

# **COUNTY OF LOS ANGELES**

#### DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

900 SOUTH FREMONT AVENUE ALHAMBRA, CALIFORNIA 91803-1331 Telephone: (626) 458-5100 www.ladpw.org

October 23, 2006

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

IN REPLY PLEASE REFER TO FILE: LD-0

Mr. David Chantarangsu, AICP Assistant Director of Planning City of Glendora 116 East Foothill Boulevard Glendora, CA 91741

Dear Mr. Chantarangsu:

RESPONSE TO NOTICE OF PREPARATION
OF DRAFT ENVIRONMENTAL IMPACT REPORT FOR
MONROVIA NURSERY VESTING TENTATIVE TRACT
CITY OF GLENDORA

Thank you for the opportunity to provide comments on the Notice of Preparation of a Draft Environmental Impact Report (DEIR) for the Monrovia Nursery Tentative Tract. The proposed project involves the adoption of a vesting tentative tract for development of 130 single-family homes. We reviewed the Initial Study and offer the following comments for your consideration in preparing the DEIR.

# Hydrology/Water Quality and Drainage

The Initial Study adequately discusses the potential substantial adverse effects, including the risk of property damage and personal safety, existing within the project site; however, the initial study does not address issues that will develop outside of the project boundary that could impact this development. It does not include the adverse effect of the debris and mudflows that are generated in the canyons of the mountains north of the project. A previous study has shown there is a potential for 15,000 cubic yards of debris in Hicrest Canyon. The crib structures in Hicrest and Lost Mine Canyons help stabilize the erosion of the streambeds in the canyons but they are not designed to retain debris. They presently do not provide any significant reduction in mudflow hazard. Hence, Checklist Item 8j needs to be revised, and the DEIR will need to address this issue.

To further evaluate hydrology and drainage impacts, a drainage concept report, including a Standard Urban Storm Water Mitigation Plan, must be prepared during the DEIR stage for Public Works' review and approval. When approved, the report should be included in the DEIR.

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The Initial Study makes reference to a previous Agreement between the developer and the Cities of Azusa and Glendora regarding the needed detention basins and the need to change this Agreement. We have concerns about the replacement of Hicrest Detention Basin Facility 2C (Exhibit 3, Hydrology Study for Miscellaneous Transfer Drain No. 1761, Monrovia Nursery, dated March 22, 2005) with a storm drain with no upstream debris protection as shown on the new storm drain plan. Failure of the proposed drain resulting from mud and debris at Reach 4A will substantially alter the existing drainage pattern and result in ponding and debris deposition on Sierra Madre Avenue with diversion of flow onto either Yucca Ridge Road or Barranca Avenue after a depth of 6-feet is reached. Lots 26 through 33 would be highly suspect for flooding and mudflow damage.

Should it be the City's intent to transfer the flood control facilities to the Los Angeles Flood Control District, the detention basin should be concrete lined (sides and bottom). Any water quality basins should be constructed off-line of the main drainage system. Also, 24-hour access to all facilities must be provided, access must be over properly sized roads, and the roads must be constructed for H20 traffic loading. Street access to a detention basin must allow two-way truck traffic. Where necessary, the turnaround areas for Public Works equipment must be able to handle a minimum 40-foot turning radius.

A recent site review revealed that the proposed detention basin in the northerly part of this property has not been constructed yet by the current development occurring in Azusa. However, all plants and vegetation have been removed leaving a vacant dirt/rock area on this sizable undeveloped property. We are in the storm season and significant rains on the current site condition may cause debris flow onto the streets and neighborhoods below. Water quality may be an issue as well. Consideration should be given to construction of the detention basin and additional erosion control measures before significant storms occur.

### **Hazards and Hazardous Materials**

The Initial Study states that the property has been a nursery for decades and that pesticides and fertilizers have come in contact with topsoil. It goes on to say that the DEIR will evaluate whether or not materials in the soil will pose a health risk during grading and the health risks from such material remaining in the soil in the project's post-construction phase. Any excavated soil that is contaminated by or classified as hazardous waste by an appropriate agency will need to be managed and disposed in accordance with applicable Federal, State, and local laws and regulations.

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Also, should any operation within the subject project include the construction, installation, modification, or removal of underground storage tanks, industrial waste treatment or disposal facilities, and/or storm water treatment facilities, the applicant will need to contact our Environmental Programs Division for required approvals and operating permits.

## **Transportation/Traffic**

The project is estimated to generate approximately 1,244 vehicle trips daily with 98 and 131 vehicle trips during the a.m. and p.m. peak hours, respectively. We agree that the proposed project has the potential to significantly impact the County and County/City roadways and intersections in the area. We would like the opportunity to review the DEIR including the traffic impact study upon its completion. The County's methodology shall be used when evaluating the County and/or County/City intersections. The study shall also address the cumulative impacts generated by this and nearby developments and include the level of service analysis for the affected intersections. If traffic signals or other mitigation measures are warranted at the affected County intersections, the applicant shall determine its proportionate share of traffic signal or other mitigation costs and submit this information to Public Works for review and approval. A copy of our Traffic Impact Analysis Report Guidelines may be obtained from our website at http://ladpw.org/Traffic.

If you have any questions regarding the above comments, please contact Mr. Suk Chong (626) 458-7150.

Very truly yours,

DONALD L. WOLFE
Director of Public Works

ROSSANA D'ANTONIO Assistant Division Engineer Land Development Division

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