

**FINAL**

**MITIGATED NEGATIVE**

**DECLARATION**

**FOR**

**ALVERNO HIGH**

**SCHOOL MASTER**

**PLAN**

**SCH NO. 2011031033**



*prepared for:*

**CITY OF SIERRA  
MADRE**

Contact:  
Danny Castro  
Director of Development  
Services

*prepared by:*

**THE PLANNING  
CENTER**

Contact:  
Barbara Wu Heyman  
Senior Planner

**MAY 2011**

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232 West Sierra Madre Boulevard  
Sierra Madre, CA 91024  
(626) 355 7135 ext. 401

Contact:  
Danny Castro  
Director of Development  
Services

*prepared by:*

**THE PLANNING  
CENTER**

1580 Metro Drive  
Costa Mesa, CA 92626  
Tel: 714.966.9220 • Fax: 714.966.9221  
E-mail: [information@planningcenter.com](mailto:information@planningcenter.com)  
Website: [www.planningcenter.com](http://www.planningcenter.com)

Contact:  
Barbara Wu Heyman  
Senior Planner

**COSM-01.0E**

**MAY 2011**

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# 1. *Introduction*

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## **1.1 INTRODUCTION**

This document and the Draft MND constitute the Final Mitigated Negative Declaration (MND) for the proposed Alverno High School Master Plan project, State Clearinghouse No. 2011031033 (Proposed Project).

This Final MND contains the comments received on the circulated Draft MND for the proposed project and the City of Sierra Madre's responses to the comments. This document also contains revisions to the Draft MND based upon 1) additional or revised information required to prepare a response to a specific comment, 2) applicable updated information that was not available at the time of the publication of the Draft MND, and/or 3) typographical errors.

## **1.2 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES**

Unlike Environmental Impact Reports (EIR), the lead agency has no affirmative duty to prepare formal responses to comments on the MND but should have adequate information on the record explaining why the comment does not affect the conclusion that there are no potentially significant environmental effects. In the spirit of public disclosure and engagement, the City of Sierra Madre, as the lead agency of the proposed project, has responded to all written comments submitted during the public review period. While not required, the City has applied and modeled this document to the guidelines and principals of the CEQA requirement for Final EIRs, Section 15132 of the CEQA Guidelines. Therefore, this Final MND consists of:

- (a) The Draft MND or a revision of the Draft;
- (b) Comments and recommendations received on the Draft MND either verbatim or in summary;
- (c) A list of persons, organizations, and public agencies comments on the Draft MND;
- (d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process; and
- (e) Any other information added by the Lead Agency.

Comment and recommendations received on the MND should focus on the sufficiency of the document in identifying and analyzing possible impacts on the environment and ways in which project impacts might be avoided or mitigated. Comments are most helpful when they suggest mitigation measures that would provide better ways to avoid or mitigate the potentially significant environmental effects.

Specifically, CEQA Guidelines Section 15204 (b) outlines parameters for submitting comments, and reminds persons and public agencies of the focus of review and comment of a Draft MND.



# 1. Introduction

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“In reviewing negative declarations, persons and public agencies should focus on the proposed finding that the project will not have a significant effect on the environment. If persons and public agencies believe that the project may have a significant effect, they should:

- (1) Identify the specific effect,
- (2) Explain why they believe the effect would occur, and
- (3) Explain why they believe the effect would be significant.”

CEQA Guidelines Section 15204 (c) further advises, “Reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence.”

CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the environmental document. Although not required by CEQA, the City will be mailing the written responses to the commenters, as well as making available the Final MND on its website prior to the date of the public hearing.

## 1.3 **FORMAT OF THE FINAL MND**

This document is organized as follows:

**Section 1, Introduction.** This section describes CEQA requirements on comments and responses, and contents of this Final MND.

**Section 2, Response to Comments.** This section identifies the agencies and interested persons that commented on the circulated Draft MND, includes copies of comment letters received during the public review period, and includes the City’s responses to the comments. To facilitate review of the responses, each comment letter has been reproduced and assigned a number. Individual comments have been numbered for each letter, and the letter is followed by responses with references to the corresponding comment number.

**Section 3, Revisions to the Circulated Draft MND.** This section contains revisions to the Draft MND text and figures, as applicable, as a result of the comments received by agencies and interested persons as described in Section 2, and/or errors and omissions discovered subsequent to release of the Draft MND for public review.

**Appendix A, Mitigation Monitoring and Reporting Program.** The Mitigation Monitoring and Reporting Program (MMRP) lists all the mitigation measures required for implementation of the project, the phase in which the measures would be implemented, and the enforcement agency responsible for compliance. The monitoring program provides 1) a mechanism for giving the lead agency staff and decision makers feedback on the effectiveness of their actions; 2) a learning opportunity for improved mitigation measures on future projects; and 3) a means of identifying corrective actions, if necessary, before irreversible environmental damage occurs.

## *2. Response to Comments*

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This section provides all written comments received on the circulated Draft MND and the City's response to each comment. General responses concerning alleged segmentation of the proposed project and concerning detailed information on the proposed removal of existing and planting of new trees have also been prepared by the City to address these recurring topics.

Comment letters and specific comments are given letters and numbers for reference purposes. Where sections of the Draft MND are excerpted in this document, the sections are shown indented. Changes to the Draft MND text are shown in underlined text for additions and ~~strikeout~~ for deletions. They are also summarized in Section 3 of this document.

The following is a list of agencies and persons that submitted comments on the Draft MND during the public review period.



## 2. Response to Comments

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| <b>Number Reference</b>             | <b>Commenting Person/Agency</b>         | <b>Date of Comment</b> | <b>Page No.</b> |
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### **General Response #1 Concerning Project Segmentation**

A few comments suggest that the project description for the proposed Alverno High School Master Plan project, as defined in Chapter 1.3 of the Mitigated Negative Declaration (MND), is not complete. The comments further suggest that the project description should include 1) a future Conditional Use Permit (CUP), for which an application has not yet been submitted, and 2) the existing uses at the Villa de Sol d'Oro. The comments imply that because the MND does not include either of these elements in the project description and because the MND does not analyze their effects, the MND has, therefore, not analyzed the full effects of the proposed project.

### **Definition of the Proposed Project**

Alverno High School, the project applicant, is currently seeking the City's approval of an amendment to a CUP that was originally approved in 1959 (Proposed CUP Amendment). Approval of the proposed CUP amendment would allow the applicant to implement the Alverno High School Master Plan. According to CEQA Guidelines Section 15378(a), "project" is defined as "the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment." As the project description provided in Chapter 1.3 of the MND fully details the features and elements of the Alverno High School Master Plan and therefore the requested action, the project as defined is whole and complete. Additionally, since the environmental analysis contained in the MND addresses all of the environmental effects associated with the master plan, the impact analysis is also sufficient and adequate.

### **Future Conditional Use Permit, Segmentation of Project**

The comments suggest that the project description should be expanded to include another CUP that the Applicant may in the future submit to the City for consideration (Future CUP). This future CUP, authorized by Section 17.82.060(B)(4) of the Sierra Madre Municipal Code, would allow the applicant to renovate the Villa de Sol d'Oro, a City-designated historical landmark located in the center of the campus, in accordance with the State Historic Building Code. The future CUP would also allow Alverno High School to permanently operate the Villa for non-school-related functions. The comments further suggest that by separating the proposed project from this future CUP, the City has "segmented" the proposed project and eliminated analysis of cumulatively considerable project impacts. "Piecemealing" or "segmenting" is generally defined as the splitting of a project into two or more components, usually resulting in submerging environmental considerations "by chopping a large project into many little ones, each with a potential impact on the environment, which cumulatively may have disastrous consequences." *Burbank-Glendale-Pasadena Airport Authority v. Hensler* (1991) 233 Cal. App. 3d 577, 592.

The City is fully aware that segmentation is prohibited by CEQA and that it must fully analyze each "project" in a single environmental review document. The City had carefully considered the possibility of segmentation prior to commencing environmental analysis of the proposed project and determined that the proposed CUP amendment and the future CUP application are two separate actions that each requires its own process.

Furthermore, not only is it speculative to assume that the Applicant will absolutely submit such an application to the City, this future CUP is in no way related to and has no bearing on the proposed action. The Proposed CUP Amendment and future CUP are mutually exclusive. A hypothetical approval of the future CUP by the City, if such an application were to be submitted, would not be a foreseeable consequence of the Proposed CUP Amendment, nor would its effects change the scope or nature of the



## 2. Response to Comments

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Proposed CUP Amendment or its environmental effects in any way. The Proposed CUP Amendment would improve the campus for school operation purposes, while the future CUP, on the other hand, would allow permanent operation of the Villa for non-school-related functions. According to *Laurel Heights Improvement Associate v. Regents of the University of California* (1988) 47 Cal. 3d 376, 396, an environmental document (i.e., EIR or MND) must include an analysis of the environmental effects of future expansion or another action if it is a reasonably foreseeable consequence of the initial project, and the future expansion or action will be significant in that it will likely change the scope or nature of the initial project or its environmental effects. As the proposed project and the future CUP are independent of one another, and in no way would the approval of one result in a reasonably foreseeable indirect physical change causing the need for the other and vice-versa, the future CUP does not need to be included as a part of the proposed project. Therefore, it is not necessary that the project description include the future CUP. The City has not bifurcated the project, as claimed in the comment letters, and the project, as defined in Chapter 1.3 of the MND, represents the whole of the action. Consequently, the analysis in the MND is sufficient and adequate.

### **Existing Uses, as “Baseline” of the Environmental Conditions**

A few of the comments also suggest that the project should be expanded to address environmental effects resulting from existing uses of the campus. Specifically, the comments suggest that noise impacts associated with existing uses of the Villa, mainly that of weddings, be analyzed and fully mitigated. The existing uses, which have generated unwanted noise and traffic in the neighborhood, are not the subject or the result of the proposed project. The existing uses of the site, as described throughout the MND, are according to CEQA Guidelines Section 15125(a) “the physical environmental conditions in the vicinity of the project, as they exist... at the time environmental analysis is commenced, from both a local and regional perspective. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant.”

Although not required for analysis of the proposed project, noise measurements were taken at a school dance and a wedding to establish baseline conditions because the City is aware of neighborhood concerns with existing noise generated at the project site. As noise generated at the Villa is not related to the proposed project, it is not within the project’s purview to mitigate these alleged noise violations. The opinion in *Riverwatch v. County of San Diego* (1999) 76 Cal. App. 4th 1428, 1451-1453 provides that with the application of the general principles set forth in CEQA Guidelines section 15125(a), “an EIR is not the appropriate forum for determining the nature and consequences of prior conduct of a project applicant.” Therefore, any potential and alleged violations associated with the existing uses of the project site, including noise levels and inappropriate operations of the Villa, do not need to be analyzed and/or mitigated as a part of the proposed project. Consequently, the project description, as defined in Chapter 1.3 of the MND, is adequate and does not need to be expanded to include existing uses of the site.

### **Conclusion**

The project as described in Chapter 1.3 of the MND consists of the whole of the proposed action. It does not need to be expanded to include the future CUP or existing uses. The future CUP is a separate action that has no bearing on the proposed action, and the existing uses are the environmental conditions that constitute the baseline project impacts are to be compared against. Consequently, the proposed project as presented is in its entirety. The City has not segmented the project, and this MND complies with the requirements of CEQA and CEQA Guidelines. The whole of the project has been studied, and the analysis of the environmental effects of the proposed action is sufficient and adequate.

## 2. Response to Comments

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### General Response #2 Detailing Tree Removal and Planting

The campus includes a very dense tree canopy, and the proposed site plan has been adjusted to preserve the existing trees. The multipurpose building has been proposed on the existing tennis courts and a major portion of the soccer/softball multipurpose field has been proposed on the existing student parking lot in order to avoid tree loss.

The Tree Survey documented 479 trees currently on the project site, not including the adjacent parkway trees. This number includes 26 protected trees. Approval of the proposed master plan would require the removal of 38 trees, including 2 protected trees. The proposed loss of 38 trees is the “worst-case” scenario; Alverno High School is exploring the feasibility of redesigning the handicapped ramps at both parking lots to further reduce tree loss. At project completion, the campus would have a total of 505 trees, a net gain of 26 trees. The below lists summarize the number of trees to be removed for each element of the proposed master plan and where the new trees would be placed.

#### Proposed Tree Removal

- Multipurpose Building – 9 Trees
- Handicapped Ramp (Michillinda Parking Lot) – 3 Trees
- Southside of Multipurpose Building – 2 Trees
- Soccer/Softball Multipurpose Field – 18 Trees (including 2 protected trees)
- Outdoor Restroom Near Field – 2 Trees
- Handicapped Ramp (Wilson Parking Lot) – 3 Trees
- Wilson Parking lot – 1 Tree

#### Proposed Tree Planting

- West Campus – 20 Trees (including 13 trees on Grandview Avenue)
- Area Between the Multipurpose Building and Villa – 7 Trees
- Area Between the school buildings and Villa – 17 Trees
- Amphitheater (Saint Claire’s Court) – 7 Trees
- East Campus – Wilson Perimeter – 5 Trees
- Street Tree on Wilson – 1 Tree
- Area Between Tennis Court and Villa – 7 Trees

#### Summary

- Existing – 479 Trees
- Proposed Removals – 38 Trees
- Proposed Plantings – 64 Trees
- Project Completion – 505 Trees
- Net Gain – 26 Trees

The proposed project would require mitigation for removal of the two protected trees. On October 17, 2007, the City’s Tree Advisory Commission reviewed and approved the Tree Removal Permit. The TAC’s approval requires the replacement of 14 coast live oaks and 1 California sycamore (see Mitigation Measure #4). The TAC also required that Alverno submit an overall landscape plan prior to plans and specifications being drawn for any phase of the project. Each phase of the master plan will need to return to the TAC for review and approval. The TAC requested that some of the replacement trees be placed in the parking areas. The approval also includes a series of recommended additional conditions



## 2. Response to Comments

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to protect existing trees during construction developed by Jan C. Snow, the City's arborist (See Jan C. Snow Consulting correspondence of October 11, 2007). Additionally, separate from the October 17, 2007 meeting, the City also ordered the removal of one oak tree for safety reasons, due to the oak splitting in the middle and dropping branches.

Although the current commitment is to plant all 14 replacement coast live oaks on the campus, it may be determined to be infeasible. Coast live oaks require large spaces as they mature to remain healthy, and there may not be adequate space on the campus to accommodate their full growth. As a result, and as allowed by CEQA Guidelines Section 15704.1 (a) Mitigation Measure #4 has been updated as follows:

4. Before issuance of a building permit for the Master Alverno High School Plan by the City of Sierra Madre, Sycamore Tree No. 336 shall be replaced by planting one 24-inch boxed western sycamore tree, and Coast Live Oak Tree No. 347 shall be replaced by planting fourteen 24-inch boxed coast live oak trees. Should it be determined that planting all 15 trees on the campus is technically infeasible, to be confirmed by a qualified arborist and subject to approval by the Sierra Madre Tree Advisory Committee, this measure can be substituted with an equivalent or more effective measure, including but not limited to offsite replacement of these trees or payment of an in-lieu fee to the City, in accordance with the City of Sierra Madre's Tree Preservation and Protection Ordinance.

The concept landscape plan includes the planting of coast live oaks and deodar cedar trees to strengthen the existing trees on the campus perimeter and interior. In order to screen the Michillinda parking lot along Grandview Avenue, 13 additional trees will be added to supplement the 12 existing olive trees (as measured from the Michillinda corner to the classroom building). This includes 1 new oak and 10 cedar trees. The concept landscape plan also includes massing of shrubs to provide additional screening of the parking area from the adjacent residential area.

The Michillinda Avenue perimeter is also extensively planted with trees and shrubs. This area includes the construction of a new perimeter fence, with historic columns, view fencing, and bougainvillea plantings on the fence. There are 21 existing trees (as measured from the corner of Grandview Avenue to the south end of the proposed multipurpose building) that will remain in place, including 7 olive trees. The landscape plan includes 6 new cedar trees and 1 oak tree. Twelve unprotected trees would be removed for the construction of the multipurpose building: 5 Chinese elms, 2 jacarandas, 2 palms, 1 eucalyptus, 2 dead trees (acacia and carob), 1 bottle tree, and 1 citrus tree.

The project does not include the removal of any of the existing Canary Island pine trees located on the Wilson Avenue perimeter. These are City Street Trees. The Wilson Avenue perimeter immediately adjacent to the proposed multipurpose field includes 5 existing pine trees. The school will add one new pine tree. The arborist reported that several of the existing cedar and carob trees are damaged and diseased on this perimeter. Six cedars are proposed to be removed for the multipurpose field. Field grades have been adjusted to save the trees, but are limited by the required safety "play out" area. Shifting the field to the west would adversely impact the Villa. Six existing cedars will remain immediately adjacent to the multipurpose field with one new cedar added. The Wilson Avenue perimeter immediately adjacent to the proposed faculty parking lot includes two existing pine trees. One new pine tree will be added to the parkway. Four new cedar trees will be added to the parking area. These perimeters also include shrub massing and planting on perimeter fencing.

The proposed amphitheatre includes seven new trees and the preservation of the existing oak tree. The Villa is a local historic landmark and was subject to a complete historic assessment by Sapphos Environmental. This assessment recommended additional mitigation measures to protect the historic

## *2. Response to Comments*

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setting of the Villa (Mitigation Measure #6). Seven new trees will also be added to screen the Villa from the multipurpose building. Seventeen trees will be added north of the Villa along the perimeter walkway. Additional trees will be added to screen the new tennis court from the Villa. The architectural historians also noted that the care should be taken in locating trees, such that the viewshed to the Villa remains open along Highland Avenue. This will limit the location of some of the replacement trees.




## *2. Response to Comments*

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## 2. Response to Comments

LETTER A1 – California Department of Transportation (2 pages)

|   |             |   |
|---|-------------|---|
| <p>STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY</p>  |             | <p>EDMUND G. BROWN, JR., Governor</p>   |
| <p><b>DEPARTMENT OF TRANSPORTATION</b><br/>DISTRICT 7, REGIONAL PLANNING<br/>IGR/CEQA BRANCH<br/>100 MAIN STREET, MS # 16<br/>LOS ANGELES, CA 90012-3606<br/>PHONE: (213) 897-9140<br/>FAX: (213) 897-1337</p>  |             |  <p><i>Flex your power!<br/>Be energy efficient!</i></p> |
| <p>March 24, 2011</p>   |             |   |
|   |             | <p>IGR/CEQA No. 110327AL-MND<br/>Alverno High School Master Plan<br/>Vic. LA-210 / PM R29.79<br/>SCH #: 2011031033</p>                      |
| <p>Mr. Danny Castro<br/>Director of Development Services<br/>City of Sierra Madre<br/>232 West Sierra Madre Boulevard<br/>Sierra Madre, CA 91024</p>  |             |   |
| <p>Dear Mr. Castro:</p>   |             |   |
| <p>Thank you for including the California Department of Transportation (Department) in the environmental review process for the above referenced project. The proposed project is to construct a 12,860 square-foot, two-story multipurpose building and a 2,900 square foot outdoor amphitheater, replacement of the existing softball field with a multipurpose field. The Master Plan would reduce the maximum permitted enrollment from 500 students to 400 students.</p>   | <p>A1-1</p> |   |
| <p>On Table 23, Project-Generated Traffic, page 106 of the Environmental Analysis, the net increase for the Average Daily Traffic, ADT, is 460 vehicle trips and 210/170 AM/PM peak hour vehicle trips. On page 116 of the analysis, it is assumed that a maximum of 25% of the school traffic would use any particular freeway segment as an access route. This would result in 53/43 AM/PM peak hour trips utilizing the freeway system. Currently, the existing freeway Level of Service (LOS) is operating at LOS "F" in the project vicinity during the peak hours. With the project assigned volume and cumulative traffic volume in the area, we would like to ask the Lead Agency to discuss any potential traffic impact and mitigation on the State facilities.</p> | <p>A1-2</p> |   |
| <p>Storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Please be mindful that projects need to be designed to discharge clean run-off water.</p>   |             |   |
| <p>Transportation of heavy construction equipment and/or materials, which requires the use of oversized-transport vehicles on State highways, will require a transportation permit from the Department. It is recommended that large size truck trips be limited to off-peak commute periods.</p>   | <p>A1-3</p> |   |
| <p><i>"Caltrans improves mobility across California"</i></p>  |             |   |



## 2. Response to Comments

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Mr. Danny Castro  
March 24, 2011  
Page 2 of 2

If you have any questions, please feel free to contact me at (213) 897-9140 or Alan Lin the project coordinator at (213) 897-8391 and refer to IGR/CEQA No. 110327AL.

Sincerely,



DIANNA WATSON  
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

*"Caltrans improves mobility across California"*



## 2. Response to Comments

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### A1. Response to Comments from California Department of Transportation, dated March 24, 2011.

- A1-1 Comment noted. The summary information about the project description is accurate.
- A1-2 The Commenter requested that traffic impact and mitigation on state roadways be discussed. Impact analysis on state-operated roadways was provided on page 116, in Section 3.16 (b) of the Draft MND. In summary, the projected increase in students at the school from the existing 228 students to the proposed 400 students would result in an increase in site-generated traffic of 210 vehicle trips during the morning peak hour and 170 vehicle trips during the afternoon peak hour. Based on the assumption that up to 25 percent of the school traffic would use the Foothill Freeway (Interstate 210), the expanded school would place 53 vehicles on the freeway during the morning peak hour (34 inbound and 19 inbound) and 43 vehicles on the freeway during the school's afternoon peak hour (17 inbound and 26 outbound). According to the Los Angeles County Congestion Management Program, a project may have a significant impact on a freeway if the project would add 150 or more peak hour trips to a freeway in either direction. As the project traffic is well below this threshold, the impact would be less than significant even if the freeway is currently operating at level of service F.
- A1-3 This comment concerning stormwater runoff is noted. Project features for water quality protection are discussed in Section 3.9, *Hydrology and Water Quality*, of the Draft MND. The proposed project would comply with the National Pollutant Discharge Elimination System (NPDES) permit requirements through the preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP) for construction activities and Water Quality Management Plan (WQMP) for post-construction activities. Compliance with these requirements would ensure that no water quality standards or discharge requirements are violated.
- A1-4 The Commenter recommends that large size truck trips be limited to off-peak commute periods. It is not anticipated that the proposed project would require the use of oversized or overweight vehicles.





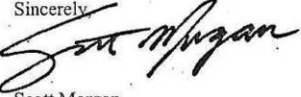
## *2. Response to Comments*

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## 2. Response to Comments

LETTER A2 - State Clearinghouse (2 pages)

|   |  |   |
|---|--|---|
|  | <p>STATE OF CALIFORNIA<br/>GOVERNOR'S OFFICE of PLANNING AND RESEARCH<br/>STATE CLEARINGHOUSE AND PLANNING UNIT</p>  |  |
| <p>JERRY BROWN<br/>GOVERNOR</p>   | <p>April 14, 2011</p>  |   |
|   | <p>Danny Castro<br/>City of Sierra Madre<br/>232 W. Sierra Madre Boulevard<br/>Sierra Madre, CA 91024</p>  |   |
|   | <p>Subject: Alverno High School Master Plan<br/>SCH#: 2011031033</p>   |   |
|   | <p>Dear Danny Castro:</p>  |   |
|   | <p>The State Clearinghouse submitted the above named Mitigated Negative Declaration to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on April 13, 2011, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.</p> |   |
|   | <p>Please note that Section 21104(c) of the California Public Resources Code states that:</p>  |   |
|   | <p>"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."</p>  | A2-1  |
|   | <p>These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.</p>  |   |
|   | <p>This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.</p>  |   |
|   | <p>Sincerely,<br/><br/>Scott Morgan<br/>Director, State Clearinghouse</p>   |   |
|   | <p>Enclosures<br/>cc: Resources Agency</p>   |   |
|   | <p>1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044<br/>(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov</p>   |   |



## 2. Response to Comments

### Document Details Report State Clearinghouse Data Base

**SCH#** 2011031033  
**Project Title** Alverno High School Master Plan  
**Lead Agency** Sierra Madre, City of

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**Type** MND Mitigated Negative Declaration

**Description** The Board of Trustees of Alverno High School, a Catholic girls' high school, is seeking approval from the City of Sierra Madre of a conditional Use Permit Amendment that would allow the Board of Trustees to implement a Master Plan for the school that includes construction of a 12,860-square-foot, two-story multipurpose building and a 2,900-square-foot outdoor amphitheater; replacement of the existing softball field with a multipurpose field; relocation of the tennis courts to a site near the proposed multipurpose field; and reconfiguration of the parking areas. The Master Plan would reduce the maximum permitted enrollment from 500 students to 400 students.

#### Lead Agency Contact

**Name** Danny Castro  
**Agency** City of Sierra Madre  
**Phone** (626) 355-7135 ext 401  
**email**  
**Address** 232 W. Sierra Madre Boulevard  
**City** Sierra Madre **State** CA **Zip** 91024  
**Fax**

#### Project Location

**County** Los Angeles  
**City** Sierra Madre  
**Region**  
**Lat / Long** 34° 9' 56" N / 118° 3' 58" W  
**Cross Streets** 200 North Michillinda Avenue (Michillinda Avenue at Grandview Avenue)  
**Parcel No.** 5768-001-004  
**Township** 1N **Range** 11W **Section** 18 **Base** SBB&M

#### Proximity to:

**Highways** Hwy 210, 19  
**Airports** No  
**Railways** Metro Gold Line  
**Waterways** Eaton Wash, Little Santa Anita Canyon, Santa Anita Canyon  
**Schools** 3 ES, 3 HS, 1 MS, 6 private/parochial  
**Land Use** Land Use: Zoning  
 General Plan: High School; Institutional; Institutional

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**Project Issues** Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Wildlife; Landuse; Cumulative Effects

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**Reviewing Agencies** Resources Agency; Department of Fish and Game, Region 5; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 7; Regional Water Quality Control Board, Region 4; Native American Heritage Commission

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**Date Received** 03/15/2011 **Start of Review** 03/15/2011 **End of Review** 04/13/2011

Note: Blanks in data fields result from insufficient information provided by lead agency.

## 2. Response to Comments

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### **A2. Response to Comments from State Clearinghouse, dated April 14, 2011.**

- A2-1 Comment noted. The State Clearinghouse indicated that the Draft MND was distributed to affected state agencies, and as of the close of the review period on April 13, 2011, only one letter from Caltrans was received. The City's response to this letter is provided in Response A1. The City of Sierra Madre thanks the State Clearinghouse for its assistance with distribution of the document.




## *2. Response to Comments*

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## 2. Response to Comments

LETTER A3 - Alverno High School (3 pages)



ALVERNO  
HIGH SCHOOL

RECEIVED  
APR 14 2011  
CITY OF SIERRA MADRE  
DEVELOPMENT SERVICES

April 14, 2011

Mr. Danny Castro  
Director of Development Services  
City of Sierra Madre  
232 W. Sierra Madre Boulevard  
Sierra Madre, CA 91204

**Re: Comments on the Alverno High School Draft MND**

Dear Mr. Castro:

Alverno High School thanks the City of Sierra Madre and the Planning Center for the efforts that have gone into the preparation of the draft Mitigated Negative Declaration for the Alverno High School Master Plan. We believe that the document is well done and reviews the possible environment impacts of the Master Plan in great detail and proposes sound mitigation measures that eliminate any potential impacts. The School is committed to working with the City and the neighbors to develop effective mitigation measures.

A3-1

This letter is sent seeking clarification to five of the eighteen proposed mitigation measures.

Biological Resources


First, we understand that the requirement to construct bat houses is something that neither the City nor the School have any experience doing. We should proceed with care whenever an untried mitigation is proposed, since there could be mistakes made. We request that the City work with the School on implementing this mitigation measure in a reasonable and practical way. The School can construct bat houses on the campus, but does not have access to private property off campus to construct bat houses.

