

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

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

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

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

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

Open Space Policy 5 – Prevention of soil erosion.

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

Conservation Policy 19 – Protect natural resources.

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

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

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

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

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

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

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

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

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

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

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

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

The technical report evaluating air quality found the 2012-2030 General Plan Update does not have the potential to violate federal or state ambient air quality standards.<sup>13</sup> The report analyzed the following criteria pollutants: VOC, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>10</sub> and PM<sub>2.5</sub>. Emissions levels in the air quality technical report were calculated based on total build-out of the General Plan Area. These calculations demonstrated that operational impacts, associated with building energy use,

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

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

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

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

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

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

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

***Construction Emissions.*** Construction activities associated with individual projects may result in emissions of CO, VOCs, NO<sub>x</sub>, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>. However, because details associated with construction of individual projects are unknown at this time, any project which may exceed construction emissions thresholds will be required to prepare project-specific studies.

***Operational Emissions.*** Operational activities associated with the 2012-2030 General Plan Update will result in some emissions of ROG, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>.<sup>15</sup> These emissions have three primary sources: area sources (i.e., lawn mowers, architectural coatings and consumer products), building energy use and mobile sources (i.e., vehicles). However, all operational emissions associated with the 2012-2030 General Plan Update fall far below significance thresholds. To illustrate, the 2012-2030 General Plan Update is expected to emit 55.04 pounds per day of CO during the summer, and the current SCAQMD threshold for CO is 550 pounds per day.<sup>16</sup> The Air Quality Analysis found that operational emissions will not exceed pollutant thresholds.<sup>17</sup>

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

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

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

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

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

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

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

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

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

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

**(d) Expose sensitive receptors to substantial pollutant concentrations?**

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

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

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

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

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

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

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

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

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

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

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

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

#### **IV. BIOLOGICAL RESOURCES: Would the project:**

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

Lands in the City of Bradbury are largely urbanized and the lower slopes contain few significant biological resources. Areas that provide habitat for sensitive or special-status species are primarily located in the northern, steep slopes near the Angeles National Forest. The types of vegetation expected in these areas include: Coastal Scrub, Chaparral, Oak Woodland and Riparian Woodland. A variety of mammals, birds and reptiles occur in the northern portion of the City. Most prevalent among the mammals are deer, bear, coyote, bobcats, raccoon, skunk, rabbits, mice rats, opossums and squirrels. Typical birds include varieties of scrub jay, hummingbird, warbler, wren and sparrow. Reptiles found in the hillside area include: lizards, rattlesnakes and garter snakes.<sup>24</sup> Prior to development of land located in a Resource Management Area, as specified in the Community Resource Element<sup>25</sup>, detailed studies will be required to determine the magnitude of any potential impacts in order to ensure any impacts are less than significant.

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

For the Bradbury 2012-2030 General Plan Update, a California Natural Diversity Data Base (CNDDB) Survey was prepared. This report identifies biological resources potentially occurring in or nearby the City by reviewing the CNDDB and aerial photos of the area<sup>26</sup>. The survey found no US Fish and Wildlife designated critical habitat occurring in the City. One CNDDB-sensitive community, southern coast live oak riparian forest, was documented in Bradbury Canyon and Bliss Canyon.<sup>27</sup> Seven other vegetation communities were identified in the 25-square mile survey area.<sup>28</sup> The CNDDB search also identified 31 plant species and 32 wildlife species with the potential to occur in Bradbury.<sup>29</sup> However, the survey further explains that many of the species identified are habitat specialists, meaning that they only live in one specific

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

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

<sup>26</sup> City of Bradbury CNDB Search, January 17, 2014, p. 1.

<sup>27</sup> City of Bradbury CNDB Search, January 17, 2014, p. 2.

<sup>28</sup> City of Bradbury CNDB Search, January 17, 2014, p. 9.

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

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

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

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

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

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

Open Space Policy 4 – Protect existing Blueline Streams.

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

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

Conservation Policy 6 – Conserve riparian vegetation.

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

Conservation Policy 8 – Conserve oak woodlands.

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

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

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

Conservation Policy 19 – Protect natural resources.

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

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

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

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<sup>30</sup> City of Bradbury CNDB Search, January 17, 2014, p. 2

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

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

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

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

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

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

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

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

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

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<sup>31</sup> City of Bradbury CNDB Search, January 17, 2014, p. 2.

## V. CULTURAL RESOURCES: Would the project:

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

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

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

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

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

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

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

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

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

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

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

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

The 2012-2030 General Plan Update also proposes the following policies to protect archaeological resources:

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

Conservation Policy 19 – Protect natural resources.

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

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

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

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

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

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

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

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

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

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

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

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

**VI. GEOLOGY AND SOILS: Would the project:**

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

- i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42?
- ii) Strong seismic ground shaking?
- iii) Seismic-related ground failure, including liquefaction?
- iv) Landslides?

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Open Space Policy 5 – Prevention of soil erosion.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## VII. GREENHOUSE GAS EMISSIONS: Would the project:

Currently, no state or regional regulatory agency has formally adopted or widely agreed upon thresholds of significance for greenhouse gas emissions. CEQA Guidelines Section 15064.7 states that "each public agency is encouraged to develop and publish thresholds of significance that the agency uses in the determination of the significance of environmental effects." This section allows lead agencies to determine their own climate change thresholds.

