingress/egress on Terrebone Avenue. This single access to the project area presents a potential hazard problem associated with a large scale evacuation (i.e., hillside fire). Although residents could exit through via the Sycamore Flats Motorway to Sycamore Canyon Road, there is the potential for heavy congestion during an evacuation on this roadway as this exit is also the primary ingress/egress for several residents and the Los Angeles Probation Camp. According to the Los Angeles Sheriff's Department, San Dimas Station, Sycamore Canyon Road is also partially blocked by Fire Department and emergency vehicles in the event of a large brush fire. Vehicles exiting the Terrebonne tract via this emergency exit would exacerbate this current condition.

The Fire Department has indicated that existing fire protection services, facilities and staff are adequate for existing development in the project area; however, the Department notes that each additional development creates greater demands on these existing resources. Thus, the proposed project would impact the ability of the Fire Department to provide adequate fire protection to both existing and new project residents. In addition, the Fire Department has indicated that the size, complexity and projected use of development within the project area may necessitate multiple ingress/egress access for traffic circulation and emergency response issues. There is the potential that the Fire Department could require future development projects to provide a second, or in some cases, a third means of access. The specific number of access routes would be reviewed by the Fire

Department on a project-by-project basis. In conclusion, future development within the project would result in unavoidable significant impacts to the Los Angeles County Fire Department's ability to adequately access and provide fire protection services to area residents."

Utilities and Road Improvements

At this time, cost estimates to install utilities and roads in the project area have not been determined. As specific development projects are submitted to the City for review, costs would be determined at that time.

14.3 ERRATA

Section 1.0 - Introduction and Purpose

Pages 1-1 through 1-3 of the Draft EIR will be modified as follows to correctly reference the CEQA Guidelines.

1.1 PURPOSE OF THE EIR

The City of San Dimas is the lead agency under the California Environmental Quality Act (CEQA), and is responsible for preparing the Environmental Impact Report (EIR) for the Northern Foothills Implementation Program (State Clearinghouse No. 98121072. This EIR has been prepared in conformance with CEQA (California Public Resources Code Section 21000 et seq.), California CEQA Guidelines (California Code of Regulations, Title 14, Section 15000 et seq.), and the rules, regulations, and procedures for implementation of CEQA, as adopted by the City of San Dimas. The principal CEQA Guidelines sections governing content of this document are Sections 15120 through 15132 (Content of an EIR), and Section 15168 (Program EIR).

Due to the fact that specific characteristics of individual projects resulting from the Northern Foothills Implementation Program have not been specified at this time, the EIR will be prepared as a Program EIR in accordance with Section 15168 and 15180(b) of the CEQA Guidelines. The intent of this review process is to address ~~both~~ plan components, present what can be deemed as a "worst case scenario" in terms of possible buildout and public improvements and formulate a master document which will be utilized as the environmental clearance for ~~both plans~~ the Implementation Program and future development proposals. The EIR will be utilized as the master CEQA clearance document for future focused studies, if determined necessary by the City, which will tier off of the Program EIR in accordance with Section 15152 of the CEQA Guidelines. Section 15168 of the CEQA Guidelines is cited as follows:

> *"(a) General. A Program EIR is an EIR which may be prepared on a series of actions that can be characterized as one large project and are related either:*
>
> *(1) Geographically,*
> *(2) As logical parts in the chain of contemplated actions,*
> *(3) In connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program, or*

(4) As individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways.

(b) Advantages. Use of a Program EIR can provide the following advantages. The Program EIR can:

(1) Provide an occasion for a more exhaustive consideration of effects and alternatives than would be practical in an EIR on an individual action,
(2) Ensure consideration of cumulative impacts that might be slighted in a case-by-case analysis,
(3) Avoid duplicative reconsideration of basic policy considerations,
(4) Allow the Lead Agency to consider broad policy alternatives and program-wide mitigation measures at an early time when the agency has greater flexibility to deal with basic problems or cumulative impacts, and
(5) Allow reduction in paperwork.

(c) Use with Later Activities. Subsequent activities in the program must be examined in the light of the Program EIR to determine whether an additional environmental document must be prepared.