A3-2

Mitigation Measure #4 of the MMD requires that the School replace Coast Live Oak Tree No. 347 with fourteen 24 inch box Coast Live Oak trees. We believe that the mitigation measure assumes that all of these trees can be replaced on the campus. The School does not object to the replacement of the trees. We will attempt to locate the replacement trees in our campus landscape plan. However, the School's tree

A3-3

200 North Michillinda Avenue, Sierra Madre, California 91024-1699  
(626) 355-3463 / Fax (626) 355-3153 / [www.alverno-hs.org](http://www.alverno-hs.org)



## 2. Response to Comments

survey documented approximately 400 trees on campus, creating a very dense tree canopy. We are concerned that Coast Live Oaks require large spaces as they mature in order to remain healthy. We believe that the Tree Commission allowed for either on-site or off-site replacement of these trees, subject to the approval of the City. The concept would be for the School to donate trees and their planting to open space and park areas designated by the City. We would request that this mitigation measure be revised to reflect this understanding.

A3-3  
cont'd.

### Public Service/Police Protection

Mitigation Measure #16 requires that the School retain a qualified officer for campus security and /or Sierra Madre Police Department for traffic control assistance for special events at the Multi-Purpose Building, when the building is at full capacity. The School already employs qualified security officers. This mitigation measure appears to be designed to address potential traffic impacts from large events at the Multi-Purpose Building.

A3-4

We request two clarifications. The School has existing campus security and we request clarification on whether our campus security would be allowed to direct traffic. Our second request is that the mitigation measure be clarified to address events at the Multi-Purpose Building that could potentially have traffic impacts on the neighborhood. Not all of the events at the facility will have traffic impacts. For example, the School will be using the Multi-Purpose Building for School assemblies and worship services. It is conceivable that the building would be at full capacity with the students and faculty, which would not result in any additional vehicles leaving or entering the campus, since the School day would still be in session. In this case we would see no need for the traffic officers.

A3-5

### Traffic/Transportation

Mitigation Measure #17 requires that the School either modify the School's procedures to allow the existing auxiliary gate from Michillinda Avenue to be opened or to modify the construction drawings to show the auxiliary driveway. We believe that this mitigation measure needs clarification. First, there is no existing auxiliary driveway from the Michillinda parking lot. The Villa's historic gates on Michillinda have been closed since the School first opened in 1960 and this driveway is located too close to the existing driveway to be considered a safe auxiliary driveway.

A3-6

The School intends to construct the new Michillinda Lot as part of the construction of either the Softball/Soccer Field or the Multi-Purpose Building. The second driveway would be constructed at this time. The southern driveway would function for access into the School, while the northern driveway would function for exiting from the School.

Mitigation Measure #18 requires that the School restripe the intersection of Highland Avenue at Michillinda Avenue to include a left-turn and right-turn lane. The mitigation measure also requires that the City fund the regular restriping and curb painting. We

A3-7



## 2. Response to Comments

have two concerns with this proposed mitigation measure. First, since Highland Avenue has a 40 foot curb-to-curb width, the mitigation measure will require a "red curb" on both the north and south side of the street in order to accommodate the left and right turn lanes. We certainly do not have an issue with a large no-parking zone on the campus side of the street, but we are concerned that the red-curb on the south side of the street will eliminate resident parking for at least two of the homes. We would also be concerned if this mitigation measures requires street widening in order to accommodate on-street parking.

A3-7  
cont'd.

Additionally, we do not understand the need for the left and right turn lanes based on the traffic data. The Master Plan will be reducing the number of trips at this intersection by the substantial downsizing of the Wilson Avenue lot. This new lot will be used by the faculty, instead of students, so that the afternoon and evening trips would be spread out, since the faculty generally does not leave the campus at the same time. The Highland Avenue exit would only be used for special events and traffic/security officers will be required at these events. The School is also concerned with the ongoing maintenance responsibility for the striping, curb painting and signs. We certainly do not object to funding the initial installation of these improvements, but believe that the City is requesting an open ended financial commitment from the School to provide funding for what is a City maintenance function.

A3-8

We want to thank you in advance for considering our requested clarification to these mitigation measures. Please do not hesitate to contact me if you have any questions or need additional clarification.

Sincerely,



Ann Gillick  
Head of School

cc: Board of Trustees



## *2. Response to Comments*

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## 2. Response to Comments

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### A3. Response to Comments from Alverno High School, dated April 14, 2011.

A3-1 The City has considered Alverno High School's request to clarify mitigation measures of the Draft MND and has provided the below responses.

A3-2 Alverno High School stated that Mitigation Measure #2 may not be practical as the school may not have access to place bat houses on private property off the campus. The City concurs with this assessment, and as allowed by CEQA Guidelines Section 15704.1 (a), Mitigation Measure #2 has been updated as follows:

2. Should the preconstruction survey identify the presence of any bat species, the project applicant shall provide bat houses constructed onsite or offsite, to the extent practical and feasible, in locations and settings where bats would be likely to use them. If bat houses are required, the project applicant shall consult with the zoological consultant regarding the design, materials, locations, and settings of the bat houses.

A3-3 Alverno High School is concerned that it may not be feasible to plant all replacement trees on the campus, as required by Mitigation Measure #4. Mitigation Measure #4 is a reiteration of the approved requirements of the Sierra Madre Tree Advisory Committee (TAC), as documented in the TAC meeting minutes, dated October 17, 2007. Any changes to this mitigation measure shall be considered by the TAC and shall be equivalent to or more effective in mitigating the potentially significant effect on the environment than the original measure. As allowed by CEQA Guidelines Section 15704.1 (a), Mitigation Measure #4 has been updated as follows:

4. Before issuance of a building permit for the Master Alverno High School Plan by the City of Sierra Madre, Sycamore Tree No. 336 shall be replaced by planting one 24-inch boxed western sycamore tree, and Coast Live Oak Tree No. 347 shall be replaced by planting fourteen 24-inch boxed coast live oak trees. Should it be determined that planting all fifteen trees on the campus is technically infeasible, to be confirmed by a qualified arborist and subject to approval by the Sierra Madre Tree Advisory Committee, this measure can be substituted with an equivalent or more effective measure, including but not limited to offsite replacement of these trees or payment of an in-lieu fee to the City, in accordance with the City of Sierra Madre's Tree Preservation and Protection Ordinance.

A3-4 Alverno High School requested that Mitigation Measure #16 be clarified to address whether campus security may direct traffic and when operation of the proposed multipurpose building would require campus security. The Sierra Madre Police Department confirmed that campus security officers should not be allowed to provide traffic control assistance for full-capacity events in the multipurpose building. Traffic control assistance shall be provided by Sierra Madre Police only. Mitigation Measure #16 as been updated as follows:

16. Alverno High School shall retain ~~a qualified officer for campus security and/or~~ the Sierra Madre Police Department for traffic control assistance when special events in the multipurpose building are expected to be at or near full capacity, generate loud music at the multipurpose building, include



## 2. Response to Comments

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visitors, and/or end after 9:00 PM, such as but not limited to school dances, school and/or City-sponsored receptions, and graduations. Alverno High School shall be responsible for the cost of the officer(s) time.

A3-5 As provided in Response A3-4, Mitigation Measure #16 has been updated to clarify which events will require traffic control.

A3-6 The Commenter would like Mitigation Measure #17 to address use of the “auxiliary driveway” at the Michillinda Avenue parking lot. The intent of this mitigation measure is to ensure that two driveways are provided for access to the expanded Michillinda Avenue parking lot. If this lot had only one driveway, the concentration of traffic at this single location would result in a significant traffic impact. The school’s proposal to provide a second driveway would satisfy the proposed mitigation measure. The second driveway does not have to be positioned at the historic gate location. Mitigation Measure #17 has been clarified as follows:

17. Before issuance of the first building permit for the project, the project applicant shall submit evidence to the Director of Development Services of the City of Sierra Madre that ~~one of the following actions has been taken:~~

~~a. The school’s operating procedures have been modified so that the gate at the existing auxiliary driveway from Michillinda Avenue into the Michillinda parking lot shall be opened during peak arrival and departure times.~~

~~b. P the project construction drawings have been modified to show an additional driveway, for a total of two driveways, from Michillinda Avenue into the Michillinda parking lot.~~

A3-7 The Commenter is concerned that Mitigation Measure #18 would result in the loss of street parking on the south side of Highland Avenue. Mitigation Measure #18 proposes to restripe the westbound approach of Highland Avenue at Michillinda Avenue to provide two lanes (a right-turn lane and a left-turn lane). This would require that parking be prohibited on the north side of the street for a distance of approximately 100 feet, either by painting a red curb or by installing No Parking signs. The pavement would be striped with a double yellow line and a white line and white arrows would be painted in the two lanes. A red curb would not be required on the south side of the street adjacent to the residences and the street would not have to be widened. Therefore, street parking on the south side of Highland Avenue would not be removed as a result of implementation of Mitigation Measure #18.

A3-8 The Commenter questioned why the downsizing of the Wilson parking lot would necessitate Mitigation Measure #18. The separation of the left turn and right turn movements at the Michillinda and Highland intersection is needed to mitigate the significant indirect impact that would occur as a result of the increased traffic volumes on Michillinda Avenue. The delay values for traffic on Highland Avenue increased because of the increased traffic levels on Michillinda Avenue. The ICU value at the intersection would increase by 0.050 as a result of the project, which is above the significance threshold of 0.040 for level of service C. The separation of the two turning movements would mitigate the impact by reducing the ICU increment to

## *2. Response to Comments*

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0.014. The reason it is needed is that the delay for motorists waiting at the stop sign on Highland Avenue is reduced by having two lanes instead of one lane.

The issue of maintenance responsibilities for the striping and signing features is not an environmental issue and will not be determined as part of the CEQA documentation. That issue is a matter of negotiation between the City of Sierra Madre and the Alverno High School.



## *2. Response to Comments*

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## 2. Response to Comments

LETTER R1 - Karen Lencioni (2 pages)

**From:** Karen Lencioni  
**Sent:** Thursday, March 17, 2011 3:00 PM  
**To:** Danny Castro  
**Subject:** Mitigated Negative Declaration for the Alverno Master Plan

Hi Danny,

I do have some concerns about the MND and the Master Plan in general. Overall, it seems that the Master Plan has changed somewhat from when the air quality and tree reports were generated, as some of the details about square footage, parking spaces, etc are different. Where can I find a current copy of the Master Plan to review?

R1-1

1. First, the MND doesn't appear to take completely into consideration the increased usage of the property for the playfield. Currently, there is no regulation soccer field on site, so with the addition of the soccer field, it would be likely that there will be increased traffic and parking issues. Where would they be expecting people to park for soccer games and for the use of the amphitheatre? Will the traffic be coming from Highland and turning onto Wilson to park in the "faculty parking"? As the MND states, traffic on Wilson is consistent with low, suburban traffic, and we do not want parking or traffic for games along our street. The MND did not address traffic usage for after-school sports, which may be coincident with the commuter hour. In fact, it states that traffic would not be impacted during this time. I feel that this has neglected to include the playfield in consideration, which could impact the Michillinda/Highland intersection at a peak traffic time.

R1-2

2. The MND states that "the multipurpose field would also be available for City-requested team sports". We have been repeatedly assured that there will be no increase in usage of the field by non-school activities. This statement is concerning, as it indicates that the City may increase usage of the soccer field, which is not a current use. While the intensity of the noise may not change from current sports activities, the frequency of it will change, and this is a quality of life issue.

R1-3

3. How will people enter and exit from the multipurpose field and tennis courts? Currently there are no gates along the southeastern edge of the property, so we would like assurance that this will not change. This is not addressed here in the pedestrian access.

R1-4

4. In the MND, there are also no profile views of the proposed project. We would like to be able to assess whether the leveling of the field will create any issues from the vantage of the neighbors. The MND states that the multipurpose field will be at ground-level. However, in order to make this a level field, some part of the elevation will need to be changed, which means that current "ground-level" will be different in the future. Will there be a retaining wall, and how will this change the current aesthetics?? The MND states that they will be replacing the current chain link fence. With another chain link, or some other, more esthetically pleasing fencing? The current fence is covered with vines, which makes it less institutional. Replacing the current fence with another chain link fence, and not providing any additional greenery, may negatively impact the aesthetics. Additionally, the tree report indicates that the inner ring of deodar on the southeastern edge of the soccer field may need to be removed. This may remove acoustic and aesthetic shielding for the current field. I would like to know what the current Master Plan is, and how Alverno plans to mitigate the possible removal of these trees.

R1-5



## 2. Response to Comments

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5. Currently, during rainstorms, we get a large amount of (red) effluent from the current sportsfield that comes off the southeastern corner, so I do have concerns about proper drainage, especially if there will be a change in the elevation along that side. During construction, hopefully they will have extensive mitigation if there is rain, as this could be a flooding concern for the neighbors on the south side of Highland if the drains get clogged with debris.

R1-6

6. The MND also states that "Exterior lighting added to the campus as part of the project would be for safety and security purposes." Will there be additional lighting on campus other than the bollard lights in the parking lots? I would like to know exactly where those lights would be located.

R1-7

7. The softball field currently has a backguard to shield neighbors from errant balls (although we frequently find them in our yard, and cars have been hit a few times- we don't park on that side of the house for this reason). Will this be replaced? And will it be of the same material as currently in place? This could significantly impact the aesthetics as well. Will there be netting or a shield for the tennis courts? How will these courts be surrounded?

R1-8

8. Overall increase in traffic- the MND estimates that the average number of trips to the school each day is going to significantly increase if the student population reaches capacity. It also noted that the average trips are much higher than the typical high school. I believe that Alverno should include mitigation measures to decrease this burden on traffic. They could provide carpool incentives for students or public transportation options. It is already incredibly difficult to make a left turn from Highland onto Michillinda during peak hours, and the visibility is poor. Including turn lanes here is not likely to help with this issue, as the issue is waiting for traffic to clear on Michillinda.

R1-9

Thank you for your time,  
~Karen Lencioni



## 2. Response to Comments

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### R1. Response to Comments from Karen Lencioni, dated March 17, 2011.

R1-1 The Commenter is concerned that the master plan has changed since the air quality and tree reports were completed, and asks where she can find a current copy of the master plan. The master plan is available for public review at Sierra Madre City Hall, 232 West Sierra Madre Boulevard.

R1-2 The comment concerns traffic and parking impacts associated with the proposed multipurpose field. Although project implementation would result in a CIF-regulation soccer field, use of the field would not be substantially increased. Historically, the field has been used for Alverno softball and soccer practices, and the school has not hosted any league matches. The proposed project, however, would result in softball and soccer league games to be played at Alverno. According to Alverno High School, projected use of the field for softball and soccer would include weekday practice from 3:00 PM to 5:15 PM, Monday through Friday. There would be approximately four practice games and four league games. If Alverno High School advances to CIF (California Interscholastic Federation) Championship Games, there would be two more CIF games during the same weekday time period. Therefore, each sport would have approximately ten home games if they advanced to CIF playoffs, six more than the existing number of games. Soccer season runs from December through March, and softball season runs from March through May.

Additionally, the City confirmed that no City-sponsored activities currently utilize Alverno High School's athletic facilities and that it does not intend to increase any of its uses at the campus. The only non-school activity at Alverno High School (related to the athletic field) is the Sierra Madre Girls Softball Association, a non-profit organization that is not sponsored by the City. The SMGSA practice sessions run from March through the middle of May, five days a week, for one hour from 5:30 PM to 6:30 PM. On rare occasion, SMGSA has had a game onsite; this year, however, it has no games scheduled. Should the City, however, decide to expand its use of Alverno's recreational amenities in the future, it would be required to go through the appropriate City-established processes, including the appropriate environmental review.

Nonetheless, concerning the additional traffic and parking generated by the increased use, as described above, the approach for the traffic analysis was to evaluate the impacts of the proposed project during the time of day when the school would generate the heaviest volumes of traffic, i.e., during the morning peak period when students and staff would be commuting to the school site. This is the standard methodology for a traffic analysis for a school because it is assumed that if the street network's capacity can accommodate the traffic volumes during the times of peak traffic flow, then it could certainly accommodate the traffic during times when the traffic volumes are lower. It is acknowledged that the multipurpose field would generate traffic, as participants and spectators would be driving to and from the school site for events. The traffic volumes generated by these events would, however, be substantially lower than the traffic that would be generated on a daily basis by the regular school activities. Therefore, a detailed capacity analysis of the roadway system relative to the proposed multipurpose field is not necessary for the environmental evaluation.



## 2. Response to Comments

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Additionally, the proposed project does not include development of new or expansion of the existing bleacher seats. Alverno will continue using its two portable bleacher stands, which can accommodate approximately 30 spectators each. It is estimated that approximately 30 to 40 vehicles would be generated by a soccer match. As currently proposed, these vehicles would be parked in the parking lot that is accessed from Michillinda Avenue. There would be little or no traffic impact on Wilson Street during such events. As the matches would occur after the dismissal time at the school or on Saturdays, the parking demand could readily be accommodated onsite in the school's 112-space parking lot. With regard to the traffic impacts at the intersection of Michillinda Avenue and Highland Avenue, a level of service analysis was conducted to determine the impacts of 40 vehicles departing the school site and traveling through this intersection during the afternoon peak hour. The results are summarized in the table below. As shown, the traffic generated by a soccer match would not result in a significant traffic impact according to the significance criteria cited in the MND.

| <b>Impact of Soccer Match on Intersection Levels of Service, PM Peak Hour</b> |   |                                 |                              |                                      |   |
|---|---|---------------------------------|------------------------------|--------------------------------------|---|
| <b>Intersection</b>   | <b>ICU Value / Delay Value<br/>&amp; Level of Service</b> |                                 |                              | <b>Increase<br/>In ICU<br/>Value</b> | <b>Significant<br/>Project<br/>Impact</b> |
|   | <b>Existing<br/>Conditions</b>                            | <b>2020 Without<br/>Project</b> | <b>2020 With<br/>Project</b> |                                      |   |
| Michillinda Ave / Highland Ave  | 0.563–16.5 - C  | 0.619–18.3 - C                  | 0.631–19.5 - C               | 0.012                                | No  |

R1-3 The comment concerns the amount of use of the proposed soccer field by the City. As the Commenter noted, while the project may not increase the magnitude of noise generated on game days, it could potentially increase the frequency or occurrence of game days on a yearly basis. As provided in Response R1-2, school operation of the multipurpose field would increase. Noise from use of the multipurpose field was analyzed in Section 3.12 of the Draft MND. It was modeled using SoundPlan and is based on monitored noise levels of a soccer game. As identified in Figure 13, *Noise from Athletic Field and St. Claire Court*, in the Draft MND, combined noise levels from use of the multipurpose field, tennis court, and the small amphitheater would generate noise levels less than 50 dBA Leq. Noise levels generated by school use or City use of the sports field would generate the same magnitude of noise and such noise is compatible with a residential noise environment. The Commenter is correct that the intensity of noise would not change, but the frequency of occurrence would change. However, as identified in the Draft MND, because noise levels would not exceed the City's Municipal Code standards and daytime noise generated at the multipurpose field is compatible in a residential noise environment, no significant noise impacts were identified.

R1-4 The comment asks how people will enter the soccer/softball field and tennis courts. No gate or pedestrian access is proposed for the southeast corner of the campus. There would be two routes for pedestrian access from the corner of Wilson Street and Highland Boulevard to the proposed multipurpose field: west on Highland Boulevard to the existing gate near the southwest corner of the campus, then east

## 2. Response to Comments

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through the campus to the field; or north on Wilson Street to the Wilson Street parking lot, then south through the campus to the field.

- R1-5 The comment concerns whether the proposed multipurpose field would create aesthetic impacts from the vantage of the neighbors. General Response #2 identifies the number of trees proposed to be removed and planted on the campus. Although field grades have been adjusted to save as many trees as possible, development of the field would still require the removal of 18 trees, including two protected trees.

The soccer/softball multipurpose field would be at a flat 1-percent slope. The required “play out” areas would be at a 2-percent slope. These play out areas vary between 10 and 15 feet in width, and have been reduced to the standard width of CIF-level soccer fields, which this field has been designed to be. The play out areas have been reduced in order to preserve several trees on the Wilson Street frontage. The field would be approximately 5 feet above the current elevation on Highland Avenue and would be set back 48 feet from the property line in this location. The slopes in this area would vary from 4:1 to 3.4:1. The slopes on the Wilson Street frontage would vary from 2 to 4 feet in height, sloped into the field from the sidewalk, at the north end of the field, over a 21-foot setback. The slopes in the south end of the field would range from 3 to 5 feet in height over the 21-foot setback, sloping towards the sidewalk.

The existing perimeter’s 5-foot-high chain-link fence with vines would remain, as would the existing hedge. The project would include filling in gaps within the hedge and fence with new shrub massing, such that screening would be more effective than the existing condition. Figure 1, *Landscape Concept at Multipurpose Field*, illustrates the location of the new trees proposed along Wilson Street in front of the multipurpose field and faculty parking lot. Figure 1 also illustrates the cross-section between the multipurpose field and west side of Wilson Street.



Section 3.1, *Aesthetics*, of the Draft MND addresses visual impacts. In general, aesthetic impacts associated with the removal of existing and the planting of new trees on the project site are not considered significant. The loss or planting of trees would not have an affect on a scenic vista or have a significant effect on public views; the Villa, a historic building; or a scenic highway. It is acknowledged that the visual character of the project site and surrounding area would change. However, the character of the existing use would not change, and the character of the project site along Wilson Street viewed from the adjoining roadway would remain similar to the existing conditions. Therefore the visual character would not be substantially degraded, and impacts are not significant.

Private views are not environmentally significant under CEQA. Neither state nor local law protects private views from private lands except in accordance with uniformly applied standards and policies as expressed in the City's general plan and zoning ordinances. In *Mira Mar Mobile Community v. City of Oceanside*, (2004) 119 Cal. App. 4th, the court held that the EIR may focus on the project's impacts only on public views. The court wrote “[u]nder CEQA, the question is whether a project will affect the environment of persons in general, not whether a project will affect particular persons.” The court found that an agency has discretion in determining

## 2. Response to Comments

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substantial impacts, and that it was proper for the City to determine that only impairment of public views, as opposed to private views, would be considered significant. Although aesthetic impacts associated with the removal and planting of trees along Wilson Street would not be significant, as viewed from the adjacent private properties, this type of analysis is not required under CEQA. The analysis in the Draft MND concerning the aesthetic impacts associated with the trees on the project site, as expanded above, is adequate, and impacts remain less than significant. No changes to the analysis or findings are necessary to address impacts to views from private properties.

- R1-6 The comment concerns water quality impacts of the proposed soccer/softball field. The existing runoff from the site to Wilson Street is expected to decrease based on the removal of significant portions of the current asphalt parking lot. Approximately 40 percent of the proposed new soccer/softball field currently consists of impervious asphalt. This area will provide additional percolation for runoff. The field will be setback 21 feet from Wilson Street. The northernmost portion of the field drains from the sidewalk into the soccer/softball field, ranging in slopes from 2 to 4 feet in height. The central portion of the field is at grade with the sidewalk. The southernmost portion of the field drains towards the sidewalk at a 5:1 slope. The southeast corner of the field contains a 5- to 6-foot-high retaining wall for the new backstop. The area from the sidewalk to the retaining wall is set back 25 feet in order to preserve the cedar tree in the corner of the site. This area will remain flat and will not present runoff issues.
- R1-7 The Commenter questions whether additional lights beyond the bollard lights identified in the Draft MND would be installed. The only light sources generated by the proposed project would be those from the bollard lights, lights from the multipurpose building, and vehicular lights. The project does not include nighttime field lighting.
- R1-8 The comment asks whether shielding will be provided to protect neighbors from errant softballs and tennis balls. The softball field would include 60 lineal feet of new backstop fencing (arranged in a traditional 30-foot wings and 20-foot backstop), and the tennis court will include new chain-link fencing. Although the existing perimeter fencing along Highland Avenue will screen some of the new fencing, portions of it will remain visible from the street. Views associated with the new fencing, however, will be similar to the existing fencing associated with the existing backstop fencing and would not have an affect on a scenic vista or have a significant effect on public views, the Villa, a historic building, or a scenic highway. Additionally, the new fencing would not substantially degrade the existing visual character of the site and surrounding. Therefore, aesthetic impacts associated with the fencing are not considered significant.
- R1-9 The comment concerns traffic impacts and mitigation. Based on traffic counts taken at the school, the trip generation rate per student at Alverno High School is higher than that of a typical high school. This school-specific trip rate was used to forecast the traffic volumes for the expanded school because it is assumed that the travel characteristics for the school's students would remain the same in the future. Alverno High School has a higher trip generation rate than a typical high school because a typical school has numerous students who live close enough to walk or

## 2. Response to Comments

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ride a bike to school. Furthermore, some schools have a busing program for students, which Alverno does not. The suggestion to offer carpool or public transit incentives for students is worthwhile and the administration at Alverno agrees that such a program is feasible and would be beneficial. It is not included as a mitigation measure in the environmental document, however, because its effects on the level of site-generated traffic cannot accurately be quantified. The traffic analysis indicated that the project would have a significant impact at the Michillinda/Highland intersection because the average delay for vehicles waiting at the stop sign on westbound Highland Avenue would increase by an amount that is above the threshold of significance. This impact could be mitigated by restriping the westbound approach to provide a left turn lane and a right turn lane instead of a single lane. While there would still be delays at this location, particular for the left turns, the increase in delay as compared to the no project scenario would be less than significant.

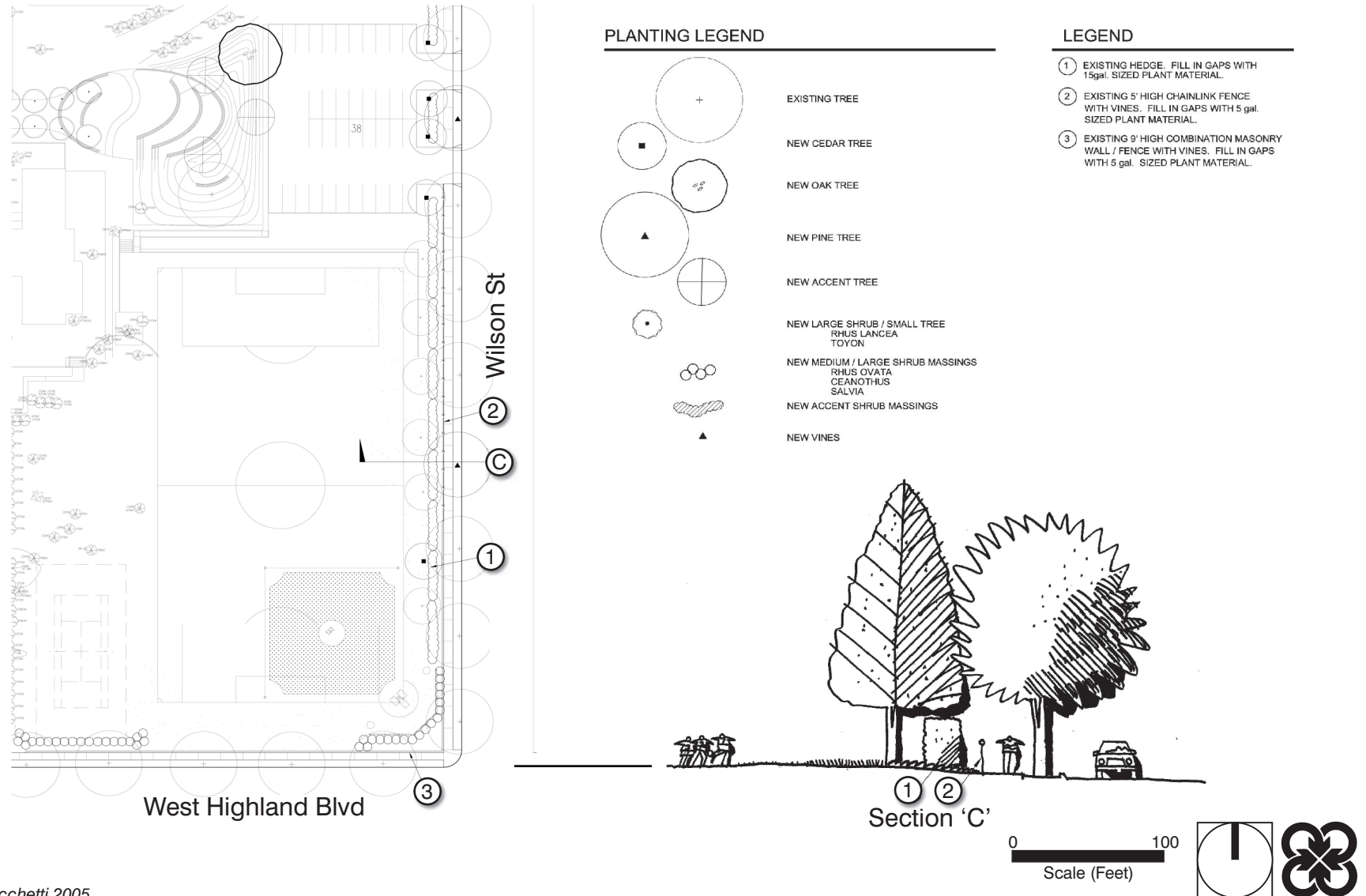


## *2. Response to Comments*

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# Landscape Concept of Multipurpose Field



Source: Jon David Cicchetti 2005

## *2. Response to Comments*

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## 2. Response to Comments

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LETTER R2 - Carolyn Simon (1 page)

**From:** Carolyn Simon  
**Sent:** Wednesday, March 23, 2011 7:31 AM  
**To:** Danny Castro  
**Subject:** a few questions

Hi Danny...Hope all is well...Got a few questions relating to the Alverno Master Plan that are not clear in the recent document...

