



RESPONSE TO COMMENTS, MITIGATION MONITORING AND REPORTING PROGRAM, AND ERRATA

CITY OF ARCADIA 2010 GENERAL PLAN UPDATE

SCH NO. 2009081034

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SECTION 1.0 INTRODUCTION

1.1 PROJECT DESCRIPTION

A comprehensive update of the *Arcadia General Plan* is being undertaken by the City at this time to strengthen its commitment to protecting the characteristics that make Arcadia a desirable place to live; gaining a new understanding of community goals; addressing continued growth pressures in the San Gabriel Valley and the demand for more diverse mobility and housing choices; and responding to evolving regional issues. The General Plan Update consists of the following elements:

- Land Use and Community Design Element,
- Economic Development Element,
- Circulation and Infrastructure Element,
- Housing Element,
- Resource Sustainability Element,
- Parks, Recreation, and Community Resources Element,
- Safety Element, and
- Noise Element.

In addition, the General Plan Update includes an Implementation Plan that establishes the actions the City will pursue to implement the goals and policies set forth in the General Plan Update.

The City is also undertaking focused amendments to the zoning regulations (Article IX, Chapter 2 of the Municipal Code) to address regulations affecting housing development in the residential and mixed use zones, and proposed land use designations in order to achieve consistency with the Draft General Plan.

1.2 PUBLIC REVIEW OF THE DRAFT EIR

Pursuant to the California Environmental Quality Act (CEQA), the potential environmental effects of the proposed 2010 Arcadia General Plan Update (proposed project) have been analyzed in a Draft Environmental Impact Report (Draft EIR) (SCH No. 2009081034) dated July 2010. The Draft EIR was made available for public review and comments have been received on the Draft EIR.

In accordance with Section 15205 of the State CEQA Guidelines, the Draft EIR for the proposed Arcadia General Plan Update was distributed on July 16, 2010, for a 45-day public review period extending from July 19, 2010, through September 2, 2010. The Notice of Availability (NOA) of the Draft EIR was published in the *Pasadena Star News* on July 19, 2010, to mark the start of the public review period. The Draft EIR and NOA were also mailed out to public agencies, groups, and individuals and were made available for review at the City of Arcadia, at the Arcadia Public Library, and on the City's website: www.ArcadiaGeneralPlan.com.

1.3 RESPONSE TO COMMENTS

The State CEQA Guidelines, Section 15088 states that prior to approving a project, the Lead Agency shall evaluate comments on environmental issues received from persons who reviewed the Draft EIR and shall prepare a written response that describes the disposition of significant environmental issues raised (e.g., revisions to the proposed project to mitigate anticipated impacts or objections). In particular, the Lead Agency must address, in detail, the major environmental issues raised in the comment letters, and when the recommendations and objections raised in the comments are at odds with the Lead Agency's position, reasons must be given why specific comments and suggestions were not accepted. Along with the Draft EIR, a list of persons, organizations, and public agencies commenting on the Draft EIR, the comments, responses to the comments, and any other information added by the Lead Agency should be included in the Final EIR (Section 15132 of the CEQA Guidelines).

Thirteen comment letters and one standard receipt letter from the Governor's Office of Planning and Research were received. The list of persons, organizations, and public agencies commenting on the Draft EIR, the comment letters, and the City's responses to the comments are provided in Section 3.0, Public Comment Letters and City Responses. Changes to the Draft EIR in response to the comments are provided in Section 4.0, Errata.

The City of Arcadia has reviewed all comments received from agencies, organizations, and individuals to determine whether any substantial new environmental issues have been raised. Based on the analysis in the Draft EIR and together with all comments received, the City has determined that no substantial new environmental issues have been raised that have not been adequately addressed in the Draft EIR and/or in the Mitigation Monitoring and Reporting Program, Responses to Comments, and Errata. No changes to the analysis or conclusions of the Draft EIR are necessary to respond to the comments.

Therefore, this document, combined with the Draft EIR, constitutes the Final EIR for the proposed Arcadia General Plan Update. The City must certify the Final EIR prior to approval and adoption of the Arcadia General Plan Update.

1.4 MITIGATION MONITORING

Section 21081.6 of CEQA and Section 15097 of the CEQA Guidelines require a public agency to adopt a monitoring and reporting program for assessing and ensuring the implementation of required mitigation measures applied to proposed projects. Specific reporting and/or monitoring requirements that will be enforced during project implementation shall be adopted simultaneously with final approval of the project by the responsible decision-maker.

Section 2.0, Mitigation Monitoring and Reporting Program, describes the mitigation program for the proposed General Plan Update.

SECTION 2.0 MITIGATION MONITORING AND REPORTING PROGRAM

While approval of the proposed project would not result in direct or immediate changes to the environment, implementation of the General Plan's plans, programs, and implementation actions, as well as future development that would be allowed under the General Plan Update, would result in environmental changes or impacts. These impacts are indirectly attributable to the General Plan Update and thus, are analyzed in the Draft EIR as "impacts" to the extent feasible, without the availability of specific development concepts or proposals. At the same time, a number of the goals, policies, implementation actions and other programs in the General Plan Update are not expected to result in environmental impacts, but are intended to avoid or reduce them.

As stated in Section 15097(b) of the CEQA Guidelines, where the project at issue is the adoption of a general plan, specific plan, community plan or other plan-level document (zoning, ordinance, regulation, policy), the monitoring plan shall apply to policies and any other portion of the plan that is a mitigation measure or adopted alternative. The monitoring plan may consist of policies included in plan-level documents. The annual report on general plan status required pursuant to the *California Government Code* may serve as a reporting program for adoption of a city general plan. Thus, the goals, policies, and implementation actions identified under each environmental issue in Section 4.0 of the Draft EIR would be implemented by the City as part of the General Plan and would be monitored during the annual report on the General Plan status. Thus, these goals, policies and implementation actions are not repeated below.

In addition to the annual report of the General Plan status, Table 2-1 describes the mitigation monitoring and reporting program (MMRP) to be adopted by the City of Arcadia for the proposed General Plan Update pursuant to the State CEQA Guidelines, Section 15097. Table 2-1 includes the potential impacts of the proposed General Plan Update, the mitigation program (including standard conditions/requirements [SCs] and mitigation measures [MMs]) to reduce the impacts to less than significant levels, and the party responsible for implementation and verification. SCs are based on local, State, or federal regulations or laws that are frequently required independent of CEQA review, yet also serve to offset or prevent certain impacts. Because SCs are incorporated into development projects, either in the project design or by law as part of project implementation, they do not constitute mitigation measures, but would reduce or avoid a potentially significant impact. Thus, SCs are included in Table 2-1 for clarification but the agency that adopted the regulation is responsible for monitoring compliance, as afforded by law.

TABLE 2-1
SUMMARY OF IMPACTS AND MITIGATION PROGRAM

Standard Conditions and Mitigation Measures	Responsible Party(ies)	Verification of Completion
Section 4.1 Aesthetics		
<p>SC 4.1.1 All proposed development within the City of Arcadia must comply with applicable Arcadia Municipal Code requirements that address aesthetic character within the City of Arcadia, including but not limited to:</p> <ul style="list-style-type: none"> • Architectural Design Guidelines for single-family, multiple-family, commercial and industrial development (Municipal Code Section 9295 et. seq.); • Architectural Review Board (ARB) standards for residential properties within the five homeowners associations (HOAs) in the City (Municipal Code Section 9272.2.3 and Municipal Code Section 9295 et. seq.); • Municipal Code requirements related to oak tree preservation, comprehensive tree management in public rights-of-way, street setbacks, underground utilities, property maintenance, and nuisance abatement (Municipal Code Article IX et. seq.; Municipal Code Article IV, Chapter 9 and 9.3); and • Zoning Regulations and development standards for all land use zones, including hillside areas, and exterior light and glare standards (Municipal Code Article IX, Chapter 2 et. seq.). 		
Section 4.3 Air Quality		
<p>SC 4.3-1 Construction activities shall implement the following measures to reduce the amount of fugitive dust that is re-entrained into the atmosphere from unpaved areas, parking lots, and construction sites, in accordance with SCAQMD Rule 403:</p> <ol style="list-style-type: none"> 1. Require the following measures to be followed during the construction of all projects in order to reduce the amount of dust and other sources of PM10: <ol style="list-style-type: none"> a. Dust suppression at construction sites using vegetation, surfactants, and other chemical stabilizers; b. Wheel washers for construction equipment; c. Watering of all actively disturbed construction areas; d. Limit speeds at construction sites to 15 miles per hour; and e. Covering of aggregate or similar material during transportation of hauling materials. 2. Pave currently unpaved roads and parking lots or establish and enforce 15-mile per hour speed limits on low-use, unpaved roads as permitted under California Vehicle Code Section 22365. 		
SC 4.3-2 Future development shall comply with the performance standards for odor, smoke, or other particulate matter, including dust, dirt or ash; production of humidity; and odorous gases and other odorous matter as contained in the Arcadia Municipal Code.		
SC 4.3-3 Construction projects within the City shall comply with the applicable regulatory requirements established by the SCAQMD, including but not limited to Rule 1113 (Architectural Coatings), Rule 431.2 (Low Sulfur Fuel), Rule 403 (Fugitive Dust), and Rule 1186/1186.1 (Street Sweepers).		
SC 4.3-4 In accordance with 13 CCR, Chapter 10, Section 2485 and CARB's ATCM, large commercial, diesel-powered vehicles shall not idle for more than five minutes. The City shall ensure this action is implemented during construction activities.		
SC 4.3-5 Future development shall comply with pertinent SCAQMD rules and regulations, including Regulation IX for new stationary sources, Regulation X on NESHAQS, Regulation XI for source specific standards, Regulation XIII for new source permits, Regulation XIV for TACs, and Rule 2202 for Motor Vehicle Mitigation, as applicable.		

TABLE 2-1 (CONTINUED)
SUMMARY OF IMPACTS AND MITIGATION PROGRAM

Standard Conditions and Mitigation Measures	Responsible Party(ies)	Verification of Completion
<p>MM 4.3-1 The City shall require construction projects that are subject to discretionary approval to implement the following measures to reduce exhaust emissions from construction equipment:</p> <ol style="list-style-type: none"> 1. Commercial electric power shall be provided to the project site in adequate capacity to avoid or minimize the use of portable gas/diesel-powered electric generators and equipment. 2. Where feasible, equipment requiring the use of fossil fuels (e.g., diesel) shall be replaced or substituted with electrically driven equivalents (provided that they are not run via a portable generator set). 3. To the extent feasible, alternative fuels and emission controls shall be used to further reduce exhaust emissions. 4. On-site equipment shall not be left idling when not in use. 5. Staging areas for heavy-duty construction equipment shall be located as far as possible from sensitive receptors. 	<p>Contractors of individual construction projects would implement this MM, with the City Building Services Division monitoring implementation through field inspections.</p>	
<p>MM 4.3-2 The City shall require future development that is inconsistent with the recommended buffer distances (siting criteria) in CARB's Land Use Handbook to prepare a site-specific health risk assessment to determine impacts to sensitive receptors. In light of the results of the aforementioned analysis, the City shall implement the following measures to minimize exposure of sensitive receptors and sites to health risks related to air pollution:</p> <ol style="list-style-type: none"> 1. Encourage site plan designs to provide appropriate set-back and/or design features that reduce TACs at the source; 2. Encourage the applicants for sensitive land uses to incorporate design features (e.g., pollution prevention, pollution reduction, barriers, landscaping, ventilation systems, or other measures) in the planning process to minimize the potential impacts to sensitive receptors; and 3. Orient activities involving idling trucks as far away from and downwind of existing or proposed sensitive receptors as feasible. 	<p>Developers of individual projects would implement this MM, with the City Planning Services monitoring compliance during site plan review.</p>	

TABLE 2-1 (CONTINUED)
SUMMARY OF IMPACTS AND MITIGATION PROGRAM

Standard Conditions and Mitigation Measures	Responsible Party(ies)	Verification of Completion
Section 4.4 Biological Resources		
<p>SC 4.4-1 A qualified biologist shall conduct nesting bird surveys in areas with suitable habitat prior to all construction or site preparation activities that would occur during the nesting and breeding season of native bird species (typically March 1 through August 15). The survey area shall include all potential bird nesting areas within 200 feet of any disturbance. The survey shall be conducted no more than three days prior to commencement of activities (i.e., grubbing or grading). If active nests of bird species protected by the MBTA and/or the California Fish and Game Code (which, together, apply to all native nesting bird species) are present in the impact area or within 200 feet of the impact area, a temporary buffer fence shall be erected a minimum of 200 feet around the nest site. This temporary buffer may be greater or lesser depending on the bird species and type of disturbance, as determined by the biologist and/or applicable regulatory agency permits. Clearing and/or construction within temporarily fenced areas shall be postponed or halted until juveniles have fledged and there is no evidence of a second nesting attempt. The biologist shall serve as a construction monitor during those periods when disturbance activities will occur near active nest areas to ensure that no inadvertent impacts on these nests will occur.</p>		
<p>SC 4.4-2 Prior to any fill of or alteration to jurisdictional resources including drainage tributaries, wetlands, and/or riparian vegetation, the project proponent shall obtain the appropriate regulatory agency permits and/or agreements from the USACE, the CDFG, and the applicable RWQCB. The project proponent shall comply with the conditions and mitigation measures specified in the regulatory agency permits and/or agreements in order to ensure no net loss in biological resource values.</p>		
<p>SC 4.4-3 In compliance with the City's Oak Tree Regulations, prior to vegetation clearing or grading, surveys shall be performed to determine if any protected oak trees are located within disturbance areas. If protected oak trees would be affected, the project proponent shall be required to obtain an Oak Tree Permit from the City pursuant to the City's Oak Tree Regulations and shall comply with all stipulated mitigation measures.</p>		
<p>SC 4.4-4 In compliance with the City's Street Tree Master Plan, a City permit shall be obtained prior to any planting, removal, cutting, or damage to a City-owned tree or shrub on any public property (in City parks, within street medians and along parkways, and on other public properties). The Public Works Department shall review the plans of any development, redevelopment, or public and infrastructure projects for compliance with the number of street trees or the species, as listed in the City's Street Tree Master Plan.</p>		
<p>MM 4.4-1 Prior to the development of vacant and undeveloped areas, a qualified biologist, under the direction from the City, shall determine whether a habitat assessment is required to assess site potential to support any special status plant or wildlife species. If potentially suitable habitat is present for any special status species, then the City shall direct appropriate focused surveys to be performed to determine the presence or absence of special status species. If any special status species is identified on the site, then appropriate avoidance and/or mitigation measures shall be implemented, as approved by the resource agencies, and subject to the necessary permits under the FESA, the CESA, the California Fish and Game Code, and other applicable regulations.</p>	<p>A biologist shall conduct biological assessment and focused surveys, with the City Planning Division requiring biological reports with appropriate mitigation measures to be submitted during the planning permit process for individual projects.</p>	

TABLE 2-1 (CONTINUED)
SUMMARY OF IMPACTS AND MITIGATION PROGRAM

Standard Conditions and Mitigation Measures	Responsible Party(ies)	Verification of Completion
Section 4.5 Cultural Resources		
SC 4.5-1 All development projects in the City that are subject to CEQA shall comply with CEQA, the CEQA Guidelines, and the CCR Title 14, Chapter 3 as they relate to cultural resources. These regulations require the identification and assessment of historic, archaeological, and paleontological resources and the determination of feasible mitigation measures (MMs) to reduce or avoid identified impacts to significant resources.		
SC 4.5-2 If human remains are encountered during excavation activities, all work shall halt, and the County Coroner shall be notified (PRC Section 5097.98). The Coroner will determine whether the remains are of forensic interest. If the Coroner, with the aid of the County-approved Archaeologist, determines that the remains are prehistoric, he/she will contact the NAHC. The NAHC will be responsible for designating the most likely descendant (MLD), who will be responsible for the ultimate disposition of the remains, as required by Section 7050.5 of the California Health and Safety Code. The MLD will make his/her recommendation within 48 hours of being granted access to the site. The recommendation of the MLD shall be followed if feasible, and may include scientific removal and non-destructive analysis of the human remains and any items associated with Native American burials (California Health and Safety Code Section 7050.5). If the landowner rejects the recommendations of the MLD, the landowner shall rebury the remains with appropriate dignity on the property in a location that will not be subject to further subsurface disturbance (PRC Section 5097.98).		
MM 4.5-1 Prior to the issuance of demolition permits that may affect structures 50 years of age or older, a qualified architectural historian shall conduct an assessment to determine the significance of the structure(s) and/or site(s). Project applicants/developers shall ensure that, to the maximum extent possible, direct or indirect impacts to any known properties that are deemed eligible for inclusion in the NRHP, the CRHR, or a local designation be avoided and/or preserved consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties. Should avoidance and/or preservation not be a feasible option, a qualified architectural historian shall develop a mitigation program that may include, but not be limited to, formal documentation of the structure using historical narrative and photographic documentation, facade preservation, and/or monumentation. Properties are not equally significant, and some retain more significance than others. Therefore, prior to development decisions, a qualified architectural historian shall be retained to evaluate the circumstance regarding the property and planned development and to make management decisions regarding documentation of the property.	The City Planning Division shall verifying compliance prior to issuance of the demolition permit for individual projects.	
MM 4.5-2 Projects that would require ground disturbance and would be located on undeveloped parcels or near known cultural resources shall implement the following: <ol style="list-style-type: none"> If only minor ground disturbance is anticipated, a "Quick Check" records search at the South Central Coastal Information Center, Fullerton, must be performed to determine whether archaeological resources are recorded on the project site. If no archeological resources were recorded on the project site based on past surveys completed, then no further action is required. If no survey has ever been conducted on the project site, or if archaeological resources are found to be recorded on the project site, a Phase I study is required. Should cultural resources be encountered during construction activities, 	The City Planning Services shall verify compliance prior to issuance of a building permit for individual projects.	