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

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

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

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

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

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

Gases that trap heat in the atmosphere are sometimes referred to as greenhouse gases (GHGs).<sup>42</sup> These gases are released into the atmosphere by both natural and human activities. The accumulation of GHGs in the atmosphere is considered to be the cause of the increase in the Earth's temperature. The primary GHGs are carbon dioxide, methane, nitrous oxide, fluorinated gases, aerosols, and water vapor.

The Environmental Impact Report (EIR) prepared for the 2012 AQMP reported GHG emissions in the SCAB for the year of 2008.<sup>43</sup> Major sources of GHG emissions included fuel combustion, waste disposal, cleaning and surface coating, petroleum production and marketing, industrial processes, and other miscellaneous processes. The EIR found that mobile sources generate 59.4 percent of all GHG emissions in the SCAB.

The 2012-2030 General Plan Update will result in emissions of carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>) and nitrous oxide (N<sub>2</sub>O) from building energy use, water supply treatment and distribution, solid waste, and mobile sources.<sup>44</sup>

***Building Energy Use.*** GHGs are emitted from buildings as a result of activities for which electricity and natural gas are typically used as energy sources. These are considered direct GHG emissions. The off-site generation of electricity from fossil fuels also emits GHGs; these emissions are considered to be indirect. GHG emissions resulting from building energy use are anticipated to total 306.97 metric tons per year from project buildout.

***Water Supply Treatment and Distribution.*** Indirect GHG emissions will result from the production of electricity which is used to convey, treat and distribute water and wastewater. GHG emissions resulting from water supply treatment and distribution are anticipated to total 29.08 metric tons per year from project buildout.

***Solid Waste.*** Solid waste will largely be diverted from landfills by, for instance, recycling and composting. The remainder will be disposed at a landfill, which produces in GHG emissions during anaerobic breakdown. GHG emissions resulting from waste are anticipated to total 43.27 metric tons per year from project buildout.

***Mobile Sources.*** Mobile source GHG emissions will result from the daily operation of motor vehicles by visitors, employees, and customers. GHG emissions resulting from mobile sources are anticipated to total 1,018.66 metric tons per year.

The significance threshold for greenhouse gas emissions has not yet been determined.<sup>45</sup> The SCAQMD recommended a significance threshold of 3,000 metric tons of carbon dioxide equivalent (MTCO<sub>2</sub>e). Under the 2012-2030 General Plan Update, the total GHG emissions from all sources are anticipated to total 1,459.16 metric tons per year, far below the threshold of 3,000 metric tons per year.<sup>46</sup> Thus, GHG emissions (both direct and indirect) associated with

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<sup>42</sup> Air Quality and Greenhouse Gas Evaluation, 2012-2030 City of Bradbury General Plan Update, p. 32.

<sup>43</sup> Air Quality and Greenhouse Gas Evaluation, 2012-2030 City of Bradbury General Plan Update, p. 31.

<sup>44</sup> Air Quality and Greenhouse Gas Evaluation, 2012-2030 City of Bradbury General Plan Update, p. 59.

<sup>45</sup> Air Quality and Greenhouse Gas Evaluation, 2012-2030 City of Bradbury General Plan Update, p. 52.

<sup>46</sup> Air Quality and Greenhouse Gas Evaluation, 2012-2030 City of Bradbury General Plan Update, p. 61.

implementation of the 2012-2030 General Plan Update will not have a significant impact on the environment. Therefore, with the implementation of the Climate Action Plan Element and the following goals, objectives and policies proposed any impacts related to GHG emissions are ***less than significant***.

Climate Objective 1. Reduce dependence on nonrenewable energy resources.

Climate Policy 2. Regularly review and update the City's Green House Gas (GHG) inventory, energy profile and Energy Action Plan.

Climate Policy 5. Promote the reduction of dependency on motor vehicles by encouraging the use of alternate transportation modes.

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

Applicable plans, policies and regulations which address GHG emissions include, among others:<sup>47</sup>

- Title 24's energy efficiency standards
- Vehicle standards
- The Energy Independence and Security Act of 2007
- The draft NEPA Guidelines on GHGs
- The Western Regional Climate Action Initiative
- California Assembly Bill No. 1493 (AB 1493)
- Executive Order S-3-05
- California Senate Bill No. 1368 (SB 1368)
- Senate Bill 97 (SB 97)

The City is zoned for low density residential uses. The General Plan encourages the energy efficiency and would require new development to follow the rules and regulations under Title 24, as well as the policies and regulations relating to energy as they may be developed through the Energy Action Plan (EAP) and those outlined in the California Green Building Code related to energy efficiency requirements.

The 2012-2030 General Plan Update would not substantively change land use, the allowable development envelopes, or the existing patterns and intensities of use. Additionally, many of the new Climate Action Plan Element policies included would ensure that energy efficient appliances, practices, and building design features be used to ensure that energy use within the City is as efficient as possible.

Therefore, with the implementation of the Climate Action Plan Element and the objectives and policies listed above in response VII (a) any impacts related to GHG emissions are ***less than significant***.

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<sup>47</sup> Air Quality and Greenhouse Gas Evaluation, 2012-2030 City of Bradbury General Plan Update, p. 44-52.