(1) If a later activity would have effects that were not examined in the Program EIR, a new Initial Study would need to be prepared leading to either an EIR or a Negative Declaration.
(2) If the agency finds that pursuant to Section 15162, no new effects could occur or no new mitigation measures would be required, the agency can approve the activity as being within the scope of the project covered by the Program EIR, and no new environmental document would be required.
(3) An agency shall incorporate feasible mitigation measures and alternatives developed in the Program EIR into subsequent actions in the program.
(4) Where the subsequent activities involve site specific operations, the agency should use a written checklist or similar device to document the evaluation of the site and the activity to determine whether the environmental effects of the operations were covered in the Program EIR.
(5) A Program EIR will be most helpful in dealing with subsequent activities if it deals with the effects of the program as specifically and comprehensively as possible. With a good and detailed analysis of the program, many subsequent activities could be found to be within the scope of the project described in the

Program EIR, and no further environmental documents would be required."

The discussion following Section 15168 of the CEQA Guidelines describes the proper process for Program EIRs as follows:

"Use of the Program EIR also enables the Lead Agency to characterize the overall program as the project being approved at that time. Following this approach when individual activities within the program are proposed, the agency would be required to examine the individual activities within the program to determine whether their effects were fully analyzed in the Program EIR. If the activities have no effects beyond those analyzed in the Program EIR, the agency could assert that the activities are merely part of the program which had been approved earlier, and no further CEQA compliance would be required. This approach offers many possibilities for agencies to reduce their costs of CEQA compliance and still achieve high levels of environmental protection." (Discussion following CEQA Guidelines, Section 15168 (emphasis added).)

The purpose of this Program EIR is to review the existing conditions, analyze potential environmental impacts, and suggest feasible mitigation measures to reduce potentially significant effects of the proposed Northern Foothills Implementation Program in the City of San Dimas.

Section 3.0 - Project Description

The text on page 3-11 of the Draft EIR will be revised to read as follows:

NORTHERN FOOTHILLS IMPLEMENTATION PROGRAM

Agency	Approval/Permit
City of San Dimas	Final EIR Certification
	General Plan Amendment
	Zone Change

FUTURE DEVELOPMENT PROPOSALS

Agency	Approval/Permit
City of San Dimas	Environmental Review and Clearance (Negative Declaration, Mitigated Negative Declaration, EIR)
	Tentative Tracts and Parcels Maps
	Site Plan Approval(s)
	Landscape Plan Approval(s)

Regional Water Quality Control Board ..... Water Discharge Permit

California Department of
Fish & Game and/or
City of San Dimas ..... 1603 Agreement

Army Corps of Engineers ..... 404 Permit

Local Utility Companies ..... Infrastructure Service Fees
Connections

Section 5.4 - Air Quality

The text from pages 5.4-9 and 5.4-10 of the Draft EIR will be modified to read as follows:

"Mobile Sources

Motor vehicles would constitute the primary source of pollutant emissions associated with buildout of the proposed project area. Implementation of the proposed project would result in an increase in mobile source emissions over existing conditions; however, this increase is not anticipated to generate any new significant air quality impacts. And while ~~Although~~ the proposed project would involve additional vehicle traffic and resultant pollutant emissions beyond existing conditions, this traffic and associated emissions increase was anticipated in the City of San Dimas General Plan EIR. In fact, the General Plan EIR analysis indicated that *"[g]rowth in the City of San Dimas will impact air quality almost exclusively through the vehicular traffic generated by the development."* The General Plan EIR goes on to say that *"[t]he anticipated incremental City of San Dimas development does not create a significant air quality impact on a local or regional scale."* Since the proposed project would result in a decrease in the intensity of the existing land use designations within the project area, that were previously analyzed in the General Plan EIR, the proposed project would not result in significant air quality impacts beyond those previously anticipated for the project area (refer to Sections 5.1, *Land Use/Relevant Planning*)."

Section 5.6 - Geology and Soils

The first sentence in the third paragraph on page 5.6-15 of the Draft EIR will be revised to read as follows:

"Due to the presence of chalcedony, opal, and ~~corbantes~~ carbonates found in vesicle fillings and disseminated within the volcanic rocks, the

deleterious nature of these substances (for production of aggregate for Portland cement) makes them generally unsuitable for exploitation as aggregate."