TABLE 2-1 (CONTINUED)
SUMMARY OF IMPACTS AND MITIGATION PROGRAM

Standard Conditions and Mitigation Measures	Responsible Party(ies)	Verification of Completion
<p>a qualified Archaeologist shall be retained to evaluate the discovery and shall implement procedures for temporarily halting or redirecting work to permit the sampling, identification, and evaluation of the resources, as appropriate. If the resources are found to be significant, the Archaeologist shall determine appropriate actions—in cooperation with the City—for preservation and/or data recovery.</p> <p>2. If a project requires major ground disturbance (e.g. grading, trenching), a Phase 1 study shall be undertaken to evaluate the current conditions of a project site. The study shall consist of (1) an initial records search including records, maps, and literature housed at the Archaeological Information Center located at California State University, Fullerton; (2) a Sacred Lands check with the NAHC and initial scoping with interested Indian Tribes and individuals identified by the NAHC; (3) a pedestrian field survey by a qualified Archaeologist to determine the presence or absence of surficial artifactual material and/or the potential for buried resources; and (4) a technical report describing the study and offering management recommendations for potential further investigation.</p> <p>3. If archaeological resources are discovered as a result of the Phase I study, a Phase II evaluation of the significance of any prehistoric material that is present shall be undertaken. The evaluation shall include further archival research, ethnographic research, and subsurface testing/excavation to determine the site's horizontal and vertical extent, the density and diversity of cultural material, and the site's overall integrity. The evaluation shall include a technical report describing the findings and offering management recommendations for sites determined to be significant. Non-significant resources would require no further study.</p> <p>4. If the Phase II evaluative study indicates that a significant site is present, the qualified Archaeologist shall determine appropriate actions, in cooperation with the City of Arcadia, for preservation and/or data recovery of the resource. Preservation in place is the preferred manner of mitigation, as provided in CCR Section 15126.5(b)(3). This could include (1) avoidance of resources; (2) incorporation of resources into open space; (3) capping the resource with chemically stable sediments; and/or (4) deeding the resource into a permanent conservation easement. To the extent that a resource cannot be preserved in place, a Phase III data recovery excavation shall be completed to recover the resource's scientifically consequential information. A technical report shall be completed that adheres to the OHP's Archaeological Resources Management Report (ARMR) guidelines.</p> <p>5. Monitoring of ground-disturbing activities shall be undertaken by a qualified Archaeologist as a final mitigation measure in areas that contain or are sensitive for the presence of cultural resources.</p>		

TABLE 2-1 (CONTINUED)
SUMMARY OF IMPACTS AND MITIGATION PROGRAM

Standard Conditions and Mitigation Measures	Responsible Party(ies)	Verification of Completion
<p>MM 4.5-3 Future development and public and infrastructure projects that would excavate into Older Quaternary Alluvium deposits shall implement the following:</p> <ol style="list-style-type: none"> 1. An archival records search shall be undertaken at the NHMLAC to determine the depositional environment within the project area and to evaluate the likelihood of fossils being present. 2. A field survey shall be undertaken prior to ground-disturbing activities in areas of potential but unknown sensitivity to evaluate the site for the presence of significant fossil resources and establish the need for paleontological salvage and/or monitoring. 3. If significant fossils are discovered as a result of a field survey or during monitoring operations, a qualified Paleontologist shall determine appropriate actions, in cooperation with the City of Arcadia, for the preservation and/or salvage of the resource. 4. Any monitoring activities shall be accomplished by a qualified paleontologist so that fossils discovered during grading can be scientifically and efficiently recovered and preserved. 5. A qualified paleontologist shall prepare collected specimens to a point of identification and place the prepared fossils in the appropriate institution for permanent curation. 6. Upon completion of recovery and curation, all studies and actions shall be described in a paleontological technical report prepared by a qualified paleontologist. 	<p>A paleontologist shall implement this MM, with the City Planning Services requiring paleontological resources reports during the planning permit process for individual projects.</p>	
Section 4.6 Geology and Soils		
<p>SC 4.6-1 All future development projects within the City shall comply with Article VIII, Sections 8010–8927 of the Arcadia Municipal Code, which incorporates by reference the 2007 California Building Code (2007 CBC), and any applicable ordinances set forth by the City, or the most recent City building and seismic codes in effect at the time the grading plans are approved.</p>		
<p>SC 4.6-2 All future development projects within the designated Alquist Priolo Earthquake Fault Zone for the Raymond fault shall prepare a geologic investigation in compliance with the Alquist Priolo Earthquake Fault Zone Act, which shall include but not be limited to literature and aerial photo review, field mapping, possible geophysics and/or trench excavations, and alluvial deposit age dating for land subdivisions and habitable structures consisting of four units or more that are proposed within this zone. As required by CGS Note 48, all essential facilities, public schools, hospitals, and other facilities deemed critical or important shall be judged to higher standards than residential developments.</p>		
<p>SC 4.6-3 All future development projects within 660 feet on either side of the Raymond fault shall be subject to special geologic investigations to confirm the presence or absence of hazardous faults in that area in compliance with the City's Special Studies Geologic Zones Code. The geologic report shall be prepared by or under the direction of a Geologist registered in the State of California and in accordance with the guidelines of the State of California Board of Mines and Geology. The requirements of this code include the following:</p> <ul style="list-style-type: none"> • No structure for human occupancy shall be built over a potentially active or an active fault trace. • A setback area of 50 feet shall be provided from a potentially active, or an active fault trace, unless the City's Geologist, after reviewing a geologic study, determines that either (1) a lesser setback would not pose an unnecessary risk of structural damage due to surface rupture or (2) a setback greater than 50 feet is needed for high risk structures (such as schools, hospitals, and buildings over 2 stories high). 		

TABLE 2-1 (CONTINUED)
SUMMARY OF IMPACTS AND MITIGATION PROGRAM

Standard Conditions and Mitigation Measures	Responsible Party(ies)	Verification of Completion	
A seller of real estate or his agent shall disclose in writing to any prospective buyer the fact that the property is located within a Special Studies Zone, to be signed by the purchaser prior to entering escrow.			
SC 4.6-4 In accordance with the Natural Hazards Disclosure Act, agents and sellers of real property located within a designated Alquist-Priolo Earthquake Hazard Zone shall disclose to any prospective purchaser that the property is within an Earthquake Hazard Zone pursuant to the requirements of this Act.			
SC 4.6-5 In accordance with Section 9250.5.3 of the Arcadia Municipal Code, every application for a development permit shall include, among other things, a report of an engineering geological investigation, which shall provide a description of the geology of the site and conclusions and recommendations regarding the effect of the geologic conditions, including consideration of seismic hazards and slope stability in natural materials on the proposed development. The Report shall be conducted in compliance with the published guidelines and implementation procedures from the Seismic Hazards Mapping Act, which requires registered professionals (California Registered Civil Engineer or Certified Engineering Geologist) to conduct liquefaction evaluations; establish the site-specific mitigation; and participate in the implementation process. Recommendations of the report, as they pertain to structural design and construction recommendations for earthwork, grading, slopes, foundations, pavements, and other necessary geologic and seismic considerations, should be incorporated into the design and construction of the proposed development.			
SC 4.6-6 In accordance with the City's Zoning Regulations and Building Regulations, every application for a development permit within the Residential Mountainous Single Family Zone shall include plans for erosion control planting or other protective devices. Irrigation systems or watering devices that cause soil erosion or saturate the soil to cause slope failure are prohibited. Site topography or configuration that causes or will cause erosion, subsidence, surface water runoff problems, or other conditions that may affect adjacent properties or the public health, safety, and welfare are prohibited.			
SC 4.6-7 All existing and future development within the City shall be conducted in compliance with Los Angeles RWQCB Order No. R4-2004-0146, which regulates discharges from residential on-site wastewater treatment systems throughout the entire Los Angeles Region (Los Angeles and Ventura Counties). The General Waste Discharge Requirements (WDRs) apply to septic tanks proposed in areas with shallow groundwater, areas adjacent to water bodies listed as impaired pursuant to Section 303(d) of the Clean Water Act, areas where groundwater is used for domestic purposes, and areas with nitrogen or bacterial contamination of ground or surface waters.			
SC 4.6-8 All future development within the City shall be conducted in compliance with the California Plumbing Code (Part 5 of the California Building Code), which provides standards for the design and construction of water and sewer systems, storm drains and recycled water systems in buildings, and which prohibits connection to a septic tank in areas served by a public sewer system. It also requires the proper abandonment of septic tanks, cesspools, and seepage pits.			
Soils at the northern end of the City pose limitations to the use of septic tanks.	MM 4.6-1 Future development at the northern edge of the City (generally north/northwest of Canyon Road) shall provide for the extension of sewer lines to serve the proposed project in order to avoid hazards associated with soils incapable of supporting septic tank systems.	The project engineer shall incorporate this MM into building plans, with the City Building Services monitoring compliance during the plan check process.	

TABLE 2-1 (CONTINUED)
SUMMARY OF IMPACTS AND MITIGATION PROGRAM

Standard Conditions and Mitigation Measures	Responsible Party(ies)	Verification of Completion
Section 4.7 Hazards and Hazardous Materials		
SC 4.7-1 All development within the City shall comply with the Hazardous Materials Transportation Act, as administered by the U.S. Department of Transportation and which governs the transport of hazardous materials, such as gasoline, contaminated soil, asbestos, or lead-containing materials. Vehicles transporting hazardous waste materials are required to comply with the regulations, as implemented by the California Department of Transportation (Caltrans).		
SC 4.7-2 All development within the City shall comply with the Resource Conservation and Recovery Act (RCRA) on the generation, transportation, treatment, storage, and disposal of hazardous waste; the management of non-hazardous solid wastes and underground tanks storing petroleum and other hazardous substances would be required for hazardous material users, waste generators, and transporters. Compliance with this Act also includes corrective action by the owner or operator of the leaking underground storage tank (LUST) or clean up of LUSTs by USEPA to reduce hazards associated with ground and water contamination by tank leaks, spills, or accidental release.		
SC 4.7-3 All development within the City shall comply with the California Hazardous Waste Control Act, which regulates facilities that generate or treat hazardous wastes. Permits for individual facilities allow the Department of Toxic Substances Control and/or the Certified Unified Program Agency (CUPA, in this case, the Los Angeles County Fire Department) to inspect the facilities for compliance and to enforce the provision of the Act.		
SC 4.7-4 All development within the City shall comply with the regulations of the Los Angeles County Fire Department, which serves as the designated CUPA and which implements the State and federal regulations related to: <ul style="list-style-type: none"> • The Hazardous Waste Generator Program, • The Hazardous Materials Release Response Plans and Inventory Program, • The California Accidental Release Prevention Program (CalARP), • The Aboveground Storage Tank (AST) Program, and • The Underground Storage Tank (UST) Program. 		
SC 4.7-5 All development within the City shall comply with CalARP to prevent the accidental release of regulated toxic and flammable substances. CalARP requires stationary sources that utilize hazardous materials exceeding a threshold quantity to develop and submit a risk management plan that addresses the potential impacts of accidental releases of hazardous materials, along with reducing hazards through prevention, response, and remediation measures.		
SC 4.7-6 All development within the City shall comply with the South Coast Air Quality Management District's (SCAQMD's) Rule 1403, which provides guidelines for the proper removal and disposal of asbestos-containing materials. In accordance with Rule 1403, structures that may contain asbestos are required to be subject to an asbestos survey by a Certified Asbestos Consultant (certified by the California Occupational Safety and Health Administration [CalOSHA]) to identify building materials that contain asbestos. Removal of the asbestos should include prior notification to the SCAQMD and compliance with removal procedures and time schedules; asbestos handling and clean-up procedures; and storage, disposal, and land filling requirements under this rule.		

TABLE 2-1 (CONTINUED)
SUMMARY OF IMPACTS AND MITIGATION PROGRAM

Standard Conditions and Mitigation Measures	Responsible Party(ies)	Verification of Completion
SC 4.7-7 All demolition that could result in the release of lead shall be conducted according to the California Code of Regulations (Title 8, Section 1532.1) regarding the removal of lead-based paint or other materials containing lead, which must be performed and monitored by contractors with appropriate certifications from the California Department of Health Services. The CalOSHA standards are intended to protect the general population and construction workers from respiratory and other hazards associated with exposure to these materials.		
SC 4.7-8 Future development pursuant to the General Plan Update and public and infrastructure projects in the City shall comply with pertinent provisions of the California Building Code (CBC), which now includes building standards for the Wildland-Urban Interface Fire Area. The standards call for the use of ignition resistant materials and design to resist the intrusion of flame or burning embers projected by a vegetation fire to help reduce losses resulting from repeated cycles of interface fire disasters. These standards apply to the areas within the designated Very High Fire Hazard Severity Zone at the northern end of the City. The City of Arcadia has officially adopted the regulations for Wildland Urban Interface Area into Article 3, Chapter 1, Part 3 of the City's Municipal Code.		
SC 4.7-9 All demolition or construction activities shall comply with the California Health and Safety Code (Section 39650 et seq.) and the California Code of Regulations (Title 8, Section 1529), which prohibit emissions of asbestos from asbestos related demolition or construction activities; require medical examinations and monitoring of employees engaged in activities that could disturb asbestos; specify precautions and safe work practices that must be followed to minimize the potential for release of asbestos fibers; and require notice to federal and local government agencies prior to beginning renovation or demolition that could disturb asbestos. The standards were developed to protect the general population and construction workers from respiratory and other hazards associated with exposure to these materials.		
SC 4.7-10 Development in the City that is within 20,000 feet of the El Monte Airport shall comply with Part 77 of the Federal Aviation Regulations (FAR), which requires Federal Aviation Administration (FAA) notification and review of site and building plans to determine the effects of proposed construction on air navigation and to identify measures to be applied for the continued safety of air navigation, if it involves construction or alteration of a temporary or permanent structure, equipment, highway, railroad, roadway, or natural growth that is more than 200 feet in height or that extends into an imaginary surface extending outward and upward at a slope of 100 to 1 for a horizontal distance of 20,000 feet from the nearest point of the nearest runway that is 3,200 feet or longer or at a slope of 50 to 1 for a horizontal distance of 10,000 feet from the nearest point of the nearest runway that is less than 3,200 feet long.		
SC 4.7-11 Development in the City of Arcadia shall comply with the California Fire Plan, as implemented by the State Board of Forestry and the California Department of Forestry and Fire Protection (CDFF). Implementation of the California Fire Plan would reduce wildland fire hazards at the Angeles National Forest and the foothills in Arcadia.		
SC 4.7-12 The City shall continue to implement its Natural Hazard Mitigation Plan for the protection of life and property from natural hazards. The Plan includes mitigation activities that include inventories of at-risk buildings and infrastructure and prioritized mitigation; emergency preparedness programs; review of ordinances that protect natural systems for enhancement; and strategies for risk reduction.		
SC 4.7-13 All development within the City shall comply with SCAQMD Rules X and XIV, which include regulations for toxic and hazardous air pollutant emissions. Rule X adopts the National Emission Standards for Hazardous Air Pollutants (NESHAPS) and Rule XIV specifies the limits for maximum individual cancer risk (MICR), cancer burden, and non-cancer acute and chronic hazard index (HI) from new, modified, or relocated stationary sources that emit toxic air contaminants. The rule includes specific limits for MICR, chronic HI, and acute HI that need to be met before a permit to construct/operate if approved for new stationary sources located within 1,000 feet of an existing school or a school under construction.		

TABLE 2-1 (CONTINUED)
SUMMARY OF IMPACTS AND MITIGATION PROGRAM

Standard Conditions and Mitigation Measures	Responsible Party(ies)	Verification of Completion
SC 4.7-14 Pursuant to Section 21676(b) of the Public Utilities Code, subsequent to receipt of the FAA determination (see SCs 4.7-10), the Los Angeles County Regional Planning Commission, acting as the Airport Land Use Commission (ALUC), shall review projects within 2 miles of the El Monte Airport for compliance with the Los Angeles County Airport Land Use Plan. Developers shall comply with the requirements of the Los Angeles County Regional Planning Commission.		
SC 4.7-15 In accordance with the California Code of Regulations (Title 8, Section 1541), persons planning new construction, excavations, and new utility lines near or crossing existing high pressure pipelines, natural gas/petroleum pipelines, electrical lines greater than 60,000 volts, and other high priority lines are required to notify the owner/operator of the line and must identify the locations of subsurface lines prior to any ground disturbance for excavation. Coordination, approval, and monitoring by the owner/operator of the line would avoid damage to high priority lines and prevent the creation of hazards to the surrounding area.		
Section 4.8 Hydrology and Water Quality		
SC 4.8-1 The project applicant/developer for all applicable development projects shall file a Permit Registration Document (PRD) with the State Water Resources Control Board in order to obtain coverage under National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with the Construction and Land Disturbance Activities (Order No 2009-009-DWQ, NPDES No. CAS000002) or the latest approved general permit. The project applicant/developer shall provide documentation of coverage under the Construction General Permit to the City of Arcadia. The PRD consists of a Notice of Intent (NOI); Risk Assessment; Site Map; Storm Water Pollution Prevention Program (SWPPP); annual fee; and a signed certification statement. Pursuant to permit requirements, the project applicant/developer shall develop and incorporate Best Management Practices (BMPs) for reducing or eliminating construction-related pollutants in the site runoff. Starting in 2011, SWPPPs shall also be prepared and implemented for construction sites less than one acre, per Title 24 Green Building Standards.		
SC 4.8-2 As required under the Municipal Separate Storm Sewer System (MS4) Permit and Waste Discharge Requirements (Order No. 01-182; NPDES No. CAS0041) for the County, the City of Arcadia requires new development and major redevelopment to prepare a Standard Urban Stormwater Management Plan (SUSMP) as part of the development permit process. The SUSMP shall identify post-construction treatment-control BMPs that would be implemented on site for long-term storm water pollutant mitigation. The SUSMP shall be prepared pursuant to the guidelines prepared by the Los Angeles County Department of Public Works' SUSMP Manual.		
SC 4.8-3 All development in the City shall comply with Article VII, Chapter 8, Stormwater Management and Discharge Control, of the Arcadia Municipal Code supplements the City's NPDES permit, which prohibits the discharge of specific pollutants into the storm water and requires development projects to provide best management practices to reduce pollutants in the storm water.		
SC 4.8-4 Discharges of groundwater from construction and project dewatering shall comply with the Los Angeles Regional Water Quality Control Board's (LARWQCB's) Order No. R4-2003-0111, which outlines the waste discharge requirements to surface waters in the coastal watersheds of Los Angeles and Ventura Counties (General NPDES Permit No. CAG994004). Projects that involve dewatering activities and that could result in discharges into "Waters of the State" must file a Report of Waste Discharge (RWD) with the LARWQCB. The LARWQCB reviews the RWD and the proposed discharge and prepares Waste Discharge Requirements (WDRs), which include operational requirements, contaminant limitations, and monitoring requirements. Compliance with the WDR would: (1) prevent groundwater discharges from resulting in water quality degradation of receiving surface water bodies and (2) protect beneficial uses of water.		