## VIII. HAZARDS AND HAZARDOUS MATERIALS: Would the project:

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

The 1994 General Plan EIR addressed this issue area under the title, Risk of Upset/Human Health. The EIR stated that hazardous materials are unlikely to pose serious threats to public safety in Bradbury in that the residential nature of the City limits hazardous materials to primarily household types and quantities. Additionally, any potential impacts in regards to this area would be mitigated by programs in the General Plan as well as by State, Federal and Regional laws.<sup>48</sup>

The existing layout of the City of Bradbury is low density residential uses in the lower elevations and estate and agricultural uses along the upper slopes. No hazardous waste generators exist in the City and no hazardous waste transportation routes traverse the City. The Land Use Element does not envision any future development that would generate an adverse impact in regards to this issue.<sup>49</sup>

The 2012-2030 General Plan Update would not substantively change existing land uses, the allowable development envelopes, or the existing patterns and intensities of use. The presence, absence, use, storage and/or transport of hazardous materials are most often a function of specific commercial uses and associated with a specific development project or site. Additionally, the Los Angeles County Fire Department, Health Hazard Material Division administers the Unified Hazardous Waste and Hazardous Materials Management Regulatory Program for the City of Bradbury.<sup>50</sup>

Therefore, with the incorporation of the following goals, objectives and policies, impacts resulting from the routine transport, use, or disposal of hazardous materials are considered **less than significant**.<sup>51</sup>

Safety Goal 6 – To minimize the risk to persons and property due to the use and storage of hazardous materials.

Safety Objective 5 – Reduce the possibility of hazardous materials becoming a health and safety issue within the community.

Safety Policy 7 – Obtain materials and support the dissemination of written information to all Bradbury households regarding minimizing or avoiding hazards within the home.

Safety Policy 17 – Regulate and monitor, to the extent possible, the delivery, use and storage of hazardous materials within the City.

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<sup>48</sup> City of Bradbury 1994 General Plan Environmental Impact Report, p. 3-48.

<sup>49</sup> City of Bradbury 1994 General Plan Initial Study, p. 3-10.

<sup>50</sup> 2012-2030 City of Bradbury General Plan Update, p. 28.

<sup>51</sup> 2012-2030 City of Bradbury General Plan Update, Health and Safety Element, p. 33-35.

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

Refer to response to VIII(a). impacts resulting from the reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment are **less than significant**.<sup>52</sup>

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

The 1994 General Plan EIR addressed this issue area under the title, Risk of Upset/Human Health. The EIR stated that hazardous materials are unlikely to pose serious threats to public safety in Bradbury in that the residential nature of the City limits hazardous materials to primarily household types and quantities. Additionally, any potential impacts in regards to this area would be mitigated by programs in the General Plan as well as by State, Federal and Regional laws.<sup>53</sup>

The California Education Code (section 17210 *et seq.*) outlines the requirements of siting school facilities near or on known or suspected hazardous materials sites, or near facilities that emit hazardous air emissions, handle hazardous or acutely hazardous materials, substances, or waste. Although hazardous materials and waste generated from future development may pose a health risk to nearby schools, all businesses that handle, or have on-site transportation of hazardous materials, would be required to comply with the provisions of the City's Fire Code and any additional measures required under the California Health and Safety Code (Article 1 Chapter 6.95).

The Royal Oaks Elementary School is located at 2499 Royal Oaks Drive, in the City of Bradbury. The general student population of Bradbury is served by the Duarte School District.

The 2012-2030 General Plan Update would not substantively change existing land uses, the allowable development envelopes, or the existing patterns and intensities of use. The City's General Plan provides for low density residential uses, which would not contribute to the potential for storage of large hazardous materials or hazardous air emissions. With the implementation of the goals, objectives and policies listed above in response to VIII(a), impacts resulting from hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school are **less than significant**.

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

The 1994 General Plan EIR did not address this issue area.

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<sup>52</sup> 2012-2030 City of Bradbury General Plan Update, Health and Safety Element, p. 33-35.

<sup>53</sup> City of Bradbury 1994 General Plan Environmental Impact Report, p. 3-48.

The City of Bradbury is not located on a site included on the Hazardous Waste and Substances "Cortese" List.<sup>54</sup> Therefore, ***no impacts*** related to this issue.

**(e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?**

The 1994 General Plan EIR did not address this issue area. The City of Bradbury is not located within any airport land use plan or within two miles of a public use airport. The nearest airport is El Monte Airport, approximately 13 miles to the south, and there are no existing private airstrips within the City.

The 2012-2030 General Plan Update does not propose an airport or substantively modify the allowable development envelopes, or the existing patterns and intensities of use. Therefore, there are ***no impacts*** resulting from airport safety hazards related to a public airport.

**(f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?**

Refer to response to VIII(e). Therefore, there are ***no impacts*** resulting from airport safety hazards related to a private air strip.

**(g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

The 1994 General Plan EIR addressed this issue area under the title, Risk of Upset/Human Health and stated that less than significant impacts would occur in regards to this issue area. The Safety Element of the 1994 included a plan that identified emergency evacuation routes and shelters. Additionally, the plan recognized that potential impacts in regards to this area would be mitigated by programs in the General Plan as well as by State, Federal and Regional laws.<sup>55</sup>

The City of Bradbury adopted a Hazard Mitigation Plan in 2004. The Plan provides guidance for the City's response to emergency situations associated with natural and manmade disasters. The Plan concentrates on management concepts and response procedures relative to large-scale disasters. Such disasters could pose major threats to life, the environment and property, and can impact the well-being of a large number of people.