1. What are the setbacks for the soccer/softball fields? tennis courts? | R2-1
2. Ground level for the soccer/softball field---with a 6% grade, are they adding dirt on the south or excavating dirt on the north to make it level? | R2-2
3. Will it be astro turf or real grass? | R2-3
4. What will the seating capacity of the amphitheater be? | R2-4
5. Use of Wilson Street parking lot---says for garage, faculty lounge, art building---will it also be used for school sports events ie; opposing team buses? during city use of fields? for profit events? | R2-5

Thanks in advance! Carolyn Simon



## *2. Response to Comments*

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## 2. Response to Comments

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### R2. Response to Comments from Carolyn Simon, dated March 23, 2011.

- R2-1 The comment asks how far the soccer/softball field and tennis courts would be set back from the school's property line. The soccer/softball field would be set back 31 feet from the east edge of the campus along Wilson Street, and 48 feet from the south edge of the campus along Highland Boulevard. The tennis courts would be set back about 32 feet from south edge of the campus along Highland Boulevard; the fence surrounding the tennis court would be set back about 3.5 feet from the south edge of the campus.
- R2-2 The comment asks whether soil would be added or removed to create a level soccer field. The project engineers have attempted to limit the import and export of soils by designing a balanced grading plan. The north end of the field will be excavated and the soils will be moved to the south end of the field. The soccer/softball field is a flat 1 percent slope. The required "play out" areas are 2 percent slope. These play out areas vary between 10 and 15 feet in width. The play-out areas have been reduced in order to preserve several trees on the Wilson Street frontage. The field is approximately 5 feet above the current elevation on Highland Avenue and is setback 48 feet from the property line in this location. The slopes in this area vary from 4:1 to 3.4:1. The slopes on the Wilson Street frontage vary from 2 to 4 feet in height, sloped into the field from the sidewalk, at the north end of the field, over a 21-foot setback. The slopes in the south end of the field range from 3 to 5 feet in height, over the 21-foot setback, sloping towards the sidewalk.
- R2-3 The comment asks whether the soccer/softball field would be artificial turf or grass. The field is planned for grass for two important reasons, including rain percolation and to mitigate "heat effect" from using artificial turf.
- R2-4 The comment asks what the seating capacity of the amphitheater would be. The amphitheater is intended to be used as an outdoor classroom, without amplification. The area consists of three seat walls facing the interior of the campus. These seat walls are approximately 50, 60 and 65 lineal feet in size. The occupancy ranges from 59 to 67 students. This area currently contains benches outside the school's cafeteria, where the students congregate during lunch.
- R2-5 The comment concerns uses of the Wilson Street parking lot. The Wilson Street parking lot will be used for faculty and staff parking. Game participants and spectators, as well as school buses, will park in the lot off Michillinda Avenue.



## *2. Response to Comments*

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## 2. Response to Comments

LETTER R3 - Bruce and Diana Baptrie (1 page)

Danny Castro  
Director, Development Services  
City of Sierra Madre  
232 W. Sierra Madre Blvd.  
Sierra Madre, Ca. 91024

4/7/11

Dear Mr. Castro,

I support Alverno High School and understand the need for facilities for their students. I am however concerned with the "Intention to Adopt a Mitigated Negative Declaration" for the Master Plan. It did not address all of the current and potential future uses at the property. It was insufficient at determining the impacts especially in the areas of noise and traffic. It did not assess the use of an outdoor sports field for games with spectators or multiple simultaneous events. All of the uses on campus need to be included in the Master Plan; events at the Villa should not be considered separately. Thank you.

R3-1  
R3-2  
R3-3  
R3-4  
R3-5

Sincerely,

Bruce Baptrie  
Diana Baptrie



## *2. Response to Comments*

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## 2. Response to Comments

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### R3. Response to Comments from Bruce Baptré and Diana Baptré, dated April 7, 2011.

- R3-1 The comment expresses support for the school and the school's need for facilities. Comment noted. All written comments submitted are part of the administrative record and will be considered by the Sierra Madre Planning Commission prior to consideration of adopting the MND and approving the project.
- R3-2 The Commenter claims that the MND did not address all of the current and proposed uses at Alverno High School. The project description provided in Chapter 1.3 of the MND represents the whole of the proposed action, and the environmental analysis completed addresses all future uses associated with the proposed action. General Response #1 on page 2-3 of this document explains why the project description does not include current or future uses on the campus.
- R3-3 The comment asserts that the MND analysis of noise and traffic impacts is inadequate. Without more detail as to how the MND is insufficient, no response can be provided.
- R3-4 The comment claims that the MND did not assess the use of the outdoor sports field for games with spectators or multiple simultaneous events. This comment is inaccurate. The MND does consider the impacts associated with simultaneous operations of the proposed athletic facilities. For example, as illustrated in Figure 13, *Noise from Athletic Fields and St. Claire Court*, in the Draft MND, simultaneous use of the multipurpose field, tennis court, and the small amphitheater would generate noise levels less than 50 dBA Leq, which is below the allowed noise levels pursuant to the City's Municipal Code standards. The MND, however, did not analyze concurrent capacity-level events (e.g., graduation in the multipurpose building, wedding in the Villa, and soccer game in the multipurpose field). Alverno High School indicated that it will not schedule conflicting full-capacity events. Therefore, an analysis of concurrent capacity-level events would be speculative and unnecessary, and CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters, as long as a good faith effort at full disclosure is made in the analysis.
- R3-5 The comment states that all of the uses on campus, including existing uses at the Villa, need to be included in the master plan. See General Response #1 above.



## *2. Response to Comments*

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## 2. Response to Comments

LETTER R4 - Jine-Ruey and Wen-Chung Chang (1 page)

|   |                                      |
|---|--------------------------------------|
| Danny Castro  | 4/7/11                               |
| Director, Development Services  |                                      |
| City of Sierra Madre  |                                      |
| 232 W. Sierra Madre Blvd.   |                                      |
| Sierra Madre, Ca. 91024   |                                      |
| Dear Mr. Castro,  |                                      |
| I support Alverno High School and understand the need for facilities for their students. I am however concerned with the "Intention to Adopt a Mitigated Negative Declaration" for the Master Plan. It did not address all of the current and potential future uses at the property. It was insufficient at determining the impacts especially in the areas of noise and traffic. It did not assess the use of an outdoor sports field for games with spectators or multiple simultaneous events. All of the uses on campus need to be included in the Master Plan; events at the Villa should not be considered separately. Thank you. | R4-1<br>R4-2<br>R4-3<br>R4-4<br>R4-5 |
| Sincerely,  |                                      |
| <i>Jine-Ruey &amp; Wen-Chung Chang</i>  |                                      |
| <i>Jine-Ruey Chang</i>  |                                      |



## *2. Response to Comments*

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## *2. Response to Comments*

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**R4. Response to Comments from Jine-Ruey and Wen-Chung Chang, dated April 7, 2011.**

Letter R4 consists of the same text as Letter R3. Please see responses R3-1 through R3-5.



## *2. Response to Comments*

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## 2. Response to Comments

LETTER R5 - Carole Farrell (1 page)

Danny Castro  
Director, Development Services  
City of Sierra Madre  
232 W. Sierra Madre Blvd.  
Sierra Madre, Ca. 91024

4/7/11

RECEIVED

APR 11 2011

CITY OF SIERRA MADRE  
DEVELOPMENT SERVICES

Dear Mr. Castro,

I support Alverno High School and understand the need for facilities for their students. I am however concerned with the "Intention to Adopt a Mitigated Negative Declaration" for the Master Plan. It did not address all of the current and potential future uses at the property. It was insufficient at determining the impacts especially in the areas of noise and traffic. It did not assess the use of an outdoor sports field for games with spectators or multiple simultaneous events. All of the uses on campus need to be included in the Master Plan; events at the Villa should not be considered separately. Thank you.

R5-1

R5-2

R5-3

R5-4

R5-5

Sincerely,

*Carole Farrell*

Carole Farrell



## *2. Response to Comments*

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## *2. Response to Comments*

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**R5. Response to Comments from Carole Farrell, dated April 7, 2011.**

Letter R5 consists of the same text as Letter R3. Please see responses R3-1 through R3-5.



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## 2. Response to Comments

LETTER R6 - Rhene Griller (1 page)

Danny Castro  
Director, Development Services  
City of Sierra Madre  
232 W. Sierra Madre Blvd.  
Sierra Madre, Ca. 91024

4/7/11

RECEIVED

APR 11 2011

CITY OF SIERRA MADRE  
DEVELOPMENT SERVICES

Dear Mr. Castro,

I support Alverno High School and understand the need for facilities for their students. I am however concerned with the "Intention to Adopt a Mitigated Negative Declaration" for the Master Plan. It did not address all of the current and potential future uses at the property. It was insufficient at determining the impacts especially in the areas of noise and traffic. It did not assess the use of an outdoor sports field for games with spectators or multiple simultaneous events. All of the uses on campus need to be included in the Master Plan; events at the Villa should not be considered separately. Thank you.

R6-1

R6-2

R6-3

R6-4

R6-5

Sincerely,



## *2. Response to Comments*

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## *2. Response to Comments*

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**R6. Response to Comments from Rhene Griller, dated April 7, 2011.**

Letter R6 consists of the same text as Letter R3. Please see responses R3-1 through R3-5.



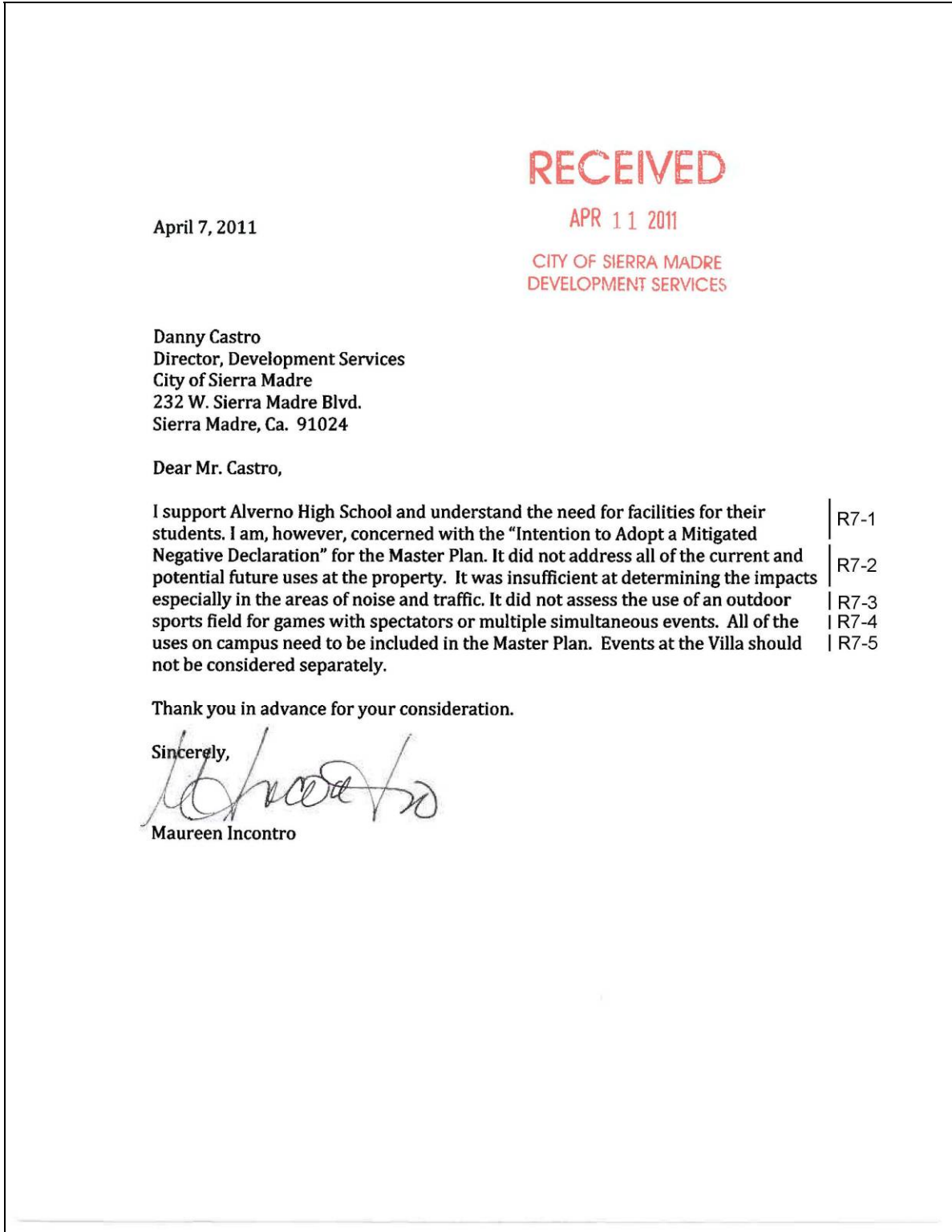
## *2. Response to Comments*

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2. Response to Comments

LETTER R7 - Maureen Incontro (1 page)



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## *2. Response to Comments*

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**R7. Response to Comment from Maureen Incontro, dated April 7, 2011.**

Letter R7 consists of the same text as Letter R3. Please see responses R3-1 through R3-5.



## *2. Response to Comments*

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## 2. Response to Comments

LETTER R8 - A. Karssing (1 page)

Danny Castro  
Director, Development Services  
City of Sierra Madre  
232 W. Sierra Madre Blvd.  
Sierra Madre, Ca. 91024

4/7/11

RECEIVED

APR 11 2011

CITY OF SIERRA MADRE  
DEVELOPMENT SERVICES

Dear Mr. Castro,

I support Alverno High School and understand the need for facilities for their students. I am however concerned with the "Intention to Adopt a Mitigated Negative Declaration" for the Master Plan. It did not address all of the current and potential future uses at the property. It was insufficient at determining the impacts especially in the areas of noise and traffic. It did not assess the use of an outdoor sports field for games with spectators or multiple simultaneous events. All of the uses on campus need to be included in the Master Plan; events at the Villa should not be considered separately. Thank you.

R8-1

R8-2

R8-3

R8-4

R8-5

Sincerely,

*A. Karssing*



## *2. Response to Comments*

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## *2. Response to Comments*

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**R8. Response to Comments from A. Karssing, dated April 7, 2011.**

Letter R8 consists of the same text as Letter R3. Please see responses R3-1 through R3-5.



## *2. Response to Comments*

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## 2. Response to Comments

LETTER R9 - Robert and Michelle Nydam (3 pages)

Danny Castro  
Director, Development Services  
City of Sierra Madre  
232 W. Sierra Madre Blvd.  
Sierra Madre, Ca. 91024

4/7/11

RECEIVED

APR 14 2011

CITY OF SIERRA MADRE  
DEVELOPMENT SERVICES

Dear Mr. Castro,

I want to make a few comments on Alverno High School's proposal for a negative mitigated declaration leading to a potential approved master plan. I appreciate your review of this letter and the significant amount of work you put into the proposed negative mitigated declaration. I am a proud Sierra Madre resident of 8 years as well as a former educator and school administrator.

My first concern is regarding the noise study. I have contended since the proposed TUP that the noise study was woefully inadequate. The studies made were highly selective in their events and do not represent a valid measurement of the noise levels currently or take into account the potential future noise levels based on the overall cumulative event usage. The current sound study handpicked specific dates and were limited in their time measurements. I would recommend a multi site sound study on the Alverno campus that takes into account a week in which there are school events, school sport events, city sport event usage, wedding business usage etc. This sound study does not address a valid measurement for a quiet residential neighborhood. Also, consider the future usage; picture a day with simultaneous soccer, softball, basketball, wedding usage, school events and a basketball game that is a school event, rental event, or city event. The noise levels will be truly inappropriate for a quiet residential neighborhood. Also, the noise requirements are based on the less-restrictive Pasadena residential requirements. The noise restrictions should be based on the more restrictive Sierra Madre noise regulations as the School resides in the City of Sierra Madre.

R9-1

My second concern is the traffic study and the resulting mitigations. From prior experience in the City of LA with similar studies I am actually shocked by the limited scope of the traffic mitigations and the complete lack of offsite improvements required besides some re-striping for additional turn lanes. For example, the school currently has 240 students and they project 400 in the future as well as increased school sporting events, city sporting events, rentals of the sports facility and usage of the villa for wedding business. This is a significant traffic impact and the cumulative and future usage has not been taken into account anywhere in this

R9-2



## 2. Response to Comments

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proposal. It is shocking to me that the underdeveloped section of Michillinda bordering the school is not a requirement of the school to put in new curb, gutter, sidewalk, and streetlights. Based on future cumulative usage it is a basic need to improve the offsite areas on Michillinda. For this reason, the traffic study should be re-done to reflect the future cumulative usage and the underdeveloped portion on Michillinda that demands improvement specifically based on the mitigations and the future proposed master plan.

R9-2  
cont'd.

My third concern is for the environmental impact on the trees along Wilson St. The proposed mitigations include removing the dead trees along Wilson St. I find this removal to inappropriate as these trees establish some screening and sound dampening.

Also there is no assessment, evaluation or study done to the effect the development of a soccer field and stands would have on the very mature canary pines lining Wilson St. The tree study does not take into account that it is likely that the excavation for the soccer field could significantly compromise the root systems of these mature trees causing their death. The tree study should be updated to reflect the potential impact on these mature trees lining Wilson St. that make this street and neighborhood special and beautiful.

R9-3

My fourth concern is that the wedding business has been completely excluded from the Neg. Dec. This makes absolutely no sense. The school frames the wedding business as a fundraising activity therefore from their perspective this is distinct school sanctioned activity raising the funds to operate the school. This proposal must be updated to include the environmental impact of the wedding business/fundraising activities at the Villa. Based on the perspective of cumulative and future usage it makes no sense that this use would be excluded from this plan and treated as separate distinct activity. From the schools own admission this is clearly a school fundraising activity that raises funds for school operations. The school stated this stance on multiple occasions during city council meetings when the TUP was being debated and approved.

R9-4

In addition, I must again state the City of Sierra Madre's conflict of interest in this whole process. The city receives free usage of sports fields and the villa. With future expansion, the City stands to gain generously in sporting fields, villa usage and facility usage. The City must take into account their inherent conflict of interest and considerable bias and have an outside third party development future plans towards the proposal of the master plan.

R9-5

## 2. Response to Comments

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Based on cumulative usage currently and in the future if all development is established as proposed by the master plan this mitigated negative declaration is inadequate to address the potentially significant impacts specifically in terms of noise, traffic and offsite improvements, environmental impacts specifically in regards to the mature canary pines on Wilson St., and the glaring omission of the fundraising activities as part of the wedding business at the villa that must be included in this proposal. For these reasons it is my sense that an environmental impact study must be performed by Alverno High School in order to make a valid assessment of the potentially significant impacts by the school's proposed master plan.

R9-6

I appreciate your consideration of these comments and for the significant work that was put into developing this plan.

Sincerely,

Robert and Michelle Nydam



## *2. Response to Comments*

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## 2. Response to Comments

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### R9. Response to Comments from Robert and Michelle Nydam, dated April 7, 2011.

R9-1 This comment concerns the noise study and alleges that it is inadequate. The purpose of the noise monitoring was to capture the ambient noise in the surrounding community when school is not in session in order to determine the baseline ambient noise environment. The intent of the measurements was not to determine if noise generated from existing uses complied with City noise regulations. The noise monitoring measured ambient noise on 1-minute intervals continuously for over a 24-hour period. Noise monitoring was conducted on certain dates as it was determined by the noise specialist as the best time to capture the ambient noise environment of the surrounding neighborhood without noise contribution from Alverno High School. This data was included in Section 2.2.2 of the Noise Technical Study. It is not atypical of CEQA evaluations to establish the ambient noise environment through a single noise monitoring session.

The MND evaluated the potential noise impacts of the proposed uses against both the City of Sierra Madre and City of Pasadena's noise ordinance where appropriate. As illustrated in Figure 13, *Noise from Athletic Fields and St. Claire Court*, in the Draft MND, combined use of the proposed multipurpose field, tennis court, and the small amphitheater would generate noise levels less than 50 dBA Leq. The noise generated is within the City's Municipal Code standards. Alverno High School has also indicated that it will not schedule concurrent capacity-level events, e.g., graduation in the multipurpose building, wedding in the Villa, and soccer game in the multipurpose field. Therefore, an analysis of concurrent capacity-level events would be speculative and unnecessary. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters, as long as a good faith effort at full disclosure is made in the environmental document. The noise analysis performed for the proposed project is beyond that generally prepared for relatively small development projects. The study adheres to industry standards and is adequate. With mitigation, noise generated by the proposed project is compatible in a residential noise environment and would not be considered significant.

R9-2 The comment concerns traffic impacts and mitigation. The proposed project is that of an amendment to an existing Conditional Use Permit (CUP) that was approved in 1959. Approval of the amendment by the City would allow Alverno High School to implement the improvements as described in Section 1.3 of the Draft MND. Please see General Response #1 on page 2-3 of this document for more information the project description. The traffic study is based on this project description, which does not include increased "city sporting events, rentals of the sports facility and usage of the villa for wedding business" as suggested by the commenter. The mitigation measures for traffic impacts that were developed for the project are based on the significant impacts that were identified at two of the seven intersections addressed in the traffic study. The impacts were evaluated using the criteria outlined in the City of Pasadena's "Transportation Impact Review Guidelines." If the City of Los Angeles guidelines had been used instead of the Pasadena guidelines, the results of the analysis would have been the same because the Los Angeles Department of Transportation guidelines also indicate that an intersection operating at LOS C would be significantly impacted if the ICU value would increase by greater than 0.040. The approach for the traffic analysis was to evaluate the impacts of the school



## 2. Response to Comments

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expansion project during the time of day when the school would generate the heaviest volumes of traffic; i.e., during the morning peak period when students and staff would be commuting to the school site. This is the standard methodology for a traffic analysis for a school because it is assumed that if the street network's capacity can accommodate the traffic volumes during the times of peak traffic flow, then it could certainly accommodate the traffic during times when the traffic volumes are lower. It is acknowledged that the athletic activities would generate traffic during after-school times. The traffic volumes generated by these events would, however, be lower than the traffic that would be generated on a daily basis by the regular school activities under most circumstances. A detailed capacity analysis of the roadway system relative to the athletic activities and special events is not necessary for the environmental evaluation. Furthermore, these activities already take place at the school and would not be categorized as new traffic associated with the proposed master plan.

With regard to the physical design of Michillinda Avenue along the school frontage and the suggestion to improve the infrastructure along this segment, this is a matter of negotiation between the City of Sierra Madre and Alverno High School. It is not an issue that is addressed in the environmental document, as the current design does not result in a defined environmental impact in accordance with CEQA guidelines.

R9-3

The comment concerns noise and aesthetic impacts associated with the trees along Wilson Street. A general response to this comment concerning the removal of existing and planting of new trees is provided in General Response #2 on page 2-5 of the Final MND. In general, vegetation, such as the trees along Wilson Avenue, have negligible effects on noise attenuation (FTA 2006; FHWA 2006; Caltrans 2009) and therefore are not considered in the noise analysis. Noise associated with the playfields was modeled using SoundPlan. The noise analysis has taken into account ground attenuation from "soft" surfaces such as grass, where appropriate. In general, unpaved surfaces absorb sound more than paved surfaces and would therefore provide some noise attenuation.

Aesthetic impacts associated with this element of the project are not considered significant. The removal of existing and planting of new trees would not have an affect on a scenic vista or have a significant effect on public views; the Villa, a historic building; or a scenic highway. While the visual character of the project site and surrounding area would change, the quality of the aesthetics of the immediate area adjoining the site would not be substantially degraded. Therefore, aesthetic impacts associated with the trees are not considered significant.

The Commenter also requested that the tree study be "updated to reflect the potential impact on the mature trees along Wilson Street that make this street and neighborhood special and beautiful." The project engineer attempted in the preliminary grading design stage to shift the soccer/softball field to the west in order to preserve the existing trees on Wilson Street. This resulted in consequences on the west side of the field, including the entire demolition of the Villa's historic seat wall. In addition, the slope area begins to encroach into the historic Villa grounds. The slopes and play-out areas have been reduced to the minimum sizes in order to protect a significant number of trees on the Wilson Street perimeter. Additional studies to address aesthetic impacts and biological impacts related to the loss of

## 2. Response to Comments

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trees is not required. The Draft MND has adequately analyzed the effects associated with their removal, as well as the planting of new trees. Furthermore, CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters, so long as a good faith effort has been made. The City acknowledges that project implementation will change the visual character of the site and surrounding area. However, these changes, with the implementation of mitigation measures and with compliance with best management practices and established local and state regulations, are not significant and adverse.

R9-4 The comment asserts that existing uses of the Villa should be analyzed in the Alverno High School Master Plan MND. Please see General Response #1 on Page 2-3.

R9-5 The Commenter claims that the City has a conflict of interest in considering the master plan for approval since the City would benefit from such approval through uses of the soccer/softball field and the Villa. Objective L36.2 of the Sierra Madre General Plan includes the following policy for the Institutional land use:

“Allow for the expansion of existing institutional site, including height and density, beyond that allowed in adjacent commercial and residential that a comprehensive master plan is approved by the City which demonstrates that the project:

a. Contains activities and functions that which will be a significant use for the City... [and]

e. Provides additional benefits to the community above those which can be exacted to account for the developments direct impacts. Such benefits would include making available parking to the public when not needed for the use, dedication of on-site recreation space or parkland, facilities for public meetings, day care available to the public, contribution to park site acquisition, offsets impacts to historic structures with monetary contribution to a preservation fund.”

The proposed project is consistent with Objective L36.2 of the General Plan. Additionally, it should be noted that the intent of this Objective was memorialized between the City and Alverno High School in a facilities agreement signed in 2006. The agreement allows the City to use Alverno High School’s facilities as long as proper notification is provided to Alverno and if there are no scheduling conflicts. Although the agreement has been in place for over four years, the City has only used Alverno’s facilities for two annual events held in the Villa. There are no other City-sponsored events currently held at Alverno High School, and the City has no intent on expanding its use. Should there be any future use, however, it would be conducted in accordance with the agreement and appropriate City-established processes. There would be no “gain” by the City, as suggested by the commenter. The entitlement process has been appropriately handled and has conformed to all planning and development requirements. No conflict of interest exists between the City and Alverno High School.



## *2. Response to Comments*

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- R9-6      This comment is a summary of the points made in Comment Letter #R9. The concerns stated in this comment are addressed in Responses R9-1 through R9-5. As fully described in General Response #1, the project description provided in the circulated Draft MND is the whole of the action, and the analysis therein fully addresses impacts of the proposed action. As all impacts associated with the proposed project can be feasibly mitigated to levels below established thresholds, preparation of a Mitigated Negative Declaration for the project is appropriate and an Environmental Impact Report is not necessary. The City has complied with the requirements of CEQA and CEQA Guidelines for the proposed project.