TABLE 2-1 (CONTINUED)
SUMMARY OF IMPACTS AND MITIGATION PROGRAM

Standard Conditions and Mitigation Measures	Responsible Party(ies)	Verification of Completion
SC 4.8-5 All new construction and major improvements shall be built in accordance with the City's Floodplain Management Regulations (Article III, Chapter 10 – Floodplain Management of the Arcadia Municipal Code), which require that structures (1) be adequately anchored to prevent flotation, collapse, or lateral movement from hydrodynamic and hydrostatic loads during flood; (2) be constructed with materials and utility equipment resistant to flood damage and using methods and practices that minimize flood damage; and have electrical, heating, ventilation, plumbing and air conditioning equipment and other utility systems that prevent water from entering or accumulating within structures during floods.		
Section 4.9 Land Use and Planning		
SC 4.9-1 As the primary land use policy document for the City, the Arcadia General Plan will regulate all future development. Consistency with the goals, policies and programs of the Arcadia General Plan, as amended, will be required for all development projects.		
SC 4.9-2 The City's Zoning Regulations provide development standards and design guidelines for the development of individual parcels in the City. Future development projects will need to comply with pertinent zoning regulations.		
Section 4.10 Mineral Resources		
SC 4.10-1 Any future mining operations shall comply with the regulations and guidelines of SMARA regarding permits, annual reporting, and reclamation plans.		
SC 4.10-2 Any future mining operations and ongoing mine reclamation shall comply with Article IX, Chapter 5 of the Arcadia Municipal Code regarding mining and reclamation operations in the City.		
Section 4.11 Noise		
SC 4.11-1 The City of Arcadia's Building Code limits construction-related activities to occur only between the hours of 7:00 AM and 7:00 PM, Monday through Saturday, unless otherwise permitted by the Development Services Department. Construction is prohibited on Sundays and major holidays. Future development shall comply with these time limits to prevent construction noise during the evening and early morning hours.		
SC 4.11-2 Future development in the City shall comply with the City's Noise Ordinance, (Chapter 6, Part 1, Section 4610.3 of the Municipal Code), which sets limits for exterior noise levels.		
SC 4.11-3 Future development in the City shall comply with Title 24, Chapter 12 of the California Administrative Code, which requires that residential structures (other than detached single-family dwellings) be designed such that the interior CNEL with windows closed shall not exceed 45 dBA in any habitable room.		
SC 4.11-4 Future development in the City shall comply with the City's vibration standards in Title 3, Performance Standards, Section 9266.3.9, of the Arcadia Municipal Code.		

TABLE 2-1 (CONTINUED)
SUMMARY OF IMPACTS AND MITIGATION PROGRAM

Standard Conditions and Mitigation Measures	Responsible Party(ies)	Verification of Completion
<p>MM 4.11-1 Prior to issuance of discretionary permits for construction activities, project applicants/developers shall submit evidence to the Director of Development Services that the following noise reduction measures are stated as requirements on the construction plans and specifications:</p> <ul style="list-style-type: none"> During all excavation and grading, the construction contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturers' standards. The construction contractor shall place all stationary construction equipment so that emitted noise is directed away from the noise-sensitive receptors. When feasible, the construction contractor shall locate equipment staging in areas that will create the greatest distance between construction-related noise sources and noise sensitive receptors during all project construction. The construction contractor shall limit all construction-related activities that would result in high noise levels, according to the construction hours set forth in the Municipal Code. The construction contractor shall limit haul truck deliveries to the same hours specified for construction equipment. To the extent feasible, haul routes shall not pass sensitive land uses or residential dwellings. 	<p>Contractors of individual construction projects will be required to implement this MM, with the City Building Services monitoring compliance through field inspections or report submittal.</p>	
<p>MM 4.11-2 Prior to the issuance of discretionary permits for residential development in areas with existing high levels of ambient noise (i.e., along major roadways and the railroad tracks), a detailed acoustical study using architectural plans shall be prepared by a qualified Acoustical Consultant and submitted to the Development Services Department for residential structures. This report shall describe and quantify the noise sources impacting the building(s), the amount of outdoor-to-indoor noise reduction provided in the architectural plans, and any upgrades required to meet the City's interior noise standards (45 CNEL for residences). The measures described in the report shall be incorporated into the architectural plans for the buildings and implemented with building construction.</p>	<p>A noise consultant shall prepare the acoustical study and the project architect shall incorporate the needed noise control measures into the project plans, with the City Planning Services monitoring implementation through site plan review and the City Building Services Division monitoring compliance during the plan check process.</p>	

TABLE 2-1 (CONTINUED)
SUMMARY OF IMPACTS AND MITIGATION PROGRAM

Standard Conditions and Mitigation Measures	Responsible Party(ies)	Verification of Completion
<p>MM 4.11-3 For proposed commercial and industrial land uses that would generate stationary noise near noise sensitive receptors, a detailed noise assessment shall be prepared by a qualified Acoustical Consultant prior to the issuance of building permits. The assessment shall utilize noise data provided by the manufacturer(s) of the equipment utilized by the project or noise measurements from substantially similar equipment to project noise levels at the noise-sensitive uses (on- and off-site). Compliance with the City's noise standards for residences shall be demonstrated and any measures required to meet the noise standards shall be described and incorporated into the building plans for the project. These measures may include, but not be limited to, selection of quiet models, construction of barriers, equipment enclosures, and placement of the equipment. Project applicants/developers shall submit evidence to the Director of Planning Development that the following noise reduction measures are stated as requirements on the construction plans and specifications:</p> <ul style="list-style-type: none"> • Require preparation of a noise analysis for all proposed commercial and industrial projects to be located adjacent to an existing noise-sensitive use, including but not limited to residential areas, schools, and hospitals. • Design the construction of new commercial and industrial uses adjacent to noise-sensitive uses with noise mitigation measures to reduce the noise impacts associated with truck deliveries and stationary equipment, such as pumps, compressors, and air conditioning units. • Require that all loading facilities be located and designed to minimize the potential noise impacts to adjacent noise sensitive uses. 	<p>A noise consultant shall prepare the noise assessment and the project architect and engineer shall incorporate the needed noise control measures into the project, with the City Planning Services monitoring implementation through site plan review and the City Building Services Services monitoring compliance during the plan check process.</p>	
<p>MM 4.11-4 Prior to the issuance of a grading permit for projects that have a potential to generate groundborne vibration (e.g., use of pile drivers, rock drills, and pavement breakers) or be exposed to vibration from off-site sources, the City shall require applicants for development projects that would be located adjacent to any developed/occupied sensitive local receptors or for proposed residential projects to submit a construction-related vibration mitigation plan to the City for review and approval. The mitigation plan shall depict the location of the construction equipment and activities and how the vibration from this equipment and activity would be mitigated during construction of the project.</p>	<p>The project engineer shall prepare the vibration mitigation plan when required, with the City Building Services monitoring compliance during the plan check process and through field inspections during construction.</p>	
Section 4.12 Population, Housing and Employment		
<p>SC 4.12.1 In accordance with California Civil Code Section 1940 et seq., termination of a lease or eviction of renters/tenants shall require written notice from the landlord or his/her agent, prior to the sale or demolition of a dwelling or unit.</p>		
<p>SC 4.12.2 In accordance with the State Relocation Assistance Act, public agency projects and redevelopment activities shall provide adequate notice, fair compensation, and housing and business relocation assistance when displacement of residents, households, businesses, or tenants occurs as part of their activities.</p>		

TABLE 2-1 (CONTINUED)
SUMMARY OF IMPACTS AND MITIGATION PROGRAM

Standard Conditions and Mitigation Measures	Responsible Party(ies)	Verification of Completion
SC 4.12.3 In accordance with the California Community Redevelopment Law, a redevelopment agency is required to provide temporary housing for displaced residents, households, and tenants and to develop replacement housing for redevelopment activities and projects that involve displacement.		
Section 4.13 Public Services		
SC 4.13-1 All development in the City shall comply with the California Fire Code and regulations in the Fire Department section (Article III, Chapter 1) of the Arcadia Municipal Code, which include standards for building construction that would reduce the creation of fire hazards and facilitate emergency response. Building plans are reviewed and structures inspected by the Arcadia Fire Department for compliance with applicable fire safety, emergency access, and fire flow standards in these codes and in order to identify additional development features that could reduce demand for fire protection services.		
SC 4.13-2 In compliance with Section 65995 of the California Government Code (SB 50), prior to approval of a development project, the property owner/developer shall pay applicable fees to the impacted school district(s). Under State law, payment of the developer fees provides full and complete mitigation of the project's impacts on school facilities.		
Section 4.14 Recreation		
SC 4.14-1 Future residential development shall comply with the City's Ordinance 2237, which requires new residential developments to pay applicable Park Facilities Impact Fees to fund the provision and/or expansion of parks and recreational facilities to serve new development.		
SC 4.14-2 Future residential development shall comply with Article IX, Chapter 2 of the Arcadia Municipal Code, which requires multi-family residential developments to provide on-site private and common open space areas. The open space and recreational facility requirements depend on the zoning of the project site and the size of development.		
Section 4.15 Transportation		
SC 4.15-1 In accordance with the City's Transportation Impact Fee Program, future development shall pay development impact fees to help fund intersection and roadway improvements in the City.		
SC 4.15-2 Future development shall improve perimeter and on-site roadways in accordance with the City's roadway standards under Article IX, Chapter 1, Parts 1 (Design of Streets) and 2 (Street Improvement Plans) of the Arcadia Municipal Code.		
SC 4.15-3 Future development shall provide internal circulation improvements in accordance with City standards for the location of traffic signs, minimum drive aisle widths, turning radii, sight distances/vision clearances, pedestrian walkways/crosswalks, and other features.		
SC 4.15-4 Future development shall include a Traffic Control Plan to be prepared and implemented in compliance with the California Manual for Uniform Traffic Control Devices (MUTCD) for all construction activities within public rights-of-way. If the project construction requires special measures outside the California MUTCD standards, the Traffic Control Plan shall be prepared, stamped, and signed by a registered Traffic Engineer. If the development is located on or near California Department of Transportation (Caltrans) right-of-way, the Property Owner/Developer shall provide a copy of the Traffic Control Plan to Caltrans for review and approval.		
SC 4.15-5 Construction work on public rights-of-way shall be performed in accordance with City regulations, including the Standard Specifications for Public Works Construction (Greenbook) and the MUTCD.		

TABLE 2-1 (CONTINUED)
SUMMARY OF IMPACTS AND MITIGATION PROGRAM

Standard Conditions and Mitigation Measures	Responsible Party(ies)	Verification of Completion
SC 4.15-6 New non-residential developments shall comply with City's Traffic Congestion Management regulations, which require non-residential development to provide transportation demand management and trip reduction measures, such as display/kiosk for transportation information, preferential parking space for carpool/vanpool vehicles, bike racks, loading/unloading zones, bus stop improvements, designated pathways, and convenient access for bicyclists.		
SC 4.15-7 Future development shall be subject to review and approval by the Arcadia Fire Department for the appropriate provision of adequate emergency access and evacuation routes.		
SC 4.15-8 Off-street parking shall be provided by new development, redevelopment, expansions, or with changes in occupancies in accordance with the parking requirements in the City's Zoning Regulations. The required parking spaces and other parking requirements shall be shown in site improvement plans submitted to the City during the permit process.		
SC 4.15-9 Future development in the City and other public projects shall comply with the CMP requirements for the preparation of Traffic Impact Analysis, which provides a consistent methodology for determining background traffic conditions, trip generation, and trip distribution; analyzing impacts; and identifying, evaluating, and implementing mitigation.		
Section 4.16 Utilities		
SC 4.16-1 All water, sewer, storm drain, and other utility infrastructure improvements within the City shall be conducted in compliance with the applicable regulations set forth in the Arcadia Municipal Code, which incorporates by reference applicable State regulations, including those that adopt the California Building Code, California Plumbing Code, California Electrical Code, and California Mechanical Code. Article IX, Chapter 1, Subdivision Code, sets forth standards for the review and approval of all development plans by the City Engineer and requires that the project applicant/developer provide utility facilities in accordance with the standards and specifications approved by the City Engineer.		
SC 4.16-2 The City of Arcadia shall require all future projects implemented pursuant to the 2010 General Plan Update that are subject to SB 610 and/or SB 221 to comply with all applicable requirements in order to demonstrate the availability of an adequate and reliable water supply.		
SC 4.16-3 All new construction and rehabilitated landscapes for public agency projects and private non-residential development projects of a qualifying size shall be subject to compliance with the Water Efficient Landscape Ordinance. In compliance with City regulations, development projects that fall into these categories shall implement water conservation measures in accordance with the standards for plant selection and grouping, water features standards, irrigation design and system requirements, and soil and grading requirements.		
SC 4.16-4 In compliance with the LACSD's Wastewater Ordinance, all wastewater discharges into LACSD facilities shall be required to comply with the discharges standards set forth to protect the public sewerage system. The LACSD Surcharge program requires all industrial companies discharging to the LACSD sewerage system to pay their fair share of the wastewater treatment and disposal costs, and the Connection Fee program requires all new users of the LACSD sewerage system, as well as existing users that significantly increase the quantity or strength of their wastewater discharge, to pay their fair share of the costs for providing additional conveyance, treatment, and disposal facilities.		
SC 4.16-5 All development projects in the City shall implement waste reduction, disposal, and recycling measures during construction and operation in accordance with the City's Source Reduction and Recycling Element (SRRE), prepared in compliance with the California Integrated Waste Management Act, as well as provide collection and loading areas for recyclables, as required under the City's Zoning Regulations.		

TABLE 2-1 (CONTINUED)
SUMMARY OF IMPACTS AND MITIGATION PROGRAM

Standard Conditions and Mitigation Measures	Responsible Party(ies)	Verification of Completion
SC 4.16-6 The City of Arcadia shall require all future projects implemented under the 2010 General Plan Update to comply with all State Energy Efficiency Standards and City Municipal Code requirements in effect at the time of application for building permits (Title 24). Title 24 covers the use of energy efficient building standards, including ventilation, insulation, and construction and the use of energy saving appliances, conditioning systems, water heating, and lighting, as well as the Title 24 Green Buildings Standards on planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental quality. Plans submitted for building permits shall include written notes demonstrating compliance with energy and green building standards and shall be reviewed and approved by the Planning Department prior to building permit issuance.		
MM 4.16-1 Prior to approval of development applications that could have an impact on existing water, sewer, or storm drain infrastructure capacities, as determined by the City Engineer, the project applicant/developer shall be required to determine project impacts on each system. If water, sewer, and/or storm drain infrastructure improvements are required in order to serve the proposed project, then appropriate mitigation shall be provided in the analysis and shall be incorporated into site development plans, subject to review and approval by the City Engineer. If infrastructure improvements outside the jurisdiction of the City of Arcadia are required, including improvements to trunk sewer lines owned by the Sanitation Districts of Los Angeles County, the needed improvements, or fair share payments in lieu of infrastructure improvements, shall be completed to the satisfaction of the appropriate jurisdictions.	The project engineer shall incorporate this MM into building plans, with the City Building Services monitoring compliance during the plan check process.	
Section 4.17 Greenhouse Gas Emissions		
MM 4.17-1 The City shall actively encourage the development and maintenance of mixed uses, particularly in the Mixed Use and Downtown Mixed Use areas, by maintaining a list of sites available for mixed use and infill development and making the list available to developers. The City shall establish developer incentives to encourage well-designed, mixed use and infill development projects in these areas.	Developers of individual projects would implement this MM, with the City Planning Services monitoring compliance during site plan review.	
MM 4.17-2 The City shall encourage future development and major renovation projects to achieve LEED certification, and/or other green certifications. The City shall investigate the potential to offer density bonus incentives on residential projects that achieve LEED certification, and other green certifications and ratings.	The City Planning Services shall implement this MM during the site plan review process for individual projects.	
MM 4.17-3 The City shall consider and evaluate the applicability of the policies contained in the California Attorney General's Sustainability and General Plans: Examples of Policies to Address Climate Change California Attorney General's Office 1/22/10 and the California Air Pollution Control Officers Association's (CAPCOA's) Model Policies for Greenhouse Gas Emissions in General Plans June 2009. Attachment B of the Air Quality Report (Appendix E of the Draft EIR) includes the referenced documents in their entirety.	The City Planning Services shall implement this MM, with the Development Services Director verifying compliance.	

SECTION 3.0 PUBLIC COMMENT LETTERS AND CITY RESPONSES

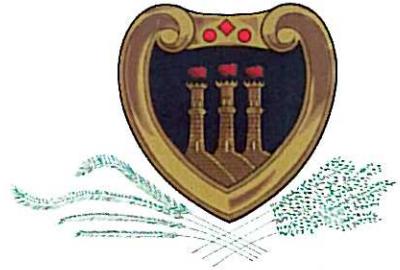
Letters commenting on the information and analysis in the Draft EIR were received from the following parties:

- City of San Marino, July 22, 2010
- Native American Heritage Commission, July 26, 2010
- County of Los Angeles Department of Parks and Recreation, July 28, 2010
- Metrolink, August 9, 2010
- Sanitation Districts of Los Angeles County, August 17, 2010
- California Board of Forestry and Fire Protection, August 19, 2010
- San Gabriel Valley Mosquito and Vector Control District, August 23, 2010
- Metropolitan Water District of Southern California, August 27, 2010
- Mr. Brian Chow, August 30, 2010
- Westfield, August 31, 2010
- State Clearinghouse, August 31, 2010
- City of Irwindale, September 1, 2010
- Los Angeles County Department of Public Works, September 1, 2010
- Los Angeles County Fire Department, September 13, 2010

Each letter listed above is included in this document in the order received, followed by the City's response to each comment. Each comment letter has been divided into sequential numbered comments (e.g., 1, 2, 3) where necessary, as shown on the enclosed letters. Each numbered comment corresponds to a matching numbered response provided after the comment letter.

City of San Marino

Planning & Building Department



July 22, 2010

RECEIVED

Lisa L. Flores, Senior Planner
Development Services Department
240 W. Huntington Drive
P.O. Box 60021
Arcadia, CA 91066

JUL 27 2010

PLANNING
SERVICES

**SUBJECT: RESPONSE TO THE CITY OF ARCADIA DRAFT GENERAL PLAN AND
DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT FOR THE
ARCADIA GENERAL PLAN UPDATE**

Dear Ms. Flores:

Thank you for the opportunity to review and comment on the Draft General Plan and Draft Program Environmental Impact Report for the Arcadia General Plan Update. The City of San Marino feels that the proposed increase in residential density and anticipated commercial growth have the potential to increase traffic flow on Huntington Drive and Duarte Road. Specifically, the City is concerned about the intersections of San Gabriel Boulevard and Huntington Drive; San Marino Avenue and Huntington Drive; and Duarte Road and San Gabriel Boulevard. If future traffic studies reveal that traffic is anticipated to increase at these intersections, both vehicular and pedestrian safety improvements should be implemented in order to mitigate such impacts.

