# KB Home Orchard Street & Cypress Avenue Modified Project

Public Review Draft Initial Study/Mitigated Negative Declaration

September 2020

Prepared by

Kimley»Horn

Expect More. Experience Better.

# KB Home Orchard Street and Cypress Avenue Modified Project

## Public Review Draft Initial Study/ Mitigated Negative Declaration

September 2020


***Lead Agency:***

**City of El Monte**
City Hall West
11333 Valley Boulevard
El Monte, California 91731
Nancy Lee, Senior Planner
Nlee@elmonteca.gov
626.580.2096

***Consultant:***

**Kimley-Horn and Associates, Inc.**
765 The City Drive, Suite 200
Orange, California 92868
Rita Garcia, Project Manager
Rita.garcia@kimley-horn.com
714.786.6116

# Table of Contents

1.0 INTRODUCTION ..... 1
1.1 Statutory Authority and Requirements ..... 1
1.2 Summary of Findings ..... 2
1.3 Initial Study Public Review Process ..... 2
1.4 Incorporation by Reference ..... 3
1.5 Report Organization ..... 4
2.0 PROJECT DESCRIPTION ..... 7
2.1 Location ..... 7
2.2 Environmental Setting ..... 7
2.3 Background and History ..... 13
2.4 Project Characteristics ..... 13
2.5 Project Construction Activities and Phasing ..... 21
2.6 Agreements, Permits, and Approvals ..... 21
3.0 ENVIRONMENTAL CHECKLIST FORM ..... 23
3.1 Background ..... 23
3.2 Environmental Factors Potentially Affected ..... 24
3.3 Lead Agency Determination ..... 24
4.0 EVALUATION OF ENVIRONMENTAL IMPACTS ..... 25
4.1 Aesthetics ..... 26
4.2 Agricultural and Forestry Resources ..... 29
4.3 Air Quality ..... 32
4.4 Biological Resources ..... 50
4.5 Cultural Resources ..... 55
4.6 Energy ..... 57
4.7 Geology and Soils ..... 62
4.8 Greenhouse Gas Emissions ..... 67
4.9 Hazards and Hazardous Materials ..... 77
4.10 Hydrology and Water Quality ..... 91
4.11 Land Use and Planning ..... 100
4.12 Mineral Resources ..... 104
4.13 Noise ..... 105
4.14 Population and Housing ..... 122
4.15 Public Services ..... 124

4.16 Recreation ..... 127
4.17 Transportation ..... 128
4.18 Tribal Cultural Resources ..... 135
4.19 Utilities and Service Systems ..... 139
4.20 Wildfire ..... 145
4.21 Mandatory Findings of Significance ..... 147
5.0 References ..... 151

## Appendices:

Appendix A: Air Quality Assessment
Appendix B: Health Risk Assessment Modeling Results
Appendix C1: Biological Resources Due Diligence Assessment
Appendix C2: Tree Survey and Arborist Report
Appendix D1: Cultural Resources Due Diligence Assessment
Appendix D2: Assembly Bill 52 and Senate Bill 18 Communications
Appendix E: Geotechnical Investigation
Appendix F: Greenhouse Gas Emissions Assessment
Appendix G1: Phase I Environmental Site Assessment
Appendix G2: Phase II Environmental Site Assessment Memo
Appendix G3: Pre-Demolition Asbestos and Lead-Based Paint Survey
Appendix G4: Remedial Action Plan
Appendix G5: Third Party Review
Appendix G6: Stantec Response To Review
Appendix H1: Hydrology and LID Report
Appendix H2: Fire Flow Analysis
Appendix I: Noise Memorandum
Appendix J1: Trip Generation Comparison Analysis
Appendix J2: Comments on Trip Generation Comparison Analysis
Appendix J3: Due Diligence Traffic Analysis

## List of Exhibits

Exhibit 2-1: Regional Vicinity Map ..... 8
Exhibit 2-2: Local Vicinity Map ..... 9
Exhibit 2-3: Existing Land Use Designations and Zoning ..... 11
Exhibit 2-4: Conceptual Site Plan ..... 15
Exhibit 2-5: Conceptual Elevations ..... 17

## List of Tables

Table 2-1: Existing On-Site Land Uses ..... 10
Table 2-2: Existing Project Site Zoning ..... 12
Table 2-3: Surrounding Zoning ..... 13
Table 2-4: Townhome Plan Summary ..... 16
Table 4.3-1: South Coast Air Quality Management District Emissions Thresholds ..... 33
Table 4.3-2: Local Significance Thresholds (Construction/Operations) ..... 34
Table 4.3-3: Construction-Related Emissions ..... 37
Table 4.3-4: Operational Emissions ..... 38
Table 4.3-5: Equipment-Specific Grading Rates ..... 41
Table 4.3-6: Localized Significance of Construction Emissions ..... 42
Table 4.3-7: Localized Significance of Operational Emissions ..... 43
Table 4.4-1: On-Site Protected Trees ..... 53
Table 4.8-1: Construction-Related Greenhouse Gas Emissions ..... 68
Table 4.8-2: Project Greenhouse Gas Emissions ..... 69
Table 4.8-3: 2016-2040 RTP/SCS Consistency ..... 70
Table 4.8-4: Project Consistency With Applicable Carb Scoping Plan Measures ..... 73
Table 4.10-1: Lid Bmp Design Summary ..... 97
Table 4.13-1: Existing Noise Measurements ..... 111
Table 4.13-2: Sensitive Receptors ..... 112
Table 4.13-3: El Monte Noise and Land Use Compatibility ..... 113
Table 4.13-4: Allowable Noise Levels ..... 114
Table 4.13-5: Typical Construction Noise Levels ..... 116
Table 4.13-6: Typical Construction Equipment Vibration Levels ..... 120
Table 4.17-1: Existing Land Uses Trip Generation Rates and Estimates ..... 129
Table 4.17-2: Proposed Project Trip Generation ..... 130
Table 4.17-3: Net Project Trip Generation ..... 130
Table 4.19-1: Landfill Capacities ..... 144

