



CITY OF
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CALIFORNIA

City Manager's Office

Richard T. Hale, Jr., Mayor
Bradbury City Hall
600 Winston Avenue
Bradbury, CA 91008

RE: City of Monrovia Concerns Regarding Lemon Reservoir Retirement Project (1271 Lemon Avenue, Bradbury, CA 91016)

Mayor Hale,

The Monrovia City Council offers our concerns related to the Lemon Reservoir Project (“Project”) as proposed by California American Water (“CalAm”). The City of Monrovia was only recently made aware of the Project in late October 2024. The Project proposes to demolish a large concrete reservoir structure that is no longer in use and haul away the debris. The Project also proposes to haul in over 12,000 cubic yards of soil to “flatten” the site. Finally, the Project proposes a zoning amendment to change the site from “Open Space Zoning” to “A-1 Agriculture Residential Estate.” The City of Bradbury adopted findings of Categorical Exemptions in their entirety.

The City of Monrovia expresses our deeply-held concerns as follows:

- 1. Use of Categorical Exemptions.** Although the proposed exemptions might be appropriate for various components of the project, CEQA requires that a project be evaluated as a whole. Further, Section 15300.2(c) of the CEQA Guidelines state that “*a categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.*”

The demolition, removal and backfill of the reservoir constitute “unusual circumstances” especially in the context of the actions taken to prepare the site for the eventual development of a single family dwelling. Demolition of the existing reservoir will require the reservoir’s concrete structure to be broken up and removed from the site as well as the approximately 12,000 cubic yards of fill that will need to be imported to the project site. This is *unusual* for an exempt residential project of any size.

Additionally, the document states the Project does not include the development of residential uses (*Lemon Reservoir Retirement Project Categorical Exemption Findings, pg 27*). However, it should be assumed the property will be developed pursuant to the requirements of the proposed designation, especially because the document states the General Plan Amendment and Zone Change would “*facilitate*



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the sale and development of the proposed parcel.” Therefore it is appropriate for the redesignation and rezoning of the property to be analyzed on a programmatic level.

2. **Traffic Impacts.** The City of Monrovia did not identify any detailed traffic plan, staging plan or street sweeping schedule for the Project which will use roadways owned and maintained by the City of Monrovia. According to the staff report (page 3), “Scheduling of the truck trips has been done in coordination with the City Engineer, the *City of Monrovia*, and the Monrovia Unified School District.” The City of Monrovia is unaware of any actual coordination for traffic control/management, and we understand traffic control/management may occur after a Project contractor has been selected. We request the City of Bradbury must urgently consider feedback from the Monrovia Unified School District (“MUSD”) and City of Monrovia to formalize a traffic plan, staging plan, street sweeping schedule and schedule for truck hauling. This plan should also be shared and communicated with residents in the adjacent area.
3. **Air Quality Impacts.** The amount of air pollution caused by this project is significant and includes both dust from the removal of concrete as well as diesel/gasoline particulate matter from the significant level of emissions required for the Project. These pose significant and serious health hazards that have been deemed “categorically exempt” from an environmental review. Dust from demolition will likely contain harmful substances as silica, asbestos, lead and other toxins. Extended exposure to the dust will directly affect residents adjacent to the Project site. In addition, particulate matter which is toxic air contaminant will be released by the heavy duty equipment and poses additional health risks. Section 3 (page 27) reads “*The proposed Project would not conflict with the implementation of any regulations set forth by the SCAQMD or violate any air quality standard; or contribute substantially to an existing project’s air quality violation.*” This summary is insufficient to determine whether there are, in fact, air quality impacts to surrounding properties.
4. **Communication.** The City of Monrovia is concerned about lack of communication with neighboring residents particularly those who reside in neighborhoods immediately surrounding the project. In the City of Monrovia’s experience, it is essential that projects adhere to best practices for regular community outreach. While the City of Bradbury may require only a 500’ notice to adjacent neighbors (there are approx. 8 homes within this radius), there are several dozen residences in the area which will all be affected by the dust, noise, pollution and construction traffic.

The City of Monrovia’s concerns can be remedied if the cities of Bradbury and Monrovia, along with our residents and CalAm partners, work together to address and mitigate these concerns. The City of Monrovia has requested CalAm consider project alternatives which would reduce the scope of demolition considerably. CalAm has indicated they are willing to consider project alternatives which would address and satisfy our



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concerns. We respectfully request our cities, along with CalAm, work together to minimize Project impacts to our communities.