Please feel free to contact me should you have any questions or need additional information.

Sincerely,

DAVID A. SALDANA, AICP
Director, Planning and Building Department

cc: Dennis Kneier, Mayor
Dr. Allan Yung, MD, Vice Mayor
Eugene Sun, Council Member
Dr. Richard Sun, DDS, Council Member
Richard Ward, Council Member
Matt Ballantyne, City Manager

CITY OF SAN MARINO

Letter dated July 22, 2010

SM-1 The Draft EIR includes arterial segment analyses rather than intersection analyses because land use types and design details are not known in sufficient detail to provide a meaningful intersection level of service analysis (see discussion on page 4.15-2 of Section 4.15, Transportation, in the Draft EIR). As stated in SC 4.15-9 of the Draft EIR, future development in the City of Arcadia shall comply with Los Angeles County Congestion Management Program (CMP) requirements for the preparation of a Traffic Impact Analysis, including the evaluation of intersection operations in and near the City of San Marino and identification of required vehicular and pedestrian safety improvements to maintain acceptable levels of service and promote public safety. If and when these studies identify significant traffic impacts, potential mitigation measures and implementation methods will be evaluated and identified as appropriate at that time. Goals, policies, and implementation actions in the 2010 Arcadia General Plan Update that would help create an efficient roadway system, promote the use of alternative transportation, enhance transit services, and encourage the use of bicycle and pedestrian networks through increased pedestrian safety are identified in Section 4.15, Transportation, of the Draft EIR. The City of San Marino will continue to be informed of projects and traffic studies that may affect intersections in and near the City of San Marino. No changes to the Draft EIR are required.

NATIVE AMERICAN HERITAGE COMMISSION

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July 26, 2010

RECEIVED

JUL 29 2010

Ms. Lisa Flores, Senior Planner

CITY OF ARCADIA

240 West Huntington Drive
Arcadia, CA 91007

PLANNING
SERVICES

Re: SCH#2009081034; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the "Arcadia General Plan Update," located in the City of Arcadia; Los Angeles County, California.

Dear Ms. Flores:

The Native American Heritage Commission (NAHC) is the state 'trustee agency' pursuant to Public Resources Code §21070 for the protection and preservation of California's Native American Cultural Resources.. (Also see *Environmental Protection Information Center v. Johnson* (1985) 170 Cal App. 3rd 604). The California Environmental Quality Act (CEQA - CA Public Resources Code §21000-21177, amended in 2009) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per the California Code of Regulations §15064.5(b)(c)(f) CEQA guidelines). Section 15382 of the CEQA Guidelines defines a significant impact on the environment as "a substantial, or potentially substantial, adverse change in any of physical conditions within an area affected by the proposed project, including ... objects of historic or aesthetic significance." In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE), and if so, to mitigate that effect. To adequately assess the project-related impacts on historical resources, the Commission recommends the following.

The Native American Heritage Commission did perform a Sacred Lands File (SLF) search in the NAHC SLF Inventory, established by the Legislature pursuant to Public Resources Code §5097.94(a) and Native American Cultural resources were not identified within the APE identified for the project. However, there are Native American cultural resources in close proximity to the APE. Early consultation with Native American tribes in your area is the best way to avoid unanticipated discoveries once a project is underway. Enclosed are the names of the nearest tribes and interested Native American individuals that the NAHC recommends as 'consulting parties,' for this purpose, that may have knowledge of the religious and cultural significance of the historic properties in the project area (e.g. APE). We recommend that you contact persons on the attached list of Native American contacts. A Native American Tribe or Tribal Elder may be the only source of information about a cultural resource.. Also, the NAHC recommends that a Native American Monitor or Native American culturally knowledgeable person be employed whenever a professional archaeologist is employed during the 'Initial Study' and in other phases of the environmental planning processes.. Furthermore we suggest that you contact the California Historic Resources Information System (CHRIS) at the Office of Historic Preservation (OHP) Coordinator's office (at (916) 653-7278, for referral to the nearest OHP Information Center of which there are 11.

Consultation with tribes and interested Native American tribes and interested Native American individuals, as consulting parties, on the NAHC list, should be conducted in compliance with the requirements of federal NEPA (42 U.S.C. 4321-43351) and Section 106 and 4(f) of federal NHPA (16 U.S.C. 470 [f]et seq.), 36 CFR Part 800.3, the President's Council on Environmental Quality (CSQ; 42 U.S.C. 4371 et seq.) and NAGPRA (25 U.S.C. 3001-3013), as appropriate. The 1992 *Secretary of the Interior's Standards for the Treatment of Historic Properties* were revised so that they could be applied to all historic resource types included in the National Register of Historic Places and including *cultural landscapes*.

Lead agencies should consider avoidance, as defined in Section 15370 of the California Environmental Quality Act (CEQA) when significant cultural resources could be affected by a project. Also, Public Resources Code Section 5097.98 and Health & Safety Code Section 7050.5 provide for provisions for accidentally discovered archeological resources during construction and mandate the processes to be followed in the event of an accidental discovery of any human remains in a project location other than a 'dedicated cemetery. Discussion of these should be included in your environmental documents, as appropriate.

The authority for the SLF record search of the NAHC Sacred Lands Inventory, established by the California Legislature, is California Public Resources Code §5097.94(a) and is exempt from the CA Public Records Act (c.f. California Government Code §6254.10). The results of the SLF search are confidential. However, Native Americans on the attached contact list are not prohibited from and may wish to reveal the nature of identified cultural resources/historic properties. Confidentiality of 'historic properties of religious and cultural significance' may also be protected under Section 304 of the NHPA or at the Secretary of the Interior's discretion if not eligible for listing on the National Register of Historic Places. The Secretary may also be advised by the federal Indian Religious Freedom Act (cf. 42 U.S.C. 1996) in issuing a decision on whether or not to disclose items of religious and/or cultural significance identified in or near the APE and possibly threatened by proposed project activity.

CEQA Guidelines, Section 15064.5(d) requires the lead agency to work with the Native Americans identified by this Commission if the initial Study identifies the presence or likely presence of Native American human remains within the APE. CEQA Guidelines provide for agreements with Native American, identified by the NAHC, to assure the appropriate and dignified treatment of Native American human remains and any associated grave liens. Although tribal consultation under the California Environmental Quality Act (CEQA; CA Public Resources Code Section 21000 – 21177) is 'advisory' rather than mandated, the NAHC does request 'lead agencies' to work with tribes and interested Native American individuals as 'consulting parties,' on the list provided by the NAHC in order that cultural resources will be protected. However, the 2006 SB 1059 the state enabling legislation to the Federal Energy Policy Act of 2005, does mandate tribal consultation for the 'electric transmission corridors. This is codified in the California Public Resources Code, Chapter 4.3, and §25330 to Division 15, requires consultation with California Native American tribes, and identifies both federally recognized and non-federally recognized on a list maintained by the NAHC

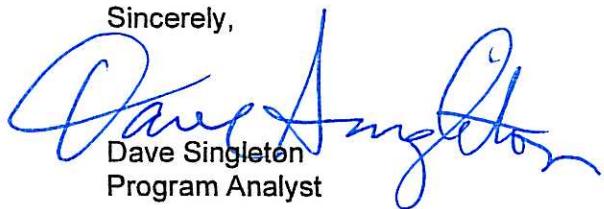
Health and Safety Code §7050.5, Public Resources Code §5097.98 and Sec. §15064.5 (d) of the California Code of Regulations (CEQA Guidelines) mandate procedures to be followed, including that construction or excavation be stopped in the event of an accidental discovery of

any human remains in a location other than a dedicated cemetery until the county coroner or medical examiner can determine whether the remains are those of a Native American. . Note that §7052 of the Health & Safety Code states that disturbance of Native American cemeteries is a felony.

Again, Lead agencies should consider avoidance, as defined in §15370 of the California Code of Regulations (CEQA Guidelines), when significant cultural resources are discovered during the course of project planning and implementation. Consultation with the **tribal governments**, shown on the attached list will comply also with California Government Code Section 65352.3 (SB 18).

Please feel free to contact me at (916) 653-6251 if you have any questions.

Sincerely,



Dave Singleton
Program Analyst

Attachment: List of Native American Contacts

Cc: State Clearinghouse

Native American Contacts
Los Angeles County
July 26 2010

LA City/County Native American Indian Comm
Ron Andrade, Director
3175 West 6th Street, Rm.
Los Angeles , CA 90020
randrade@css.lacounty.gov
(213) 351-5324
(213) 386-3995 FAX

Ti'At Society
Cindi Alvitre
6515 E. Seaside Walk, #C
Long Beach , CA 90803
calvitre@yahoo.com
(714) 504-2468 Cell

Tongva Ancestral Territorial Tribal Nation
John Tommy Rosas, Tribal Admin.
tattnlaw@gmail.com
310-570-6567

Gabrieleno/Tongva San Gabriel Band of Mission
Anthony Morales, Chairperson
PO Box 693
San Gabriel , CA 91778
(626) 286-1262 -FAX
(626) 286-1632
(626) 286-1758 - Home
(626) 286-1262 Fax

Gabrielino Tongva Nation
Sam Dunlap, Chairperson
P.O. Box 86908
Los Angeles , CA 90086
samdunlap@earthlink.net

(909) 262-9351 - cell

Gabrielino Tongva

Gabrielino Tongva Indians of California Tribal Council
Robert F. Doramae, Tribal Chair/Cultural
P.O. Box 490
Bellflower , CA 90707
gtongva@verizon.net
562-761-6417 - voice
562-925-7989 - fax

Gabrielino Tongva

Gabrielino-Tongva Tribe
Bernie Acuna
1875 Century Pk East #1500 Gabrielino
Los Angeles , CA 90067
(310) 587-2203
(310) 428-7720 - cell
(310) 587-2281

Shoshoneon Gabrieleno Band of Mission Indians
Andy Salas, Chairperson
PO Box 393
Covina , CA 91723
gabrielenoindians@yahoo.
626-926-4131
(213) 688-0181 - FAX

Gabrieleno

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code. Also, federal National Environmental Policy Act (NEPA), National Historic Preservation Act, Section 106 and federal NAGPRA. And 36 CFR Part 800.3.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2009081034; CEQA Notice of Completion; draft Environmental Impact Report (DIER) for the City of Arcadia 2010 General Plan Update; Los Angeles County, California.

Native American Contacts
Los Angeles County
July 26 2010

Gabrielino-Tongva Tribe
Linda Candelaria, Chairwoman

1875 Century Park East, Suite 1500
Los Angeles , CA 90067 Gabrielino
(310) 587-2203

310-428-5767- cell
(310) 587-2281

lcandelaria1@gabrielinoTribe.org

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code. Also, federal National Environmental Policy Act (NEPA), National Historic Preservation Act, Section 106 and federal NAGPRA. And 36 CFR Part 800.3.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2009081034; CEQA Notice of Completion; draft Environmental Impact Report (DIER) for the City of Arcadia 2010 General Plan Update; Los Angeles County, California.

NATIVE AMERICAN HERITAGE COMMISSION

July 26, 2010

NAHC-1 The City of Arcadia initiated government-to-government consultation in April 2008 and October 2009 with Native American Heritage Commission (NAHC)-identified California Native American tribes in order to identify, protect, and/or mitigate potential impacts to cultural places/resources. This consultation was conducted in accordance with Senate Bill (SB) 18 (*California Government Code §65352.3*). No responses from these tribes have been received as of September 2010. In addition, no specific development projects are planned at this time.

NAHC-2 As stated in MM 4.5-2 on page 4.5-21 of the Draft EIR, a qualified archaeologist shall be consulted if a significant archaeological resource is discovered through the cultural resources evaluation process on a project site. The qualified archaeologist on the project will be responsible for contacting a “Native American Monitor or Native American culturally knowledgeable person” when deemed appropriate based on the potential for Native American resources to be found onsite. No changes to the Draft EIR are required.

NAHC-3 As stated on page 4.5-1 of the Draft EIR, an archaeological/historical resources records search for the City and surrounding 1-mile radius was completed at the South Central Coastal Information Center (SCCIC) at the California State University, Fullerton, which is the designated repository of the California Historical Resources Information Systems (CHRIS) in Los Angeles County. Additionally, as required in SC 4.5-1 on page 4.5-15 of the Draft Program EIR, all qualifying development projects in the City would be subject to compliance with CEQA requirements as they relate to cultural resources and subject to identification and assessment of historic, archaeological, and paleontological resources. As such, future development would also be subject to records searches for known archaeological and constructed resources, including data from other studies conducted within the City and the surrounding areas. No changes to the Draft EIR are required.

NAHC-4 Please see response NAHC-1 above. Additionally, MM 4.5-1 on page 4.5-21 of the Draft EIR calls for avoidance and/or preservation in compliance with the Secretary of the Interior’s Standards for the Treatment of Historic Properties to reduce impacts to sensitive historical resources in the City. No changes to the Draft EIR are required.

NAHC-5 As required in SC 4.5-1 on page 4.5-15 of the Draft Program EIR, all qualifying development projects in the City would be subject to compliance with CEQA requirements as they relate to cultural resources and subject to identification and assessment of historic, archaeological, and paleontological resources. As such, future development would also be subject to records searches for known archaeological and constructed resources, including data from other studies conducted within the City and the surrounding areas. Section 15370 of the CEQA Guidelines requires consideration of avoidance measures as a preferred method of reducing environmental impacts, if feasible. Additionally, SC 4.5-2 on page 4.5-15 of the Draft EIR outlines existing regulations in the event of the discovery of human remains. No changes to the Draft EIR are required.

NAHC-6 Please see response NAHC-1 above.

NAHC-7 SC 4.5-2 on page 4.5-15 of the Draft EIR outlines existing regulations in the event of the discovery of human remains. No changes to the Draft EIR are required.

NAHC-8 Please see responses NAHC-2, -4, and -5.



COUNTY OF LOS ANGELES
DEPARTMENT OF PARKS AND RECREATION
"Creating Community Through People, Parks and Programs"
Russ Guiney, Director

August 30, 2010

Sent via email: lflores@ci.arcadia.ca.us

Ms. Lisa Flores
Senior Planner
City of Arcadia
240 W. Huntington Drive
P.O. Box 60021
Arcadia, CA 91066-2021

RECEIVED

AUG 31 2010

PLANNING
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Dear Ms. Flores:

**DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT (EIR) FOR THE
ARCADIA GENERAL PLAN UPDATE
STATE CLEARINGHOUSE NO. 2009081034**

The Draft EIR for the Arcadia General Plan Update has been reviewed for potential impact on the facilities of this Department for which we offer the following comments:

Page 4.14-3, Existing Conditions:
City Recreational Facilities

Approximately 550.439 acres are located within parks and recreational facilities owned and operated by the Los Angeles County Department of Parks and Recreation.

Page 4.14-5, Table 4.14-1: City Parks and Recreational Facilities

Please update the table as follows:

County Parks and Facilities	Size (acres)
Los Angeles County Arboretum & Botanical Garden	119.4 127
Arcadia Community Regional Park	181.70 52
Peck Road Water Conservation Park	119.97 120
Santa Anita Golf Course	129.68 147
Total County Parks and Facilities	550.75- 439

Page 4.14-7, Policy PR-1.11:

We will be glad to coordinate with the City of Arcadia to preserve the County regional trails that may be outside the City's jurisdiction. Please contact Mr. Frank Moreno, Section Head, Trails & Planning Research at (213) 351-5136 or fmoreno@parks.lacounty.gov for any trail related inquiries.

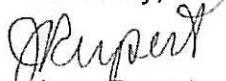
Ms. Lisa Flores, Senior Planner
August 30, 2010
Page 2

Page 4.14-8, Policy PR-2.1:

We will be glad to coordinate with the City of Arcadia to ensure the preservation and maintenance of the Peck Road Water Conservation Park as a multi-use facility, including recreation uses. Please contact Mr. Chris Graham, Superintendent, Peck Road Water Conservation Park at (626) 812-6377 or cgraham@parks.lacounty.gov for any Peck Park related inquiries.

Thank you for including this Department in the review of this process. If we may be of further assistance, please contact Ms. Julie Yom at (213) 351-5127 or jyom@parks.lacounty.gov.

Sincerely,



Joan Rupert
Section Head
Environmental & Regulatory Permitting Section

JR:JY:tl/s/response to City of Arcadia DEIR for the General Plan Update

c: Parks and Recreation (N. E. Garcia, L. Hensley, F. Moreno, C. Graham, J. Yom)

COUNTY OF LOS ANGELES DEPARTMENT OF PARKS AND RECREATION

August 30, 2010

DPR-1 Revised acreages for County Parks and Facilities have been provided for the draft General Plan and the Draft EIR. The City will revise the text of the General Plan accordingly. To be consistent with the Parks, Recreation, and Community Resources Element of the draft General Plan, the acreages for County parks and facilities on page 4.14-3 of the Draft EIR and in Table 4.14-1 on page 4.14-5 of the Draft EIR, will also be revised, as listed in Section 4.0, Errata, of this document. The change in acreage does not affect the analysis in the Draft EIR since the County parks and facilities were not used in the discussion of parkland ratio. No change to the analysis or conclusions in the Draft EIR is necessary. *Note: The Los Angeles County Department of Parks and Recreation comment letter provides an incorrect total of 439 acres; the 4 park facilities added together total 446 acres.*

DPR-2 The County's willingness to coordinate with the City of Arcadia on the preservation of regional trails and County parks in the City is noted and would complement the City's efforts to retain existing recreational facilities and resources.



Southern California Regional Rail Authority

August 9, 2010

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AUG 11 2010

PLANNING
SERVICES

Ms. Lisa Flores
Senior Planner
City of Arcadia
240 W. Huntington Drive
Arcadia, CA 91007

RE: **Draft Environmental Impact Report (DEIR) for Arcadia General Plan Update July 2010**

Dear Ms. Flores:

The Southern California Regional Rail Authority (SCRRA) has received the Draft Environmental Impact Report (DEIR) for the City of Arcadia General Plan Update released July 2010. Thank you for the opportunity to comment on key issues relative to Metrolink and operations of the railroad adjacent to the project site.

As background information, SCRRA is a five-county Joint Powers Authority (JPA) that operates the regional commuter rail system known as Metrolink on member agency-owned and on private freight railroad rights of way. The JPA consists of the Orange County Transportation Authority (OCTA), Los Angeles County Metropolitan Transportation Authority (MTA), San Bernardino Associated Governments (SANBAG), Riverside County Transportation Commission (RCTC) and Ventura County Transportation Commission (VCTC).