## 2. Response to Comments

LETTER R10 - Jean Ruth (1 page)

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|--|--|
| <p>Danny Castro<br/>Director, Development Services<br/>City of Sierra Madre<br/>232 W. Sierra Madre Blvd.<br/>Sierra Madre, Ca. 91024</p>  | <p>4/7/11</p>  |
| <p>Dear Mr. Castro,</p>  |  |
| <p>I support Alverno High School and understand the need for facilities for their students. I am however concerned with the "Intention to Adopt a Mitigated Negative Declaration" for the Master Plan. It did not address all of the current and potential future uses at the property. It was insufficient at determining the impacts especially in the areas of noise and traffic. It did not assess the use of an outdoor sports field for games with spectators or multiple simultaneous events. All of the uses on campus need to be included in the Master Plan; events at the Villa should not be considered separately. Thank you.</p> | <p>R10-1<br/>R10-2<br/>R10-3<br/>R10-4<br/>R10-5</p> |
| <p>Sincerely,<br/><i>Jean Ruth</i></p>   |  |



## *2. Response to Comments*

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## *2. Response to Comments*

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**R10. Response to Comments from Jean Ruth, dated April 7, 2011.**

The text of letter R10 is identical to that of letter R3. Please see responses R3-1 through R3-5 above.



## *2. Response to Comments*

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## 2. Response to Comments

LETTER R11- Russ and Carolyn Simon (12 pages)

Danny Castro  
Director, Development Services  
City of Sierra Madre  
232 W. Sierra Madre Blvd.  
Sierra Madre, Ca. 91024

4/7/11

Dear Mr. Castro,

Being a Director of Development Services is a lot like walking a tightrope; you must balance the need for development with the responsibility of protecting the environment and neighborhoods. We have reviewed the NMD however and don't see such objectivity with the Alverno Master Plan. The Negative Mitigation Declaration and the studies contained therein fail to accurately address the impacts of the project. The document describes new regulation soccer/softball fields yet their new campus uses for outdoor games with significantly more players & spectators (noise/traffic) were *totally omitted* from all of the studies. City use of these sports fields, which is also included in the Master Plan and NMD, was *noticeably absent* from the noise/traffic testing as well. Quantifying the cumulative uses of the new construction ie; a soccer game simultaneously with a basketball game on campus was *never done*. *Separation of the fundraising/for profit use of the Villa has shamelessly been requested*. This leaves your position disproportionately biased in favor of the development, without the necessary reality checks in place relating to the environment and the neighborhood.

Without limits, there are significant environmental issues in the Master Plan for this quiet residential neighborhood. Any attempt to minimize the impacts by completely omitting the actual projected uses is inappropriate. The City of Sierra Madre stands to benefit substantially with their intended use of the Alverno property for City sports and events. Certainly a conflict of interest or the appearance of collusion would be implied if after new evidence has been presented about omissions and flawed data, no remedial actions were taken. Objectivity is critical in assessing the needs of *BOTH* parties. The NMD is very limited, incomplete and therefore one-sided.

The environmental factors of Land Use and Planning, Noise, Transportation/Traffic, and Mandatory Findings of Significance ALL involve impacts that are "Potentially Significant".

Here are the main issues that came to our attention while reviewing the NMD...



R11-1

## 2. Response to Comments

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**X. Land Use and Planning.** Would the project:

**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?**

Requested in the Master Plan is an outdoor spectator sports field along with an amphitheater; land use plan which is incompatible for this quiet suburban neighborhood. New construction or development should not be undertaken without an Environmental Impact Report.

R11-2

The City and the Alverno High School Board of Trustees are negotiating a second CUP amendment, separately from the proposed project, to permit the permanent continuation of the existing uses of the Villa for special events and weddings. They refer to those uses as "occasional". **(See the attached documents)** This usage alone prompted many heated City Hall meetings, newspaper articles and protesting lawn signs. It was so substantial that it required a TUP in 2010 with mitigations to assist with the environmental impacts of *just this* campus activity. **Not including this activity in the Master Plan would be solely for the purpose of avoiding or mitigating environmental effects of this land use plan. It is also "cumulatively considerable".**

**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?**
- c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?**
- d) A substantial temporary or periodic increase in ambient noise levels in ambient noise levels in the project vicinity above levels existing without the project?**

The Noise study done by the Planning Center attempted to calculate the current and projected uses of the Alverno High School property and their Master Plan. The basis of their test was extremely limited using insufficient data and thus did not capture an accurate baseline for comparison. The noise-monitoring program reflected only *minutes* of a single event (perhaps of a date/time selected by the applicant, Alverno) for some studies, reflected exclusively the winter season, and used outdated criteria. How can one model for a Threshold of Significance with just 18 minutes of data for a location? Any of the noise measurement results and hence their related analysis listed in the Tables & Figures in the NMD are inaccurate and therefore without merit.

R11-3

R11-4

R11-5

**Ambient Noise Study:** A total of only 72 hours encompassing only one single weekend and one single school day in March 2010 were captured to establish a

R11-6

## 2. Response to Comments

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| <p>baseline for ambient noise. A project with the scope of the Master Plan certainly requires more data to accurately create a foundation for comparison. Without broader sampling, how can we really know what is a <i>reliable</i> average? <i>One single study does not prove an average. Did the applicant select the testing period?</i> Who decided the hours and the positioning of the SLMs? Levels and comparisons in Figures 5-9 reflect only Monday, the school day. The weekend comparisons of Saturday and Sunday, with and without the project are noticeably omitted from the NMD. <i>These would be of important concern to the City staff and neighbors if weekend use were to take place with the project.</i> The SLM for this study was placed <math>\frac{3}{4}</math> up on Wilson Street and thus less able to accurately collect data relating to sports noise from the school's field. Which sport was being played on that single date? What if softball is noisier than soccer? Was that the only sport being played? Was it practice or a game with spectators? City sports use was never tested. Without a study of a variety of days of the week, times of year, types of events, and combinations of simultaneous events, then the ambient noise data is inadequate and thus flawed. So many assumptions and comparisons in the NMD are extrapolated from this data that they too are flawed.</p> | <p>R11-6<br/>cont'd.</p>                  |
| <p><b>Parking Lot Noise Study:</b> This study did not include augmented after school sports, or weekend City sport usage and is thus insufficient for making any conclusions.</p>  | <p>R11-7</p> <p>R11-8</p> <p>R11-9</p>    |
| <p><b>Dance Noise Study:</b> The study was based on a single school event during only one time of year, the Winter Formal on 12/4/2009. This study covered a little more than 3 hours in total (745p-1125p) and <b>the dance site SLM itself captured only a period of 18 minutes</b> (831p-849p). In winter, doors and windows are typically closed for dances and thus may not be used for comparisons of school dances &amp; events during other seasons of the year.</p>   | <p>R11-10</p> <p>R11-11</p> <p>R11-12</p> |
| <p><b>Wedding Noise Study:</b> The study was based on a single event on 12/18/2008. While the NMD shows that this was for a wedding/reception, the time frame of the sound study (811p-930p) <b>failed to include the outdoor ceremony portion (4p-6p outdoors/with amplification). It also neglected to include the outdoor dining with amplification portion.</b> <i>The wedding site SLM covered a grand total of 1 hour 19 minutes. The Wilson Street site's SLM reflected 13 minutes total.</i> Weddings at the Villa end at 10pm (music and bar close at 930p) yet the study only covered only the period until 930pm so it <b>excluded the time frame when the majority of traffic is exiting the property.</b> The event took place in winter, when doors and windows would be primarily closed. Weddings are more frequently held during the peak months of April through October and conditions are quite different during that time of year. This sound study did not take into consideration the new use of the Highland Street exit. How many guests attended this particular event? Is that the average number for fundraising/for profit events at the Villa? This would affect the overall number of vehicles, which would in turn affect the noise and traffic conditions. The Wedding noise study's sample is inadequate and thus flawed.</p>  | <p>R11-13</p>                             |



## 2. Response to Comments

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Has The Planning Center calculated how the loss of trees and grading of fields would affect the dispersement of sound? How about the "spreading loss" for sports or for profit events? **Has a soccer game been tested from a distance of 25 feet?** Did anyone model the sound of the tractor smoothing out the softball field? What about the congregation of noise behind home plate in the bleachers? The lobby of MPB opens on the Wilson street side--was that calculated into the projection? What about when air conditioning costs become prohibitive and lobby doors are left open during events?

R11-14

R11-15

R11-16

R11-17

R11-18

**General Noise Regulations 9.32.100** enumerates many of the neighbors' concerns about potential noise from the project: the volume, pitch, intensity of the noise, the duration and frequency of the noise, whether the nature of the noise is typical of the area, whether the origins of the noise is natural, the volume and intensity of the background noise, the proximity of the noise to residential sleeping facilities, the zoning of the area within which the noise emanates, the timing of the noise and whether the noise is recurrent, intermittent or constant and whether the noise is produced by a commercial activity or whether the amplified sound is loud enough to be decipherable outside the property plane. The psychological and physiological effects of noise are clearly stated in the NMD. Too many questions have not been sufficiently addressed by the noise study in the NMD document. It is inadequate in measuring the realistic environmental impacts of the project and thus flawed.

R11-19

Actual current and projected uses of the project *would* elevate noise to levels in excess of local standards. A substantial permanent increase in ambient noise levels *would* take place in the project vicinity above levels without the project. Above and beyond that permanent increase with the project, *will be* additional temporary and periodic increases that have not been addressed. The project is in a residential area of the City and is across the street from noise-sensitive single-family residential homes. An EIR is needed to accurately assess the full impacts relating to noise.

R11-20

R11-21

R11-22

### **XVI. Transportation/Traffic.** Would the project:

- a) **Conflict with and applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?**
- b) **Conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highway**
- g) **Result in inadequate parking capacity?**

In the traffic study done by Zimmerman Engineering for the NMD, **only traffic for the academic school times of day** were measured. It did not capture after school sports attended by the students, their opposing teams, and/or spectators. It did not take into account *any* City sports or event usage and the many individuals coming to the campus for those types of activities. Where are all of these people going to park? If the field is on the *southeast* corner of the property, Wilson Street will become a parking lot; they will not go to the *northwestern* lot. The studies omitted the frequent high capacity fundraising/"for profit" events at the Villa. **All of these individual scenarios as well as the potential for simultaneous activity on the property, at capacity or not, were never addressed for the baseline or the projections. It did not capture the noise, congestion, or parking needs of these augmented uses whatsoever.** It is not representative of the full scope of the Master Plan and therefore any analysis or conclusions reached by the study are inadequate for an NMD. An EIR based on the *cumulative* uses of the property is necessary to determine accurate realistic environmental traffic/transportation impacts of this Master Plan.

R11-23

**XVIII. Mandatory Findings of Significance.**

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

The project has the potential to degrade the quality of the environment. The NMD focuses on the threats to the property itself yet it does not sufficiently take into consideration the neighborhood impact as well as impact to the City as a whole. The loss of 47 trees, some of which are protected, in a "Tree City USA" is turning our back on our City's philosophy of tree protection and preservation. Concern is addressed about the Villa's viewshed and the use of trees to screen the proposed additions of the MPB and MPF yet it never addressed the *neighbors'* viewshed. Long-standing deodar cedars that conceal the athletic field and parking lots from street view are slated to be removed. The beautiful and historical Canary pines that line the perimeter of the school and are enjoyed by neighbors and residents will be in jeopardy. In the NMD it states that each day of work on site is potentially threatening to mature trees. The Tree Report asks that we leave the trees as undisturbed as possible and give them as much space as possible. They respond slowly to injury and they recover slowly. It also says that nothing done to the site should compromise the stability and structural integrity of these old heavy living organisms. The construction of the multipurpose field will require significant grading and trenching with insufficient setback from the Canary pines located in the parkway. Trauma to their root system would most certainly result in the loss of some if not all of the trees in the southeastern portion of the property. The birds

R11-24



## 2. Response to Comments

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and animals that inhabit those trees will be forever displaced, not to mention the blight of the neighborhood with the loss of such majestic treasures.

Residents chose this location for their homes much like Dr. Barlow did-- for it's natural beauty and tranquility. The ambience of this quadrant of Sierra Madre will be forever changed with the cumulative effects of this project. The natural resources of the City need to be preserved and protected. Even with additional mitigation, it may be not enough to protect these valuable gems.

Photo of my current viewshed and of the Canary pines that line the parkway:



R11-24  
cont'd.

### **XVIII. Mandatory Findings of Significance.**

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

Development of the Alverno High School property began for the personal residence of Dr. Jarvis Barlow built in 1924. Later in 1941 it was sold to the Sisters of St. Francis for use as a convent. 1960 was the year it began to be used as a private day school for girls. Today it is a campus for the academic, athletic, and enrichment programs of high school girls with a current school enrollment of 228. The City of Sierra Madre's Girls Softball Association at this point uses the athletic field on a

R11-25

## 2. Response to Comments

limited basis only for its younger girls' teams. The onsite Villa is used frequently for school fundraising/"for profit" events.

School use will be augmented with the implementation of the project. A potential increase of up to 400 students is included in the Master Plan. With more academic students will come more noise and traffic. One of the biggest additions of school use will be the augmented school sports use. Currently only school softball, soccer, track, and cross country practices only are played on the property. With the Master Plan **the following uses would be added with the project...**

**Additional Alverno Sports Use with the Master Plan:**

Soccer games including finals and playoffs

Softball games including finals and playoffs

Basketball practices and games (jv & varsity)

Volleyball practices and games (freshman/sophomore, jv & varsity)

Tennis practices and games

Track and field meets

Cross country meets (jv & varsity)

**The augmentation of school sports is "cumulatively considerable".**

There is even more substantial environmental impact with **sports' games & meets** in comparison to **practices**. They involve twice as many athletes (or more), a large number of spectators, whistle blowing, cheering, p.a. systems, etc. Increases in noise and traffic are inherently considerable with games & meets on campus. **Outdoor school spectator games on campus are inappropriate land use and are "cumulatively considerable".**

**Additional Outdoor School Use with the Master Plan:**

With the creation of an outdoor amphitheater, some school activities, which are currently indoors such as school plays and choir & dance concerts with minimal noise impact, may now be moved outdoors and therefore contribute to the **cumulative** environmental impact to the neighborhood.

**Of even greater concern however are the unaddressed non-school uses of the project (rental of the Villa and City Sports Use) and their cumulative impacts...**

R11-25  
cont'd

R11-26



## 2. Response to Comments

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### **Additional Fundraising/"for profit" Villa Use needs to be in the Master Plan:**

The Villa on campus is *occasionally* used for student activities while *frequently* rented for school fundraising/"for profit" events. Weddings and anniversary/birthday parties with up to 200 guests, 100+ cars and film/photo shoots with generators and large crews are booked to offset tuition costs according to Alverno High School. (See attachments related to Weekend Villa use)

Film use at the Villa prompted **not one but two City lawsuits** with Pasadena residents several years ago. **The event/wedding usage has been highlighted in many recent newspaper articles, spirited City Hall meetings, protesting lawn signs and ultimately a 2010 Temporary Use Permit (TUP).** This TUP includes conditions to offset the negative environmental issues (noise, traffic and parking) relating to **only this usage** on campus. Mitigation measures included the limiting of peak season use of the Villa to 2 rental events per month and the requirement of the use of the Highland Street drive for exiting of these events in addition to many other measures. **Mitigation has been necessary even without the project and will be even more important as the full scope with the project is examined.**

The City and the Alverno High School Board of Trustees are negotiating a second CUP amendment, *separately* from the proposed project, to permit the permanent continuation of the existing uses of the Villa. We question the legality of intentionally separating the environmental review of this use of the Villa from the Master Plan especially considering the volume of activity (see attachments) and the negative impacts that this activity has *already* placed upon the neighboring residents. **The use of the Villa for fundraising and/or for profit is "cumulatively considerable"** as evidenced by historical data and must be factored collectively with all other uses when assessing the project. The new amphitheater with its potential for fundraising/for profit events also needs to be considered in this exercise.

### **City Sports Use without the Master Plan:**

Current City sports activity on the Alverno field is primarily practiced by the Sierra Madre Girls Softball Association younger teams on a limited basis. They share the field hours with the Alverno team. Since it is a non-regulation field the younger girls use it; the trees on campus restrict the use by older more skilled players. The recent calendar provided showed no weekend (Sat/Sun) use for SMGSA but this needs to be verified. Stats for the full annual usage of Alverno's field by SMGSA (#of days per year, # of days per week, hours used, teams) have been requested, but were not available as of this letter.

### **Additional City Sports Use WITH the Master Plan:**

The potential for increased City sports use is substantial and with considerable impacts. The SMGSA alone has **27 teams** for girls' ages 6 years to 14. They offer

R11-26  
cont'd.

R11-27



both Spring and Fall ball playing. With the completion of the project, the fields would be of regulation size and thus increased use for softball with older girls is possible. Add to that the potential for *augmented* City use in the sports of soccer, tennis, volleyball, basketball, etc. and the project would have significant impacts on this quiet residential neighborhood. Imagine "back to back to back" games or simultaneously running City sports events on weekends and the resulting noise and traffic. Environmental impacts of these future uses have not been quantified or tested. **The augmented sports use by the City of Sierra Madre is "cumulatively considerable".**

R11-27  
cont'd.

Again as with school sports, there is much greater environmental impact with City **sports' games & meets** in comparison to **practices**. They involve twice as many athletes (or more), a large number of spectators, whistle blowing, cheering, etc. Increases in noise and traffic are inherently considerable with games & meets on campus. **The usage of City indoor & outdoor spectator sports games on campus is inappropriate land use and is "cumulatively considerable".**

**Neighboring usage with the Master Plan:**

With LaSalle High School, SM United Methodist Church and a busy shopping plaza in close proximity; the cumulative effects of those uses need to be included when evaluating the cumulative effect of the project.

**XVIII. Mandatory Findings of Significance.**

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

Information listed in this document support the findings that the project as a whole has environmental effects, which will cause substantial adverse effects on human beings both directly and indirectly especially in the areas of noise, traffic, and cumulative usage. (The neighbors deserve *at least* the same consideration that the bats on the property have been given!)

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We have lived on Wilson Street for nearly 20 years. We *love* the City of Sierra Madre. Our son was raised in local schools starting with Mama Pete's. We have many friends that are Alverno families and understand their need for new facilities. The quiet ambience of our home's neighborhood however could be permanently and irreparably changed if realistic studies and a cumulative overview of the Master Plan's uses and impacts are not given the appropriate consideration. In this letter, we have presented substantial evidence that needs to be addressed. Mitigation must be recalculated based on this new information. Impartial oversight is critical to quantify the project's span. A separate agreement between the City of Sierra Madre and Alverno High School is already in place relating to the sharing of facilities & property. Unfair bias could be perceived if City staff inadequately addresses the Master Plan issues and the appearance of collusion would certainly be raised. As

R11-28



## 2. Response to Comments

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Director of Development Services and Lead Agency, you have a moral and legal *obligation* to ensure that there are no gaps or discrimination in this process. Separating *any* of the cumulative uses or ignoring the missed criteria of current and/or intended use of the Master Plan would be looking the other way for one friend at the expense of another *especially relating to Villa and City usage*. The NMD is based on irrelevant and insufficient criteria. It does not adequately explore the cumulative or environmental impacts of *this particular* project. Additional mitigation is essential to bring the impacts of Alverno's Master Plan to acceptable levels for the neighboring properties. We are the constant---we are present for school hours, after school sports, City sports/events and the wedding/"for profit events". Based on the NMD, we seem to be the only ones who have considered the reality and potential reality of the project. But based on this new information, we hope to have raised everyone's awareness. Comprehensive studies *inclusive of the full-intended use of the Master Plan* are necessary. **The environmental factors of Land Use and Planning, Noise, Transportation/Traffic, and Mandatory Findings of Significance involve impacts that are "Potentially Significant"**. Thank you for taking the time to read this letter. Should you have *any* questions or wish to discuss this further, please let us know. We would be happy to meet with you. Lawn signs are not the optimal way to communicate.

Not yet convinced about significant impacts? Then please listen to this link ...  
(p.s. apologize about the intro about the loss of Frankie, but we did not create nor edit this video)

<http://www.youtube.com/watch?v=K5tabDozg8>

Sincerely,

Russ and Carolyn Simon

[address and phone number redacted]

cc: Elaine Aguilar, City Manager

cc: Sandra Levin, City Attorney

cc: Richard McDonald, ESQ.

cc: Alverno Board Members

cc: The Planning Center

please don't miss the 2008 and 2009 Villa Stats on next 2 pages

R11-28  
cont'd.

## 2. Response to Comments

### 2008 Weekend Villa Use

| Date       | Villa Use | Event               | Type of Use | Notes   |
|------------|-----------|---------------------|-------------|---|
| 1/5/2008   |           | N/A                 |             |   |
| 1/13/2008  | Event     | Open House          | School      |   |
| 1/19/2008  | Event     | WEDDING             | RENTAL      |   |
| 1/26/2008  |           | N/A                 |             |   |
| 2/2/2008   | Event     | PARTY               | RENTAL      | St. Rita's Wine; Fee Waived                           |
| 2/9/2008   |           | N/A                 |             |   |
| 2/16/2008  |           | N/A                 |             |   |
| 2/22/2008  | Event     | Party               | City        | Friends of SM Library Food/Wine Party                 |
| 3/1/2008   | Event     | AHS Father/Daughter | School      |   |
| 3/8/2008   | Event     | Gala                | School      |   |
| 3/15/2008  | Event     | WEDDING             | RENTAL      |   |
| 3/22/2008  |           | N/A                 |             | Easter  |
| 3/29/2008  | Event     | WEDDING             | RENTAL      |   |
| 4/5/2008   | Event     | WEDDING             | RENTAL      |   |
| 4/12/2008  | Event     | WEDDING             | RENTAL      |   |
| 4/19/2008  | Event     | Brunch              | School      | Mother/Daughter Brunch                                |
| 4/26/2008  | Event     | WEDDING             | RENTAL      |   |
| 5/3/2008   | Event     | WEDDING             | RENTAL      |   |
| 5/10/2008  | Event     | WEDDING             | RENTAL      |   |
| 5/17/2008  | Event     | Dance               | School      | Father/Daughter Dance                                 |
| 5/24/2008  | Event     | WEDDING             | RENTAL      |   |
| 5/31/2008  | Event     | WEDDING             | RENTAL      | Memorial Day Weekend                                  |
| 6/7/2008   | Event     | Graduation          | School      |   |
| 6/14/2008  | Event     | WEDDING             | RENTAL      |   |
| 6/21/2008  | Event     | WEDDING             | RENTAL      |   |
| 6/28/2008  | Event     | WEDDING             | RENTAL      |   |
| 7/5/2008   | Event     | WEDDING             | RENTAL      | Fourth of July Weekend                                |
| 7/12/2008  | Event     | PARTY               | School      | AHS Alumni Reunion                                    |
| 7/19/2008  | Event     | WEDDING             | RENTAL      |   |
| 7/26/2008  |           | N/A                 |             |   |
| 8/4/2008   | Event     | PARTY               | RENTAL      |   |
| 8/9/2008   | Event     | WEDDING             | RENTAL      |   |
| 8/16/2008  | Event     | WEDDING             | RENTAL      |   |
| 8/23/2008  | Event     | WEDDING             | RENTAL      |   |
| 8/30/2008  | Event     | WEDDING             | RENTAL      |   |
| 9/6/2008   | Event     | WEDDING             | RENTAL      | Labor Day Weekend                                     |
| 9/13/2008  |           | N/A                 |             |   |
| 9/20/2008  | Event     | WEDDING             | RENTAL      | Also Alumni Softball Game                             |
| 9/27/2008  | Event     | WEDDING             | RENTAL      |   |
| 10/4/2008  | Event     | WEDDING             | RENTAL      | Also IHHS Father/Daughter Picnic (10/5)               |
| 10/11/2008 | Event     | WEDDING             | RENTAL      |   |
| 10/18/2008 | Event     | WEDDING             | RENTAL      |   |
| 10/25/2008 | Event     | Festival            | School      | Festival of Haunts                                    |
| 11/1/2008  | Event     | WEDDING             | RENTAL      |   |
| 11/8/2008  | Event     | PARTY               | City        | SM Fire Dept Awards                                   |
| 11/15/2008 | Event     | Dance               | School      | Father/Daughter Dance                                 |
| 11/22/2008 | Event     | WEDDING             | RENTAL      | Also AHS Open House (11/23)                           |
| 11/29/2008 | Event     | PARTY               | RENTAL      | Ara Arts Fundraiser; Fee Waived; Thanksgiving Weekend |
| 12/5/2008  | Event     | Dance               | School      | Winter Formal   |
| 12/13/2008 | Event     | WEDDING             | RENTAL      |   |
| 12/20/2008 |           | N/A                 |             |   |
| 12/27/2008 |           | N/A                 |             | Christmas Weekend                                     |

From February 22 to December 13, 2008 (43 weeks), there were only 3 quiet weekends.  
 AHS allowed a solid block of 17 weeks to be booked with events without providing a quiet weekend.  
 Quiet weekends = blue boxes: 1<sup>st</sup> Q: 5/13 weekends; 2<sup>nd</sup> Q: 0/13 weekends; 3<sup>rd</sup> Q: 2/13; 4<sup>th</sup> Q: 2/13 weekend.



## 2. Response to Comments

### 2009 Weekend Villa Use

| Date       | Villa Use | Event      | Type of Use | Notes  |
|------------|-----------|------------|-------------|--|
| 1/3/2009   |           | N/A        |             |  |
| 1/11/2009  | Event     | Open House | School      |  |
| 1/17/2009  |           | N/A        |             |  |
| 1/24/2009  | Event     | PARTY      | RENTAL      | St. Rita's Wine; Fee Waived                      |
| 1/31/2009  | Event     | Brunch     | School      | Mother/Daughter Brunch                           |
| 2/7/2009   | Event     | WEDDING    | RENTAL      |  |
| 2/14/2009  | Event     | WEDDING    | RENTAL      |  |
| 2/20/2009  | Event     | Party      | City        | Friends of SM Library                            |
| 2/28/2009  | Event     | WEDDING    | RENTAL      |  |
| 3/7/2009   | Event     | WEDDING    | RENTAL      |  |
| 3/14/2009  |           | N/A        |             |  |
| 3/21/2009  |           | N/A        |             |  |
| 3/28/2009  |           | N/A        |             |  |
| 4/11/2009  |           | N/A        |             |  |
| 4/18/2009  | Event     | WEDDING    | RENTAL      |  |
| 4/25/2009  |           | N/A        |             |  |
| 5/2/2009   |           | N/A        |             |  |
| 5/9/2009   | Event     | WEDDING    | RENTAL      | Also School Picnic function                      |
| 5/16/2009  | Event     | WEDDING    | RENTAL      |  |
| 5/23/2009  | Event     | WEDDING    | RENTAL      |  |
| 5/30/2009  | Event     | WEDDING    | RENTAL      | Memorial Day Weekend                             |
| 6/6/2009   | Event     | Picnic     | School      |  |
| 6/13/2009  | Event     | WEDDING    | RENTAL      | Also Graduation (6/12/09)                        |
| 6/20/2009  | Event     | WEDDING    | RENTAL      |  |
| 6/27/2009  | Event     | WEDDING    | RENTAL      |  |
| 7/4/2009   | Event     | WEDDING    | RENTAL      | 4th of July Holiday                              |
| 7/11/2009  | Event     | PARTY      | School      | Alumni Reunion                                   |
| 7/18/2009  | Event     | WEDDING    | RENTAL      |  |
| 7/25/2009  | Event     | WEDDING    | RENTAL      |  |
| 8/1/2009   | Event     | WEDDING    | RENTAL      |  |
| 8/8/2009   |           | N/A        |             |  |
| 8/15/2009  | Event     | WEDDING    | RENTAL      |  |
| 8/22/2009  | Event     | PARTY      | RENTAL      | Anniversary                                      |
| 8/29/2009  | Event     | WEDDING    | RENTAL      |  |
| 9/5/2009   | Event     | WEDDING    | RENTAL      | Labor Day Weekend                                |
| 9/12/2009  | Event     | WEDDING    | RENTAL      |  |
| 9/19/2009  | Event     | WEDDING    | RENTAL      |  |
| 9/26/2009  | Event     | Dance      | School      | Father/Daughter Dance; Also Alumni Softball Game |
| 10/3/2009  | Event     | Picnic     | RENTAL      | Immaculate Heart Picnic; Fee Waived              |
| 10/10/2009 | Event     | WEDDING    | RENTAL      |  |
| 10/17/2009 |           | N/A        |             |  |
| 10/24/2009 | Event     | WEDDING    | RENTAL      |  |
| 10/30/2009 | Event     | Festival   | School      | Festival of Haunts                               |
| 11/7/2009  |           | N/A        |             |  |
| 11/14/2009 | Event     | WEDDING    | RENTAL      |  |
| 11/21/2009 | Event     | WEDDING    | RENTAL      | Also AHS Open House (11/22)                      |
| 11/28/2009 | Event     | WEDDING    | RENTAL      | Thanksgiving Weekend                             |
| 12/4/2009  | Event     | Dance      | School      | Winter Formal                                    |
| 12/12/2009 | Event     | WEDDING    | RENTAL      |  |
| 12/19/2009 |           | N/A        |             |  |
| 12/26/2009 |           | N/A        |             | Christmas Weekend                                |

During the third quarter of 2009, AHS provided only 1 quiet weekend.