In addition and at the very least, an Environmental Checklist (Initial Study) must be completed to determine the appropriate level of environmental review pursuant to CEQA. Of particular concern to the City would be an analysis of impacts to aesthetics, noise, air quality, land use and transportation. The City of Monrovia was not provided any previous communication related to the Project.

Sincerely,

Monrovia City Council

DRAFT



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October 15, 2024

Kevin Kearney, City Manager
Bradbury City Hall
600 Winston Avenue
Bradbury, CA 91008

RE: Lemon Reservoir Retirement Project Categorical Exemption Findings

Dear Kevin,

I write on behalf of the City of Monrovia related to the Lemon Reservoir Project (“Project”) as proposed by California American Water (“CalAm”). The City of Monrovia was only recently made aware of the Project and thus has not completed a comprehensive analysis of the *Lemon Reservoir Retirement Project Categorical Exemption Findings* in their entirety. The Project proposes to demolish a large concrete reservoir structure that is no longer in use and haul away the debris. The Project also proposes to haul in over 12,000 cubic yards of soil to “flatten” the site. Finally, the Project proposes a zoning amendment to change the site from “Open Space Zoning” to “A-1 Agriculture Residential Estate.”

The City of Monrovia expresses our concerns as follows:

- 1. Use of Categorical Exemptions.** Although the proposed exemptions might be appropriate for various components of the project, CEQA requires that a project be evaluated as a whole. Further, Section 15300.2(c) of the CEQA Guidelines state that “*a categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.*”

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Additionally, the document states the Project does not include the development of residential uses (*Lemon Reservoir Retirement Project Categorical Exemption Findings*, pg 27). However, it should be assumed the property will be developed pursuant to the requirements of the proposed designation, especially because the document states the General Plan Amendment and Zone Change would “*facilitate the sale and development of the proposed parcel.*” Therefore it is appropriate for the redesignation and rezoning of the property to be analyzed on a programmatic level.



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2. **Traffic Impacts.** The City of Monrovia did not identify any detailed traffic plan, staging plan or street sweeping schedule for the Project which will use roadways owned and maintained by the City of Monrovia. According to the staff report (page 3), “Scheduling of the truck trips has been done in coordination with the City Engineer, the *City of Monrovia*, and the Monrovia Unified School District.” The City of Monrovia is unaware of any actual coordination for traffic control/management, and we understand traffic control/management may occur after a Project contractor has been selected. We request the City of Bradbury must urgently consider feedback from the Monrovia Unified School District (“MUSD”) and City of Monrovia to formalize a traffic plan, staging plan, street sweeping schedule and schedule for truck hauling. This plan should also be shared and communicated with residents in the adjacent area.
3. **Air Quality Impacts.** The amount of air pollution caused by this project is significant and includes both dust from the removal of concrete as well as diesel/gasoline particulate matter from the significant level of emissions required for the Project. These pose significant and serious health hazards that have been deemed “categorically exempt” from an environmental review. Dust from demolition will likely contain harmful substances as silica, asbestos, lead and other toxins. Extended exposure to the dust will directly affect residents adjacent to the Project site. In addition, particulate matter which is toxic air contaminate will be released by the heavy duty equipment and poses additional health risks. Section 3 (page 27) reads “*The proposed Project would not conflict with the implementation of any regulations set forth by the SCAQMD or violate any air quality standard; or contribute substantially to an existing project’s air quality violation.*” This summary is insufficient to determine whether there are, in fact, air quality impacts to surrounding properties.
4. **Communication.** The City of Monrovia is concerned about lack of communication with neighboring residents particularly those who reside in neighborhoods immediately surrounding the project. In the City of Monrovia’s experience, it is essential that projects adhere to best practices for regular community outreach. Recently CalAm constructed a new water treatment facility in Monrovia (148 Jeffries, Monrovia, CA 91016) and did not perform such outreach. The new facility was constructed adjacent to residential neighborhoods and a school property and CalAm insufficiently noticed neighbors about the scope of the project, ongoing construction activities, and work progress. This led to significant complaints and concerns raised by residents. While the City of Bradbury may require only a 500’ notice to adjacent neighbors (there are approx. 8 homes within this radius), there are several dozen residences in the area which will all be affected by the dust, noise, pollution and construction traffic.

In conclusion, an Environmental Checklist (Initial Study) should be completed to determine the appropriate level of environmental review pursuant to CEQA. Of particular concern to the City would be an analysis of impacts to aesthetics, noise, air quality, land use and transportation.



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Sincerely,

A blue ink handwritten signature of Dylan Feik.

Dylan Feik
City Manager