

May 7, 2016

Michele Bush
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RE: Comments on Case Number R2013-03046-(4) 18002 Colima Road Project Initial Study (I/S) and Traffic Impact Study (TIS)

Rowland Heights Community Coordinating Council (RHCCC), has reviewed the above referenced project and offers the following comments.

Aesthetics:

1(d) Substantially degrade the existing visual character or quality of the site and its surroundings because of height, bulk, pattern, scale, character, or other features?

RHCCC does not agree with the I/S assessment of "less than significant impact" and further highlights the I/S acknowledges that a negative impact is possible in the associated narrative which states "the **height/bulk of the proposed project could negatively impact the surrounding area** if the project is not integrated well with the surrounding neighborhood."

RHCCC contends that the project will have a significant impact that either requires mitigation or require an EIR to be completed.

RHCCC further contends that the project is not consistent with the surrounding uses and visual character of the area. The current site, while operating as a commercial plant nursery, is a low impact use and provides a visual character more on the lines of a park than a "commercial" operation. The neighboring adjacent uses are 100% residential (single family and multi-family) and as such the development of a two-story 45' high office building is not consistent with the surrounding area. The touted commercial corridor is located in a neighboring city, are single story units with significant setbacks.

1(e) "Create a new source of substantial shadows, light, or glare which would adversely affect day or nighttime views in the area?"

RHCCC highlights that the I/S itself acknowledges that "The proposed project would be located downhill from a number of single-family residences. The proposed office building **might be visible** from those properties."

RHCCC contends that it is very likely that a two-story 45' high office building would negatively impact significant day and nighttime views of the residents living above the development. Additionally, in the area, it is becoming a common practice to locate Wireless Telecommunication Facilities on top of buildings and thus would add even more height to the facility and further negatively impact residential city and mountain views.

Geology and Soils:

7(a)(iii) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: Seismic-related ground failure, including liquefaction and lateral spreading?

RHCCC highlights the associated narrative of the I/S that states "The ***project site is located within a liquefaction zone*** which has the potential for permanent ground displacements such that ***mitigation would be required.***" Yet this item has been marked as less than significant impact; therefore RHCCC suggests that at a minimum the "Less than Significant Impact with Mitigation Incorporated" be selected.

Land Use and Planning:

11(b) Would the project be inconsistent with the applicable County plans for the subject property including, but not limited to, the General Plan, specific plans, local coastal plans, area plans, and community/neighborhood plans?

(c) Would the project be inconsistent with County zoning ordinance as applicable to the subject property?

RHCCC's does not agree with the I/S assessment that there is no impact. Rowland Heights Community Plan is a decision-making tool to guide public and private investment in the community. County's role is to help to assure that private development conforms to the goals and policies of the plan. The project proposal for a office development is not allowed under U1 designation.

The I/S narrative states "The project site is currently a commercial use" in attempt to equate the existing and proposed use. RHCCC does not agree with this comparison and contends there is a ***significant difference*** between a 'commercial plant nursery' (an A-1 Light Agricultural zoned use) in a U1-Urban 1 (1.1 to 3.2 du/ac) land use area and the proposed commercial two-story 45', 113 parking space office building' which would require both a zoning and land use change to be in conformance. ***The project is inconsistent with Rowland Heights Community Plan and Community Design Standards and as such is a significant impact and should be recognized as such in the I/S.***

Public Services

15(a) Would the project create capacity or service level problems.... (parks)?

The I/S narrative states "No new park facilities will be created." RHCCC brings to your attention that LA County just completed a Parks Needs Assessment Study which identified this specific area of Rowland Heights as a high park need area. **The Community, at a Park Needs Assessment Workshop, held on January 20, 2016 voted to prioritize a top 10 list of park projects which included a new park for this northern portion of Rowland Heights.** The prioritized list was provided to County for incorporation into the Countywide Plan that will be considered for adoption by LA County Board of Supervisors in June 2016. This parcel was provided as a potential location as part of that study and the Community's submittal. **The parcel is a suitable location for a small park that would be within walking distance from adjacent multi-family residences and would service a disadvantaged population.** As a reminder, the current plant nursery site low impact use resembles a park space today and a park would be consistent with current land use.

Transportation/Traffic

17(a)(b)(d) - Circulation, Congestion, and Hazards.

RHCCC's does not agree with both the I/S assessment that there is 'a less than significant impact' and the Traffic Impact Study (TIS), dated November 3, 2014, being approved by Public Works without mitigation.

RHCCC does not agree with the findings of the TIS and further states that the TIS does not accurately reflect the impacts of the project. The TIS evaluated general office use only instead of a general office and medical office mix and factored trip generation on a smaller building footprint than the currently proposed 35,413 sf.

Regional Planning's May 11, 2016 staff report, states the current development plans total building square footage of 35,414 sf. broken down by planned use as 19,505 sf. of general office space and 15,710 sf. of medical office space. as project description. As such the Trip Generation found in the Traffic Study does not accurately reflect the impacts of the project. At a minimum the TIS finding that the project does not meet the minimum Peak Trips required by LA County Congestion Management Plan (CMP) to require mitigation is incorrect. Using generally accepted Trip Generation factors the project would generate a total of 741 (general office=215; medical office=567) net daily trips not the 331 net daily trips noted in the study which only considered office space use. Additionally, the Peak PM Trips would be approximately 92 vs. the 46 noted in the TIS which exceeds the 50 Peak Trips threshold that would require mitigation consideration.

The TIS also assessed traffic impacts at a total of 8 intersections which were analyzed for existing (2014) and future (2015) traffic conditions. However,

ingress and egress for the proposed project will require right turns only with no left turn options the TIS should have considered both the impacts of U-turns and cut-through traffic of vehicles seeking to avoid arterial streets by utilizing neighborhood streets. As such, the TIS should have considered U-turn impacts as well as the following four intersections:

1. Larkvane Road at Colima Road (cut-through neighborhood and/U-turns to return westbound)
2. Larkvane Road at Crosshaven Drive (cut-through neighborhood)
3. Crosshaven Drive at Fullerton Road
4. Walnut Hall Road at Colima (U-turns at this signal light will be necessary for westbound traffic to access project. U-turns are not allowed at Stoner Creek Road)
5. Fullerton Road at Colima (U-turns will be made at this signal light to return to westbound route of travel)

Thank you for the opportunity to review the Initial Study and Traffic Impact Study and provide comments. If you have any questions, or need further clarification on the items discussed above please contact me via email at debbie.rhccc@gmail.com.

Sincerely,

Debbie Enos
1st Vice President, RHCCC