From May 9 to December 12, 2009 (32 weeks), there will be only three quiet weekends.

AHS allowed a solid block of 13 weeks to be booked with events without providing a quiet weekend.

During the past two years, there was a period of 75 weekends where only 6 of them were event free. In other words, for approximately three quarters of the weekends in the last two years, there was only 6 free weekends. That's only 8% of the weekends during the period in question.

## 2. Response to Comments

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### R11. Response to Comments from Russ and Carolyn Simon, dated April 7, 2011.

R11-1 The comment is a summary of Comment Letter #R11. It claims that analysis of impacts of sports field use is inadequate; that the City would have a conflict of interest in approving the master plan; and that project impacts to Land Use and Planning, Noise, and Transportation/Traffic, as well as Mandatory Findings of Significance, are potentially significant. The allegation that the City has an interest in the proposed project is unfounded. The City confirmed that no City-sponsored activities currently utilize Alverno High School's athletic facilities and that it has no intent to increase its use of any of Alverno High School's facilities at this time. Additional information concerning the alleged conflict of interest is provided in Response R9-5. The City's responses to the remaining comments are addressed below.

R11-2 The comment claims that the augmented multipurpose field and amphitheater are incompatible uses with the surrounding residential neighborhood. Both the field and amphitheater will be utilized as a part of the teaching program at Alverno High School, and accordingly would be allowed uses under the Institutional Zone with the approval of a conditional use permit (CUP), which is the subject of the requested City action and the proposed project. The Commenter further states that new construction or development should not be undertaken without an Environmental Impact Report. This statement is conclusory and unsupported, and therefore contrary to CEQA Guidelines Section 15204(c), which provides "Reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments." The MND has studied the whole of the action, and as all impacts associated with the proposed project can be feasibly mitigated to levels below established thresholds, preparation of a Mitigated Negative Declaration for the proposed project is appropriate and an EIR is not necessary. The City has complied with the requirements of CEQA and CEQA Guidelines for the proposed project. As the comment is not on the adequacy of the Draft MND and does not provide new information or arguments that would support changing the conclusions of the Draft MND, no revisions are necessary.

The comment further states that the City and project applicant are negotiating a second CUP amendment. The Draft MND has inappropriately characterized the status of this future CUP and the below corrections have been made to clarify this error. These changes are reflected in Chapter 3, *Errata*, of this Final MND.

Section 1.5, *City Action Requested*, page 4 of the Draft MND has been updated as follows to provide clarification on the future CUP:

~~The City and the Alverno High School Board of Trustees is considering~~  
~~are also considering~~ a separate project that would allow the permanent operation of the existing for-profit uses of the Villa, including weddings and other special events. This action is separate from the proposed project and would be subject to its own environmental review.

The analysis in Section 3.10(b) of the Draft MND has been updated as follows to provide clarification on the future CUP:



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**No Impact.** The existing zoning on the project site is Institutional, and the existing General Plan land use designation is also Institutional. The Institutional Zone permits the operation of schools, including private schools, with a conditional use permit (CUP). The City granted the original CUP for the school in 1959. The proposed project includes a request for City approval of a CUP amendment to allow for development of the proposed master plan. The project would not involve changing the zoning or General Plan land use designation on the site. Upon City approval of the proposed CUP Amendment, the proposed project would comply with zoning on the project site. ~~The City and the Alverno High School Board of Trustees are negotiating a second~~ is considering a separate CUP application amendment, separately from the proposed project, to permit the permanent continuation of the existing ~~occasional~~ uses of the Villa for special events and weddings. This action would be subject to its own environmental review and separate from this report. The proposed project would not conflict with zoning or General Plan land use designation on the site, and no impact would occur. No mitigation is needed.

The only application that has been submitted to the City by Alverno High School is that of the subject CUP Amendment. The project applicant may in the future submit another application for an Adaptive Reuse CUP, which will allow the Alverno to permanently operate the Villa de Sol d'Oro for for-profit functions. This future CUP will require its own entitlement and environmental processes, and as further detailed in General Response #1 on page 2-3 of this Final MND, is not a part of the proposed project. Therefore, the Adaptive Reuse CUP does not need to be analyzed at this time in combination of the CUP Amendment.

- R11-3 The comment asserts that the noise monitoring done was inadequate to establish baseline noise conditions. Noise monitoring was conducted on the weekend to capture the ambient noise environment of the surrounding neighborhood without noise contribution from Alverno High School. While an ambient noise monitoring program was conducted, noise impacts identified in the Draft MND are not based on noise monitoring but were calculated based on noise modeling of transportation and non-transportation noise sources. It should be noted that non-school uses associated with the Villa (e.g., Weddings) are not a part of the project (see General Response #1) and were obtained for informational purposes only. Likewise, noise generated by school dances is representative of existing conditions and is not a “new” source of noise generated at the project site.
- R11-4 The Commenter claims that the timing and duration of noise monitoring of existing conditions was inadequate. Noise monitoring conducted for the Alverno High School Winter Formal measured the entire duration of the dance and included monitoring of the period before and after the dance (7:45 PM to 11:25 PM). Noise monitoring of a dance represents peak noise levels generated by school activities. It should be noted that non-school uses of the Villa are not a part of the project (see General Response #1) and were obtained for informational purposes only. Likewise, noise generated by school dances is representative of existing conditions and is not “new” noise generated at the project site.
- R11-5 The Commenter claims that analysis of noise impacts is inadequate because of insufficient data on existing conditions. See Response to Comment R11-3. Noise

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generated by school dances is representative of existing conditions and is not “new” noise generated by the project. Non-school uses of the Villa are not a part of the project (see General Response #1) and were obtained for informational purposes only. Noise impacts were based on noise modeling of changes in the ambient noise environment generated by the project (CEQA Guidelines Section 15064) and not noise monitoring. The project would not substantially increase the number of school-related events onsite. The project would not result in a higher magnitude of noise generated from events onsite. Furthermore, Mitigation Measure 14 was incorporated to ensure that school events held in the new multipurpose building would be attenuated so that interior-exterior noise transmission would not impact the surrounding residential community and that windows and doors would remain closed during an event.

R11-6 The comment concerns the amount and type of noise monitoring done of existing conditions. Noise monitoring conducted on the weekend captures the ambient noise environment of the surrounding neighborhood without noise contribution from Alverno High School. However, the site is operating as an existing school, and pursuant to the CEQA Guidelines Section 15064, the noise study evaluates the changes in the ambient noise environment generated by the project. Noise impacts were based on noise modeling of changes in the ambient noise environment generated by the project and not noise monitoring and comparison of noise generated by school-related uses to local noise standards.

R11-7 The comment asks about how the testing periods and positioning of the noise monitors were determined. The City’s noise standards are based on noise levels averaged over a period of time. Typically, noise monitoring is conducted over a period of 15 minutes to capture average ambient noise levels. Therefore, short-term, 15-minute noise modeling is used to determine average, not peak, activities in accordance with the City’s noise standards. Noise monitoring was conducted to obtain average school-related and a non-school-related event noise. Noise monitoring was conducted for the entire duration of the event. The noise specialist determined the location, time, and duration of noise monitoring conducted, which was coordinated with the scheduling of events at Alverno High School at the time of preparation of the Noise Study. As stated previously, noise monitoring was obtained to document existing noise environment onsite. Pursuant to the CEQA Guidelines, noise impacts are based on the change in the noise environment generated by the project and whether or not those changes achieve the City’s noise standards. The project would not alter the number of dances or weddings onsite. However, the noise study did evaluate moving school-related functions, such as dances, from the Villa into a newly constructed multipurpose building. A mitigation measure was proposed to ensure that the new building would be designed to better contain noise in accordance with the City’s noise standards (see Mitigation Measure 14).

R11-8 The Commenter asserts that comparisons of with-project and without-project noise on weekends are needed. The Commenter is referring to Figures 5 through 9 in the Noise Technical Study. These figures show hourly noise levels of 24-hour noise monitoring (Saturday, March 27 through Monday, March 29 of 2010) conducted to determine the ambient noise levels on a weekend without an event (e.g., no athletic field noise). These figures are not a comparison of with and without Project conditions and therefore no omission is made. The purpose of the ambient noise



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study was not to measure athletic field/court noise that could be generated at Alverno High School. The primary purpose of the ambient noise study was to measure the noise levels in the proximate area when school was not in session in order to establish the baseline ambient noise environment for the area without operation of the school to describe the existing environmental conditions. These figures are not included in the Initial Study because they are additional detail of the noise monitoring conducted.

Figure 13 of the Draft MND, *Noise from Athletic Fields and St. Clair Court*, shows noise levels from project-related activities. No changes to the softball field are proposed and noise levels shown in Figure 13 are a worst-case scenario associated with how the project could alter the noise environment with concurrent use of the tennis courts, amphitheater, and activities on the multipurpose field. These activities could occur on a weekday or weekend. However, noise levels shown in Figure 13 are below the local noise standards and are compatible with a residential noise environment. Therefore, no significant impact would occur (see also response to Comment R11-3).

- R11-9 Comment states that noise studies of a variety of days of the week, times of year, types of events, and combinations of simultaneous events are required for adequate noise analysis. See Response to Comment R11-3. The noise measurement was taken to reflect a typical day and not to represent all types of conditions that could be occurring at any moment at any given time. For operational-related noise, the noise study assesses changes in the ambient noise environment generated by the project (CEQA Guidelines Section 15064).
- R11-10 The comment states that a study of parking lot noise from after-school and weekend sports uses is needed. Peak use of the parking lots associated with the proposed project would occur during operation of the school on a weekday and not on a weekend. While use of the multipurpose field would result in people using the parking lot, peak use of the parking lot related to the project would continue to occur during the weekdays when school is in session. Furthermore, the parking analysis assumes full use of the parking lots and represents the worst-case scenario. No significant impacts were identified from “full” use of the parking lots.
- R11-11 The comment claims that dance noise monitoring was inadequate because of limited duration. Noise monitoring conducted for the Alverno High School Winter Formal measured the entire duration of the dance including the period before and after the dance (7:45 PM to 11:25 PM) at three different locations onsite (Dance Sites 1 through 3). Additionally, the noise monitoring also included measuring noise levels of the dance at the residences along the roadways surrounding the school (Dance Sites 5 through 8). Dance Site 5 noted by the Commenter captured noise data for a period of 18 minutes from 8:31 PM to 8:49 PM. Data compiled at Dance Sites 5 through 8 were for informational purposes only and not used in any portions of the actual noise analysis. See response to Comment R11-4.
- R11-12 The comment claims that dance noise monitoring was inadequate due to the season (winter, when doors and windows would be closed). Mitigation Measure 14 requires noise attenuation measures implemented in the design of the building to ensure that the proposed multipurpose building would contain noise associated with school



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dances in compliance with both the City of Pasadena and City of Sierra Madre's Noise Ordinances. At the request of the commenter, the multipurpose building would be designed so that doors and windows would be closed during these school-related events, and opening of doors/windows during these events would be prohibited.

14. Prior to issuance of building permits, the project applicant shall demonstrate that operation of the multipurpose building with amplified sound shall be in compliance with the City of Pasadena's noise limits as specified in Municipal Code Section 9.36.040 and Sierra Madre Municipal Code Sections 9.32.030 and 9.32.060. Compliance will be demonstrated through an acoustical study that may include, but is not limited to, noise attenuation measures within wall and window building assemblies, location of air ventilation ducts, and location of entry doors. The building shall be constructed so that windows and doors can remain closed during school functions to prevent interior-exterior transmission of noise. These noise attenuation measures shall be shown on all building plans and verified during construction. The school administrator shall ensure that doors and windows remain closed during school functions.

- R11-13 The comment claims that noise monitoring of the wedding was inadequate due to limited duration and that the noisiest parts of the wedding were not monitored. Under CEQA Guidelines Section 15064, "in evaluating the significance of the environmental effect of a project, the Lead Agency shall consider direct physical changes in the environment which may be caused by the project and reasonably foreseeable indirect physical changes in the environment which may be caused by the project." Therefore, evaluation of existing impacts is outside the purview of CEQA. See Response R11-2 and General Response #1. The project does not involve non-school-related noise associated with use of the Villa.
- R11-14 The comment asks how tree removals would affect sound travel. Trees have negligible effects on noise attenuation (FTA 2006, FHWA 2006, Caltrans 2009) and therefore are not considered in the noise analysis. Noise associated with the playfields was modeling using SoundPlan. The noise analysis has taken into account ground attenuation from "soft" surfaces such as grass, where appropriate. In general, unpaved surfaces absorb more sound than paved surfaces and would therefore provide some noise attenuation.
- R11-15 The comment asks about noise impacts of sporting events. See Response R11-2 regarding use of the site for non-school-related functions. Section 3.12(a) of the Draft MND evaluates noise levels that would be generated from use of the proposed multi-use athletic field, amphitheater, and the multipurpose building. The analysis has accounted for distance in calculating the noise levels that these facilities would generate from their use.
- R11-16 The comment concerns noise from a tractor smoothing out the softball field. Noise generated from construction activities related to the project was analyzed in section 3.12(d) of the Draft MND. Noise levels generated from grading of the multipurpose field area are shown in Table 17 under the "Ground Clearing/Demolition" construction phase. The noise levels in the table are based on the referenced construction noise levels reported in Bolt et al. These referenced noise levels are the



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average noise levels that would be generated during each construction phase and are based on multiple pieces of construction equipment that would typically be operating. Each stage involves the use of different kinds of construction equipment and, therefore, has its own distinct noise characteristics.

R11-17 The comment asks about noise from the softball field. There are two existing bleacher stands for use at the softball field that will remain after project implementation. Noise generated by the bleachers would be similar to the existing conditions.

R11-18 The comment asks about noise impacts from the multipurpose building with doors and windows open. Comment acknowledged. Under CEQA Guidelines Section 15064, it states, "An indirect physical change is to be considered only if that change is a reasonably foreseeable impact which may be caused by the project. A change which is speculative or unlikely to occur is not reasonably foreseeable." The scenario regarding air conditioning costs as presented by the Commenter is speculative and therefore not required to be analyzed under CEQA. However, Mitigation Measure 14 has been revised to require that windows and doors be closed during school-related functions at the new multipurpose building (see Response to Comment R11-12).

R11-19 The comment claims that analysis of noise impacts is inadequate. Under CEQA Guidelines Section 15064, "in evaluating the significance of the environmental effect of a project, the Lead Agency shall consider direct physical changes in the environment which may be caused by the project and reasonably foreseeable indirect physical changes in the environment which may be caused by the project." The noise analysis presented in Section 3.12, *Noise*, of the Draft MND is consistent with Section 15064, since it analyzes potential noise impacts that would result from implementation of the proposed project. It analyzes potential noise impacts related to project-generated traffic, relocation of the tennis courts, operation of the proposed multipurpose field, and operation of the proposed multipurpose building. Additionally, the noise analysis also evaluates potential construction noise and vibration impacts related to buildout of the proposed project.

As described in the noise study, uses associated with the proposed project occur in the daytime hours when people are least sensitive to noise. The exception to this is after-school functions, such as school dances, which occur occasionally in the evening. However, the proposed project does not increase the frequency of this type of activity onsite or increase the magnitude, pitch, or duration of noise generated. With the implementation of mitigation, no significant noise impacts were identified with this activity. In general, school uses are compatible in a residential noise environment.

R11-20 The comment claims that project-generated noise would exceed noise standards. Under CEQA Guidelines Section 15064, "in evaluating the significance of the environmental effect of a project, the Lead Agency shall consider direct physical changes in the environment which may be caused by the project and reasonably foreseeable indirect physical changes in the environment which may be caused by the project." The noise study evaluated impacts associated with the proposed project, which includes noise associated with an increase or change in school-

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related activities proposed by the proposed Alverno High School Facilities Master Plan. Significance criteria used in the analysis were based on local noise standards. As discussed in Section 3.12(a), *Noise*, of the Draft MND, implementation of the project would not result in significant noise impacts from the parking lot, the multipurpose field, St. Claire Court, or the new multipurpose building.

- R11-21 The comment claims that analysis of temporary noise impacts has not been addressed. Sections 3.12(b) and (d) of the Draft MND address construction-related vibration and noise impacts. See also response to Comment R11-3. For operational-related noise, the noise study assesses changes in the ambient noise environment generated by the project (CEQA Guidelines Section 15064), including noise from the multipurpose field and school dances in the new multipurpose building.
- R11-22 The comment asserts that an EIR is needed due to proximity of noise-sensitive residents to school. Comment acknowledged. No significant noise impacts were identified as a result of the project. Mitigation measures were incorporated to ensure no significant impact would occur.
- R11-23 The comment claims that the Alverno High School Traffic Assessment and Parking Lot Study prepared by W.G. Zimmerman did not analyze traffic impacts of after-school events or events at the Villa. Section 3.16, *Transportation/Traffic*, of the Draft MND, was prepared by Garland and Associates, a traffic engineering firm and was not solely based on the Zimmerman study. Garland and Associates was retained to conduct a peer review of the Zimmerman study and supplement the study, as needed, in order to provide traffic analysis compliant with the requirements of CEQA and CEQA Guidelines, as well as local traffic impact assessment guidelines.



The approach for the traffic analysis was to evaluate the impacts of the school expansion project during the time of day when the school would generate the heaviest volumes of traffic flow; i.e., during the morning peak period when students and staff would be commuting to the school site. This is the standard methodology for a traffic analysis for a school because it is assumed that if the street network's capacity can accommodate the traffic volumes during the times of peak traffic flow, then it could certainly accommodate the traffic during times when the traffic volumes are lower. It is acknowledged that the athletic activities and events at the Villa would generate traffic during after-school times. The traffic volumes generated by these events would, however, be lower than the traffic that would be generated on a daily basis by the regular school activities under most circumstances. A detailed capacity analysis of the roadway system relative to the athletic activities and special events is not necessary for the environmental evaluation. Furthermore, these activities already take place at the school and would not be categorized as new traffic associated with the proposed master plan.

With regard to parking, it is proposed that the vehicles generated by special events at the school would park in the parking lot that is accessed from Michillinda Avenue. As the events would occur after the dismissal time at the school and/or on weekends, the parking demand would be accommodated onsite in the school's 112-space parking lot and in the additional spaces that would be provided along the Villa access road. Parking demand at the school could exceed the proposed number of parking spaces if events were to be held in the multipurpose building and the

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athletic field simultaneously. However, Alverno High School has indicated that it will not schedule concurrent capacity-level events at these facilities.

- R11-24 The comment concerns the potential loss of the neighbors' views of the existing trees on the project site from their private properties. Information concerning project details on the removal and replacement of trees is provided in General Response #2 on page 2-5 of the Final MND. Screening of the campus is discussed in Section 3.1, *Aesthetics*. In general, aesthetic impacts associated with the removal of existing and the planting of new trees on the project site are not considered significant. The loss or planting of trees would not have an affect on a scenic vista or have a significant effect on public views, the Villa, a historic building; or a scenic highway. It is acknowledged that the visual character of the project site and surrounding area would change. However, the quality of the aesthetics of the immediate area adjoining the site would not be substantially degraded. Therefore, aesthetic impacts associated with the removal and planting of trees are not considered significant.

Additionally, private views are not environmentally significant under CEQA. Neither state nor local law protects private views from private lands except in accordance with uniformly applied standards and policies as expressed in the City's general plan and zoning ordinances. In *Mira Mar Mobile Community v. City of Oceanside*, (2004) 119 Cal. App. 4th, the court held that the EIR may focus on the project's impacts only on public views. The court wrote "[u]nder CEQA, the question is whether a project will affect the environment of persons in general, not whether a project will affect particular persons." The court found that an agency has discretion in determining substantial impacts, and that it was proper for the City to determine that only impairment of public views, as opposed to private views, would be considered significant. Although aesthetic impacts associated with the removal and planting of trees along Wilson Street would not be significant, as viewed from the adjacent private properties, this type of analysis is not required under CEQA. The analysis in the Draft MND concerning the aesthetic impacts associated with the trees on the project site, as expanded in the above paragraph, is adequate, and impacts remain less than significant. No changes to the analysis or findings are necessary to address impacts to views from private properties.

- R11-25 The comment addresses after-school sports use and alleges that the Mandatory Findings of Significance in the Draft MND is inadequate because it does not address the cumulative impacts that could be created by the combined uses of the new recreational facilities.

The Commenter provided an erroneous list of sports that would occur at the campus and erroneously stated that a public address (PA) system would be used during these events. Alverno High School confirmed that the proposed project would not entail installation of a PA system and also provided the below list of school-sponsored sporting events:

- September – November: Volleyball
- December – February: Basketball
- December – March: Soccer
- March – May: Softball

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Operation of these sports would include practice games, league games, and CIF championship games. Similar to existing conditions, they would occur daily during the specified months, generally from 3:00 PM to 6:30 PM. Alverno also indicated that the campus is too small to provide a regulation site for track and field and cross-country, and that they currently do not have a tennis team. Furthermore, Alverno indicated that the one tennis court that is proposed as a part of the project is not enough to field a tennis team.

Alverno stated that it has no intent to rent its new athletic facilities to outside groups, and the only nonschool-sponsored recreational use is that of the Sierra Madre Girls Softball Association, a nonprofit organization that is not associated with the City. The City has confirmed that it does not intend to increase its use of the proposed Alverno recreational facilities. However, should the City decide to do so in the future, it would be required to complete the appropriate City-established processes.

It is acknowledged that implementation of the proposed project would increase sports use of the campus with league games and CIF championship games, and consequently the amount of noise and traffic generated would increase. The Draft MND analyzed the impacts associated with the additional use and concluded that while the project would generate more noise and traffic than its existing state, the amount of increase, while substantial, could be reduced to levels below established thresholds of significance with implementation Mitigation Measures 14 through 18.

The comment further alleges that “The augmentation of school sports is ‘cumulatively considerable’.” It is uncertain what the Commenter is trying to convey, as the MND analyzes the combined sporting uses. For example, Section 3.12(a) of the Draft MND analyzes the concurrent noise levels that would be generated if events at the tennis courts, multipurpose field, and outdoor amphitheater were simultaneous scheduled. Furthermore, it should be noted that the term “cumulatively considerable,” according to CEQA Guidelines Section 15064(h), refers to “the incremental effects of an individual project... when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.” The analysis in the MND takes into consideration related development projects in the project area, and as it was determined at the commencement of the environmental process that there were no related project that could contribute to a cumulative environmental effect, analysis of the MND is adequate and preparation of an EIR is not required.



- R11-26 The comment claims that cumulative impacts would result due to uses of the Villa in combination with the proposed project. See Response R11-2 and General Response #1 on page 2-3 of the Final MND. Continuation of uses of the Villa is not part of the proposed project and therefore has not been analyzed individually or cumulatively.
- R11-27 The comment mentions that the Sierra Madre Girls Softball Association uses the existing field and that “augmented sports use by the City of Sierra Madre is ‘cumulatively considerable’” and inappropriate land use. The Commenter is correct in that the only nonschool use of the existing fields is the SMGSA practice sessions. According to Alverno High School, SMGSA uses the field between March and the middle of May. The SMGSA uses the field 5 days a week, for 1 hour from 5:30 PM to 6:30 PM. They use the field after the Alverno softball team leaves the field at 5:15

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PM. On rare occasions the SMGSA have had a game on the campus, but this year they have no games scheduled. Additionally, the City of Sierra Madre has confirmed that it has no intent to expand its use of Alverno's fields. As the proposed use of the field by the SMGSA will not change, the impacts associated with SMGSA's use of the new multipurpose field do not need to be addressed in the Draft MND.

The Commenter states that expanded use of the fields by the City is inappropriate land use. As indicated, the City is not currently using any of Alverno's athletic facilities and does not plan to do so. Additionally, as mentioned in Response R11-2, the project site is zoned Institutional. While school uses are permitted with approval of a CUP, pursuant to Section 17.38.020(B)(3) of the Sierra Madre Municipal Code, accessory use of property zoned "I" is permitted, including but not limited to parks, playground, recreational areas, and open space.. Therefore, use of the multipurpose field by SMGSA would be allowed. Although the City does not intend to expand its use of Alverno's recreational facilities, please note that should it change its position in the future, it would be required to go through the appropriate processes, including an environmental review, as needed, that would be separate from this process.

Finally, it is not clear what the Commenter intends to convey by stating that the augmented sports use by the city is "cumulatively considerable." As indicated in Response R11-25, analysis of the proposed project has considered the incremental effects of the proposed project in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects. The Commenter further suggests that the cumulative analysis needs to include existing operations at "LaSalle High School, SM United Methodist Church, and a busy shopping plaza in close proximity." These existing uses have been considered in the Draft MND. They were captured in the environmental setting as a part of the baseline condition of the proposed project. As substantiated by the MND, with the implementation of mitigation measures, project implementation will not result in a cumulatively considerable impact.

- R11-28 The comment is a summary regarding the Commenter's concern that the MND does not analyze the "cumulative" impacts of the project and alleged bias for the project on the part of the City. The Commenter further states that Comment Letter R11 presents substantial evidence that an EIR is warranted and that mitigation must be recalculated on the new information provided by the Commenter. The City's responses to the comments concerning cumulative effects and alleged bias are in Responses R11-1 through R11-27. However, the City disagrees that the Commenter has provided substantial evidence demonstrating that the proposed project would result in a significant environmental effect. According to CEQA Guidelines Section 15384(b), "Substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts." The Commenter has failed to provide such information and has not presented a fair argument showing that the project will have a significant effect on the environment. The project description and the environmental analysis of the proposed project contained in the circulated Draft MND address the whole of the project and are adequate. As the project would not result in a significant environmental effect after imposition of mitigation measures and compliance with applicable regulations and best management practices, preparation of the MND for the project is appropriate, and an EIR need not be prepared.

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LETTER R12 - Lyle Steiner (1 page)

Danny Castro  
Director, Development Services  
City of Sierra Madre  
232 W. Sierra Madre Blvd.  
Sierra Madre, Ca. 91024

4/7/11

Dear Mr. Castro,

I support Alverno High School and understand the need for facilities for their students. I am however concerned with the "Intention to Adopt a Mitigated Negative Declaration" for the Master Plan. It did not address all of the current and potential future uses at the property. It was insufficient at determining the impacts especially in the areas of noise and traffic. It did not assess the use of an outdoor sports field for games with spectators or multiple simultaneous events. All of the uses on campus need to be included in the Master Plan; events at the Villa should not be considered separately. Thank you.

R12-1  
R12-2  
R12-3  
R12-4  
R12-5

Sincerely, *Lyle E Steiner*



Addendum:

Pay close attention to Words & Acts of  
Separate  
Divide  
Separation

R12-6

Sierra Madre lay upon a shifting  
mantle of plate tectonics - that NATURAL  
Process of recycling our LIVING Planet.

R12-7

The SHIFT of Commerce From Sierra Madre  
business district into residential NEIGHBORHOODS  
is UNNATURAL - destroying our HABITAT &  
Quality of life & property values, and  
IDENTITY of a desirable NEIGHBORHOOD

R12-8

*Lyle E Steiner*

## *2. Response to Comments*

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## 2. Response to Comments

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### R12. Response to Comments from Lyle Steiner, dated April 7, 2011.