The 2012-2030 General Plan Update would not substantively change land use or the allowable development envelopes and would not increase the residential or daily working populations in the City beyond those contemplated by the existing General Plan and Hazard Mitigation Plan. The 1994 General Plan and the 2007 General Plan projected a population of 1,500 and 501

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<sup>54</sup> Website accessed on July 25, 2013, <http://www.calepa.ca.gov/sitecleanup/corteselist/SectionA.htm>.

<sup>55</sup> City of Bradbury 1994 General Plan Environmental Impact Report, p. 3-48.

dwelling units at full build-out. Similarly, the 2012-2030 General Plan Update estimates a population of 1,540 and 497 dwelling units at build-out.

The 2012-2030 General Plan Update updates emergency routes in the City, as well as identifies collection and information centers. The following streets would be used as primary evacuation routes:

- Mount Olive Drive.
- Woodlyn Lane (gates will be opened to permit exiting at Royal Oaks Drive, North). The access gate located near Mount Olive Drive will be used by "First Responders" to gain access to the Woodlyn Lane neighborhood.
- Deodar Lane (gates at Wild Rose, Barranca, and Woodlyn Lane will be opened to permit exiting from the Bradbury Estates neighborhood).
- Winston Avenue and the Lemon Avenue access to the Flood Control Channel will be used as access points for "First Responders".

Although no specific development project is considered at this time, development will continue under the full build-out of the General Plan. Both the existing and proposed General Plans provide for low density population, so a major increase in traffic is not anticipated. In the event of an accident or natural disaster, any delay in evacuation would occur due to the narrow roads and the abundance of private gates. These factors could also increase response times for emergency medical or containment services and/or evacuation personnel.<sup>56</sup> All new development would consult with the Fire Department to ensure adequate emergency access routes. As a result with the implementation of the goals, and objectives listed below, impacts related to emergency access are **less than significant**.<sup>57</sup>

Circulation-Transportation Goal 1 – The Circulation-Transportation Element seeks to maintain safe and efficient circulation systems that do not impact the rural residential character of the City.

Circulation-Transportation Goal 5 – Promote traffic safety throughout the community.

Circulation-Transportation Objective 2 – Strive for the creation of new transportation facilities for motorists, equestrians, pedestrians, and bicyclists. Emphasize design standards that result in the construction of circulation and transportation systems that are safe and efficient; and sensitive to the needs of the disabled and City's unique rural residential character.

Safety Objective 4 – Implement the City's Hazard's Mitigation Plan in a timely manner.

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<sup>56</sup> 2012-2030 City of Bradbury General Plan Update, Background Report, p. V-9.

<sup>57</sup> 2012-2030 City of Bradbury General Plan Update, Circulation Element, p. 12-13; 2012-2030 City of Bradbury General Plan Update, Health and Safety Element, p. 33.

**(h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?**

This specific issue area was not discussed in the 1994 EIR General Plan. However, under the title, Risk of Upset/Human Health addressed in the Initial Study the concern of an increase in fire hazards was found to be Potentially Significant Unless Mitigated. Implementation of the Public Safety Plan and programs provided in the 1994 General Plan provided ways to reduce the risk and protect residents from these hazards.

The City of Bradbury is located within a "Very High Fire Hazard Severity Zone," as determined by the Los Angeles County Fire Department, and is subject to the requirements of Section 51182 of the California Government Code, California Fire Protection. The Los Angeles County Fire Department adopted Fuel Modification Plan Guidelines in 1998 that provide guidelines and regulations for development and for maintaining existing properties within Fire Zone 4 or Very High Fire Hazard Severity Zones.<sup>58</sup> All new development would be required to comply with existing City and County standards which require, among other things, the installation of automatic fire extinguishing systems, brush clearance around structures, incorporation of fire prevention building practices, and installation of fire retardant plant materials.

The 2012-2030 General Plan Update will continue plans and program initiated in the 1994 General Plan. In addition to existing standards, the following goals, objectives and policies will ensure that impacts in regards to this issue area are *less than significant*.<sup>59</sup>

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

Safety Goal 5 – To minimize the risk to lives and property due to fire hazards

Safety Goal 8 – Assure that existing and new development addresses fire protection in a proactive and preventative way.

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

Safety Objective 2 – Prepare the residents of Bradbury to be aware of potential hazards and disasters and to be prepared to be self-reliant for at least seven-days in the event of a disaster.

Safety Objective 4 – Implement the City's Hazard's Mitigation Plan in a timely manner.

Safety Objective 7 – Ensure that adequate service levels of fire protection are maintained in the City.

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

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<sup>58</sup> 2012-2030 City of Bradbury General Plan Update, Background Report, p. V-5.

<sup>59</sup> 2012-2030 City of Bradbury General Plan Update, Health and Safety Element, p. 33-35.

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

Safety Policy 4 – Provide adequate levels of service to ensure that the residents are protected to the best of the City's ability from natural and manmade disasters.

Safety Policy 11 – Maintain and evaluate the level of safety services available to the community.

Safety Policy 14 – Continue to support programs to reduce fire hazards within the community.

Safety Policy 15 – Provide appropriate fire-fighting equipment, personnel and peakload water supply.

Safety Policy 18 – Require all existing and new development to install and maintain adequate smoke detection systems.

Safety Policy 19 – All new development to install fire sprinkler systems.