The Metrolink rail line that is within the City of Arcadia is the Pasadena Subdivision. SCRRA is currently in the process of transferring maintenance and dispatching obligation for the Pasadena Subdivision from the SCRRA to the Metro Gold Line Construction Authority (Authority). The Authority is in the process of using this rail line to extend the Gold Line from Pasadena to Azusa and has started the planning and design phases. Therefore, SCRRA will defer the review of this DEIR to Authority.

If you have any questions regarding these comments please contact Kim Chan at 213-452-0253 or chank@scrra.net

Sincerely,

Kim Chan
Rail Corridor Crossing Engineer

cc: Christopher Burner, Gold Line Construction Authority
Naresh Patel, SCRRA

METROLINK

August 9, 2010

Metro-1 The Metro Gold Line Construction Authority's plans for the extension of the Gold Line through the City of Arcadia, with a new station west of First Avenue and Santa Clara Street, have been acknowledged in the proposed Arcadia General Plan Update and discussed in Section 4.15, Transportation, of the Draft EIR. The Notice of Preparation of an EIR and the Notice of Availability of the Draft EIR were provided to the Metro Gold Line Construction Authority and no comment has been received.



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
www.lacsd.org

STEPHEN R. MAGUIN
Chief Engineer and General Manager

August 17, 2010

File No: 15-00.04-00
22-00.04-00

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AUG 18 2010

PLANNING
SERVICES

Ms. Lisa Flores, Senior Planner
Development Services Department
City of Arcadia
240 W. Huntington Drive
P.O. Box 60021
Arcadia, CA 91066-6021

Dear Ms. Flores:

Arcadia General Plan Update

The County Sanitation Districts of Los Angeles County (Districts) received a Draft Environmental Impact Report for the subject project on July 15, 2010. The proposed development is located within the jurisdictional boundaries of Districts Nos. 15 and 22. We offer the following comments regarding sewerage service:

1. Previous comments submitted by the Districts in correspondence dated December 16, 2009 (copy enclosed), to Ms. Josephine Alido of BonTerra Consulting, still apply to the subject project with the following updated information.
2. The San Jose Creek Water Reclamation Plant (WRP) currently processes an average flow of 75.6 mgd, the Los Coyotes Water Reclamation Plant currently processes an average flow of 25.3 mgd, and the Whittier Narrows WRP currently processes an average flow of 4.7 mgd.
3. All information concerning Districts' facilities and sewerage service contained in the document is current.

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

Very truly yours,

Stephen R. Maguin

Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR:ar

Enclosure

SANITATION DISTRICTS OF LOS ANGELES COUNTY

August 17, 2010

CSD-1 The Draft EIR incorporates the information provided in the December 16, 2009 letter on page 4.16-13 of the Draft EIR.

CSD-2 The decrease in the average volumes of wastewater treated at the water reclamation plants serving the City will be noted on page 4.16-13 of the Draft EIR. These changes would affect the discussion of total remaining treatment plant capacities on page 4.16-31 and thus, would be revised accordingly. These changes are listed in Section 4.0, Errata, of this document. They will reduce the proportional demand for wastewater treatment from future development in the City and its Sphere of Influence but will not affect wastewater generation or impacts on the Districts' facilities. No change to the analysis or conclusions in the Draft EIR is necessary.

BOARD OF FORESTRY AND FIRE PROTECTION

P.O. Box 944246
SACRAMENTO, CA 94244-2460
(916) 653-8007
(916) 653-0989 FAX
Website: <http://www.bof.fire.ca.gov/>



August 19, 2010

Ms. Lisa L. Flores
Senior Planner,
City of Arcadia Planning Division
240 W. Huntington Dr.
Arcadia, CA 91066-6021

Re: General Plan Fire Safety Element Recommendations for the City of Arcadia

Dear Ms. Flores:

The State Board of Forestry and Fire Protection (Board) is required to review and provide recommendations to the safety element of county and local government general plans when such plans are being updated. This review is in accordance with Government Code (GC) §65302.5 which requires the Board to review the fire safety element when the general plan update contains State Responsibility Areas or Very High Fire Hazard Severity Zones.

Enclosed is a list of standard recommendations titled “*General Plan Fire Safety Elements Standard Recommendations*” which should be incorporated into the General Plan. Each entity should evaluate their general plan and include the appropriate recommendations from the list.

Please note requirements for response pursuant to GC §65302.5(b). Thank you for the opportunity to participate in your planning process. We hope this input leads to greater protection and reduced cost and losses from wildfires in your jurisdiction.

Sincerely,

A handwritten signature in blue ink that reads "Stan Dixon".

Stan Dixon
Chair, State Board of Forestry and Fire Protection

General Plan Fire Safety Element

Standard Recommendations

January 26, 2010

State Board of Forestry and Fire Protection



Contents

Purpose and Background

Methodology for Review and Recommendations

Standard List of Recommendations

Purpose and Background: The State Board of Forestry and Fire Protection (BOF/Board) is required to review and make recommendations to the fire safety element of general plan updates in accordance with Government Code (GC) §65302.5. The review and recommendations apply to those general plans with State Responsibility Area (SRA) (Public Resources Code 4125) or Very High Fire Hazard Severity Zones (VHFHSZ) (GC 51175).

The statutory requirements for the Board review and recommendations pursuant to GC 65302.5 (a)(1) and (2), and (b) are as follows:

- *“The draft elements...to the fire safety element of a county’s or a city’s general plan...shall be submitted to the Board at least 90 days prior to... the adoption or amendment to the safety element of its general plan [for each county or city with SRA or VHFHSZ].”*
- *“The Board shall... review the draft or an existing safety element and report its written recommendations to the planning agency within 60 days of its receipt of the draft or existing safety element....”*
- *“Prior to adoption of the draft element..., the Board of Supervisors... shall consider the recommendations made by the Board... If the Board of Supervisors...determines not to accept all or some of the recommendations...,” the Board of Supervisors... shall communicate in writing to the Board its reasons for not accepting the recommendations.*

Methodology for Review and Recommendations: The Board established a standardized method to review the safety element of general plans. The methodology includes 1) examining the general plan for inclusion of factors that are important for mitigation of fire hazard and risks, and 2) making recommendations related to these factors. The evaluation factors and recommendations were developed using CAL FIRE technical documents and input from local fire departments.

Enclosed are the entire set of recommendations suggested by the Board’s for any entity. Each entity should evaluate their general plan using the factors and include the appropriate recommendations from the list as part of the general plan.

Standard List of General Plan Safety Element Recommendations

1.0 Wildfire Protection Planning

1.1 General Plan References and Incorporates County or Unit Fire Plan: Yes Partial No

Recommendation: Identify, reference or create (if necessary) a fire plan for the geographic scope of the General Plan. General Plan (GP) should incorporate the general concepts and standards from any county fire plan, fire protection agency (federal or state) fire plan, and local hazard mitigation plan.

Recommendation: Ensure fire plans incorporated by reference into the GP contain evaluations of fire hazards, assessment of assets at risk, prioritization of hazard mitigation actions, and implementation and monitoring components.

2.0 Land Use Planning:

2.1 Goals and policies include mitigation of fire hazard for future development. Yes Partial No

Recommendation: Establish goals and policies for specific ordinances addressing evacuation and emergency vehicle access; water supplies and fire flow; fuel modification for defensible space; and home addressing and signing.

Recommendation: Develop fire safe development codes used as standards for fire protection for new development in State Responsibility Area (SRA) within the entity's jurisdiction that meet or exceed statewide standards in 14 California Code of Regulations Section 1270 et seq.

Recommendation: Adopt, and have certified by the BOF, local fire safe ordinances which meet or exceed standards in 14 CCR § 1270 for State Responsibility Area.

2.2 Disclosure of wildland urban interface hazards including Fire Hazard Severity Zones designations and Communities at Risk designations: Yes Partial No

Recommendation: Specify whether the entity has a Very High Fire Hazard Severity Zones (VHFHSZ) designation pursuant GC 51175 and include a map of the zones that clearly indicates any area designated VHFHSZ.

Recommendation: Adopt CAL FIRE recommended Fire Hazard Severity Zones including model ordinances developed by the Office of the State Fire Marshal for establishing VHFHSZ areas.

Recommendation: Identify and disclose information on communities listed as "Communities at Risk".

3.0 Housing/structures and neighborhoods:

3.1 Incorporation of current fire safe building codes. Yes Partial No

Recommendation: Adopt building codes for new development in State Responsibility Areas or incorporated areas with VHFHSZ that are established by the Office of the State Fire Marshal in Title 19 and Title 24 CCR, referred to as the “Wildland Urban Interface Building Codes”.

3.2 Identification and actions for substandard fire safe housing and neighborhoods relative to fire hazard area. Yes Partial No

Recommendation: Identify and map existing housing structures that do not conform to contemporary fire standards in terms of building materials, perimeter access, and vegetative hazards in VHFHSZ or SRA by fire hazard zone designation.

Recommendation: Identify plans and actions to improve substandard housing structures and neighborhoods. Plans and actions should include structural rehabilitation, occupancy reduction, demolition, reconstruction, neighborhood –wide fuels hazard reduction projects, community education, and other community based solutions.

Recommendation: Identify plans and actions for existing residential structures and neighborhoods, and particularly substandard residential structures and neighborhoods, to be improved to meet current fire safe ordinances pertaining to access, water flow, signing, and vegetation clearing.

3.3 Consideration of occupancy category effects on wildfire protection. Yes Partial No

Recommendation: Ensure risks to uniquely occupied structures, such as seasonally occupied homes, multiple dwelling structures, or other structures with unique occupancy characteristics, are considered for appropriate and unique wildfire protection needs.

3.4 Fire engineering features for structures in VHFHSZ. Yes Partial No

Recommendation: Ensure new development proposals contain specific fire protection plans, actions, and codes for fire engineering features for structures in VHFHSZ. Examples include codes requiring automatic sprinklers in VHFHSZ.

4.0 Conservation and Open Space:

4.1 Identification of critical natural resource values relative to fire hazard areas.

Yes Partial No

Recommendation: Identify critical natural resources and other “open space” values within the geographic scope of the GP. Determine maximum acceptable wildfire size, fire prevention plans, emergency response plans and initial attack suppression success rates for protection of these areas and values.

4.2 Inclusion of resource management activities to enhance protection of open space and natural resource values. Yes Partial No

Recommendation: Develop plans and action for vegetation management that provides fire damage mitigation and protection of open space values. Plans should address protection of natural resource financial values, establishment of fire resilient natural resources, protection of watershed qualities, and protection of endangered species habitats. Actions should consider prescribed burning, fuel breaks, vegetation thinning and removal

Recommendation: Establish goals and policies for reducing the wildland fire hazards within the entity’s boundaries and on adjacent private wildlands, federal lands, vacant residential lots, and greenbelts with fire hazards that threaten the entity’s jurisdiction.

4.3 Mitigation for unique pest, disease and other forest health issues leading to hazardous situations. Yes Partial No

Recommendation: Establish goals and policies that address unique pest, disease, exotic species and other forest health issues in open space areas for purposes of reducing fire hazard and supporting ecological integrity.

4.4 Integration of open space into fire safety effectiveness. Yes Partial No

Recommendation: Establish goals and policies for incorporating systematic fire protection improvements for open space. Specifics policies should address facilitation of safe fire suppression tactics, standards for adequate access for firefighting, fire mitigation planning with agencies/private landowners managing open space adjacent to the GP area, water sources for fire suppression, and other fire prevention and suppression needs.

4.5 Urban forestry plans relative to fire protection: Yes Partial No

Recommendation: Ensure residential areas have appropriate fire resistant landscapes and discontinuous vegetation adjacent to open space or wildland areas.

Recommendation: Evaluate and resolve existing laws and local ordinances which conflict with fire protection requirements. Examples include conflicts with vegetation hazard reduction ordinances and listed species habitat protection requirements.

5. Circulation and Access:

5.1 Adequacy of existing and future transportation system to incorporate fire infrastructure elements. Yes Partial No

Recommendation: Establish goals and policies for proposed and existing transportation systems to facilitate fire infrastructure elements such as turnouts, helispots and safety zones.

5.2 Adequate access to high hazard wildland/open space areas. Yes Partial No

Recommendation: Establish goals and policies for high or very high fire hazard hazard zones adequate access that meets or exceeds standards in 14 CCR 1270 for lands with no structures, and maintain conditions of access in a suitable fashion for suppression access or public evacuation.

5.3 Standards for evacuation of residential areas in high hazard areas. Yes Partial No

Recommendation: Goals and policies should be established to delineate residential evacuation routes and evacuation plans in high or very high fire hazard residential areas.

6. Defensible Space

6.1 Geographic specific fire risk reduction mitigation measures using fuel modification.
 Yes Partial No

Recommendation: Include policies and recommendations that incorporate fire safe buffers and greenbelts as part of the development planning. Ensure that land uses designated near high or very fire hazard severity zones are compatible with wildland fire protection strategies/capabilities.

6.2 Fuel Modification around homes. Yes Partial No

Recommendation: Establish ordinances in SRA or VHFHSZ for vegetation fire hazard reduction around structures that meet or exceed the Board of Forestry and Fire Protection's Defensible Space Guidelines, (http://www.bof.fire.ca.gov/pdfs/Copyof4291finalguidelines9_29_06.pdf) for SRA.

6.3 Fire suppression defense zones. Yes Partial No

Recommendation: Establish goals and policies that create wildfire defense zones for emergency services including fuel breaks, back fire areas, or other staging areas that support safe fire suppression activities.

Recommendation: Establish goals and policies that identify structures (or other critical/valuable assets) that have adequate fuel modification or other fire safe features that provide adequate fire

fighter safety when tactics call for protection of a specific asset (i.e. which houses are safe to protect).

7.0 Emergency Services:

7.1 Map/description of existing emergency service facilities and areas lacking services:

Yes Partial No

Recommendation: Include descriptions of emergency services including available equipment, personnel, and maps of facilities.

Recommendation: Initiate studies and analyses to identify appropriate staffing levels and equipment needs commensurate with the current and projected emergency response environment.

7.2 Assessment and projection of future emergency service needs: Yes Partial No

Recommendation: Ensure new development includes appropriate facilities, equipment, personnel and capacity to assist and support wildfire suppression emergency service needs. Future emergency service needs should be:

- Established consistent with state or national standards.
- develop based on criteria for determining suppression resource allocation that includes elements such as identified values and assets at risk, ignition density, vegetation type and condition, as well as local weather and topography.
- Local Agency Formation municipal services reviews for evaluating level of service, response times, equipments condition levels and other relevant emergency service information.

7.3 Adequacy of training. Yes Partial No

Recommendation: Establish goals and policies for emergency service training that meets or exceeds state or national standards.

7.4 Inter-fire service coordination preparedness/mutual aid and multi-jurisdictional fire service agreements. Yes Partial No

Recommendation: Adopt the Standardized Emergency Management Systems for responding to large scale disasters requiring a multi-agency response. Ensure and review mutual aid/automatic aid and other cooperative agreements with adjoining emergency service providers.

8.0 Post Fire Safety, Recovery and Maintenance: The post fire recommendations address an opportunity for the community and landowners to re-evaluate land uses and practices that affect future wildfire hazards and risk. They also provide for immediate post-fire life and safety considerations to mitigate potential losses to life, human assets and critical natural resources.

8.1 Reevaluate hazard conditions and provide for future fire safe conditions Yes Partial No

Recommendation: Incorporate goals and policies that provide for reassessment of fire hazards following wildfire events. Adjust fire prevention and suppression needs commensurate for both short and long term fire protection needs.

8.2 **Recommendation:** Develop burn area recovery plans that incorporate strategic fire safe measures developed during the fire suppression, such as access roads, fire lines, safety zones, and fuelbreaks, and helispots.

8.3 Restore sustainable landscapes and restore functioning ecosystems. Yes Partial No

Recommendation: Develop burn area recovery plans, evaluation processes and implementation actions that encourage tree and biomass salvage, reforestation activities, create resilient and sustainable landscapes, and restore functioning ecosystems.

8.4 Incorporate wildlife habitat/endangered species considerations Yes Partial No

Recommendation: Establish goals and policies for consideration of wildlife habitat//endangered species into long term fire area recovery and protection plans, including environmental protection agreements such as natural community conservation plans.

8.5 Native species reintroduction. Yes Partial No

Recommendation: Incorporate native species habitat needs as part of long term fire protection and fire restoration plans.

8.6 Evaluation of redevelopment. Yes Partial No

Recommendation: In High and Very hazardous areas, ensure redevelopment utilizes state of the art fire resistant building and development standards to improve past 'substandard' fire safe conditions.

8.7 Long term maintenance of fire hazard reduction mitigation projects Yes Partial No

Recommendation: Provide policies and goals for maintenance of the post-fire-recovery projects, activities, or infrastructure.

8.8 Post fire life and safety assessments Yes Partial No

Recommendation: Develop frameworks for rapid post-fire assessment and project implementation to minimize flooding, protect water quality, limit sediment flows and reduce other risks on all land ownerships impacted by wildland fire.

Recommendation: Identity flood and landslide vulnerability areas related to post wildfire conditions.

Recommendation: Establish goals and policies that address the intersection of flood /landslide/post fire burn areas into long term public safety protection plans. These should include treatment assessment of fire related flood risk to life, methods to control storm runoff in burn areas, revegetation of burn areas, and drainage crossing debris maintenance.

Recommendation: Encourage rapid post-fire assessment, as appropriate, and project implementation to minimize flooding, protect water quality, limit sediment flows and reduce other risks on all land ownerships impacted by wildland fire.

9. Terrorist and homeland security impacts on wildfire protection

These recommendations are included to address fire protection needs related to terrorist acts or other homeland security preparedness and response actions. Both preparedness and incident response can adversely impact fire protection. Adverse effects include substantially decreasing emergency resources' availability, responsiveness and effectiveness by diverting resources, interrupting communications, or restricting emergency access.

9.1 Communication channels during incidences. Yes Partial No

Recommendation: Establish goals and policies consistent with the Governor's Blue Ribbon Fire Commission of 2005 for communications and interoperability. Example goals and policies should address fire personnel capability to communicate effectively across multiple frequency bands and update and expansion of current handheld and mobile radios used on major mutual aid incidents.

9.2 Emergency response barriers. Yes Partial No

Recommendation: Identify goals and policies that address vital access routes that if removed would prevent fire fighter access (bridges, dams, etc.). Develop an alternative emergency access plan for these areas.