Comments R12-1 through R12-5 are identical to Comments R3-1 through R3-5; please see responses R3-1 through R3-5.

R12-6 It appears that the comment may concern project segmentation. Please see General Response #1 on page 2-3 of the Final MND.

R12-7 The comment states that the City lays upon a shifting plate tectonic. Seismic hazards are addressed in Section 3.6, *Geology and Soils*, of the Draft MND. Compliance with state building code standards would reduce potential impacts related to geology and soils to an insignificant level.

R12-8 The Commenter is suggesting that the proposed project would shift commercial uses into a residential neighborhood and would divide an existing residential neighborhood. Section 3.10(a) of the Draft MND addresses whether the project would divide an established community. In general, approval of the proposed project would allow improvements to be made to an outdated high school campus. The improved facilities would continue to be used by Alverno and the City, who has indicated that it does not intend to increase its use beyond the two evening events it hosts at the Villa. Alverno High School has also indicated that it will not be renting out the improved facilities.



## *2. Response to Comments*

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2. Response to Comments

LETTER R13 - Afsoun Tabrizi et al. (1 page)

Danny Castro  
Director, Development Services  
City of Sierra Madre  
232 W. Sierra Madre Blvd.  
Sierra Madre, Ca. 91024

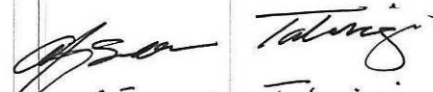
4/7/11

Dear Mr. Castro,

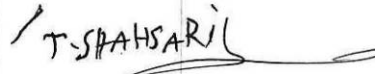
I support Alverno High School and understand the need for facilities for their students. I am however concerned with the "Intention to Adopt a Mitigated Negative Declaration" for the Master Plan. It did not address all of the current and potential future uses at the property. It was insufficient at determining the impacts especially in the areas of noise and traffic. It did not assess the use of an outdoor sports field for games with spectators or multiple simultaneous events. All of the uses on campus need to be included in the Master Plan; events at the Villa should not be considered separately. Thank you.

R13-1  
R13-2  
R13-3  
R13-4  
R13-5

Sincerely,

  
Afsoun Tabrizi

  
Zahra Djeddi

  
Talat Shahsari

  
Ali Akbar Djeddi



## *2. Response to Comments*

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## *2. Response to Comments*

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**R13. Response to Comments from Afsoun Tabrizi et al., dated April 7, 2011.**

Comments R13-1 through R13-5 are identical to Comments R3-1 through R3-5; please see responses R3-1 through R3-5.



## *2. Response to Comments*

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## 2. Response to Comments

LETTER R14 - Bill and Helen Gronquist (1 page)

*William and Helen Gronquist  
185 Wilson Street  
Sierra Madre, CA 91024*

RECEIVED

APR 11 2011

CITY OF SIERRA MADRE  
DEVELOPMENT SERVICES

Danny Castro  
Director, Development Services  
City of Sierra Madre  
232 W. Sierra Madre Blvd.  
Sierra Madre, CA 91024

Dear Mr. Castro:

As a neighbor across the street, we do support Alverno High School and understand the need for facilities for their students. We are very concerned with the "Intention to Adopt Mitigated Negative Declaration" for the Master Plan. It does not address all of the current and potential future uses at the property. Some of these issues for concern are:

1. Insufficient in determining the impacts, especially in the areas of noise and traffic. | R14-1
2. Not assessing the use of an outdoor sports field for games with spectators or multiple simultaneous events. | R14-2

All of the uses need to be included in the Master Plan and events at the Villa should not be considered separately since Alverno is in charge of scheduling these events. | R14-3

Thank you.

Sincerely,

*B. H. & Helen Gronquist*  
Bill and Helen Gronquist



## *2. Response to Comments*

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## *2. Response to Comments*

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**R14. Response to Comments from Bill and Helen Gronquist, dated April 11, 2011.**

Comments R14-1 through R14-5 are similar to Comments R3-1 through R3-5; please see responses R3-1 through R3-5.



## *2. Response to Comments*

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2. Response to Comments

LETTER R15 - Lyle Steiner (1 page)

Urgent 4-11-2019

Dear Neighbors - Urgent -  
due at City Hall 14:00

Please -  
Review  
Consider

Sign - Legibly or will be rejected  
Full name  
Address

And mail Tuesday April 12

I now agree with mutual  
interests in opposition to Pending  
Master Plan - for Commerce  
in our neighborhood

thanks  
Lyle E Steiner

All households  
members who agree

R15-1



## *2. Response to Comments*

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## 2. Response to Comments

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### **R15. Response to Comments from Lyle Steiner, dated April 11, 2011.**

- R15-1      The letter is a request to neighbors of Alverno High School and does not address the adequacy of the CEQA document. The comment is noted; the Sierra Madre Planning Commission will consider all written comments received before deciding whether to approve the master plan.



## *2. Response to Comments*

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## 2. Response to Comments

LETTER R16 - Harry and Karen Brumer (1 page).

Danny Castro  
Director of Development Services  
232 W. Sierra Madre Blvd.  
City of Sierra Madre, Ca. 91024

4/13/2011

Dear Mr. Castro,

When we moved to Wilson Street the Villa was a residence for nuns and Alverno High School was seen as having a beautiful campus. We understand the need for updating their facilities for the students, but have witnessed the snowballing of use at the property throughout recent years. Filming during the week and the use of the Villa for weddings on weekends began. Other non-Alverno uses included City softball & events for feeder schools. All of these uses added to the noise and traffic levels. Many attempts have been made by neighbors over the years to mediate some control. Now with the potential addition of more students, the construction of regulation soccer/softball fields along with a massive multi-purpose building and a noise-producing outdoor amphitheatre there will be yet another increase in noise and traffic.

R16-1

R16-2

The degradation of that once beautiful campus will result with the current Alverno Master Plan. The loss of 47 trees on campus coupled with the potential loss of the Canary pines on the perimeter will be felt deeply by our family. As avid birdwatchers, we will miss the creatures that inhabit the trees.

R16-3

The Negative Mitigation Declaration attempts to separate the use of the Villa, yet this is one of the many uses of the property. It must be included when considering the impacts of the project.

R16-4

We are concerned that insufficient environmental studies were done and request that the full uses of the property be addressed. New studies must include noise, traffic, and environmental impacts as they relate to the property and nearby neighborhoods.

R16-5

Sincerely,

Harry and Karen Brumer

*Karen Brumer*  
*Harry Brumer*

**RECEIVED**

APR 13 2011

CITY OF SIERRA MADRE  
DEVELOPMENT SERVICES



## *2. Response to Comments*

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## 2. Response to Comments

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### R16. Response to Comments from Harry and Karen Brumer, dated April 13, 2011.

- R16-1 The Commenter is concerned that Alverno High School has been continually expanding nonschool sponsored uses on campus. The comment is noted. Please see General Response #1 on page 2-3 of the Final MND which elaborates on the focus of the proposed project.
- R16-2 The comment addresses project noise and traffic impacts. It is acknowledged that the project would result in an increase in noise and traffic. Sections 3.12, *Noise*, and 3.16, *Transportation/Traffic*, of the Draft MND discuss the impacts associated with these two topics. The Draft MND concluded that with the incorporation of mitigation measures, traffic and noise impacts would be reduced to levels below established thresholds.
- R16-3 The comment concerns the loss of trees and potential consequent impacts to birds. General Response #2 on page 2-5 of the Final MND details the proposed tree removal and planting. In general, the existing Canary pine trees along the roadway will not be removed and project implementation would include the planting of a new pine tree. Additionally, it is acknowledged that construction could affect birds. Mandatory compliance with the federal Migratory Bird Treaty Act would reduce impacts to nesting birds from tree removals.
- R16-4 The comment concerns segmentation of the project. Operation of the Villa is not a part of the proposed project. Please see General Response #1 of the Final MND which addresses this issue.
- R16-5 The comment makes a conclusory statement that insufficient environmental studies were prepared for the proposed project. It is uncertain why the Commenter feels that the MND is insufficient and why the Commenter thinks additional studies are required. Please note, CEQA does not require the lead agency to conduct every test, research, study, or experimentation recommended or demanded by commenters, as long as a good faith effort at full disclosure is made in the environmental document. As the Commenter fails to explain the basis for their position, no additional response can be provided.



## *2. Response to Comments*

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## 2. Response to Comments

LETTER R17 - John Rakiewicz (1 page)

Danny Castro  
Director, Development Services  
City of Sierra Madre  
232 W. Sierra Madre Blvd.  
Sierra Madre, Ca. 91024

4/13/11

Dear Mr. Castro,

I support Alverno High School and understand the need for facilities for their students. I am however concerned with the "Intention to Adopt a Mitigated Negative Declaration" for the Master Plan. It did not address all of the current and potential future uses at the property. It was insufficient at determining the impacts especially in the areas of noise and traffic. It did not assess the use of an outdoor sports field for games with spectators or multiple simultaneous events. All of the uses on campus need to be included in the Master Plan; events at the Villa should not be considered separately. Thank you.

R17-1  
R17-2  
R17-3  
R17-4  
R17-5

Sincerely,

*John Rakiewicz*  
JOHN RAKIEWICZ



## *2. Response to Comments*

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## *2. Response to Comments*

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**R17. Response to Comments from John Rakiewicz, dated April 13, 2011.**

Comments R17-1 through R17-5 are identical to comments R3-1 through R3-5. Please see responses R3-1 through R3-5.



## *2. Response to Comments*

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## 2. Response to Comments

LETTER R18 - Stephens Family (5 pages)

|   |  |
|---|--|
| <p>Danny Castro<br/>Director, Development Services<br/>City of Sierra Madre<br/>232 W. Sierra Madre Blvd.<br/>Sierra Madre, Ca. 91024</p>   | <p><i>Draft in progress -<br/>Submit for<br/>Public Comment<br/>any way.</i></p> <p>4/7/11</p> |
| <p>Dear Mr. Castro,</p>   | <p><b>RECEIVED</b><br/>APR 14 2011<br/>CITY OF SIERRA MADRE<br/>DEVELOPMENT SERVICES</p>       |
| <p>We support Alverno High School as a neighbor and have been in conversation for many years about their desire to enhance their property and our desire to retain our right to a quiet enjoyment of our own property. As neighbors, we have even kept an eye on the property as part of our neighborhood watch thwarting vandals or persons who didn't respect the property. Years ago we were encouraged to walk the grounds which were much, more lush and tree filled at the time. It felt less like a school than a visit to a park or even a foreign countryside but with the ongoing removal of mature trees and other vegetation, the grounds being closed for any visits like in the past during non school hours it has the appearance of being cleared to pave the way for this expansion. We agree some expansion was inevitable after seeing how the grounds and buildings were falling into disrepair but this proposed expansion and the impact has grown tenfold from those early discussions and the agreements to mitigate the current impacts.</p> | <p>R18-1</p>   |
| <p>While we are most appreciative of the opportunity to weigh in on the proposed expansion of Alverno School we can't fail to note the document is substantial in size but it lacks substance for the impact it will bring regarding the proposed expansion and the rentals they will ask to be permitted to have. Especially in light of, years of discussions with Alverno making our concerns known for the record and yet several of the concerns continue to be left unaddressed in this document, why?</p>  | <p>R18-2</p>   |
| <p>We strongly disagree with the bifurcation of the school expansion and Villa usage or perhaps we should say the expansion and usage of the property as a whole. As we came to learn only after purchasing our home it was a school across the street, never was it disclosed it was legally allowable for commercial revenue generating property under the zoning. We understand there is a TUP and wish to have ALL uses and impacts studied. To us, there is no difference in our home, as to the fact that noise, traffic and pollution emitted from the property that sits across from us could be coming from the school use or use as a rental. It is what it is and request that the usage not be individuated so that it appears to be any less impacting than it currently is and as it can be with some type of expansion.</p>  |  |



## 2. Response to Comments

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|---|--------|
| <p>At the time we first lived in our home we couldn't even see the school, or the North parking lot for the trees although we could hear the bells, music and other noise. After hearing about the intent to expand Alverno, we have watched the removal of many trees and vegetation so that the growing usage of the parking lot that borders Michillinda and Grandview by various types of vehicular traffic, along with the additional lighting that came with the additional usage of the property, it's events and rentals, have steadily intruded into our home and the quiet enjoyment of our property by the noise and lighting that is emitted.</p> | R18-3  |
| <p>We appreciated the change in the school bells and the commercial rentals reducing, or at least not always placing their generators within a few car lengths of our home so we could smell and hear them the entire time they rented from Alverno. We understand the recession has brought a reduction of rentals but have concerns that with the inevitable upswing we will be back to levels of noise we previously were subjected to. With that in mind we have concerns regarding the following:</p>  | R18-4  |
| <p>We can not fully understand the impact Alverno's proposed lighting will have because this plan does not study it so neither can the planning commission. The lighting plan for the property which includes the landscaping, the buildings, and site was unavailable during this period of public comment.</p>  |        |
| <p>What composition will the parking lot be made of? Will there be any of the newer greener materials such as the rubberized material cities are using to help reduce some traffic noise?</p>   | R18-5  |
| <p>Noise is a huge issue with the property and this study has failed to address it. Neighbors over a quarter mile away already call the police as La Salle's amplified events grow in noise and intrusion. We have great concerns regarding the noise from outdoor events held across the street, amplified amphitheater and that would include other types of uses for the property.</p>   | R18-6  |
| <p>The Villa may be a historical property and perhaps have an ability to be used differently than the school but that should not extend to an enormously larger than the Villa multi-purpose use building which would not be designated historical.</p>   | R18-7  |
| <p>The window for proposed ongoing construction projects alone will impact its neighbors for many many years. We have not seen the planning commission agree to any building project for the length of time proposed.</p>   | R18-8  |
| <p>Such a project would dwarf the surrounding low density housing and is out of character with Sierra Madre and how our current general plan values it's character, trees, and lack of a stoplight.</p>   | R18-9  |
| <p>The study noted, "Nuisance odors would be confined to the immediate vicinity of the construction equipment. An occasional whiff of diesel exhaust from passing equipment and trucks accessing the site from public roadways may result."</p>   | R18-10 |



## 2. Response to Comments

We disagree because any building that has occurred across the street, or anywhere anyone who has dealt with diesel trucks during building projects or removal of dirt from the canyons know they don't turn off their trucks. The drivers let them run for a reason that has to do with how that type of engine works. Maybe they were just fibbing when they said they could not but we would be back to the old days and the smell of diesel is quite strong and would MOST definitely impact us as historically we have had discussions about this impact. We have health issues in our family and diesel brings on nausea and headaches.

R18-11  
cont'd.

We have concerns that the proposed landscaping plan has not designated the appropriate vegetation to mitigate the additional lighting issues that would be present with the additional vehicular traffic (and possibly landscape lighting) using the expanded parking lot.

We see an architecturally drawn illusion of a dense planting but are not convinced from the plans how this would be possible.

How is it possible the proposed vegetation would tolerate a dense or even lush growth given the root spread, the drip line, the dirt composition and other current vegetative habits?

Also, given the growing needs of the current and proposed vegetation we are concerned about the ability of the current plot and even soil quality along the North side of the property would sustain such planting, especially next a large blacktop.

R18-12

We are concerned with the proposed tree removal. It is our understanding from that San Francisco has passed laws that treat mature trees like old buildings. The Sierra Madre's most recent survey regarding the revision of the general plan asks under the conservation portion how the residents feel about preserving and protecting the identity, the night sky, scenic views throughout the city, existing trees, and so on. We feel as strongly now as we did with the 1996 plan that the city should not make an exception with Alverno to allow the removal of any more large, mature trees. To allow great exceptions would set a precedent for other institutions to follow suit. Alverno's exceptions not only the impact the heat index, light pollution emitted into the neighboring properties but it's character which requires preserving in our current general plan.

R18-13

In terms of development we have these concerns after the removal of some rather huge trees has been occurring already. Enough is enough. Their leaves filter out particulate pollution. The crown of a large tree also intercepts rain water that might otherwise clog cities' aging drainage systems. In some cases, a tree can ensure that 1,500 gallons of water a year will evaporate before it hits the ground.

R18-14



## 2. Response to Comments

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|   |                   |
|---|-------------------|
| <p>Tree shade stops asphalt from reflecting the sun's heat and creating so-called heat islands. "A big tree does 60 to 70 times the pollution removal of a small tree," David Nowak, project leader with the U.S. Forest Research's northern research station.</p>  | R18-14<br>cont'd. |
| <p>With that in mind we are concerned that Alverno is planning on removing even more VERY LARGE trees and will not be able to match their loss with a building or even smaller trees with what the previous trees were providing. Michillinda is a well traveled street and we could use all the pollution removal those large trees have provided. Over the years we have watched removal after removal of many rather large trees on Alverno's property to make way for this proposed expansion.</p>  | R18-15            |
| <p>Also noted on the landscape in terms of trees are, the city planted Oak trees on Grandview which are a variety that will take decades to be mature and will never be considered dense or mitigate noise. They were planted many years ago and they are still nothing more than spindly shoots out of the ground with several having died and no replacements.</p>  |                   |
| <p>The old Olive trees growing on the Alverno property are lacy and never going to be dense in their foliage as the plans appear to be showing.</p>   |                   |
| <p>We have concerns that historically the Alverno landscaping on the North side of Alverno has never been lush nor adequate in the last 20 years to mitigate the continual usage of the current parking lot and now the proposed property usage. The proposed vegetation and trees are clearly not going to be adequate either, coupled with the height restriction of the fence, and a lighting plan we can not comment on because it is unavailable. The surrounding neighborhood homes will continue to be assaulted with light pollution from the property expansion as it is proposed but we can not fully comprehend how because the lighting plan was not studied nor was it available as part of this comment period.</p> | R18-16            |
| <p>To add to the above concern is the additional heat that will be generated from an even larger parking lot.</p>   |                   |
| <p>The study does not address issues like this and the dual usage by school events, and the Villa rentals, day or night.</p>  |                   |
| <p>We have major concerns that allowing the property usage as a whole to be bifurcated falsely represents the true impact the various uses will have on the neighborhood. To do so would create an impression of lesser impact. The usage of the property needs to be considered in its totality and not allow this scenario as it is currently being presented.</p>  | R18-17            |
| <p>A residential neighborhood should and can be protected, through zoning, against traffic that comes from the outside and does not directly serve the neighborhood.</p>  | R18-18            |

## 2. Response to Comments

From the landscape plan the proposed tubular steel fence will provide even less protection against the noise and light intrusion into the surrounding neighbors as well as the vehicular traffic that was once more shielded on Michillinda and Grandview.

R18-19

We are still reviewing the plans and realize we have run out of time to delve into this document and the how it does not appear to align itself with the character and vision of Sierra Madre's general plan. We have run out of time to start citing the various components of the general plan and make further comment so we forgive the less than well drafted documentation of our concerns. None-the-less, given how hard it has been to pull all of our concerns together regarding this document, and we aren't land use attorneys

We would most appreciate the opportunity to engage in a more complete dialogue regarding the proposed expansion after seeing a more appropriately aligned study of not only the proposed expansion but all other usage the owners of the property wish to propose. This study should include the concerns already on the record and the Villa's future. Given this documents current state of incompleteness, we respectfully request the city reject it and ask the petitioners come back with one that includes studies of all uses and their impact of the proposed property. We feel the planning commission would be derelict in it's duty if it were to choose to apply city standards for parking, signage, lighting, landscaping, site design, and other general standards or any exceptions at this time.

R18-20

Yours truly,  
The Stephens family



## *2. Response to Comments*

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## 2. Response to Comments

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### **R18. Response to Comments from the Stephens Family, dated April 14, 2011.**

- R18-1 The Commenter states that Alverno High School appears to have been slowly clearing the campus for the proposed project and that the proposed project has grown from early discussions. These comments are noted. The Sierra Madre Planning Commission will consider all written comments received before deciding whether to adopt the Mitigated Negative Declaration and approve the proposed Conditional Use Permit (CUP) Amendment.
- R18-2 The comment concerns alleged segmentation of the project. The Commenter wants to know why the project description does not include rental uses of the Villa de Sol d'Oro. General Response #1 on page 2-3 of the Final MND addresses why the proposed project does not include existing and potential future uses at the Villa.
- R18-3 The Commenter is concerned with the loss of trees and vegetation in the Michillinda parking lot and increased lighting on the property over the years. This comment does not address the adequacy of the Draft MND. No response is necessary.
- R18-4 The comment concerns the reduction of noise from the school bells and pollution from portable generators associated with past and present operations of the campus. This comment does not address the adequacy of the Draft MND. No response is necessary.
- R18-5 The comment concerns lighting impacts. No nighttime field lighting or court lighting is proposed. Outdoor lighting would be for safety and security purposes only. The lighting concept for the parking areas and drive lanes would utilize low level light bollards with louvered shields. The bollards would be no more than 3.5 feet high and would be spaced to create pools of light to guide traffic. As discussed in Section 3.1, *Aesthetics*, compliance with section 17.68.120 of the City municipal code would reduce lighting and glare impacts to levels below significance.
- R18-6 The comment concerns traffic noise from the parking lots. The parking lots are proposed to be constructed of a combination of porous paving in order to protect the City's drainage system and improve quality of runoff, as well as traditional paving. Low vehicular speeds in the parking area do not generate significant noise levels to warrant the use of rubberized asphalt. The noise study, which assumed the parking lot to be of typical construction and material (i.e., hardscape surface), determined that noise generated from that the parking areas would be below the City's noise levels.
- R18-7 The Commenter is concerned with noise impacts from proposed outdoor uses. Section 3.12(a) of the Draft MND determined that noise impacts from use of the proposed outdoor amphitheatre would not be significant and that noise impacts from special events held at the proposed multipurpose building would not be significant with incorporation of mitigation. It should be noted that small events at the outdoor amphitheater would be restricted to the daytime hours when people are less sensitive to noise. The amphitheater would be used for school-related functions and would not include any amplification.



## 2. Response to Comments

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- R18-8 The comment addresses the proposed multipurpose building. The proposed multipurpose building would be smaller than the Villa: the multipurpose building would be 12,860 square feet, while the Villa is 15,758 square feet.
- R18-9 The Commenter is concerned with the duration of construction impacts. The Planning Commission will consider the duration of construction, and of construction impacts, in deciding whether to adopt the MND and approve the CUP Amendment.
- R18-10 The comment addresses the scale of the project compared to that of the surrounding residential uses. The proposed multipurpose building would be 35 feet high, shorter and smaller than the Villa, and would be screened by trees from view from opposite Michillinda Avenue.
- R18-11 The comment concerns offensive odors, especially diesel exhaust. The California Resources Board's (CARB) new Rule 2485 prohibits non-essential idling of commercial diesel vehicles for more than a five-minute period. Additionally, CARB Rule 2449 also limits idling to five minutes under certain circumstances for off-road diesel vehicles that are covered under its provisions.

In circumstances where the Commenter believes there may be an issue with odors from project-related construction activities, the Commenter should contact the South Coast Air Quality Management District (SCAQMD) at 1-800-288-7664 to report the potential odor issue.

- R18-12 The comment pertains to aesthetic impacts involving screening of the Michillinda parking lot by landscaping. The Draft MND concluded that lighting impacts caused by the proposed project would not be significant and therefore mitigation would not be required. Nevertheless, Alverno High School is aware of the Commenter's concerns and therefore has included as a part of the proposed project screening of the main parking lot along Grandview Avenue with 13 new trees, including 1 oak and 10 cedar trees. These trees will supplement the 12 existing olive trees along the perimeter on Grandview Avenue and will be planted between the Michillinda corner and the existing classroom building. The concept landscape plan also includes massing of shrubs to provide additional screening of the parking area from the adjacent residential area. Figure 2, *Landscape Concept of Parking Lot at Michillinda Avenue*, illustrates the proposed landscape plan near the Michillinda parking lot.
- R18-13 The comment is a general concern about the City's tree ordinance. Specifically, the Commenter feels that the City should not allow mature trees to be removed. The City's tree preservation and protection ordinance is provided in Chapter 12.20 of the Sierra Madre Municipal Code. Project compliance with the tree ordinance would reduce potentially significant impacts to trees to less than significant. No additional response will be provided as this comment does not address the adequacy of the Draft MND.
- R18-14 The comment concerns hydrologic and air quality benefits of trees and does not address the adequacy of the Draft MND. The statements about the benefits of trees are noted. The Sierra Madre Planning Commission will consider all written comments received before deciding whether to approve the master plan.

## 2. Response to Comments

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- R18-15 The comment concerns the continual loss of trees on the project site over the years and as it relates to the proposed project. General Response #2 on page 2-5 of the Final MND provides a description of the trees that will be planted as a part of the proposed project. As the proposed project complies with the City's tree ordinance, impacts to trees would be insignificant. This comment is noted and will be considered by the decision makers. As it does not address the adequacy of the Draft MND, no further response can be provided.
- R18-16 The Commenter appears to be concerned with headlights from vehicles accessing the Michillinda parking lot. The Draft MND concluded that lights from vehicles would not be significant. Nevertheless, as indicated above, Alverno is aware of the Commenter's concerns, and therefore has included as a part of the proposed project screening of the main parking lot along Grandview Avenue with 13 new trees, including 1 oak and 10 cedar trees. Although the City may have a height restriction on the height of the perimeter fence, the project also includes massing of shrubs to provide additional screening of the parking area.
- R18-17 The Commenter is concerned with segmentation of the project. The proposed action is that of a CUP Amendment. Its approval would allow physical improvements to be made at Alverno High School for continued operation of the campus by the school. It is assumed that the Commenter is referring to the existing non-school operations at the Villa as it relates to "bifurcating" the project. Impacts associated with the existing uses of the campus do not need to be evaluated. The existing uses are a part of the existing environmental condition, which forms the baseline for comparison of impacts. The project applicant may, however, in the future submit a separate application to the City for an Adaptive Reuse CUP. This future CUP would allow Alverno to permanently operate the Villa for non-school functions and is not related to the proposed project. Additional information concerning the alleged segmentation of the proposed project is provided in General Response #1 on page 2-3 of this document.
- R18-18 The comment concerns traffic impacts on the neighborhood. Project traffic impacts would be less than significant with mitigation, as substantiated in Section 3.16 of the Draft MND, *Transportation and Traffic*.
- R18-19 The comment concerns noise and light intrusion associated with new tubular fencing at the Michillinda parking lot. The tubular fencing would be installed on the perimeter of the lot along Michillinda Avenue. The existing six-foot-high wall along Grandview Avenue would remain. Both noise and light impacts associated with the Michillinda parking lot were studied in the Draft MND. As described in section 3.1(d) of the Draft MND, compliance with lighting requirements, as specified under Section 17.68.120 of the Sierra Madre Municipal Code, would reduce lighting impacts to an insignificant level. Additionally, as illustrated in Figure 14 of the Draft MND, noise levels generated from the lot would not be significant.
- R18-20 The comment states that they "have run out of time to delve into this document" and summarizes some of the preceding statements about impacts and segmentation of the project. The proposed project has complied with the requirements of CEQA and CEQA Guidelines. The Draft MND was made available for a 30-day review period, commencing March 15, 2011, as required by CEQA Guidelines Section 15073(a).