## **IX. HYDROLOGY AND WATER QUALITY: Would the project:**

### **(a) Violate any water quality standards or waste discharge requirements?**

The 1994 General Plan Initial Study stated that future residential development is not expected to include uses that would cause major discharges or alteration in surface water. Additionally, new development would be subjected to the preparation of a Standard Urban Stormwater Mitigation Plan (SUSMP), in compliance with the Municipal Stormwater NPDES Permit.<sup>60</sup> The EIR prepared for the 1994 General Plan found that no significant adverse impacts would occur with build-out of the area due to the implementation of Land Use and Conservation Policies.<sup>61</sup>

California American Water conducts extensive monitoring to test for various contaminants that may be present in the water supply and to ensure that all safe water quality standards are met. A report issued in 2011 indicated that all state and federal water quality standards were met in the City of Bradbury.<sup>62</sup>

The 2012-2030 General Plan Update would not substantively change land uses, the allowable development envelopes, or the existing patterns and intensities of use. Addition of the following goals, objectives and policies will ensure that impacts in regards to water quality standards and discharge requirements are **less than significant**.<sup>63</sup>

Open-Space Policy 2 – Protect water quality.

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<sup>60</sup> City of Bradbury 1994 General Plan Initial Study, p.3-5.

<sup>61</sup> City of Bradbury 1994 General Plan Environmental Impact Report, p. 3-28.

<sup>62</sup> 2012-2030 City of Bradbury General Plan Update, Background Report, p. VII-4.

<sup>63</sup> 2012-2030 City of Bradbury General Plan Update, Community Resources Element, p. 7, 29-31.

Open-Space Policy 5 – Prevention of soil erosion.

Conservation Goal 3 – Protect the valuable watershed and natural habitat areas.

Conservation Goal 4 – Protect and maintain the local water supply to ensure that the City's growing demand for water is properly accommodated.

Conservation Objective 5 – Continue to develop a comprehensive NPDES plan that meets state standards.

Conservation Policy 1 – Protect water bodies, watersheds and courses from development impacts.

Conservation Policy 3 – Protect surface water resources from contamination.

Conservation Policy 5 – Conserve water supplies (ground and surface).

Conservation Policy 15 – Eliminate identified water pollution sources.

Conservation Policy 16 – Improve major sewer, water, and storm drainage systems.

Conservation Policy 17 – Control hazardous materials in areas where water pollution is possible.

**(b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?**

The EIR prepared for the 1994 General Plan stated that although new residential development in the City of Bradbury would lead to increases in water consumption and increased pumping of groundwater resources, the lower density development envisioned under the General Plan would not create a significant adverse impact.<sup>64</sup> Since that time, fixtures have become more efficient and the Building Codes have required use of the same.

The proposed 2012-2030 General Plan Update would not substantively change land uses, the allowable development envelopes, or the existing patterns and intensities of use. Any new development in the City would be subjected to compliance with City and County Codes, as they pertain to groundwater issues. Additionally, implementation of the following goals and policies would ensure impacts to groundwater supplies or recharge are *less than significant*.<sup>65</sup>

Conservation Goal 3 – Protect the valuable watershed and natural habitat areas.

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<sup>64</sup> City of Bradbury 1994 General Plan Environmental Impact Report, p. 3-26.

<sup>65</sup> 2012-2030 City of Bradbury General Plan Update, Community Resources Element, p. 29-30.

Conservation Goal 4 – Protect and maintain the local water supply to ensure that the City's growing demand for water is properly accommodated.

Conservation Policy 1 – Protect water bodies, watersheds and courses from development impacts.

Conservation Policy 5 – Conserve water supplies (ground and surface).

**(c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on- or off-site?**

The EIR prepared for the 1994 General Plan found that issues related to water would not result in significant adverse impacts through the implementation of various programs in the General Plan.<sup>66</sup>

The City of Bradbury does not discharge to a water body that would be susceptible to erosion and siltation caused by alteration of drainage properties. Additionally, drainage patterns in the City would not be substantially altered in a manner that could cause or contribute to increased erosion or siltation. Existing development regulations include design requirements to minimize post-construction erosion impacts, reduction of stormwater runoff, adequate drainage and the prevention of any illegal discharges that could contribute to capacity exceedances and localized flooding. These regulations ensure incorporation of stormwater detention facilities, design of drainage facilities to minimize adverse effects on water quality, and minimization of increases in impervious areas.

The 2012-2030 General Plan Update would not substantively change land use, the allowable development envelopes, or the existing patterns and intensities of use. Additionally, with the implementation of the goals, objectives, and policies listed in IX a) and b) would ensure impacts resulting from alterations to the existing drainage patterns that would cause erosion and siltation are ***less than significant***.

**(d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?**

Refer to response to IX(c). Impacts resulting from alterations to the existing drainage patterns that would cause flooding are ***less than significant***.

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<sup>66</sup> City of Bradbury 1994 General Plan Environmental Impact Report, p. 3-28.

**(e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?**

The EIR prepared for the 1994 General Plan found that issues related to water would not result in significant adverse impacts through the implementation of various programs in the General Plan.<sup>67</sup>

The City of Bradbury is almost entirely built-out with established utility services and discharges stormwater to the Los Angeles Hyperion Wastewater Treatment Plant (HWTP), which provides secondary treatment to dry-weather stormwater within its service area. Current regulations reduce the potential for runoff so that the stormwater system does not contribute to water quality contamination. Specific projects would be required to undergo project-specific environmental review, at which time specific mitigation or design changes would occur to reduce the exposure of people or structures to flooding.