9.3 Prioritizing asset protection from fire with lack of suppression forces. Yes Partial No

Recommendation: Identify and prioritize protection needs for assets at risk in the absence of response forces.

Recommendation: Establish fire defense strategies (such as fire ignition resistant areas) that provide adequate fire protection without dependency on air attack and could serve as survivor safety zones for the public or emergency support personnel.

CALIFORNIA BOARD OF FORESTRY AND FIRE PROTECTION

August 19, 2010

BFFP-1 The comment refers to the General Plan Fire Safety Elements Standard Recommendations that are intended to improve public safety, reduce fire hazards, prevent wildfires, and minimize demands for fire protection services. The *Arcadia General Plan* largely addresses the recommendations identified in the California Board of Forestry and Fire Protection letter dated August 19, 2010. The letter includes an attachment that identifies a standard list of 33 general plan safety element recommendations.

The following paragraphs identify the *Arcadia General Plan* policies, figures, and/or implementation measures that address the California Board of Forestry and Fire Protection's recommendations. The General Plan does not address recommendation 4.3, regarding forest health issues. It also does not address Recommendation 8.0, Post Fire Safety, Recovery, and Maintenance (8.1 to 8.8), regarding issues related to post wildland fire recovery and safety. However, the City Fire Department has committed to considering post-wildland fire recovery as part of the citywide Emergency Operations Plan.

1.0 Wildfire Protection Planning

The General Plan adequately addresses recommendation 1.1 based on the following the implementation measure:

- Implementation Measure 8-11.1 (Emergency Preparedness) states that the City will maintain and update, on a regular basis, emergency response preparedness programs, plans, and procedures such as its Emergency Operations Plan, Emergency Management Plan, and Natural Hazard Mitigation Plan.

2.0 Land Use Planning

The General Plan adequately addresses recommendations 2.1 and 2.2 based on the following policy, figure, and implementation measure:

- Policy S-3.2 states that the City will continue to adopt and implement the most current fire prevention technology, as recognized by national standards, in the development of Building and Fire Codes.
- Figure S-6 identifies wildland interface hazards, including Fire Hazard Severity Zones.
- Implementation Measure 8.22 identifies that a future development proposal will be forwarded to the Arcadia Fire Department for review and comment.

3.0 Housing/Structures and Neighborhoods

The General Plan adequately addresses recommendations 3.1, 3.2, 3.3, and 3.4 based on the following policies and implementation measures:

- Policy S-3.2 states that the City will continue to adopt and implement the most current fire prevention technology, as recognized by national standards, in the development of Building and Fire Codes.
- Policy S-3.4 will limit new development in designated high-fire hazard areas. Where prior entitlements have been given, strict adherence to City, County, and State codes that address building materials and approaches, defensible spaces, brush clearance, required fire flows, on-site or nearby fire-fighting equipment, and adequate emergency vehicle access to accommodate the weight and size of vehicles will be required and enforced.
- Policy S-3.5 prohibits new development in areas that do not have adequate water pressure or fire flows until sufficient pressure and fire flows can reliably be provided and maintained.
- Policy S-3.7 states that the City of Arcadia and the Fire Department will perform regular life safety inspections of all commercial, multi-family, and brush area occupancies to ensure compliance with City and State fire codes, standards, and regulations.
- Implementation Measure 8-8 (Adequate Fire Flow) requires that through the development review and building permit processes, the City will require that all new developments provide the water systems needed to meet fire flow requirements as determined by the Arcadia Fire Department. When deemed necessary, existing fire hydrants will be required to be tested to confirm adequate fire flows.
- Implementation Measures 8-14 and 8-15 promote the use, installation, and maintenance of working smoke alarms in all residential structures, and also promote retrofitting fire sprinkler systems in existing buildings.
- Implementation Measure 8-16.1 states that the City will replace existing fire hydrants with single two-inch outlets with fire hydrants with 2-inch by 4-inch by 4-inch inch outlets.

4.0 Conservation and Open Space

The General Plan does not address recommendation 4.3, which advises the City to establish policies that address unique pest, disease, exotic species, and other forest health issues in open space areas for reducing fire hazards and supporting ecological integrity. The General Plan adequately addresses recommendations 4.1, 4.2, 4.4, and 4.5 based on the following implementation measures:

- Policy S-3.1 states that the Fire Department will practice fire prevention, engineering, enforcement, and education as the primary means to reduce incidents of wildland and urban fires.
- Policy S-3.2 states that the City will continue to adopt and implement the most current fire prevention technology, as recognized by national standards, in the development of Building and Fire Codes.

- Implementation Measure 6-13 (Habitat Protection) requires that for all new developments, including roads and other public projects, that are proposed adjacent to sensitive habitats, the City will require that adequate buffers, setbacks, and other protections are provided to avoid significant direct and indirect impacts to such areas.
- Implementation Measure 7-8 (Preservation of the Urban Forest) states that the City will maintain and enhance tree coverage and tree health citywide by:
 - Continued enforcement of Article IX, Chapters 7 and 8 of the Municipal Code,
 - Continued preservation of landmark trees,
 - Continuation of the Public Works Services Department's Four-Year Tree Trimming Plan,
 - Continued participation in the Tree City USA program, and
 - Public education efforts regarding existing City regulations regarding trees and the importance of trees to the overall community aesthetic and property values.

5.0 Circulation and Access

The General Plan adequately addresses recommendations 5.1, 5.2, and 5.3 based on the following policies and implementation measures:

- Policy S-3.6 defines and maintains effective evacuation routes for neighborhoods within high fire-hazard areas.
- Policy S-6.4 states that the City will conduct ongoing public outreach and promote community awareness regarding evacuation routes and procedures to be followed in the event of an emergency.
- Implementation Measure 8-9 (Adequate Emergency Vehicle Access) states that through the development review process, the City will require that internal circulation systems be designed to accommodate fire suppression equipment with adequate turnaround areas as determined by the Arcadia Fire Department. The City will require new development to provide adequate access for emergency vehicles, particularly fire-fighting equipment, as well as secure evacuation routes for inhabitants in compliance with the latest building and fire codes.

6.0 Defensible Space

The General Plan adequately addresses recommendations 6.1, 6.2, and 6.3 based on the following policies:

- Policy S-3.4 will limit new development in designated high fire-hazard areas. Where prior entitlements have been given, strict adherence to City, County, and State codes that address building materials and approaches, defensible spaces, brush clearance, required fire flows, on-site or nearby fire-fighting equipment, and adequate emergency vehicle access to

accommodate the weight and size of vehicles shall be required and enforced.

- Policy S-3.7 states that the City of Arcadia and the Fire Department will perform regular life safety inspections of all commercial, multi-family, and brush area occupancies to ensure compliance with City and State fire codes, standards, and regulations.

7.0 Emergency Services

The General Plan adequately addresses recommendations 7.1, 7.2, 7.3, and 7.4 based on the following figure and implementation measures:

- Figure S-6 identifies the location of existing fire stations in Arcadia.
- Policy S-5.12 states that the City will provide and maintain a joint training facility for Fire, Police, Public Works, and all City employees.
- Implementation Measure 8-12 (Fire and Police Department Funding) states that through the annual budgeting and long-range planning processes, the City will assess changing needs for fire and police department personnel, equipment, and facilities based on desired service levels, demands created by new development and uses, and other specific needs. Funding will be provided consistent with City Council objectives.
- Implementation Measure 8-10 (Mutual Aid Agreements) states that the City will maintain standing mutual aid agreements with neighboring jurisdictions, Los Angeles County, and CAL Fire to furnish specified aid upon demand in the event of a major emergency, as appropriate.
- Implementation Measure 8-11.2 (Emergency Preparedness) identifies that members of the City's Emergency Management Team will receive regular training to provide them with the skills necessary to respond to any emergency.
- Implementation Measure 8-21 (Multi-Department Training Facility) states that the City will seek funding to develop state of the art training facilities for Police, Fire, and Public Works personnel. The training facility will include a training room available for all City departments' classroom training opportunities. The training facility will be able to accommodate large water flows required from Fire Department training and release these flows in compliance with all State and Federal regulations for waste water runoff and control.

8.0 Post Fire Safety, Recovery, and Maintenance

The General Plan does not address recommendation 8.0, Post Fire Safety, Recovery, and Maintenance (8.1 to 8.8). The General Plan does not include policies or implementation measures to address the aftermath of a major hillside wildland fire, including post fire safety, recovery, and maintenance.

Although the General Plan does not directly respond to these recommendations, they can be addressed indirectly in Implementation Measure 8-11 (Emergency Preparedness), which states that the City will maintain and update, on a regular basis, emergency response preparedness programs, plans, and procedures in the Emergency Operations Plan.

9.0 Terrorist and Homeland Security Impacts on Wildfire Protection

The General Plan adequately addresses recommendations 9.1, 9.2, and 9.3 based on the following policies and implementation measures:

- Policy S-5.2 states that the City will integrate new technologies and crime and fire prevention concepts into the design and construction of new, remodeled, and replaced development, as well as into all public facilities and parks.
- Policy S-5.3 states that the City will maintain fire and police stations, facilities, and services sufficient to meet high public safety standards, as established by the City Council.
- Policy S-5.4 states that the City will monitor the development of technology for fire and law enforcement services, and acquire and use the latest technology as funding permits to enhance emergency services.
- Policy S-5.6 states that the City will maintain automatic aid agreements, mutual aid agreements, and communication links with County, State, and federal agencies and with other municipalities participating in emergency operations planning.
- Policy S-5.7 states that the City will coordinate information sharing with State and federal law enforcement agencies regarding potential terrorist threats.
- Policy S-3.6 states that the City will define and maintain effective evacuation routes for neighborhoods within high fire-hazard areas.
- Implementation Measure 8-11.1 (Emergency Preparedness) states that the City will maintain and update, on a regular basis, emergency response preparedness programs, plans, and procedures such as its Emergency Operations Plan, Emergency Management Plan, and Natural Hazard Mitigation Plan.
- Policy S-3.1 states that the City and emergency personnel will practice fire prevention, engineering, enforcement, and education as the primary means to reduce incidents of wildland and urban fires.



SAN GABRIEL VALLEY MOSQUITO & VECTOR CONTROL DISTRICT

1145 N. Azusa Canyon Road
West Covina, California 91790
(626) 814-9466 • FAX (626) 337-5686
email: district@sgvmosquito.org

*Steve West
District Manager*

*Kenn K. Fujioka, Ph.D.
Assistant Manager*

Cities of:

Alhambra

Arcadia

Azusa

Bradbury

Claremont

Covina

Duarte

El Monte

Glendora

Industry

Irwindale

La Puente

La Verne

Monrovia

Monterey Park

Pomona

Rosemead

San Dimas

San Gabriel

Sierra Madre

Temple City

Walnut

West Covina

*County of
Los Angeles*

August 23, 2010

AUG 25 2010

**RECEIVED
PLANNING
SERVICES**

**Lisa L. Flores, Senior Planner
Development Services Department/Planning Services
Cit of Arcadia
240 W. Huntington Drive
Arcadia, CA 91006**

Dear Ms. Flores:

Thank you for the opportunity to offer additional comments on the Draft EIR for the Arcadia Generall Plan Update. Primary concerns were reflected in our letter to you dated August 27, 2009. However, we think additional emphasis on some items is justifiable.

There are as follows:

- 1) Reference to vector control should be specified and correlated with the issue of human discomfort and unfortunately death.
- 2) Your concerns about runoff and pooling as a Key Goal are welcomed but should be related in some way again to vector control.
- 3) We earlier requested your draft specify that vector control be notified of planned BMP's. We would appreciate that particularly critical source of mosquito habitation be illuminated.
- 4) We asked also that property owners be notified of BMP maintenance requirements and abatement liability. Recognizing this may be a detail of plan checks on maintenance agreements, our concern may be unjustified. However, the California Health and Safety Code extends considerable authority for vector control to abate BMPs at the owner's expense. Our interest is to preclude this unfortunate circumstance.

Very Truly Yours,

A handwritten signature in blue ink, appearing to read "Steve West".

**Steve West
District Manager**

SAN GABRIEL VALLEY MOSQUITO AND VECTOR CONTROL DISTRICT

August 23, 2010

MVCD-1 SC 4.8-1 through SC 4.8-3, starting on page 4.8-15 of the Draft EIR, discuss the State and local requirements regarding proper storm water control Best Management Practices (BMPs), which, when properly designed and implemented, would not exacerbate vector control issues. Compliance with applicable laws to reduce runoff and implementation of proper site drainage are adequate measures to ensure appropriate vector control. Additionally, the issue of vector control is addressed at the project-specific design level rather than the program level of this Draft EIR. The City of Arcadia has a history of coordinating with the San Gabriel Valley Mosquito and Vector Control District at the project level, and guidelines for minimizing vector problems were provided to the City. These guidelines will continue to be referenced by the City for future projects, and coordination with the San Gabriel Valley Mosquito and Vector Control District will continue to occur on a project-by-project basis. No changes to the Draft EIR are required.

MVCD-2 Please see response MVCD-1. BMPs for runoff control would be selected and designed during project level analysis, at the same time vector control issues would be considered. No changes to the Draft EIR are required.

MVCD-3 As stated in MVCD-1, the City of Arcadia has a history of coordinating with the San Gabriel Valley Mosquito and Vector Control District at the project level, and guidelines for minimizing vector problems were provided to the City. These guidelines will continue to be referenced by the City for future projects, and coordination with the San Gabriel Valley Mosquito and Vector Control District will continue to occur on a project-by-project basis. No BMPs are proposed at the General Plan level or as part of the General Plan update since no development project would accompany the approval or adoption of the General Plan. No changes to the Draft EIR are required.

MVCD-4 The City of Arcadia has an established protocol for the notification of maintenance requirements to the owners of storm water BMPs. As such, this San Gabriel Valley Mosquito and Vector Control District request is already occurring and will continue as appropriate. No changes to the Draft EIR are required.



MWD

METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Executive Office

August 27, 2010

Ms. Lisa Flores, Senior Planner
City of Arcadia
Development Services Department
240 W. Huntington Drive
Arcadia, California 91066

RECEIVED

AUG 31 2010

PLANNING
SERVICES

Dear Ms. Flores:

Notice of Preparation of a Draft Environmental Impact Report
for the Arcadia General Plan Update (SCH No. 2009081034 Project)

Thank you for your letter dated July 12, 2010 and a map showing the location of your proposed project in the city of Arcadia.

We reviewed the notice and documentation and determined the proposed Project is not regionally significant to The Metropolitan Water District of Southern California (Metropolitan). However, we support increased water conservation efforts and encourage projects to include water conservation measures such as using water efficient fixtures, drought-tolerant landscaping, and use of recycled water to offset increases in water use. Additional information on water conservation measures is available on Metropolitan's website at www.bewaterwise.com.

Should there be a change in the scope of the Project, we would appreciate the opportunity to review and comment at that time. If we can be of further assistance, please contact Mrs. Rebecca De Leon at (213) 217-6337.

Very truly yours,

John Shamma
Manager, Environmental Planning Team

RDL:

(J:\Environmental Planning-Compliance\Completed Jobs\August 2010\Job No. 10081703)

METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

August 27, 2010

MWD-1 The City promotes water conservation through various Goals, Policies, and Implementation Actions in the proposed General Plan Update. Section 4.16, Utilities and Service Systems, of the Draft EIR also identifies existing regulations and City programs that call for water conservation. No issues of concern were identified in the Metropolitan Water District letter, and no changes to the Draft EIR are required.

Lisa Flores

From: Brian Chow [briano408@yahoo.com]
Sent: Monday, August 30, 2010 11:43 PM
To: Lisa Flores
Subject: General Plan Comments

Dear Lisa Flores,

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AUG 30 2010

PLANNING
SERVICES

Can you please be so kind as to attach a copy of the "Circulation and Infrastructure" Chapter of the General Plan document (pdf format) for me? I would very much appreciate it.

Recently, there was a road enlargement of the intersection between Santa Anita Ave. and Duarte Road. However, there were no bicycle lanes included in this expansion. I will explain what I mean by this. Usually, in forward-thinking cities such as Santa Monica and San Diego, there would be a small lane for bicycles in between the lane that is turning right and the lane that is continuing straight. Neither Santa Anita nor Duarte has any bicycle lane in it. However, the fact that this improvement was made without any future improvement in mind is a little disappointing. Is the city really paying attention to DEIR Section 4.15, Goals CI-1 and CI-3? These specify the development of alternative forms of transportation, but I am not seeing this anywhere. I feel concerned that many Arcadians do not take to the issue of global warming seriously enough. The most recent data from the past several years show the indicators of climate change, such as ice loss, to exceed the predictions ([LINK](#)). Southern California is thought to become drier also, as a result. I hope the city moves forward with real transportation (bicycles and rail, not cars).

I would also like to express a chronic concern. There are many two-story mansions being built around the east part of the city, all being monotonous and rather ugly-looking. Furthermore, their construction entails the destruction of many large trees, which frankly could have been preserved for better property value (supposedly each large tree adds at least 1% to the property value). Instead, the developer typically chooses to plant small trees which will take another 30-60 years to reach mature size.

I am wondering if anything is done to:

1. Facilitate neighborhood critique of new residential housing, from an aesthetic standpoint.
2. Encourage the retention of old-growth trees, regardless of distance from the street curb.
3. Promote a "build around" instead of a "build over" philosophy.

Thank you very much for your attention.

Regards,
Brian Chow

1433 Loganita Ave.
Arcadia, CA. 91006

MR. BRIAN CHOW

August 30, 2010

Chow-1 A copy of the Circulation and Infrastructure Element of the draft General Plan was provided to Mr. Chow and acknowledged via email to Ms. Lisa Flores of the City of Arcadia on Tuesday, August 31, 2010.

Chow-2 The Circulation and Infrastructure Element has a section on Accommodating Bicycles, and as shown in Figure CI-7 of the Draft General Plan, the conceptual Bicycle Plan identifies a potential citywide network of bicycle routes connecting all parts of the City. It also includes a goal and an implementation action to prepare a Bikeway Master Plan for the City, and in anticipation of this, a Master Plan preparation has been budgeted in this year's Capital Improvement Program. A conceptual Bicycle Network Plan is included in the Draft General Plan as the basis for development of the Master Plan.

With specific reference to the Santa Anita Avenue and Duarte Road intersection improvements, these were funded by a federal grant with a scope of work that was determined several years ago, well before any discussions of a Bikeway Master Plan. The intersection of Santa Anita Avenue and Duarte Road is extremely tight, and adding paved area for bicycle lanes would require additional right-of-way from adjacent properties which is not available. The Draft General Plan does not preclude future widening and adjustments to add bike lanes; however, the installation of bike lanes would need to be addressed comprehensively from a corridor standpoint rather than an isolated location and subject to specific CEQA review.