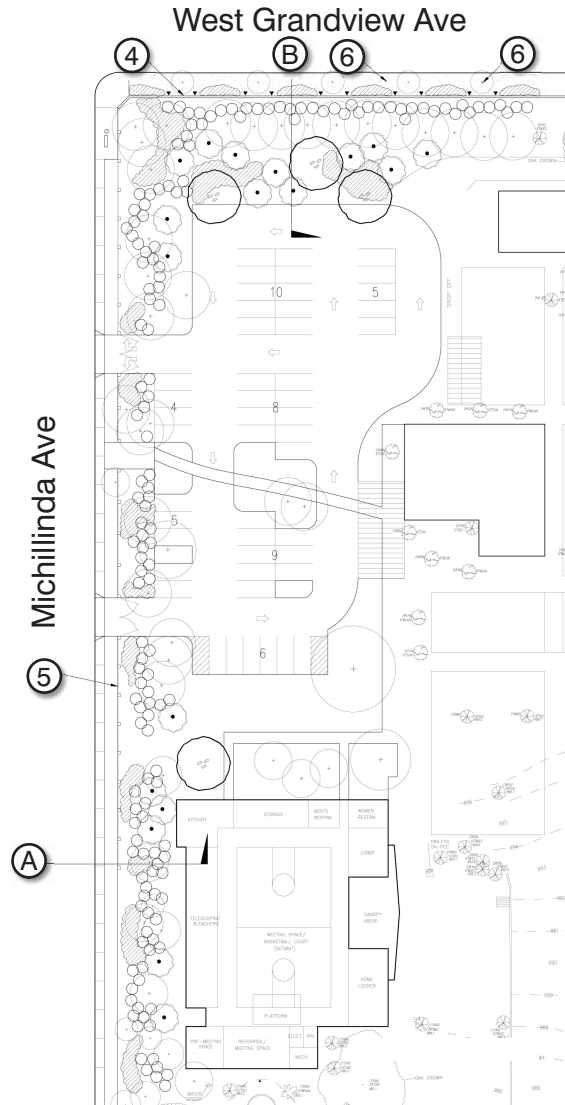
## *2. Response to Comments*

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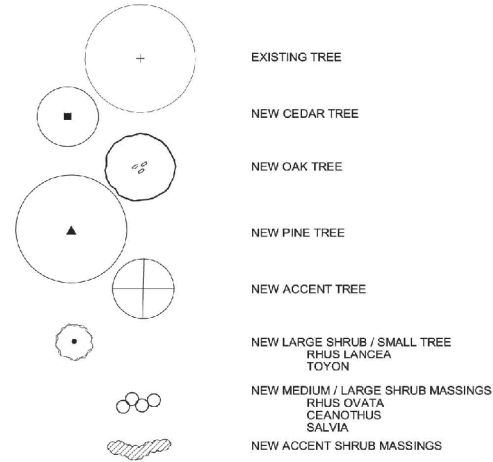
Additionally, as discussed in General Response #1, the proposed project does not need to analyze existing impacts associated with operation of the Villa. Impacts to noise, traffic, and aesthetics are addressed in the preceding responses to this comment letter.



# Landscape Concept of Parking Lot at Michillinda Avenue

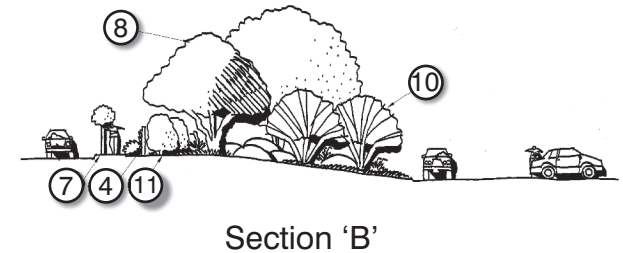
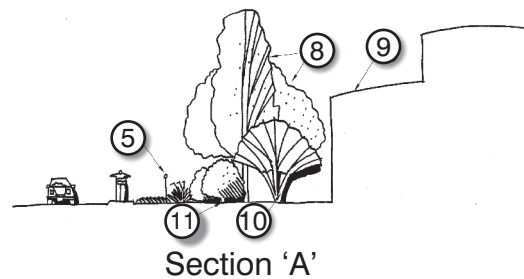


### PLANTING LEGEND



### LEGEND

- 4 EXISTING 6' HIGH WALL. PROVIDE NEW VINE AND SHRUB PLANTING IN R.O.W.
- 5 NEW 6' HIGH TUBULAR STEEL FENCE WITH MASONRY PILASTERS.
- 6 MULCHED AREA
- 7 EXISTING CITY STREET TREE ( OAK )
- 8 EXISTING TREES
- 9 PROPOSED MULTI-PURPOSE BUILDING
- 10 NEW LARGE SHRUB / SMALL TREES
- 11 NEW MEDIUM / LARGE SHRUBS



Source: Jon David Cicchetti 2005

## *2. Response to Comments*

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## 2. Response to Comments

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LETTER R19 - Darlene Traxler (1 page)

Danny Castro  
Director, Development Services  
City of Sierra Madre  
232 W. Sierra Madre Blvd.  
Sierra Madre, Ca. 91024

4/13/11

Dear Mr. Castro,

I support Alverno High School and understand the need for facilities for their students. I am however concerned with the "Intention to Adopt a Mitigated Negative Declaration" for the Master Plan. It did not address all of the current and potential future uses at the property. It was insufficient at determining the impacts especially in the areas of noise and traffic. It did not assess the use of an outdoor sports field for games with spectators or multiple simultaneous events. All of the uses on campus need to be included in the Master Plan; events at the Villa should not be considered separately. Thank you.

| R19-1

| R19-2

| R19-3

| R19-4

| R19-5

Sincerely,

*Darlene Traxler*



## *2. Response to Comments*

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## *2. Response to Comments*

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**R19. Response to Comments from the Darlene Traxler, dated April 13, 2011.**

Comments R19-1 through R19-5 are identical to comments R3-1 through R3-5. Please see responses R3-1 through R3-5.



## *2. Response to Comments*

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## 2. Response to Comments

### LETTER R20 - Keith and Chui Chow (2 pages)

April 14, 2011

Mr. Danny Castro  
Director, Development Services  
City of Sierra Madre  
232 W. Sierra Madre Blvd, CA 91024

Dear Mr. Castro,

We would like to echo everything that Janet Owens and the Simons mentioned in their letter to you.

As they say, "a picture is worth a thousand words," I hope that the DVD I've enclosed is just as effective if not more. Please give us 6 minutes of your time to view it.

The recording was made on Saturday March 19, 2011 beginning at 10 PM. It is documentation of another typical Alverno event in which the music and noise was unbearable. The music was so loud that I could hear the words to the songs from the back of my house even with all the windows shut. During the summer months my windows are opened so the noise is even louder.

Footage is shot from inside my living room with the windows open and shut as well as from my front door and front yard. At the beginning of the tape you will hear me on the phone with the Sierra Madre Police department. In the video you will hear yelling, screaming, cheering, incredibly loud music, drums, heavy bass, and the sound of cars scraping the concrete when exiting the Michillinda lot across from my house. These are all issues we've brought up at council meetings and the quarterly meetings with Alverno. All issues denied by the school and seemingly ignored by the city.

We ask that you view the footage and honestly put yourself in our shoes. Would you think it's okay if you lived across the street from such a nuisance and had to constantly deal with this? I would think that anyone studying this footage without bias would be appalled. How can you and the city continue to believe that Alverno's events and activities don't have a negative impact on the neighborhood?

We are very concerned with the Master Plan as proposed by Alverno. My home made video is not a sophisticated noise study but it shows the truth. It is not flawed or misrepresented as the data and "research" presented to the city by Alverno.

How much more noise will the outdoor amphitheatre contribute to the neighborhood? How about the additional usage of the property associated with the multi-use building and sports field?

As you know, our house is directly across from Alverno's driveway. Those of us on Michillinda already bear the brunt of most of the Alverno traffic, noise and lights

R20-1

R20-2

R20-3

R20-4



## 2. Response to Comments

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streaming into our homes. With the master plan, it appears that all school related, non-school related and sports event parking will be in the north east Michillinda lot and all vehicles exiting the property will be on the Michillinda side. That's just not right.

Currently, only the East and South side of the campus have sufficient landscaping which helps to mitigate the noise and lights from Alverno. We do not have that on the Michillinda side and in the master plan, directly across from my living room are parking spaces facing my house and visible from my house.

R20-4  
cont'd.

Again, please take a few moments to view the DVD and consider additional studies before proceeding. Surely what you see in the video cannot be in compliance with the city's noise ordinance.

R20-5

Thank you for your consideration.

Sincerely,



Keith and Chui Chow

Cc: Elaine Aguilar, City Manager  
Sandra Levin, City Attorney



## 2. Response to Comments

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### R20. Response to Comments from Keith and Chui Chow, dated April 14, 2011.

- R20-1 The comment refers to an enclosed DVD video that documented noise generated during a wedding held at Alverno High School. It is unclear whether or not noise generated from the wedding exceeded the noise standards of Sierra Madre (i.e., magnitude of noise compared to the City's stationary noise standards of the Municipal Code) because noise monitoring of the event would have been required to determine if the noise complied with the local noise standards. However, noise from the wedding was clearly audible in the nighttime noise environment as a result of amplified sound. The Draft MND evaluates changes in environmental conditions associated with the Proposed Project (CEQA Guidelines 15064). Consequently, existing events at the Villa are not evaluated in the MND.
- R20-2 The comment concerns existing noise generated at the project site. As described in the noise study, uses associated with the proposed project occur in the daytime hours when people are least sensitive to noise. The exception to this is after-school functions, such as school dances in the multipurpose building, which would occur occasionally in the evening. However, the proposed project does not increase the frequency of this type of activity onsite or increase the magnitude, pitch, or duration of noise generated. Mitigation Measure 14 requires noise attenuation measures implemented in the design of the building to ensure that the proposed multipurpose building would contain noise associated with school dances in compliance with both the City of Pasadena and City of Sierra Madre's Noise Ordinances. In general, school uses are compatible in a residential noise environment.
- R20-3 The comment concerns potential noise generated by the proposed outdoor amphitheatre and multipurpose field, which is discussed in Section 3.12(a) of the MND. Noise modeling was conducted to determine the extent of the noise propagation. Figure 13 illustrates that the amphitheater would generate noise levels less than 55 dBA  $L_{eq}$  outside of the campus property line. Noise generated from school use of the small outdoor amphitheater and sports field is not substantial and is compatible in a residential neighborhood. In addition, noise levels from the amphitheater and sport field would not exceed the 80 dB noise limit at a distance of 25 feet, as specified under Section 9.32.060.A of the City Municipal Code. Consequently, no significant noise impacts would occur from use of the proposed amphitheater. It should be noted that small events at the outdoor amphitheater and use of the multipurpose field would be restricted to the daytime hours when people are less sensitive to noise and would be used for school-related functions.
- R20-4 The comment concerns additional traffic, noise, and lights associated with school- and nonschool-related activities. The circulated Draft MND thoroughly addresses these impacts as they relate to the proposed project in sections 3.16, 3.12, and 3.1, respectively. As discussed, traffic, noise, and lighting impacts would be less than significant. The Commenter is also concerned about the "inequity" that most of the traffic would be generated by the Michillinda parking lot. This comment is noted and will be forwarded to the decision makers for their consideration prior to adoption of the MND and approval of the proposed project.



## *2. Response to Comments*

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- R20-5      The City has viewed the video. The proposed project is that of the CUP Amendment, the approval of which would allow the Facilities Master Plan to be implemented. Noise impacts documented in the video are associated with existing uses of the campus that are not analyzed as a part of the proposed project.

## 2. Response to Comments

LETTER R21 - Robert Jasper and Marguerite Dastoor (1 page)

**From:** Marquerite J. Dastoor.  
**Sent:** Thursday, April 14, 2011 1:13 PM  
**To:** Danny Castro  
**Subject:** Alverno Master Plan

Dear Mr. Castro,

My husband and I have been living across the street from Alverno for 12 years, and plan to retire here. We love Sierra Madre, choosing this location carefully after decades of raising family in San Marino and Pasadena. Now we are dismayed to realize our peaceful way of life is seriously threatened.

R21-1

We wholeheartedly agree with the serious, valid concerns described clearly and accurately in the letter sent to you by Carolyn and Russ Simon dated 4/7/11. We request you study carefully all the uses of the Alverno Campus because the NMD and its studies do NOT Address the overwhelmingly destructive impacts of Alverno's plan on our neighborhood.

R21-2

The truth is that this Alverno Project is way too large for the size of their physical lot. There is no buffer around it. Our modest homes on the perimeters of Alverno have no large front yards, and the Grandview, Wilson, and Highland avenues are too narrow for the 2-way traffic, pedestrian traffic, and parking space required for the planned use of the lot, especially after school hours and on weekends.

R21-3

Along with the birds, bats, and trees of Alverno, our way of life is endangered because the Project's resulting street litter, traffic, Security concerns, Parking problems, and noise will reverberate into our living room and bedrooms. We plead with you and the Sierra Madre City Council not to ignore the needs of the Sierra Madre neighbors of Alverno.

Sincerely Yours,

Robert Jasper and Marguerite Dastoor

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## *2. Response to Comments*

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## 2. Response to Comments

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### **R21. Response to Comments from Robert Jasper and Marguerite Dastoor, dated April 14, 2011.**

- R21-1 This comment, concerning impacts to the Commenter's quality of life, is noted. The Draft MND has fully analyzed the environmental effects of the proposed project, and where needed mitigation measures have been identified to reduce all potentially significant effects to levels below established thresholds.
- R21-2 The Commenter makes mention of Comment Letter R11. Please see responses R11-1 through R11-28.
- R21-3 The Commenter is concerned about traffic, parking, litter, security, and noise associated with the proposed project. The Draft MND fully analyzed these issues as they relate to the proposed project and has identified mitigation measures to reduce these impacts to insignificant levels. Please note, however, that the proposed project is that of a CUP Amendment. Approval of the CUP Amendment would allow Alverno High School to implement their master plan and to continue operation of the campus for school uses. The proposed project does not include improvements to or operational changes to the Villa. Therefore, the Draft MND does not analyze potential impacts associated with operation of the Villa. The Sierra Madre Planning Commission will consider all written comments on the MND before deciding whether to approve the MND.



## *2. Response to Comments*

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## 2. Response to Comments

LETTER R22 - Wendy Morgan (2 pages)

**From:** Wendy Morgan  
**Sent:** Thursday, April 14, 2011 4:04 PM  
**To:** Jen Peterson  
**Subject:** Alverno Plans

Dear Jen,

First I would like to thank you, and all city employees for the hard work you do for this glorious city of Sierra Madre. I believe this is the best place to live in the Los Angeles area and I feel terribly lucky and proud to call myself a resident and member of this lovely community. While I have only had the pleasure of living here for two years, I have spent many days here during my 45 years as my grandparents lived in the area during my childhood.

The sense of community and appreciation residents display for all this area has to offer is palpable. Not a day goes by that I am not overwhelmed by the beauty here. The stunning mountains, verdant trees, wildlife, parks - with all of the glorious hiking trails, sense of community, lack of lighted signals are all reasons we chose to move here. What my husband and I appreciate, **above all else**, is the sense of peace that envelopes the city.

R22-1

I am deeply concerned about the plans Alverno is proposing and this is the reason for my correspondence.

My understanding is the enrollment at Alverno is a mere 200+ and I question how many of these students are actually residents of the city. Beyond the formidable trees established on the grounds, I cannot help but wonder how this exclusive private school actually benefits the community. Most days I walk around the grounds of the Retreat Center and I am so grateful I am able to enjoy the beauty and spender of the Mater Dolorosa Center and I see a huge benefit to the residents of Sierra Madre. While I appreciate all school grounds must be closed to the public during school hours, my understanding is that I am unable to walk the grounds of Alverno, even during the weekends.

R22-2

The only noise pollution I have experienced at my home is from Alverno. While I am unsure if the noise is generated by weddings or school events, it is still quite an irritating nuisance to be disturbed by the loud music that emanates from the Alverno campus. Please do not get me wrong, I am not the sort who screams, 'get off my lawn!' to the neighborhood children. Not all all. Still, every time I am disturbed by the noise pollution from the school I cannot help but think, it doesn't fit the Sierra Madre mold.

R22-3

I do not believe it is in the best interest of the city to endure the removal of well established trees. Nor do I believe the community will benefit by the sound of demolition and construction that we will all have to endure for quite a long period of time. Further, I see nothing positive, for the residents of SM, about building an outbuilding or outdoor theater to act as additional venues for noise pollution.

R22-4

If these additions were planned at one of our local public schools then I could see a benefit to Sierra Madre and I would raise my hand to help to build such an asset to our precious community but, and again, who will benefit besides the 200+ privileged few?

R22-5



## *2. Response to Comments*

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Please say no. Please.

Thank you for your time.

Best regards,

Wendy Morgan



## 2. Response to Comments

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### **R22. Response to Comments from Wendy Morgan, dated April 14, 2011.**

- R22-1 The comment describes the Commenter's appreciation of the city's beauty and city employees. The comment does not address the adequacy of the Draft MND. No response can be provided.
- R22-2 The Commenter questions the residence of the Alverno students and whether the campus benefits the Sierra Madre community. This comment does not address the adequacy of the Draft MND. No response can be provided.
- R22-3 The Commenter is concerned with existing noise generated at Alverno. The Draft MND analyzed noise impacts associated with the proposed project in Section 3.12, *Noise*, of the Draft MND and concluded that with mitigation, noise impacts would be less than significant.
- R22-4 The comment concerns the loss of established trees and the impact associated with construction noise. Detailed information about the proposed removal of existing and planting of new trees is provided in General Response #2 of this document. Impacts to trees are discussed in Section 3.4, *Biological Resources*, of the Draft MND. Compliance the City's tree ordinance would reduce impacts to trees to a level below significance. Additionally, construction noise impacts are discussed in Section 3.12, *Noise*; such impacts would be less than significant after implementation of mitigation.
- R22-5 This comment concerning whether the community would benefit from the project is noted and will be considered by the Sierra Madre Planning Commission.



## *2. Response to Comments*

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## 2. Response to Comments

LETTER R23 - Janet Owens (2 pages)

**From:** Janet Owens  
**Sent:** Thursday, April 14, 2011 7:44 AM  
**To:** Danny Castro; Danny Castro  
**Subject:** Alverno Master Plan

Dear Mr. Castro:

I would like to second every point that Carolyn and Russ Simon voiced in their letter to you. I would like to add some points of my own.

A building the size that Alverno is proposing is totally outrageous. A full NCAA basketball court is 4,700 square feet, less than one third of the massive building that they want to build. There is no building in all of Sierra Madre that large. The average size house in the surrounding area is 1,300 square feet. The Alverno building would be the equivalent of ten average size homes!

R23-1

Pasadena High School and Mater Dei High School as examples, do not have a gym and auditorium combined that large and they have thousands of students, not 400. Alverno claims that the building would be multi-purpose; gym, auditorium, etc. The square footage they want would house a full size gym, an auditorium larger than that at PCC and offices and probably a dance floor that would rival the one at the Langham Hotel in Pasadena. The whole recreation department in Sierra Madre is not 13,000 square feet.

The neighbors have endured years of rowdy, loud and drunken parties. This building would literally bring the quality of life in the neighborhood down to such a level as to drive us all insane.

The school will no doubt bring hundreds of alumni in to testify for days about their need for this monstrosity. We do not object to a standard High School gym which is not as large as the NCAA, 4,200 square feet. They do not need a concert hall/nightclub. We are already being blown out of our own homes by the rental activities at the Villa. This would just multiply the problems. A gym "for the school only" is not a problem. The addition of a nightclub is unconscionable.

R23-2

I have never understood how Alverno got whatever they wanted for years inspite of not having a legal permit. They have made our lives miserable for decades. We cannot sell our homes for any price near their worth because of this neighborhood nuisance.

R23-3

Also, to add a gate on Michillinda is just not fair to those of us who have born the brunt of the traffic all these years. Since the folks on Highland have no problem with Alverno and their parties, either enlarge the gate on Highland or add another on Highland. Give the Michillinda neighbors a break for the next twenty years.

R23-4

As you probably know, employees of Alverno have in the past been taking the proceeds from the rentals for their own personal use. It appears that that is still happening because the Villa and grounds remain in poor repair in spite of their pleas that the rental money was needed to upgrade the Villa.

R23-5

With this massive construction project and subsequent nightclub activity things can only get worse. By the way, if you are taking my letter as less serious than others because my home is in Pasadena, please reconsider. I have owned a house in Sierra Madre longer than probably all the other Alverno neighbors in Sierra Madre. I have owned my house on Lima Street since 1956. I have lived on and off in Sierra Madre since 1950. If my parents were still alive and knew what Sierra Madre was doing to the neighborhood around Alverno and it's citizens, they would turn over in their graves. Alverno used to be a quiet girls school, not the nightclub that it is today.

R23-6



## 2. Response to Comments

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Alverno students and staff come and go, the neighbors stay and should have more say in these matters. Again, we are not objecting to a gym for the school that can also be used by the school for their own plays, but the nightclub activities.

R23-7

Thank you for taking my and other neighbors views into consideration when looking into this matter.

Sincerely,

Janet Owens

[REDACTED] Pasadena. My husband and I had to move because of the harassment we received from Alverno staff and students. Alverno has a policy of telling the students that we are against them and then give out our address. We are not against the students, only the loud parties. We now reside in [REDACTED]  
[REDACTED]

## 2. Response to Comments

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### R23. Response to Comments from Janet Owens, dated April 14, 2011.

R23-1 The Commenter has concerns for the scale of the proposed multipurpose building relative to homes in the surrounding neighborhood, as well as the intended purposes of the building. Although it does not pertain to the adequacy of the Draft MND, for information purposes, the project architect has provided the dimensions of recently designed multipurpose buildings. The size of the proposed multipurpose building of 12,860 square feet is comparable in size to other schools in the Los Angeles region.

- El Monte Union High School District: Mt. View High School, Multipurpose Building - 11,244 square feet (added to existing gym)
- El Monte City School District: Columbia Elementary School, Multipurpose Building - 14,100 square feet
- Los Angeles Unified School District: Robert F. Kennedy Community Schools, High School Gym - 10,700 square feet
- Los Angeles Unified School District: Robert F. Kennedy Community Schools, Middle School Gym - 7,500 square feet
- University of La Verne: Abraham Campus Center, Multipurpose Room w/ warming kitchen and "mixing" area - 6,000 square feet (this space occupies the 3rd floor of a 40,000-square-foot building)

Figures 3 and 4 illustrate the massing of the proposed building along Michillinda Avenue. Although the multipurpose building is sizeable, most of it would be screened by existing landscape along the perimeter of Michillinda Avenue. Additionally, as illustrated in Figure 2, *Landscape Concept of Parking Lot at Michillinda Avenue*, the proposed project would also include the planting of new shrubs and trees in the area between the multipurpose building and Michillinda Avenue. Section A of Figure 2 shows the cross-section of this area. Although the multipurpose building would be visible, impacts would not be significant.

R23-2 The Commenter's concerns about the size and prospective uses of the multipurpose building are noted. The multipurpose building would only be used for existing school- and City-sponsored events and would not be rented out or otherwise made available for private uses.

R23-3 The Commenter is concerned about past and current uses of the Villa, and exceeding uses permitted in the original Conditional Use Permit (CUP) issued for Alverno High School in 1959 are noted. Please note that the proposed project is a CUP Amendment that would allow Alverno High School to implement their master plan. The proposed project does not include improvements to or operational changes to the Villa. Therefore, the Draft MND only addresses impacts associated with the master plan, and impacts associated with operation of the Villa have not been analyzed.



## *2. Response to Comments*

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- R23-4      The comment concerns the increased traffic associated with the expansion of the Michillinda Avenue parking lot. It is acknowledged that project implementation would result in an increase in traffic. The traffic analysis completed for the proposed project indicated that the proposed project would require mitigation to reduce impacts to insignificant levels. The proposed project includes 52 tandem parking spaces next to the existing drive aisle in the southwestern part of the campus; direct access to these new spaces would be from Highland Avenue.
- R23-5      The comment about Alverno High School's finances is noted. CEQA addresses impacts to the physical environment, and the school's finances are outside of the purview of CEQA. No additional response will be provided.
- R23-6      The proposed multipurpose building would be used only for school- and City-sponsored events, and would not be available for private uses. No nightclub use is planned for the multipurpose building. As the City of Pasadena is opposite the project site, in addition to Sierra Madre regulations, and as applicable, the Draft MND also considered Pasadena codes and land use requirements.
- R23-7      The comment concerns the weight of the neighbors' opinions on the proposed project. This comment is noted and will be reviewed by the decision makers. The Commenter also stated that she does not object to the proposed multipurpose building for school use, but its "nightclub activities." As stated above, the proposed project would not result in any nightclub uses. However, the project would result in relocating existing school dances that currently occur in the Villa to the multipurpose building.

## Massing of Multipurpose Building from Michillinda to North



Existing view of Alverno High School at the Michillinda and Highland intersection, facing northbound.



Same view with massing of the multipurpose building. The density of the existing vegetation will minimize its view.

Source: Gonzalez Goodale Architects 2002



## *2. Response to Comments*

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## Massing of Multipurpose Building from Michillinda to South



Existing view of Alverno High School near the historic gate on Michillinda and Cartwright intersection, facing southbound.



Same view with massing of the multipurpose building. The density of the existing vegetation will minimize its view.

Source: Gonzalez Goodale Architects 2002



## *2. Response to Comments*

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## 2. Response to Comments

LETTER R24 - Carolyn Halpern (2 pages)

**From:** [halpernc](#)  
**Sent:** Thursday, April 14, 2011 11:14 AM  
**To:** Danny Castro; Danny Castro  
**Subject:** Alverno

Dear Mr. Castro:

The Sarley-Halpern family has owned the house at 1105 N. Michillinda Ave. in Pasadena, across from Alverno, since 1956. During that time we have seen Alverno become a school, become a much desired and used film location, a sports center, and a serious contributor to traffic on Michillinda, going both north and south. My family and I have endured this for over 50 years.

R24-1

My parents and I have called in numerous times over the years to the police for loud activities held at the Alverno property, but have tried to be flexible, as I love Sierra Madre, and am a proponent of education, particularly public, but private, when appropriate.

So, we endured evening filmings complete with "gunfire", messes left on Cartwright street from students eating their lunches, Alverno students doing drugs on our cross-street in the 70's, and back in the '60's, even a home break-in done by Alverno students. Parking on Michillinda for Alverno events have caused participants to park on the street, but partially in my driveway, creating difficulty for us to pull-out, with no apologies from the participants but rather rants and threats.

R24-2

What irritated me the most, that now, myself as owner of the property, had a tile man completing work on a bathroom. He was outside using his machinery, when a staff member from a filming going on at Alverno had the gall to come to my home and threaten the worker to quit since they said he was making too much noise. The worker did quit working, costing me an extra day to get the work done, as well as pay for his extra time. Clearly, since then, I have a different perspective towards Alverno.

R24-3

In regard to the recent Negative Mitigation Declaration for the Alverno Master Plan, I do not agree with it. I do not understand why you are attempting to separate the use of the Villa from the Master Plan. I think that you need a much more comprehensive study of the noise, transportation, and traffic than has been done. Clearly, you should be working with the City of

R24-4



## 2. Response to Comments

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Pasadena on this, as this will affect Pasadena residents as well. We are already having a difficult time selling our homes on Michillinda due to the issues that living across from Alverno bring into play.

R24-4  
cont'd;

Personally, and in my opinion, I feel that Alverno should concentrate on their educational studies rather than branch into a sports and filming center. My daughter proudly went to LaSalle and I had the opportunity to compare the studies of both schools back in 2000. Enough said.

Why is an amphitheater being contemplated in such a dense population? As a student at a college where there was an amphitheater, the campus was so vast, and homes were not nearby, that it made sense. Not at Alverno, where the property is surrounded by homes in both Sierra Madre and Pasadena and the noise would be heard in both cities, if not beyond.

R24-5

Carolyn and Russ Simon's letter is much more aligned and more thought out than mine, and I totally agree with it as well as my family.

R24-6

My family did not sign up for this across the street when they bought the property in 1956. If these had been the variables, they would not have purchased the property.

R24-7

Yours truly,  
Carolyn Sarley Halpern

## 2. Response to Comments

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### **R24. Response to Comments from Carolyn Halpern, dated April 14, 2011.**

- R24-1 The comment concerns existing traffic on Michillinda Avenue and existing noise, generated by events at Alverno High School. The Draft MND included technical studies that analyzed traffic and noise impacts that would be generated from the proposed project. The existing traffic conditions and noise environment were used as the baseline for the studies. The Draft MND concluded that with mitigation, both noise and traffic impacts would be reduced to levels below established thresholds.
- R24-2 The comment concerns previous impacts and nuisances associated with Alverno's operations since the 1960s. This comment is not in reference to the proposed project and does not address the adequacy of the MND. No response can be provided.
- R24-3 The comment concerns a personal situation related to film work that had taken place at Alverno High School. This comment is not in reference to the proposed project and does not address the adequacy of the MND. No response can be provided.
- R24-4 The comment concerns segmentation of the proposed project. Please see General Response #1, which explains why the MND does not analyze impacts related to the existing uses of the Villa or impacts associated with a future CUP application for permanent for-profit use of the Villa. Furthermore, please note that, where applicable, the Draft MND relies on both the Sierra Madre and Pasadena Municipal Codes and regulations.
- R24-5 The Commenter is concerned with noise generated at the proposed amphitheater. This issue was studied in section 3.12(a) the Draft MND, which concluded that use of the amphitheater would not generate unacceptable noise levels, as established by the City of Sierra Madre noise ordinance.
- R24-6 The Commenter references the comment letter from Carolyn and Russ Simon. This comment is acknowledged. The City's responses to the Simon letter are provided in R11 of this document.
- R24-7 The comment is in reference to the Commenter's disapproval of the operations at Alverno High School. It does not concern the adequacy of the Draft MND. No response can be provided.