No development is contemplated at this time and the 2012-2030 General Plan Update does not substantively change land use or development intensity. With the implementation of the proposed goals, objectives and policies listed above in response IX (a) and (b) as they relate to this issue area the 2012-2030 General Plan Update would not exceed the volume stormwater runoff and impacts are ***less than significant***.

**(f) Otherwise substantially degrade water quality?**

The EIR prepared for the 1994 General Plan found that issues related to groundwater would not result in significant adverse impacts through the implementation of various programs in the General Plan.<sup>68</sup>

Common sources of groundwater contamination during construction include earth-disturbing activities, such as trenching for underground utilities and pile driving for foundations. These activities could penetrate the water table and potentially result in minor groundwater contamination. Compliance with existing regulations would ensure that these earth-disturbing activities would not result in adverse groundwater conditions.

Another source of ground water contamination is spillage resulting from improper handling, or storage of hazardous materials used during construction, which, could contaminate surface water or percolate into the groundwater. Careful monitoring of construction activities to ensure compliance with best management practices would ensure groundwater degradation during construction is not substantial. Additionally, project-specific environmental review would be required, with appropriate mitigation identified.

No development is contemplated at this time and the 2012-2030 General Plan Update does not substantively change land use or development intensity. With the implementation of the proposed goals, objectives and policies listed above IX (a) and (b) as they relate to water quality

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<sup>67</sup> City of Bradbury 1994 General Plan Environmental Impact Report, p. 3-28.

<sup>68</sup> City of Bradbury 1994 General Plan Environmental Impact Report, p. 3-28.

the 2012-2030 General Plan Update would not degrade water quality and impacts are ***less than significant***.

**(g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?**

The EIR prepared for the 1994 General Plan found that issues related to flooding would not result in significant adverse impacts through the implementation of various programs in the General Plan.<sup>69</sup>

The City of Bradbury is not located within a 100-year flood hazard area, as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map. The City's storm drain system would continue to be maintained and upgraded. The City's large agriculturally zoned and developed parcels either retain surface run-off on-site or it is directed to the public facilities by a system of privately owned and maintained drainage swales.<sup>70</sup> Minor occurrences concerning water runoff occurred in the past during extremely wet years, however privately owned improvements have been made to rectify the local flooding issues. These minor flooding problems tend to be localized and primarily relate to very small mudslides and small erosion problems in areas where the natural topography had been altered.

The City of Bradbury adopted and updated the Natural Hazard Mitigation Plan on July 7, 2007 by City Council Resolution No. 07-17.<sup>71</sup> The updated plan fulfills the City's obligation pursuant to the Federal Disaster Mitigation Act of 2000. Flood mitigation including flood hazard mitigation would continue to be addressed as part of the City's Natural Hazard Mitigation Plan to minimize potential risks associated with flooding.

Furthermore, future projects under the continued build-out of the General Plan would be required to undergo project-specific environmental review, at which time specific mitigation or design changes would be required to appropriately protect against potential flooding and would not result in exposing additional people to flooding. With the implementation of the proposed goals, objectives in the 2012-2030 General Plan Update and specifically the following Policy and Goal impacts as they related to housing placed within a flood hazard area are ***less than significant***.

Conservation Policy 18 - Implement and maintain flood management facilities.

Safety Goal 7 - Protect the community from floods and landslides.

**(h) Place within a 100-year flood hazard area structures, which would impede or redirect flood flows?**

Refer to response to IX(g). Impacts as they related to structures placed within a 100-year flood hazard area are ***less than significant***.

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<sup>69</sup> City of Bradbury 1994 General Plan Environmental Impact Report, p. 3-28.

<sup>70</sup> 2012-2030 City of Bradbury General Plan Update, Health and Safety Element, p. 19.

<sup>71</sup> 2012-2030 City of Bradbury General Plan Update, Health and Safety Element, p. 27.

**(i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?**

The EIR prepared for the 1994 General Plan found that issues related to flooding would not result in significant adverse impacts through the implementation of various programs in the General Plan.<sup>72</sup>

The San Gabriel River, situated east of the City of Bradbury, the Spinks Debris Basin and the Bradbury Debris Basin are within areas subject to flooding. Existing and future land uses and residents within the flood hazard areas will continue to be exposed to inundation hazards. The City's Natural Hazard Mitigation Plan minimizes potential risks from flooding.

Current design and construction practices and ongoing programs of review, modification, or total reconstruction of existing dams are intended to ensure that all dams are capable of withstanding the maximum credible earthquake (MCE) for the Incentive Area. FEMA requires that all reservoir owners develop Emergency Action Plans (EAP) for warning, evacuation, and post-flood actions. Although there may be coordination with County officials when drafting the EAP, the responsibility for developing potential flood-inundation maps and facilitation of emergency response is the responsibility of the reservoir owner. There are four reservoirs currently located with the City.<sup>73</sup>

The 2012-2030 General Plan Update includes the following policies and goals to ensure impacts are less than significant:

Conservation Policy 18 – Adopt ordinances that require new development to utilize techniques and equipment that reduce consumption of non-renewable resources.

Safety Goal 7 – Protect the community from floods and landslides.