The conceptual Bicycle Plan in the Draft General Plan does not designate bike lanes on either Santa Anita Avenue or Duarte Road for the following reasons: (1) The provision of bicycle facilities has to be balanced with many other factors, including available roadway width, number of traffic lanes necessary to carry projected traffic flows, need for on-street parking, the convenience and comfort level of bicyclists, and other factors and (2) the Bicycle Plan is based on bicycle needs and feasible routes at a corridor level rather than a specific intersection level in order to achieve full connectivity of routes across the City. For example, to add bike lanes to a specific intersection may not be appropriate if the streets beyond the intersection cannot adequately accommodate bike lanes. The conceptual Bicycle Plan in the Draft General Plan was based on consideration of all these factors, as well as consideration of specific conditions at individual locations. Figure CI-7 of the Draft General Plan locates bicycle routes on other streets in the vicinity of the intersection in question that are considered to be more appropriate for development of a citywide bicycle network. No changes to the Draft EIR are required.

Chow-3 The Resources and Sustainability Element of the Draft General Plan outlines the City's Goals and Policies related to the reduction of greenhouse gas emissions. A number of Implementation Actions would also reduce vehicle trips, water and energy consumption, and solid waste generation and in turn, reduce greenhouse gases generated in the City. In addition, Section 4.17, Greenhouse Gas Emissions, of the EIR includes mitigation measures to further reduce the greenhouse gas generation from future development in the City. No changes to the Draft EIR are required.

Chow-4 Many of the styles of the homes in the City of Arcadia pre-date the City's design review process and guidelines, which went into effect in 2005. However, the City undertook a comprehensive update to the City's Single Family Residential Design Guidelines in 2009 to preserve the character of the neighborhoods, promote high-quality architectural design throughout the City, and enhance the overall cohesiveness of the document. In the guidelines, the City added language under the "Site Planning" section that trees unique to the site should be preserved and incorporated into development proposals. Accordingly, project architects are becoming more conscientious about preserving mature trees if preservation does not interfere with the building footprint of the new house or addition. The Parks, Recreation, and Community Resources Element of the draft General Plan includes Policy PR-3.6 to ensure that existing mature trees on private property are considered in the planning and development process and are retained to the greatest extent feasible. No changes to the Draft EIR are required.

The Land Use and Community Design Element of the Draft General Plan outlines the City's Goals and Policies related to maintaining Arcadia's architectural and aesthetic quality standards. A number of Implementation Actions would also improve the visual quality of developments and of the City as a whole. In addition, the City has Architectural Design Guidelines and an Architectural Review Board to promote visual quality.

Chow-5 Please refer to Chow-4.



August 31, 2010

BY HAND DELIVERY

Ms. Lisa L. Flores, Senior Planner
City of Arcadia
240 W. Huntington Drive
Arcadia, CA 91066-2021

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11th Floor
Los Angeles, CA 90025
T 310.478.4456
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AUG 31 2010

PLANNING SERVICES

Re: Comment Letter to Draft Program Environmental Impact Report for City of Arcadia 2010 General Plan Update (SCH No. 2009081034)

Dear Ms. Flores:

On behalf of Westfield, LLC, Santa Anita Shoppingtown LP and Santa Anita Fashion Park LP (collectively, "Westfield"), this comment letter sets forth the language that we have agreed upon with the City regarding the Arcadia General Plan Update (the "GPU") and the related Environmental Impact Report ("EIR") and text amendments (collectively, the "GPU Documents"). We appreciate the time that you and Jason Kruckeberg provided to Westfield on August 17, 2010 to discuss Westfield's concerns and willingness to provide the clarifications noted below.

1. GLA Clarifications for Westfield Santa Anita

The City will incorporate into the GPU Documents two sets of square footages for Westfield Santa Anita reflecting the current gross leasable area ("GLA") definition in the Municipal Code and the new proposed definition in the GPU, which is intended to mirror the industry standard definition from the Urban Land Institute ("ULI"). As we discussed, the two sets of square footages will include the existing and future square footages for Westfield Santa Anita using both the City GLA and ULI GLA definitions, as follows:

	City GLA	ULI GLA	Required Parking
Existing	1,242,876 sf	1,468,122 sf	5,904 spaces
Future¹	1,522,451 sf	1,698,596 sf	6,999 spaces ²

¹ The future square footages reflect the approvals granted by the City in 2000 to Westfield for an expansion of Westfield Santa Anita.

² The required parking is the sum of two calculations: (1) Existing parking requirement using City GLA is 5,904 (4.75 * 1,242.876 = 5,904 spaces) PLUS (2) Future parking requirement is 1,095 spaces assuming full buildout calculated as the difference in existing and future ULI GLA multiplied by the parking rate ((1,698.596 – 1,468.122) * 4.75 = 1,095 spaces).



As we have agreed, the new ULI definition will apply only to new GLA added to Westfield Santa Anita and will not apply to any existing GLA, which includes any future reuse or redevelopment of existing space. The date for what constitutes existing GLA shall be the effective date of the GPU. For example, we have agreed that if an existing anchor store is damaged in the future, Westfield would be permitted to replace/rebuild this store up to the existing GLA in place at the time the GPU was adopted using the prior definition of GLA without any change to required parking. As another example, if Westfield sought to re-tenant the existing RobinsonMay building in the future without any increase in square footage, this tenant improvement would not be considered new GLA and would not trigger any new parking or FAR requirements. This interpretation is consistent with industry standards and the City's historic practice at Westfield Santa Anita.

Also, we have agreed to delete any reference to kiosks in the proposed GLA definition to be consistent with industry standard definitions used by the ULI and the International Council of Shopping Centers.

Westfield would appreciate an opportunity to review the implementing text amendment in this regard to ensure that it accurately reflects the understanding above.

2. Clarification of FAR

The Draft EIR reference on page 3-6 that the "maximum intensity allowed for the mall remains the same, with a nominal increase in floor-area-ratio (FAR) from 0.4 to 0.5" will be clarified to note that Westfield Santa Anita is not receiving any increase in permitted FAR as a part of this GPU. As a part of the 2000 approvals, the City adopted an FAR of 0.5 for Westfield Santa Anita. The 0.4 FAR reference in the current General Plan was not updated inadvertently.

3. Regional Commercial Land Use Designation

Westfield supports redesignating Westfield Santa Anita from "Commercial" to "Regional Commercial," which more accurately reflects the unique regional-serving characteristics of the property. Consistent with this approach, we have agreed that the following definition of Regional Commercial should be adopted:

The Regional Commercial designation applies only to the regional shopping center located east of Baldwin Avenue and north of Huntington Drive. The designation provides for regional commercial centers intended to serve the needs of a regional market and the surrounding community that are constantly evolving, but typically includes a wide range in depth and variety of retail, office and service uses. Such centers provide a combination of anchor stores, which can include department stores, discounters, warehouse stores, mass merchants, consumer products, home furnishings, entertainment, grocery and drug stores, and/or fashion department stores, with a large quantity and variety of restaurants,

specialty shops, boutiques, kiosks, health, wellness, media, offices and/or services. Due to the regional nature, large community events, promotions and gatherings are encouraged to be held at a regional commercial shopping center.

4. Future Buildout of Westfield Santa Anita To Be Clarified

The City will update the GPU Documents to reflect the future buildout of the Westfield property as approved by the City in 2000 and noted in Section 1 above.

5. Parking Impacts to Westfield Santa Anita

The City will update page 2-63 of the GPU to acknowledge the existing problem of race track patrons parking in the parking areas of Westfield Santa Anita, as well as in nearby residential areas.

6. Gate 8 Clarification

The City will replace the following sentence on page 2-64 of the GPU, which does not reflect existing conditions: "Another physical separation occurs during horse racing season when the race track's Baldwin Avenue entry gate at the northerly boundary of the mall is closed off to the mall." The replacement will be as follows:

The Baldwin Avenue entry gate at the northerly boundary of the Westfield Santa Anita center (Gate 8) is used primarily by visitors to access Westfield Santa Anita. This access roadway is also used by visitors to the Racetrack pursuant to an access easement over Westfield's property. During the racing season, some racing events cause a substantial amount of race track traffic to enter through the roadway leading from the Baldwin Avenue/Gate 8 intersection. Depending on traffic conditions, and based on information provided by the City's Police Department and race track operations personnel, Westfield Santa Anita on occasion has agreed to temporarily barricade the internal roadway leading from Gate 8 to the Westfield Santa Anita parking lot so that shopping center traffic will not combine with race track traffic to worsen conditions through Gate 8 onto Baldwin Avenue.

7. Designation of the Santa Anita Park as an Historic Resource Under Federal Law

Both the GPU and the Draft EIR provide that Santa Anita Racetrack is eligible for listing in the California Register of Historical Resources. However, in order to provide full disclosure of the Racetrack's status as an historic resource, the GPU and Final EIR should also state that the Racetrack has been determined to be eligible for listing in the National Register of Historic Places; that the Racetrack has been determined to be a historic district; and that the Racetrack's historic district is comprised of 47 structures.

8. Conclusion

To the extent any factual errors or inconsistencies discussed above are repeated in other sections of the GPU, EIR or related text amendments, the documents should be revised in accordance with these comments to ensure that they will be consistent, both internally and with respect to one another.

Thank you again for the opportunity to discuss our comments and to come to agreement on these clarifications. If there are any issues with the above clarifications, please contact me immediately.

Sincerely yours,



John M. Healy
Vice President Development

cc: Mr. Jason Kruckeberg
Mr. Larry Green
Mr. Francis Park, Esq.

WESTFIELD

August 31, 2010

West-1 The increase in floor area at the Westfield Santa Anita Mall has been accounted for in the calculation of future development in the remainder of the City where no changes in land use designation are proposed. The change in the definition of gross leasable area would not affect the buildout estimates in the General Plan Update, and no changes to the Draft EIR are required. Additionally, changes to the definition of the "gross leasable area" would have no impact on the Draft EIR, and no changes are required.

West-2 This change will be made to Section 3.0, Project Description, and accordingly throughout the Draft EIR, but does not change the analysis in the EIR. These changes are listed in Section 4.0, Errata, of this document.

West-3 This topic will be addressed through the General Plan Update public hearing process and is not an issue for the Draft EIR, and no changes to the Draft EIR are required.

West-4 Please see response West-3.

West-5 Please see response West-3.

West-6 Please see response West-3.

West-7 According to the Historic Property Data File (HPDF) at the South Central Coastal Information Center (SCCIC) as listed in Table 4.5-2 of Section 4.5, Cultural Resources, of the Draft EIR, the Santa Anita Park is on the National Register of Historic Places (NRHP). The racetrack is on the NRHP (2S) as a Historic District comprised of 53 contributing elements and therefore automatically listed on the California Register of Historical Resources (CRHR) (1CL). A sentence will be added to Table 4.5-2 to state that 53 contributing resources (buildings, sites, structures, and objects) in the Santa Anita Park are considered part of a Historic District. See Section 4.0, Errata, below. The clarifications stated above do not impact the analysis in the Draft EIR, and no other changes to the EIR are required.

West-8 All revisions have been adequately made to appropriate sections of the Draft EIR, as stated in Section 4.0, Errata.



STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit

Arnold Schwarzenegger
Governor



Cathleen Cox
Acting Director

August 31, 2010.

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SEP 01 2010

PLANNING
SERVICES

Lisa Flores
City of Arcadia
240 W. Huntington Drive
Arcadia, CA 91007

Subject: Arcadia General Plan Update
SCH#: 2009081034

Dear Lisa Flores:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on August 30, 2010, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures

cc: Resources Agency

Document Details Report
State Clearinghouse Data Base

SCH# 2009081034
Project Title Arcadia General Plan Update
Lead Agency Arcadia, City of

Type EIR Draft EIR
Description The proposed General Plan Update is a comprehensive revision of the current General Plan. The Arcadia General Plan is proposed to include ten chapters: (1) Introduction; (2) Land Use and Community Design Element; (3) Economic Development Element; (4) Circulation and Infrastructure Element; (5) Housing Element; (6) Resource Sustainability Element; (7) Parks, Recreation, and Community Resources Element; (8) Safety Element; (9) Noise Element; and (10) Implementation Plan.

Lead Agency Contact

Name Lisa Flores
Agency City of Arcadia
Phone 626 574-5445
email
Address 240 W. Huntington Drive
City Arcadia **Fax**
State CA **Zip** 91007

Project Location

County Los Angeles
City Arcadia
Region
Lat / Long
Cross Streets Huntington Drive and Colorado Place
Parcel No. various
Township 1N **Range** 12W **Section** **Base** SBB&M

Proximity to:

Highways Hwy 210
Airports El Monte
Railways SCRRA
Waterways
Schools Arcadia USD
Land Use The City of Arcadia is largely developed with various land uses, as regulated by the City's Zoning Regulations and current General Plan.

Project Issues Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Noise; Sewer Capacity; Soil Erosion/Compaction/Grading; Traffic/Circulation; Vegetation; Cumulative Effects; Other Issues

Reviewing Agencies Resources Agency; Department of Conservation; Department of Fish and Game, Region 5; Cal Fire; Department of Parks and Recreation; Department of Water Resources; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 7; CA Department of Public Health; Air Resources Board, Transportation Projects; Regional Water Quality Control Board, Region 4; California Energy Commission; Native American Heritage Commission; Public Utilities Commission; State Lands Commission; Office of Emergency Management Agency, California

Date Received 07/16/2010 **Start of Review** 07/16/2010 **End of Review** 08/30/2010

STATE CLEARINGHOUSE

August 31, 2010

This letter confirms receipt of the Draft Program EIR at the State Clearinghouse for the designated public review period.

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PLANNING
SERVICES



September 1, 2010

Lisa L. Flores, Senior Planner
Development Services Department/Planning Services
240 W. Huntington Drive
P.O. Box 60021
Arcadia, CA 91066

RE: Draft Environmental Impact Report for the City of Arcadia General Plan Update

Dear Ms. Flores:

Thank you for providing the City of Irwindale with the opportunity to review and comment on the above-referenced environmental document. Staff has found that the majority of the potential impacts of the proposal to the City of Irwindale are less than significant. However, the proximity of the Lower Azusa Road Reclamation Area to the City's border and the potential impact of future reclamation are a major concern to the City. Based on the Land Use and Planning and Mineral Resources sections of the Draft EIR, there are two (2) quarries near Irwindale's border, which have Industrial designations. The City of Irwindale's General Plan designations are similar (Quarry and Industrial/Business Park), which could entail similarly developed projects and intensification along the common border.

The Draft EIR indicates that mining operations at the Rodeffer Quarry site have been completed and that reclamation is ongoing and that future mining at the Livingston-Graham site is subject to a Conditional Use Permit. The Livingston-Graham (aka Hanson Aggregate Pit) site in particular is primarily located within the City of Irwindale and currently operates under a valid Conditional Use Permit and in accordance with SMARA. The City of Irwindale will review and comment upon future individual developments for any proposed construction and/or aggregate extraction.

If you have any questions, please contact me at (626) 430-2260.

Sincerely,


Brandi M. Jones
Associate Planner

C: File
Ray Hamada, Director of Planning
Paula Kelly, Senior Planner



CITY OF IRWINDALE

September 1, 2010

Irwin-1 The Land Use Plan in the Draft General Plan designates the southeastern corner of the City as Industrial and Commercial/Light Industrial to reflect surrounding uses and proximity to I-605. The Draft General Plan acknowledges that mineral extraction activities at the Livingston-Graham quarry are likely to be confined to the portion of the quarry within the City of Irwindale. As discussed on page 4.10-5 of the Draft EIR, no extraction or planned mining operations are expected within the City. If the City were to be presented with a proposal for mining operations, the activity would require a conditional use permit (CUP), and the City of Arcadia would inform the City of Irwindale of the application. No changes to the Draft EIR are required.

Irwin-2 The portion of the Livingston-Graham (aka Hanson Aggregate Pit) site located within the City of Irwindale would not be impacted by the Draft General Plan, which proposes no changes to the zoning of the portion of the site within the City of Arcadia. Any future development proposals for the site would be referred to the City of Irwindale for comment. No changes to the Draft EIR are required.



COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

GAIL FARBER, Director

900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
Telephone: (626) 458-5100
<http://dpw.lacounty.gov>

ADDRESS ALL CORRESPONDENCE TO:
P.O. BOX 1460
ALHAMBRA, CALIFORNIA 91802-1460

September 1, 2010

IN REPLY PLEASE
REFER TO FILE: LD-1

Ms. Lisa Flores, Senior Planner
City of Arcadia
Development Services Development
P.O. Box 60021
Arcadia, CA 91066-6021

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SEP 01 2010

PLANNING
SERVICES

Dear Ms. Flores:

DRAFT ENVIRONMENTAL IMPACT REPORT ARCADIA GENERAL PLAN UPDATE CITY OF ARCADIA

We reviewed the Draft Environmental Impact Report for the City of Arcadia's General Plan Update project. The updated General Plan establishes an overall development capacity for the City and surrounding areas and serves as a policy guide for determining the appropriate physical development and character of the City.

The following comments are for your consideration and relate to the environmental document only.

Services–Traffic/Access

1. **Mitigation SC 4.15-1:** We recommend that any impact fee also be applied to intersections that are shared within the unincorporated County or are in the unincorporated area sphere of influence.
2. **Mitigation SC 4.15-9:** Traffic impact reports for future developments should analyze the project's impact as well as the cumulative impact generated by the project and nearby developments for the affected roadways and intersections within the unincorporated County areas. The traffic study should also propose feasible mitigation measures to address all identified impacts. A copy of our Traffic Impact Analysis Report guidelines may be obtained on the County of Los Angeles Department of Public Works' website at <http://dpw.lacounty.gov/traffic>.

Ms. Lisa Flores
September 1, 2010
Page 2

If you have any questions regarding the traffic/access comments, please contact Ms. Lindsay Sagorski at (626) 300-4784 or by e-mail at lsagorski@dpw.lacounty.gov.

Other-Environmental Safety

- Underground Storage Tanks

Should any operation within the proposed project include the construction, installation, modification, or removal of underground storage tanks, Public Works' Environmental Programs Division must be contacted for required approvals and operating permits.

If you have any questions regarding environmental safety comments, please contact Mr. Corey Mayne at (626) 458-3524 or by e-mail at cmayne@dpw.lacounty.gov.