## *2. Response to Comments*

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## 2. Response to Comments

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LETTER R25 - Carolyn Simon (1 page)

**From:** Carolyn Simon  
**Sent:** Thursday, April 14, 2011 2:43 PM  
**To:** Danny Castro; Danny Castro  
**Subject:** one LAST comment before the deadline...

I would like Alverno and the City of Sierra Madre to be reminded that removing the Villa from the Master Plan is considered "segmenting" the project and that this is not permitted under CEQA. Also note the contradiction that while *so much* of the NMD focused on the Villa ie; its history, concerns and data relating to new uses around it, construction, etc, yet Alverno wants to segregate it from the plan. ***Is the Villa for sale? Are there new and separate uses planned for this building? Otherwise what is their reason for the separation other than reducing the cumulative effect?*** Those are the last questions I wanted to raise before the closing of the comment period. Thank you...Carolyn Simon

R25-1



## *2. Response to Comments*

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## 2. Response to Comments

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### **R25. Response to Comments from Carolyn Simon, dated April 14, 2011.**

- R25-1 The Commenter is concerned about segmentation of the project. The City understands the consequences of project segmentation, which is prohibited by CEQA. The City has thoroughly reviewed this issue. The proposed project has not been segmented. Please refer to General Response #1 on page 2-3 of this document for a full explanation.



## *2. Response to Comments*

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## 2. Response to Comments

LETTER R26 - Roman Padilla (1 page)

-----Original Message-----

From: Roman Padilla

Sent: Thursday, April 14, 2011 3:48 PM

To: Danny Castro; Danny Castro

Cc:

Subject: Alverno's "Intention to Adopt A Mitigated Negative Declaration"

MR Danny Castro

Director

Development Services

City of Sierra Madre

232 W. Sierra Madre Blvd.

Sierra Madre, California 91024

Dear Mr. Castro,

I am concerned with Alverno's "Intention to Adopt a Mitigated Negative Declaration" for the Master Plan. It does not adequately address all of the current and potential future uses at the campus, especially in determining the impacts relative to noise and traffic.

R26-1

For example, it did not assess the use of an outdoor sports field for games with spectators or multiple, simultaneous events. Additionally, I am concerned with the significant footprint that a full soccer field will have on a relatively small campus. That is to say, soccer fields are usually located within parks and campuses with a substantially larger, overall acreage than Alverno, where there is typically a significant buffer zone between the field and residential housing.

R26-2

All of the uses on campus need to be included in the Master Plan, where events at the Villa should not be considered separately.

R26-3

Thank you for your time and consideration.

Sincerely,

Roman Padilla

EL RANCHO UNIFIED SCHOOL DISTRICT E-MAIL DISCLAIMER: This communication and any documents, files, or previous e-mail messages attached to it constitute an electronic communication



## *2. Response to Comments*

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## 2. Response to Comments

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### R26. Response to Comments from Roman Padilla, dated April 15, 2011.

R26-1 The Commenter is concerned that the project does not address current and potential future uses at the campus. This issue is addressed in General Response #1 on page 2-3 of this document.

The Commenter is also concerned about the adequacy of the Draft MND, specifically impacts related to noise and traffic. Section 3.12, *Noise*, and Section 3.16, *Transportation/Traffic*, fully analyze the environmental effects the proposed project would have on the noise environment and on levels of service at nearby roadways and intersections. Mitigation measures have been recommended to reduce impacts to levels below established thresholds. The Commenter does not provide additional information on why he believes the analysis is insufficient. Therefore, no further response can be provided.

R26-2 The Commenter is concerned about multiple simultaneous events scheduled on the Alverno campus. Alverno High School has indicated that it will not schedule concurrent capacity-level events, e.g., graduation in the multipurpose building, wedding in the Villa, and soccer game at the renovated field. Therefore, an analysis of concurrent capacity-level events would be speculative and unnecessary. CEQA does not require the lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters, as long as a good faith effort at full disclosure is made in the environmental document.

Impacts associated with the potential concurrent school use of the proposed facilities, however, were analyzed and/or were taken into consideration during preparation of the Draft MND. Section 3.12(a) analyzed noise impacts associated with the concurrent use of the multipurpose field, tennis court, and amphitheater. The traffic analysis also took into consideration traffic impacts associated with these concurrent uses. Traffic impacts would not be significant, however. The approach for the traffic analysis was to evaluate the impacts of the school expansion project during the time of day when the school would generate the heaviest volumes of traffic flow, i.e., during the morning peak period when students and staff would be commuting to the school site. This is the standard methodology for a traffic analysis for a school because it is assumed that if the street network's capacity can accommodate the traffic volumes during the times of peak traffic flow, then it could certainly accommodate the traffic during times when the traffic volumes are lower. It is acknowledged that concurrent uses of the proposed facilities would generate traffic, as participants and spectators would be driving to and from the school site for events. The traffic volumes generated by these events would, however, be substantially lower than the traffic that would be generated on a daily basis by the regular school activities.

R26-3 The comment requests that events in the Villa not be considered separately from the proposed master plan. General Response #1 of this document substantiates why uses of the Villa are not analyzed as a part of the proposed project.



## *2. Response to Comments*

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### 3. *Revisions to the Circulated Draft MND*

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#### 3.1 INTRODUCTION

This section contains revisions to the MND based upon (1) additional or revised information required to prepare a response to a specific comment; (2) applicable updated information that was not available at the time of Draft MND publication; and/or (3) typographical errors. This section also includes revised mitigation measures to fully respond to commenter concerns as well as provide additional clarification to mitigation requirements included in the Draft MND. The provision of these revised and additional mitigation measures does not alter any impact significance conclusions as disclosed in the Draft MND. Changes made to the Draft MND are identified here in ~~strikeout text~~ to indicate deletions and in underlined text to signify additions.

The changes made under this section and throughout this document do not constitute significant new information that would require recirculation of the Draft MND for further public comment under CEQA Guidelines Section 15088.5, nor would it necessitate the preparation of an Environmental Impact Report. None of the changes and clarifications indicates that the project will result in a new environmental impact not previously disclosed in the circulated Draft MND. Additionally, none of this material indicates that there would be a substantial increase in the severity of a previously identified environmental impact that cannot be mitigated, or that there would be any of the other circumstances requiring recirculation described in Section 15088.5.



#### 3.2 DRAFT MND REVISIONS IN RESPONSE TO WRITTEN COMMENTS

The following text has been revised in response to comments received on the Draft MND.

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**Page 4, Section 1.5, *City Action Requested*. The following text has been revised as follows to provide clarification on the future CUP, in response to Comment R11-2 from Russ and Carolyn Simon.**

---

The ~~City and the Alverno High School Board of Trustees is considering~~ are also considering a separate project that would allow the permanent operation of the existing for-profit uses of the Villa, including weddings and other special events. This action is separate from the proposed project and would be subject to its own environmental review.

---

**Page 39, Section 3.4(a), *Biological Resources*. The following mitigation measure is modified in response to Comment A3-2, from Alverno High School**

---

2. Should the preconstruction survey identify the presence of any bat species, the project applicant shall provide bat houses constructed onsite or offsite, to the extent practical and feasible, in locations and settings where bats would be likely to use them. If bat houses are required, the project applicant shall consult with the zoological consultant regarding the design, materials, locations, and settings of the bat houses.

### *3. Revisions to the Circulated Draft MND*

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**Page 39, Section 3.4(e), Biological Resources. The following mitigation measure is modified in response to Comment A3-3, from Alverno High School**

---

4. Before issuance of a building permit for the Master Alverno High School Plan by the City of Sierra Madre, Sycamore Tree No. 336 shall be replaced by planting one 24-inch boxed western sycamore tree, and Coast Live Oak Tree No. 347 shall be replaced by planting fourteen 24-inch boxed coast live oak trees. Should it be determined that planting all fifteen trees on the campus is technically infeasible, to be confirmed by a qualified arborist and subject to approval by the Sierra Madre Tree Advisory Committee, this measure can be substituted with an equivalent or more effective measure, including but not limited to offsite replacement of these trees or payment of an in-lieu fee to the City, in accordance with the City of Sierra Madre's Tree Preservation and Protection Ordinance.
- 

**Page 62, Section 3.10(b), Land Use and Planning. The following text has been revised as follows to provide clarification on the future CUP, in response to Comment R11-2 from Russ and Carolyn Simon.**

---

**No Impact.** The existing zoning on the project site is Institutional, and the existing General Plan land use designation is also Institutional. The Institutional Zone permits the operation of schools, including private schools, with a conditional use permit (CUP). The City granted the original CUP for the school in 1959. The proposed project includes a request for City approval of a CUP amendment to allow for development of the proposed master plan. The project would not involve changing the zoning or General Plan land use designation on the site. Upon City approval of the proposed CUP Amendment, the proposed project would comply with zoning on the project site. ~~The City and the Alverno High School Board of Trustees are negotiating a second~~ is considering a separate CUP application amendment, separately from the proposed project, to permit the permanent continuation of the existing ~~occasional~~ uses of the Villa for special events and weddings. This action would be subject to its own environmental review and separate from this report. The proposed project would not conflict with zoning or General Plan land use designation on the site, and no impact would occur. No mitigation is needed.

---

**Page 85, Section 3.12(a), Noise. The following mitigation measure has been revised as follows to provide clarification on the design and operation of the proposed Multipurpose Building in order to minimize interior-to-exterior noise transmission, in response to Comment R11-12 from Russ and Carolyn Simon.**

---

14. Prior to issuance of building permits, the project applicant shall demonstrate that operation of the multipurpose building with amplified sound shall be in compliance with the City of Pasadena's noise limits as specified in Municipal Code Section 9.36.040 and Sierra Madre Municipal Code Sections 9.32.030 and 9.32.060. Compliance will be demonstrated through an acoustical study that may include, but is not limited to, noise attenuation measures within wall and window building assemblies, location of air ventilation ducts, and location of entry doors. The building shall be constructed so that windows and doors can remain closed during school functions to prevent interior-exterior transmission of noise. These noise attenuation measures shall be shown on all building plans and verified during construction. The school administrator shall ensure that doors and windows remain closed during school functions.
-



### 3. Revisions to the Circulated Draft MND

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**Page 96, Section 3.14(b), Public Services. The following mitigation measure is modified in response to Comment A3-4, from Alverno High School**

---

16. Alverno High School shall retain ~~a qualified officer for campus security and/or~~ the Sierra Madre Police Department for traffic control assistance when special events in the multipurpose building are expected to be at or near full capacity, generate loud music at the multipurpose building, include visitors, and/or end after 9:00 PM, such as but not limited to school dances, school and/or City-sponsored receptions, and graduations. Alverno High School shall be responsible for the cost of the officer(s) time.
- 

**Page 115, Section 3.16(a), Transportation and Traffic. The following mitigation measure is modified in response to Comment A3-6, from Alverno High School**

---

17. Before issuance of the first building permit for the project, the project applicant shall submit evidence to the Director of Development Services of the City of Sierra Madre that ~~one of the following actions has been taken:~~
- ~~a. The school's operating procedures have been modified so that the gate at the existing auxiliary driveway from Michillinda Avenue into the Michillinda parking lot shall be opened during peak arrival and departure times.~~
  - ~~b. P~~ the project construction drawings have been modified to show an additional driveway, for a total of two driveways, from Michillinda Avenue into the Michillinda parking lot.



### *3. Revisions to the Circulated Draft MND*

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*Appendix A. Mitigation Monitoring and Reporting  
Program*



## *Appendices*

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**MITIGATION  
MONITORING  
AND REPORTING  
PROGRAM  
FOR:**

**ALVERNO HIGH  
SCHOOL MASTER  
PLAN**



*prepared for:*

**CITY OF SIERRA  
MADRE**

Contact:  
Danny Castro  
Director of Development  
Services

*prepared by:*

**THE PLANNING  
CENTER**

Contact:  
Barbara Heyman  
Director, School  
Facilities Planning

**MAY 2011**

**MITIGATION  
MONITORING AND  
REPORTING  
PROGRAM  
FOR:**

**ALVERNO HIGH  
SCHOOL MASTER  
PLAN**



*prepared for:*

**CITY OF SIERRA  
MADRE**

232 West Sierra Madre Boulevard  
Sierra Madre, CA 91024  
(626) 355 7135 ext. 401

Contact:  
Danny Castro  
Director of Development  
Services

*prepared by:*

**THE PLANNING  
CENTER**

9841 Airport Boulevard  
Los Angeles, CA 90045  
Tel: 310.670.9221 • Fax: 310.670.9512  
E-mail: [bheyman@planningcenter.com](mailto:bheyman@planningcenter.com)  
Website: [www.planningcenter.com](http://www.planningcenter.com)

Contact:  
Barbara Heyman  
Director, School  
Facilities Planning

**COSM-01.0E**

**MAY 2011**

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## APPENDICES

- A Mitigation Measure Monitoring Compliance Form

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# 1. Introduction

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## 1.1 PURPOSE OF MITIGATION MONITORING AND REPORTING PROGRAM

The California Environmental Quality Act (CEQA) requires that agencies certifying an Environmental Impact Report (EIR) or adopting a Mitigated Negative Declaration (MND) take affirmative steps to determine that approved mitigation measures are implemented subsequent to project approval. This Mitigation Monitoring and Reporting Program (MMRP) has been developed as a tool to monitor mitigation measures and conditions of approval outlined in the Alverno High School Master Plan Final MND.

Effective January 1, 1989, CEQA was amended to add Section 21081.6, implementing Assembly Bill (AB) 3180. As part of CEQA (state-mandated) environmental review procedures, Section 21081.6 requires a public agency to adopt a monitoring and reporting program for assessing and ensuring the efficacy of any mitigation measures applied to a proposed project. Specifically, the lead or responsible agency must adopt a reporting or monitoring program for mitigation measures incorporated into a project or imposed as conditions of approval. The program must be designed to ensure compliance during project implementation. As stated in Public Resources Code, Section 21081.6(a)(1):

The public agency shall adopt a reporting or monitoring *program for the changes made to the project or conditions of project approval*, adopted in order to mitigate or avoid significant effects on the environment. The reporting or monitoring program shall be designed to ensure compliance during project implementation. For those changes which have been required or incorporated into the project at the request of a responsible agency or a public agency having jurisdiction by law over natural resources affected by the project, that agency shall, if so requested by the lead agency or a responsible agency, prepare and submit a proposed reporting or monitoring program.



AB 3180 provides general guidelines for implementing the MMRP. Specific reporting and/or monitoring requirements, to be enforced during project implementation, shall be defined prior to final approval of the proposal by the responsible decision maker(s). In response to established CEQA requirements and those of AB 3180 (Public Resources Code Section 21000 et seq.), the proposed MMRP for the Alverno High School Master Plan project shall be submitted for adoption by the decision makers prior to completion of the environmental review process.

The overall MMRP management, review of all monitoring reports, enforcement actions, and document disposition are the responsibility of the City of Sierra Madre, the Lead Agency under CEQA for the project. The Lead Agency is required to ensure that the mitigation measures identified in the Alverno High School Master Plan project, as adopted, are adequately implemented. However, because of the nature of some of the mitigation measures identified in the Final MND, the City may delegate duties and responsibilities to environmental monitors or other professionals, as warranted.

The City of Sierra Madre will use the MMRP, categorized in matrix format as shown in Table 2-1, to ensure compliance with mitigation measures associated with development proposed under the Alverno High School Master Plan project. Under each identified resource, the adverse impact, its corresponding mitigation measures, and the implementation and monitoring requirements are discussed. The implementation and monitoring requirements that have been set forth in this MMRP are as follows:

## *1. Introduction*

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- Party Responsible for Implementation of Mitigation
- Implementation Timing
- Party Responsible for Monitoring Activity

Mitigation is required to address significant or potentially significant impacts to the following resources:

- Biological Resources
- Cultural Resources
- Hazards and Hazardous Materials
- Noise

A sample mitigation monitoring compliance form is provided in Appendix A of this document. For detailed information regarding environmental resource impact methodology and analysis, please refer to the Final MND.

## 2. Mitigation Monitoring and Reporting Program

**Table 2-1  
Mitigation Monitoring and Reporting Requirements**

| <i>Mitigation Measure</i>   | <i>Responsibility for Implementation</i>              | <i>Timing</i>  | <i>Responsibility for Monitoring</i> | <i>Monitor<br/>(Signature Required)<br/>(Date of Compliance)</i> |
|---|---|--|--------------------------------------|--|
| <b>3.4 BIOLOGICAL RESOURCES</b>   |   |  |                                      |  |
| 1<br>Before the start of tree removals, the project applicant shall retain a qualified zoological consultant to conduct a pre-construction survey for Hoary bat, or other bat species, in the trees to be removed. Trees shall be surveyed on a minimum of two days. Survey methods may involve acoustic detection, mistnetting, or other methods, at the discretion of the consultant. The consultant shall record the number and species of any bats observed, and which trees the bats are observed in. The survey shall be submitted to the City of Sierra Madre for approval prior to any tree removals. | Project Applicant and Qualified Zoological Consultant | Before the start of tree removals                        | City of Sierra Madre                 |  |
| 2<br>Should the preconstruction survey identify the presence of any bat species, the project applicant shall provide bat houses constructed onsite or offsite, to the extent practical and feasible, in locations and settings where bats would be likely to use them. If bat houses are required, the project applicant shall consult with the zoological consultant regarding the design, materials, locations, and settings of the bat houses.   | Project Applicant and Qualified Zoological Consultant | Before the start of tree removals                        | City of Sierra Madre                 |  |
| 3<br>Tree removals must not occur during cold-weather periods when bats could be hibernating and/or in torpor. This period shall be determined by the qualified zoological consultant.  | Project Applicant and Qualified Zoological Consultant | Before and during tree removals                          | City of Sierra Madre                 |  |
| 4<br>Before issuance of a building permit for the Master Alverno High School Plan by the City of Sierra Madre, Sycamore Tree No. 336 shall be replaced by planting one 24-inch boxed western sycamore tree, and Coast Live Oak Tree No. 347 shall be replaced by planting   | Project Applicant and Project Landscape Contractor    | Before issuance of a building permit for the Master Plan | City of Sierra Madre                 |  |

## 2. Mitigation Monitoring and Reporting Program

**Table 2-1  
Mitigation Monitoring and Reporting Requirements**

| <b>Mitigation Measure</b>  | <b>Responsibility for Implementation</b>                          | <b>Timing</b>   | <b>Responsibility for Monitoring</b> | <b>Monitor<br/>(Signature Required)<br/>(Date of Compliance)</b> |
|--|---|---|--------------------------------------|--|
| fourteen 24-inch boxed coast live oak trees. Should it be determined that planting all fifteen trees on the campus is technically infeasible, to be confirmed by a qualified arborist and subject to approval by the Sierra Madre Tree Advisory Committee, this measure can be substituted with an equivalent or more effective measure, including but not limited to offsite replacement of these trees or payment of an in-lieu fee to the City, in accordance with the City of Sierra Madre's Tree Preservation and Protection Ordinance. |   |   |                                      |  |
| <b>3.5 CULTURAL RESOURCES</b>  |   |   |                                      |  |
| 5 Preserve the entry gates located on Michillinda Avenue and Wilson Avenue. The entry gate on Michillinda Avenue shall be preserved as a pedestrian gate and incorporated into the landscape entry. The entry gate on Wilson Avenue shall be preserved as an entry gate for the garage, faculty lounge building, and art room.   | Project Applicant, Project Architect, and Construction Contractor | Before and during project construction                                | City of Sierra Madre                 |  |
| 6 Additional mature trees shall be added along the southeastern corner of the proposed multipurpose building to further screen the building from the Villa's viewshed. The trees should fit into the existing landscaping character of the high school campus and should be of sufficient height to screen the multipurpose building from view from the western façade of the Villa.   | Project Applicant, Project Architect, and Construction Contractor | During project construction   | City of Sierra Madre                 |  |
| 7 The bench/wall feature shall be measured and documented in accordance to Historic American Building Survey standards prior to the removal of the eastern portion of the bench/wall feature to accommodate the setback requirements of the proposed multipurpose field.   | Project Applicant and Historic Resources Specialist               | Prior to the removal of the eastern portion of the bench/wall feature | City of Sierra Madre                 |  |
| 8 A historical resources specialist shall be retained and be present during the demolition of the eastern portion of the bench/wall feature to ensure that only this portion of the feature is removed.  | Project Applicant and Historic Resources Specialist               | During demolition of the eastern portion of the bench/wall feature    | City of Sierra Madre                 |  |

## 2. Mitigation Monitoring and Reporting Program

**Table 2-1  
Mitigation Monitoring and Reporting Requirements**

| <i><b>Mitigation Measure</b></i>   | <i><b>Responsibility for Implementation</b></i>  | <i><b>Timing</b></i>   | <i><b>Responsibility for Monitoring</b></i> | <i><b>Monitor<br/>(Signature Required)<br/>(Date of Compliance)</b></i> |
|--|--|--|---|---|
| 9 The proposed tennis courts shall be screened from the Villa with trees that fit into the existing landscaping character of the high school and should be of sufficient height to screen the tennis courts from view from the southern façade of the Villa.   | Project Applicant, Historic Resources Specialist, Project Architect, and Construction Contractor | Before completion of proposed tennis courts and during planting of the new trees | City of Sierra Madre                        |   |
| 10 The Board of Trustees shall retain a qualified archaeologist to periodically monitor ground-disturbing activities. The archaeologist shall have the authority to halt any project-related activities. If archaeological resources are uncovered, they must be recovered, analyzed in accordance with CEQA guidelines, and curated with the facilities at the Natural History Museum of Los Angeles County or another accredited and permanent scientific institution, for the benefit of current and future generations.    | Project Applicant, Qualified Archaeologist, and Construction Contractor                          | During ground-disturbing activities  | City of Sierra Madre                        |   |
| 11 The Board of Trustees shall retain a qualified paleontologist to periodically monitor ground-disturbing activities. The paleontologist shall have the authority to halt any project-related activities. If paleontological resources are uncovered, they must be recovered, analyzed in accordance with CEQA guidelines, and curated with the facilities at the Natural History Museum of Los Angeles County or another accredited and permanent scientific institution, for the benefit of current and future generations. | Project Applicant, Qualified Paleontologist, and Construction Contractor                         | During ground-disturbing activities  | City of Sierra Madre                        |   |
| <b>3.8 HAZARDS AND HAZARDOUS MATERIALS</b>   |  |  |   |   |
| 12 The multipurpose building shall be fully sprinklered per the appropriate National Fire Protection Association sprinkler standard for school buildings.  | Project Applicant, Project Architect, and Construction Contractor                                | During project design and project construction                                   | City of Sierra Madre                        |   |
| 13 The multipurpose building shall be designed and constructed in conformance with Chapter 7A of the 2007 California Building Code, Materials and Methods for Exterior Wildfire Exposure. Chapter 7A includes  | Project Applicant, Project Architect, and Construction Contractor                                | During project design and project construction                                   | City of Sierra Madre                        |   |

## 2. Mitigation Monitoring and Reporting Program

**Table 2-1  
Mitigation Monitoring and Reporting Requirements**

| <b>Mitigation Measure</b>  | <b>Responsibility for Implementation</b>                                      | <b>Timing</b>  | <b>Responsibility for Monitoring</b> | <b>Monitor<br/>(Signature Required)<br/>(Date of Compliance)</b> |
|--|---|--|--------------------------------------|--|
| requirements pertaining to roofing, roof and attic vents, eaves, fire-resistive walls, fire-resistant exterior windows and glazing, exterior doors, decking, protection of underfloor and appendages, and accessory buildings.   |   |  |                                      |  |
| <b>3.12 NOISE</b>  |   |  |                                      |  |
| 14 Prior to issuance of building permits, the project applicant shall demonstrate that operation of the multipurpose building with amplified sound shall be in compliance with the City of Pasadena's noise limits as specified in Municipal Code Section 9.36.040 and Sierra Madre Municipal Code Sections 9.32.030 and 9.32.060. Compliance will be demonstrated through an acoustical study that may include, but is not limited to, noise attenuation measures within wall and window building assemblies, location of air ventilation ducts, and location of entry doors. The building shall be constructed so that windows and doors can remain closed during school functions to prevent interior-exterior transmission of noise. These noise attenuation measures shall be shown on all building plans and verified during construction. The school administrator shall ensure that doors and windows remain closed during school functions. | Project Applicant and Construction Contractor                                 | During project construction  | City of Sierra Madre                 |  |
| 15 The construction contractor shall not operate vibration-intensive construction equipment/activities, such as jackhammers, large bulldozers, scrapers, excavators, or vibratory compactors, within 25 feet of the Villa de Sol d'Oro unless vibration levels from such equipment do not exceed 0.12 inches per second at the structures.   | Project Applicant, Historic Resources Specialist, and Construction Contractor | During project construction  | City of Sierra Madre                 |  |
| <b>3.14 PUBLIC SERVICES (Police Protection)</b>  |   |  |                                      |  |
| 16 Alverno High School shall retain the Sierra Madre Police Department for traffic control assistance when special events in the multipurpose building are expected to be at or near full capacity, generate loud music at the   | Project Applicant   | Before and during events in multipurpose building expected to have capacity attendance | City of Sierra Madre                 |  |

## *2. Mitigation Monitoring and Reporting Program*

**Table 2-1  
Mitigation Monitoring and Reporting Requirements**

| <i>Mitigation Measure</i>  | <i>Responsibility for Implementation</i>   | <i>Timing</i>   | <i>Responsibility for Monitoring</i> | <i>Monitor<br/>(Signature Required)<br/>(Date of Compliance)</i> |
|--|--|---|--------------------------------------|--|
| <p>multipurpose building, include visitors, and/or end after 9:00 PM, such as but not limited to school dances, school and/or City-sponsored receptions, and graduations. Alverno High School shall be responsible for the cost of the officer(s) time.</p>  |  |   |                                      |  |
| <b>3.16 TRANSPORTATION AND TRAFFIC</b>   |  |   |                                      |  |
| <p>17 Before issuance of the first building permit for the project, the project applicant shall submit evidence to the Director of Development Services of the City of Sierra Madre that the project construction drawings have been modified to show an additional driveway, for a total of two driveways, from Michillinda Avenue into the Michillinda parking lot.</p>  | Project Applicant                          | Before issuance of the first building permit for the project  | City of Sierra Madre                 |  |
| <p>18 At least four months before issuance of a building permit for either the multipurpose building or the soccer/softball field, the school shall request approval from the City of Sierra Madre for restriping the westbound approach of the intersection of Highland Avenue at Michillinda Avenue to provide a right-turn lane and a left-turn lane. Upon approval by the City, the restriping, curb painting, and maintenance on a regular basis shall be financed by the school.</p> | Project Applicant and City of Sierra Madre | At least four months before issuance of a building permit for either the multipurpose building or the soccer/softball field | City of Sierra Madre                 |  |

## *2. Mitigation Monitoring and Reporting Program*

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*Appendix A Mitigation Measure Monitoring Compliance  
Form*



## *Appendices*

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**Alverno High School Master Plan**

**Mitigation Measure Monitoring Compliance Form**

Reporting Period:  Pre-Construction  Construction  Post-Construction

Reporting Date: \_\_\_\_\_

Mitigation Measure:

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Has the mitigation measure been implemented?

Yes  No

Notes:

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Is further action or monitoring required:

Yes  No

If yes, describe:

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Is consultation with outside agencies required?

Yes  No

Has consultation with outside agencies been completed?

Yes  No

Monitoring verified by: \_\_\_\_\_

Date: \_\_\_\_\_