Impacts related to the loss of property or harm to individuals due to hazards related to flooding are considered ***less than significant***.

**(j) Inundation by seiche, tsunami, or mudflow?**

The 1994 General Plan EIR discussed this issue area under Earth Resources and proposed a number of policies and implementation programs that addressed the geologic and seismic hazards that are present in the planning area, including, but not limited to:

- Geologic investigations should be performed for projects within one-half mile of the Duarte and Sierra Madre fault traces. Buildings should be located away from the fault, as much as possible. Investigations should also be performed for development on potential landslide areas.

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<sup>72</sup> City of Bradbury 1994 General Plan Environmental Impact Report, p. 3-28.

<sup>73</sup> 2012-2030 City of Bradbury General Plan Update, Health and Safety Element, p. 26.

- Areas with slopes greater than 20 percent should be subject to engineering design methods to achieve adequate foundation support.
- Exposed slopes should be landscaped immediately after grading to prevent erosion.
- Projects within or near identified flood hazard areas should be constructed to withstand flood waters at a capacity of the 100-year flood or should include storm drain improvements to eliminate potential flooding.
- Water lines and utilities infrastructure in hazard zones should be designed with a higher safety factor.

The EIR stated that these policies and programs would mitigate impacts associated with any new development proposed and any adverse impacts associated would be mitigated by the policies, programs, land use controls, and building and engineering methods.<sup>74</sup>

The City of Bradbury is almost entirely built-out and the 2012-2030 General Plan Update would not substantively change land use, the allowable development envelopes, or the existing patterns and intensities of use.

A seiche is wave generated on the surface of a landlocked body of water, such as a lake, reservoir or swimming pool.<sup>75</sup> A tsunami is a great sea wave produced by submarine earth movement or volcanic eruption. Both seiches and tsunamis are known to occur following earthquakes. After a major earthquake, it can be assumed that there may be minor flooding and damage caused by water sloshing out of swimming pools (resulting from a seiche); however, this is not anticipated to be substantial. The City is located inland from the Pacific Ocean and would not be subjected by a tsunami. The San Gabriel River Channel, east of the City, is designed to contain a 100-year flood. The Natural Ground Center, the Spinks Debris Basin, the Bradbury Debris Basin, and check dams provide the City with protection from large scale floods. The General Plan EIIR found less than significant impact from seiche.

Mudflows are often triggered by periods of heavy rainfall. Earthquakes, subterranean water flow and excavation can also trigger mudflows. Factors contributing to rain-caused mudslides are barren earth, steep slopes and roads. Although landslides are natural processes, the incidence of mudslides and their impacts on people and structures can be exacerbated by human activities. Grading and construction can decrease the stability of a slope by adding weight to the top, removing support at the base, or increasing water content. Other activities that can increase the potential for mudslides include: excavation, improper drainage, ground water alteration and vegetation removal (due to construction or wildfire). Minor problems involving small mudslides and erosion problems have occurred due to runoff in areas where the natural grade has been disturbed.

The City is located at the foot of the San Gabriel Mountains, with hillside areas to the north. In the event of heavy rains, saturated soils in hillside areas may be subject to failure. The majority of the vacant parcels in the City are located in areas where the existing slope grade exceeds a 2:1 ratio of horizontal to vertical distance. Existing regulations regulate grading that would increase the potential for mudslides and the General Plan encourages the preservation of natural features in hillside areas.

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<sup>74</sup> City of Bradbury 1994 General Plan Environmental Impact Report, p. 3-28.

<sup>75</sup> Merriam-Webster Dictionary, 2009.

No individual development projects are contemplated at this time. Any future development in the City of Bradbury would be required to analyze hazards associated with mudflow and seiches. Due to the City's location, there is no need for reports to address tsunamis.

With the implementation of the proposed goals and objectives stated in the 2012-2030 General Plan Update impacts as they related to inundation by seiche, tsunami, or mudflow are ***less than significant***.

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

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

Safety Goal 7 – Protect the community from floods and landslides.

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

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

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

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

## X. LAND USE AND PLANNING: Would the project:

### (a) Physically divide an established community?

The 1994 General Plan EIR found that no impact would occur in regards to physically dividing an established community. Additionally, the EIR stated that the Land Use Plan was designed to prevent adverse impacts on land use. Future development envisioned under the Land Use Element would not result in land use conflicts or incompatibilities.<sup>76</sup>

The 2012-2030 General Plan Update would not substantively change land use, the allowable development envelopes, or the existing patterns and intensities of use. The City of Bradbury is essentially built-out, with a very limited inventory of large, unconstrained, vacant properties available for new development. There are no land use changes or any extensions of roadways or other development features that could result in the physical division of an established community. Rather, the 2012-2030 General Plan Update supports the preservation of existing residential neighborhoods while allowing the City to continue developing under the allowable envelopes, preserving residential neighborhoods, promoting transit accessibility and ensuring design which will provide for appropriate transitions and compatibility between adjoining uses.

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<sup>76</sup> City of Bradbury 1994 General Plan Environmental Impact Report, p. 3-8.

The protection of residential neighborhoods is an important objective of the General Plan. The 2012-2030 General Plan Update would continue to protect the City's residential communities and would not physically divide an established community. Therefore, with the implementation of the Land Use Element and the following there are ***no impacts*** resulting in the physical division of an established community.