If you have any other questions or require additional information, please contact Mr. Toan Duong at (626) 458-4921 or by e-mail at tduong@dpw.lacounty.gov.

Very truly yours,

GAIL FARBER
Director of Public Works



DENNIS HUNTER, PLS PE
Assistant Deputy Director
Land Development Division

JY:ca

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LOS ANGELES COUNTY DEPARTMENT OF PUBLIC WORKS

September 1, 2010

DPW-1 As stated in SC 4.15-1 on page 4.15-22 of the Draft EIR, the City's Transportation Impact Fee Program is directed to a specific set of defined transportation improvements within the City of Arcadia based on a City-wide nexus analysis. The Program has no standing for any areas or jurisdictions outside the City, and therefore, traffic impact fees cannot be used for improvements outside the City. No changes to the Draft EIR are required.

DPW-2 As stated in SC 4.15-9 on page 4.15-23 of the Draft EIR, traffic impact reports are required to comply with the Congestion Management Plan Traffic Impact Analysis guidelines, which does not recognize city limits in determining which intersections or roadways would be impacted and analyzed. Therefore, impacts on roadways and intersections in unincorporated County areas would be analyzed, where necessary. Traffic impact studies for future developments will be conducted per the City's procedures and per CEQA requirements. If and when these studies identify significant traffic impacts, potential mitigation measures and implementation methods will be evaluated and identified as appropriate and feasible at that time. No changes to the Draft EIR are required.

DPW-3 As stated in SC 4.7-2 on page 4.7-15 of the Draft EIR, all development shall comply with existing regulations regarding the generation, transportation, treatment, storage, and disposal of hazardous waste; the management of non-hazardous solid wastes and underground tanks storing petroleum and other hazardous substances would be required for hazardous material users, waste generators, and transporters. As such, the County Department of Public Works, Environmental Programs Division must be contacted for required approvals and operating permits for applicable projects. No changes to the Draft EIR are required.



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

September 7, 2010

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SEP 10 2010

PLANNING
SERVICES

Lisa Flores, Senior Planner
City of Arcadia
Development Services Department
240 West Huntington Drive
Arcadia, CA 91066

Dear Ms. Flores:

NOTICE OF AVAILABILITY OF THE DRAFT ENVIRONMENTAL IMPACT REPORT, GENERAL PLAN UPDATE, SCH # 2009081034, TO MAINTAIN THE CITY AS A DESIREABLE PLACE FOR HOUSING AND BUSINESS, ARCADIA (FFER #201000159)

The Notice of Availability has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department. The following are their comments:

PLANNING DIVISION:

1. The subject property is entirely within the City of Arcadia, which is not a part of the emergency response area of the Los Angeles County Fire Department (also known as the Consolidated Fire Protection District of Los Angeles County). Therefore, this project does not appear to have any impact on the emergency responsibilities of this department.

LAND DEVELOPMENT UNIT:

1. This project is located entirely in the City of Arcadia, therefore the Arcadia Fire Department has jurisdiction concerning this project and will be setting conditions. This project is located in close proximity to the jurisdictional area of the Los Angeles County Fire Department. However, this project is unlikely to have an impact that necessitates a comment concerning general requirements from the Land Development Unit of the Los Angeles County Fire Department.
2. The County of Los Angeles Fire Department, Land Development Unit appreciates the opportunity to comment on this project.

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

AGOURA HILLS	BRADBURY	CUDAHY	HAWTHORNE	LA MIRADA	MALIBU	POMONA	SIGNAL HILL
ARTESIA	CALABASAS	DIAMOND BAR	HIDDEN HILLS	LA PUENTE	MAYWOOD	RANCHO PALOS VERDES	SOUTH EL MONTE
AZUSA	CARSON	DUARTE	HUNTINGTON PARK	LAKWOOD	NORWALK	ROLLING HILLS	SOUTH GATE
BALDWIN PARK	CERRITOS	EL MONTE	INDUSTRY	LANCASTER	PALMDALE	ROLLING HILLS ESTATES	TEMPLE CITY
BELL	CLAREMONT	GARDENA	INGLEWOOD	LAWNDALE	PALOS VERDES ESTATES	ROSEMEAD	WALNUT
BELL GARDENS	COMMERCE	GLENDORA	IRWINDALE	LOMITA	PARAMOUNT	SAN DIMAS	WEST HOLLYWOOD
BELLFLOWER	COVINA	HAWAIIAN GARDENS	LA CANADA-FLINTRIDGE	LYNWOOD	PICO RIVERA	SANTA CLARITA	WESTLAKE VILLAGE
			LA HABRA				WHITTIER

Lisa Flores, Senior Planner
September 7, 2010
Page 2

3. The statutory responsibilities of the County of Los Angeles Fire Department, Land Development Unit, are the review of, and comment on, all projects within the unincorporated areas of the County of Los Angeles. Our emphasis is on the availability of sufficient water supplies for fire fighting operations and local/regional access issues. However, we review all projects for issues that may have a significant impact on the County of Los Angeles Fire Department.

We are responsible for the review of all projects within contract cities (cities that contract with the County of Los Angeles Fire Department for fire protection services). We are responsible for all County facilities, located within non-contract cities. The County of Los Angeles Fire Department, Land Development Unit may also comment on conditions that may be imposed on a project by the Fire Prevention Division, which may create a potentially significant impact to the environment.

4. Should any questions arise regarding subdivision, water systems, or access, please contact the County of Los Angeles Fire Department, Land Development Unit, Inspector Claudia Soiza at (323) 890-4243.

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

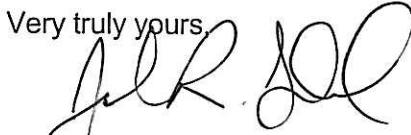
1. The statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division includes erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources, and the County Oak Tree Ordinance.
2. The areas germane to the statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division have been addressed.

HEALTH HAZARDOUS MATERIALS DIVISION:

1. The Health Hazardous Materials Division has no objection to the proposed General Plan Update.

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,



JOHN R. TODD, CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

JRT:ss

LOS ANGELES COUNTY FIRE DEPARTMENT

September 7, 2010

- FD-1 This comment acknowledges that the Draft General Plan would have no impact on the County's emergency responsibilities, and no changes to the EIR are required.
- FD-2 This comment acknowledges that the draft General Plan would have no impact on the County's Land Development Unit responsibilities, and no changes to the EIR are required.
- FD-3 The City of Arcadia contains approximately 1.26 square miles of unincorporated County land within its Sphere of Influence. The County of Los Angeles Fire Department acknowledges in the letter the responsibility for providing fire protection services to this area. No changes to the Draft EIR are required.
- FD-4 This comment acknowledges that the areas germane to the County Fire Department, Forestry Division, and Health Hazardous Materials Division have been addressed, and no changes to the Draft EIR are required.

SECTION 4.0 ERRATA

The following text changes are made to the Draft EIR and incorporated as part of the Final EIR. These changes further substantiate conclusions and/or clarify aspects of the previously circulated document. None of these changes reflect a determination of a new or more significant environmental impact than disclosed in the Draft EIR. Changes to the text are noted with **bold** (for added text) or ~~strikeout~~ type (for deleted text).

Section 3.0, Project Description

Page 3-6, last paragraph:

The “Commercial” designation is proposed to distinguish the Santa Anita Westfield Mall (Mall) as “Regional Commercial”. The maximum intensity allowed for the mall remains the same, ~~with a nominal increase in at a floor-area ratio (FAR) from 0.4 to of~~ 0.5. Allowable development intensity for Santa Anita Park (the racetrack) remains the same, with an FAR of 0.3 allowed for the Commercial portion of Santa Anita Park and no applicable FAR for the Horse Racing portion of Santa Anita Park.

Section 4.5, Cultural Resources

Page 4.5-11, first paragraph:

Santa Anita Park is listed in the National Register of Historic Places as a Historic District comprised of 53 contributing elements (buildings, sites, structures, and objects) on a 304-acre property. It is therefore automatically listed in the California Register of Historical Resources. Also, the following....

Page 4.5-21:

MM 4.5-2: Projects that **require ground disturbance** and would be located on undeveloped parcels or near known cultural resources shall implement the following:

1. If only minor ground disturbance is anticipated, a “Quick Check” records search at the South Central Coastal Information Center, Fullerton, must be performed to determine whether archaeological resources are recorded on the project site. If no archaeological resources were recorded on the project site based on past surveys completed, then no further action is required. If no survey has ever been conducted on the project site, or if archaeological resources are found to be recorded on the project site, a Phase I study is required. Should cultural resources be encountered during construction activities, a qualified Archaeologist shall be retained to evaluate the discovery and shall implement procedures for temporarily halting or redirecting work to permit the sampling, identification, and evaluation of the resources, as appropriate. If the resources are found to be significant, the Archaeologist shall determine appropriate actions-in cooperation with the City —for preservation and/or data recovery.

2. **If a project requires major ground disturbance (e.g. grading, trenching),** A Phase I study shall be undertaken to evaluate the current conditions of a project site. The study shall consist of (1) an initial records search including records, maps, and literature housed at the Archaeological Information Center located at California State University, Fullerton; (2) a Sacred Lands check with the NAHC and initial scoping with interested Indian Tribes and individuals identified by the NAHC; (3) a pedestrian field survey by a qualified Archaeologist to determine the presence or absence of surficial artifactual material and/or the potential for buried resources; and (4) a technical report describing the study and offering management recommendations for potential further investigation.
3. If archaeological **sites resources** are discovered as a result of the Phase I study, a Phase II evaluation of the significance of any prehistoric material that is present shall be undertaken. The evaluation shall include further archival research, ethnographic research, and subsurface testing/excavation to determine the site's horizontal and vertical extent, the density and diversity of cultural material, and the site's overall integrity. The evaluation shall include a technical report describing the findings and offering management recommendations for sites determined to be significant. Non-significant resources would require no further study.
4. If the Phase II evaluative study indicates that a significant site is present, the qualified Archaeologist shall determine appropriate actions, in cooperation with the City of Arcadia, for preservation and/or data recovery of the resource. Preservation in place is the preferred manner of mitigation, as provided in CCR Section 15126.5(b)(3). This could include (1) avoidance of resources; (2) incorporation of resources into open space; (3) capping the resource with chemically stable sediments; and/or (4) deeding the resource into a permanent conservation easement. To the extent that a resource cannot be preserved in place, a Phase III data recovery excavation shall be completed to recover the resource's scientifically consequential information. A technical report shall be completed that adheres to the OHP's Archaeological Resources Management Report (ARMR) guidelines.
5. Monitoring of ground-disturbing activities shall be undertaken by a qualified Archaeologist as a final mitigation measure in areas that contain or are sensitive for the presence of cultural resources.

Section 4.14, Recreation

Pages 4.14-4 – 1st Paragraph under Section 4.14.3, Existing Conditions, City Recreational Facilities:

The City of Arcadia has approximately **680.34** 785-acres of parkland, park facilities, and open space areas. These facilities include 13 City parks, 4 County parks, and several joint use facilities with the AUSD. Approximately **446** 550-acres are located within parks and recreational facilities **owned and** operated by the Los Angeles County Department of Parks and Recreation. Another 25.5 acres are in a privately owned Par 3 golf course that is open to the public.

Section 4.15, Transportation

Pages 4.15-22

SC 4.15-8 Off-street parking shall be provided by new development, redevelopment, expansions, or with changes in occupancies in accordance with the parking requirements in the City's Zoning Regulations. ~~Compliance with the parking requirements would prevent spillover parking on streets and adjacent areas, as well as provide buffers to surrounding land uses.~~ The required parking spaces and other parking requirements shall be shown in site improvement plans submitted to the City during the permit process.

Pages 4.14-4 to 4.14-5 – Table 4.14-2:

TABLE 4-1
CITY PARKS AND RECREATIONAL FACILITIES

Map Key	Name/Location	Size (acres)	Facilities
Mini Parks			
1	Bicentennial Park: Sixth and Longden Avenues	0.63	Tennis courts, play area, picnic sites
2	Fairview Avenue Park: 542 Fairview Avenue	0.91	Picnic sites
3	Forest Avenue Park: 132 Forest Avenue	0.26	Picnic sites
4	Tripolis Friendship Park: Golden West and Fairview Avenues	0.34	Play area, picnic sites
Total Acres		2.14	
Neighborhood Parks			
5	Eisenhower Park and Dog Park: Second Avenue and Colorado Boulevard	5.39	Baseball field, bleachers, batting cage, game courts and fields, picnic shelter, play area, dog park
6	Newcastle Park: 143 Colorado Boulevard	2.64	Tennis courts, handball courts, sand volleyball courts, play area, picnic sites
7	Orange Grove Park: Orange Grove and Baldwin Avenues	2.66	Tennis courts, play area, picnic sites
8	Tierra Verde Park: Second and Camino Real Avenues	1.55	Tennis courts, play area, picnic sites
Total Acres		12.24	
Community Parks			
9	Wilderness Park: 2240 Highland Oaks Drive	120.0	8.7 acres developed with nature center, pond, trails, amphitheater, picnic sites, open field
Special Parks			
10	Arcadia Community Center/Senior Center: 365 Campus Drive	4.98	18800 sf multi-purpose community center./senior center
11	Bonita Park and Skate Park: Second Avenue and Bonita Street	3.38	Baseball diamond, bleachers, batting cage, picnic sites, play area, skate park
12	Civic Center Athletic Field: 240 W. Huntington Drive	2.24	Open field for soccer, bleachers
13	Longden Park: 1179 Longden Avenue	0.99	Baseball diamond, batting cage, bleachers
14	Par-3 Golf Course: 620 East Live Oak Avenue	25.5	18-hole par 3 golf course, driving range, putting green, pro shop
Total Acres		37.09	
Map Key	Joint-Use Parks and Facilities	School Site Size	Recreational Facility Acreage
15	Arcadia High School: 180 Campus Drive	40.93	20.47 acres of game courts and athletic fields, swimming pools, track, stadium
16,17	Baldwin Stocker Elementary School and Park: 422 West Lemon Avenue	5.75	2.88 acres of basketball courts, baseball diamond, picnic table and open field
18,19	Camino Grove Elementary School: 1420 Sixth Avenue	8.18	1.8 acres of city park and 4.09 acres by basketball courts, baseball diamond, tennis courts, picnic areas, play area

TABLE 4-1 (Continued)
CITY PARKS AND RECREATIONAL FACILITIES

Map Key	Name/Location	Size (acres)	Facilities
20	Dana Middle School: 1401 First Avenue	10.92	5.46 acres of basketball courts and open field
21	First Avenue Middle School: 301 South First Avenue	6.68	3.3 acres of basketball courts and open field
22	Foothills Middle School: 171 Sycamore Avenue	13.43	6.72 acres of track, open field, baseball field and basketball courts
23	Highland Oaks Elementary: 10 Virginia Drive	7.67	3.84 acres of picnic areas, basketball courts and open field
24	Holly Avenue Elementary School: 360 West Duarte Road	7.95	3.98 acres of tennis courts, basketball courts, open field
25,26	Hugo Reid Elementary School: 1000 Hugo Reid Road	4.83	4.35 acres of city park and 2.42 acres of tennis courts, open field, baseball diamond, play area, bleachers, batting cage
27	Hugo Reid Primary School: 1153 De Anza Place	0.98	0.98 acres
28	Longley Way Elementary School: 2601 Longley Way	5.12	2.56 acres of baseball diamond, basketball courts and open field
Total Acres		112.44^a	62.87 of recreational facilities
County Parks and Facilities			
29	Los Angeles County Arboretum and Botanical Garden: 301 North Baldwin Avenue	127.0 119.4	Gardens, ponds, waterfall, trails, historic structures, fountains, gift shop, library, classrooms, conference hall
30	Arcadia County Park: 405 South Santa Anita Avenue	52.0 181.70	baseball diamonds, bowling greens, play areas, community room, open field, swimming pool, tennis courts
31	Peck Road Water Conservation Park: 5401 North Peck Road	120.0 119.97	hiking trails, fishing lake
32	Santa Anita Golf Course: 405 South Santa Anita Avenue	147.0 120.68	18-hole golf course
Total Acres		446.0 550.75	
Total Acreage		680.34 785.09	
Notes: The Santa Anita Racetrack is not included because of the ongoing decline in use of the facility and anticipated reuse opportunities. A gymnasium is also under construction at Dana Middle School at this time (2010).			
^a Only 62.87 acres of the school sites are developed with recreational facilities, as used in the calculation of total acreage of park facilities			
Source: Arcadia 2007 and County of Los Angeles Department of Parks and Recreation 2010			

Note: The Los Angeles County Department of Parks and Recreation comment letter provides an incorrect total of 439 acres; the 4 park facilities added together total 446 acres.

Section 4.16 Utilities

Page 4.16-13 – 2nd Paragraph:

The LACSD operates three wastewater treatment facilities that treat wastewater generated in the City of Arcadia: (1) the Whittier Narrows Water Reclamation Plant (WRP), located near the City of South El Monte, with a design capacity of 15 million gallons per day (mgd) and an average flow of **4.75**.4 mgd; (2) the San Jose Creek WRP, located adjacent to the City of Industry, with a design capacity of 100 mgd and an average flow of **75.6**77.4 mgd; and (3) the Los Coyotes WRP, located in the City of Cerritos, with a design capacity of 37.5 mgd and an average flow of **25.3** 27mgd (LACSD 20102009). The LACSD has indicated that there are no deficiencies in its facilities that serve the City. Specifically regarding wastewater treatment, based on the current average daily flows described above, there is a total of 43 mgd of remaining wastewater treatment capacity at the three WRP's serving the City (LACSD 2009).

Page 4.16-31 – 1st Paragraph:

As shown in Table 4.16-7, approximately 1,939,301 gpd (1.94 mgd) of additional wastewater would be generated by the increase in development in the City and its Sphere of Influence (SOI) at buildout. As discussed above, according to the LACSD, there are approximately **46.9** 43 mgd of remaining capacity at the 3 WRPs serving the City. The incremental increase of 1.94 mgd would represent approximately **4.1** 4.5 percent of the current available capacity. The LACSD is authorized by the *California Health and Safety Code* to charge a fee for connections to the LACSD sewage system. This connection fee is in an amount adequate to construct incremental expansions of the sewage system in order to accommodate proposed projects. Therefore, payment of applicable connection fees, as required by SC 4.16-4, would allow the LACSD to provide adequate capacity to serve the projected wastewater generation at buildout of the City under the General Plan Update. Therefore, the General Plan Update would not directly result in the need for new or expanded wastewater treatment facilities at buildout of the City. There would be a less than significant impact related to wastewater treatment facilities, and no mitigation is required.