The fourth paragraph on page 5.6-15 of the Draft EIR will be revised to read as follows:

"The Quaternary age alluvial deposits within San Dimas Wash contain clean, coarse aggregate material to depths of 30 to 70 feet (CDMG, 1987). Alluvial materials from San Dimas Wash are carried to and mix with alluvium in the San Gabriel (alluvial) fan to the west, that is mined for aggregate. Some areas along the San Dimas Wash within the project area have been mapped as MRZ-2 for aggregate resources. It should be noted that the MRZ-2 zone extends along the San Dimas Wash, including areas outside of the project area. However, given the limited extent and current level of development in and around the San Dimas Wash, the economic potential of these deposits is considered to be low. Given the fine-grained nature of the rocks comprising the Puente Formation within the project area, there is no potential for these deposits to contain aggregate materials."

Section 5.8 - Biological Resources

Mitigation measures BIO6 and BIO7 on pages 5.8-29 and 5.8-30, as well as pages 2-28 through 2-31 (Executive Summary), of the Draft EIR will be revised to read as follows:

Plants

BIO6. To fully document the potential impacts to sensitive plant species, focused surveys for the following state or federally listed threatened or endangered plant species shall be conducted during the optimal survey period prior to any development approvals from the City for any project within the potential development areas.

Braunton's milkvetch
Nevin's barberry
Thread-leaved brodiaea

In addition, focused surveys may also be warranted for sensitive species that are not currently classified as endangered, threatened, or proposed for listing, but which may be listed in the future or would be of concern to state and federal resource agencies during future environmental review processes for projects within the

potential development areas. The following species may require focus surveys if specific project locations contain appropriate habitat:

Slender Mariposa lily
Plummer's Mariposa lily
San Gabriel Mountains dudleya
Many-Stemmed dudleya
Pious daisy
Robinson's peppergrass
Rayless ragwort

Focused surveys shall be conducted using the USFWS' survey protocol. In addition, surveys for federally listed species shall be conducted by qualified biologists that possess valid section 10(a)(1)(a) permits issued by USFWS.

Should focused surveys find a state or federally listed threatened or endangered species, or a substantial population of other lower status special status plant species on-site, mitigation would need to be coordinated with the USFWS, CDFG, and/or CNPS and may include habitat preservation off-site or population relocation to off-site natural open space areas.

Wildlife

BIO7. To fully document the potential impacts to sensitive wildlife species, focused surveys for the following state or federally listed threatened or endangered wildlife species shall be conducted during the optimal survey period prior to any development approvals from the City for any project within the potential development area.

Quino checkerspot butterfly
Santa Ana sucker
Arroyo southwestern toad
California red-legged frog
Southwestern willow flycatcher
Least Bell's vireo
Bank swallow (nesting)
Coastal California gnatcatcher
Raptor (nesting)

In addition, focused surveys may also be warranted for sensitive species that are not currently classified as endangered, threatened, or proposed for listing, but which may be listed in the future or would be of concern to state and federal resource agencies during future environmental review processes for projects within the potential development areas. The following species may require focus surveys if future project locations contain appropriate habitat:

Arroyo chub	*San Bernardino mountain kingsnake*	*Grasshopper sparrow*
Santa Ana speckled dace	*Coast patchnose snake*	*Tricolored blackbird*
Coast range newt	*Two-striped garter snake*	*Pallid bat*
Large-blotched ensantina	*Loggerhead shrike*	*Townsend's western big-eared bat*
Western spadefoot	*California horned lark*	*San Diego black-tailed jackrabbit*
Mountain yellow-legged frog	*San Diego cactus wren*	*Dulzura California pocket mouse*
Southwestern pond turtle	*Yellow warbler*	*Pallid San Diego pocket mouse*
San Diego horned lizard	*Yellow-breasted chat*	*Los Angeles pocket mouse*
Coastal western whiptail	*Summer tanager*	*San Diego desert woodrat*
Silvery legless lizard	*Southern California rufous-crowned sparrow*	*Southern grasshopper mouse*
San Bernardino ring-necked snake	*Bell's sage sparrow*	*American badger*

Focused surveys shall be conducted using the USFWS' survey protocol. In addition, surveys for federally listed species shall be conducted by qualified biologists that possess valid section 10(a)(1)(a) permits issued by USFWS.

Should surveys find a state or federally listed threatened or endangered species, or a substantial population of the other lower status special status wildlife species on-site, mitigation shall need to be coordinated with the USFWS and CDFG. Mitigation may include habitat preservation off-site or habitat replacement through enhancement or restoration of on-site or off-site resources.