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

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

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

**(b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?**

The 1994 General Plan EIR found that no impact would occur in regards to conflicting with applicable environmental plans or policies. Additionally, the EIR stated that the Land Use Plan was designed to prevent adverse impacts on land use and future development envisioned under the Land Use Element would not result in land use conflicts or incompatibilities.<sup>77</sup>

Applicable regionally adopted plans, policies, and regulations include the 2007 Air Quality Management Plan (AQMP), the Regional Transportation Plan (RTP) and SCAG's Regional Comprehensive Plan and Guide (RCPG). The SCAG regional plans cover Los Angeles County, which includes the City of Bradbury, and five other counties within Southern California.

Implementation of the 2012-2030 General Plan Update would not result in additional development beyond what has already been contemplated within the existing General Plan. Therefore, the growth projections included in the RCPG, which are based on full build-out of the City's existing General Plan, still provide a good estimation of growth for the City, and, in turn, are consistent with the growth projections included in the AQMP. With the implementation of the Land Use Goal, Policy and Objective stated above in response X(a) there are ***no impacts*** in resulting from conflicts with planning regulations.

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<sup>77</sup> City of Bradbury 1994 General Plan Environmental Impact Report, p. 3-8.

**(c) Conflict with any applicable Habitat Conservation Plan or Natural Community Conservation Plan?**

Implementation of the 2012-2030 General Plan Update would not conflict with any Habitat Conservation Plan or Natural Community Conservation Plans because the City does not have any habitat or natural community conservation plans. The City is almost entirely built-out and the majority of the vacant parcels are in areas that may be difficult to develop due to steep slopes, erosion potential and natural constraints. The developed areas contain paved, landscaped areas of ornamental and non-native plant species. Any proposed development in areas of natural vegetation would be required to submit a biological resource evaluation and be subject to potential mitigation.

Although the City does not have any Habitat Conservation Plans or Natural Community Conservation Plans, the 2012-2030 General Plan Update includes:

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

Therefore, there are ***no impacts***.

**XI. MINERAL RESOURCES: Would the project:**

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

The 1994 General Plan EIR discussed this issue area under the title of Energy and Mineral Resources. The EIR found that no impacts would occur in that the City is not located within a Significant Mineral Aggregate Resource Area nor in an area with active mineral extraction activities.<sup>78</sup>

The Surface Mining and Reclamation Act of 1975 (SMARA) provides for the regulation of surface mining operations to assure that adverse environmental impacts are minimized and mined lands are reclaimed to a usable condition. The SMARA also encourages the production, conservation, and protection of the State's mineral resources. California Public Resources Code, Section 2207 provides annual reporting requirements for all mines in the State, under which the State Mining and Geology Board (SMGB) is also granted authority and obligations.

There are no MRZ zones in the City of Bradbury.

The 2012-2030 General Plan Update does not substantively change land use or development intensity. The General Plan Update includes:

Conservation Policy 19 – Protect natural resources.

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<sup>78</sup> City of Bradbury 1994 General Plan Initial Study, p.3-10.

With the implementation of the proposed goals, objectives and policies in the 2012-2030 General Plan Update and specifically Conservation Policy 19, ***no impacts*** related to the loss of availability of a known mineral resource.

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

Refer to response to XI(a). There are ***no impacts*** related to the loss of availability of a locally-important mineral resource.

**XII. NOISE: Would the project result in:**

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

The 1994 General Plan EIR's major goal of the Noise Element was to prevent the creation of noise problems in the City and the mitigation of existing noise sources. Policies and programs in the Noise Element serve to reduce noise impacts due to future development in the planning area. Implementation of these programs would mitigate noise impacts to a level of insignificance.<sup>79</sup>

The City of Bradbury is exclusively zoned and developed with single-family residential detached dwelling units on primarily private roads.<sup>80</sup> Under the 2012-2030 General Plan Update, the City would remain exclusively single-family residential. There are no industrial uses in close proximity to residents in the City. As a result, noise levels which are acceptable for commercial and industrial uses in other communities are not acceptable in the City of Bradbury.

Within the City, outdoor and indoor noise is generated from activities associated with single-family residences, such as yard maintenance, barking dogs, and the use of appliances and electronics.<sup>81</sup> The average residential lot in the City is substantially larger than single-family residential lots in adjacent communities. These large parcels generally contain dense landscaping and have significant setbacks which buffer noise emanating from adjacent uses.

The Irwindale Raceway located south of the City of Bradbury has been identified as a noise source.<sup>82</sup> To combat noise related to the Raceway, dwelling units constructed within the past several decades are well insulated and are equipped with double and triple pane windows.

The greatest source of noise for the City of Bradbury is traffic.<sup>83</sup> Therefore, revised Noise Contours were prepared for the General Plan Update 2012-2030. Royal Oaks Drive, which borders the City, Huntington Drive, Buena Vista Street, Highland Avenue, and Duarte Road are

<sup>79</sup> City of Bradbury 1994 General Plan Environmental Impact Report, p. 3-53.

<sup>80</sup> City of Bradbury General Plan Update 2012-2030, Health and Safety Element, p. 4-6.

<sup>81</sup> City of Bradbury General Plan Update 2012-2030, Health and Safety Element, p. 4-5.

<sup>82</sup> City of Bradbury General Plan Update 2012-2030, Health and Safety Element, p. 4-5.

<sup>83</sup> City of Bradbury General Plan Update 2012-2030, Health and Safety Element, p. 5.