*This page intentionally left blank.*

1.0

# Introduction

# 1.0 INTRODUCTION

## 1.1 Statutory Authority and Requirements

This Initial Study has been prepared in accordance with the California Environmental Quality Act (CEQA) (California Public Resources Code [PRC] §21000 et seq.) and the State CEQA Guidelines (California Code of Regulations [CCR], Title 14, §15000 et seq.). Pursuant to State CEQA Guidelines §15063, this Initial Study has been prepared to determine if the proposed KB Home Orchard Street and Cypress Avenue Modified Project ("Project") would have a significant effect on the environment. The approximately 5.24-gross-acre (5.17-net-acre) Project site is located at 3630, 3640, and 3700 Cypress Avenue and 11312 Orchard Street, in the City of El Monte, Los Angeles County, California. The Project would demolish all existing on-site structures and develop a residential community consisting of 103 two- and three-story townhomes, at a density of 19.7 dwelling units per net-acre (DU/net AC). The requested entitlements include a General Plan Amendment, Zone Change, Vesting Tentative Tract Map, Conditional Use Permit, Variances, and Modifications.

State CEQA Guidelines §15063(b) states that if the Lead Agency determines that there is substantial evidence that any aspect of a project, either individually or cumulatively, may cause a significant effect on the environment, the Lead Agency shall prepare an Environmental Impact Report (EIR), use a previously prepared EIR, or determine, which of a project's effects were adequately examined by an earlier EIR or Negative Declaration (ND). Conversely, the Lead Agency shall prepare a ND if there is no substantial evidence that the project or any of its aspects may cause a significant effect on the environment.

Pursuant to State CEQA Guidelines §15063(c), the purposes of an Initial Study are to:

- Provide the Lead Agency with information to use as the basis for deciding whether to prepare an EIR or a ND;
- Enable an applicant or Lead Agency to modify a project, mitigating adverse impacts before an EIR is prepared, thereby enabling the project to qualify for a ND;
- Assist in the preparation of an EIR, if one is required;
- Facilitate environmental assessment early in the design of a project;
- Provide documentation of the factual basis for the finding in a ND that a project will not have a significant effect on the environment;
- Eliminate unnecessary EIRs; and
- Determine whether a previously prepared EIR could be used with the project.

This Initial Study is intended to be used as a decision-making tool for the Lead Agency and responsible agencies in considering and acting on the proposed Project. Responsible agencies would comply with CEQA by considering this environmental analysis for discretionary actions associated with Project implementation, if any.

State CEQA Guidelines §15063(g) specifies that as soon as a Lead Agency has determined that an Initial Study will be required for a project, the Lead Agency shall consult informally with all Responsible Agencies and all Trustee Agencies responsible for resources affected by the project to obtain their recommendations as to whether an EIR, Mitigated Negative Declaration (MND), or ND should be prepared.

## 1.2 Summary of Findings

Pursuant to State CEQA Guidelines §15367, the City of El Monte ("City"), as the Lead Agency, has the authority for environmental review and adoption of the environmental documentation, in accordance with CEQA. This Initial Study has evaluated the environmental issues outlined in **Section 3.2: Environmental Factors Potentially Affected**. It provides decision-makers and the public with information concerning the Project's potential environmental effects and recommended mitigation measures, if any.

Based on the Environmental Checklist Form and supporting environmental analysis, the Project would have no impact or a less than significant impact concerning all environmental issue areas, except the following, for which the Project would have a less than significant impact with mitigation incorporated:

- Biological Resources
- Cultural Resources
- Geology and Soils
- Hazards and Hazardous Materials
- Noise
- Tribal Cultural Resources

As set forth in State CEQA Guidelines §15070, an Initial Study leading to a Mitigated Negative Declaration (IS/MND) can be prepared when the Initial Study identifies potentially significant effects but Project revisions would avoid or mitigate the effects to a point where clearly no significant effects would occur, and there is no substantial evidence, in light of the whole record before the agency, that the Project as revised may have a significant effect on the environment.

## 1.3 Initial Study Public Review Process

The Notice of Intent (NOI) to Adopt a Mitigated Negative Declaration has been provided to the Clerk of the County of Los Angeles and mailed to responsible and trustee agencies concerned with the Project and other public agencies with jurisdiction by law over resources affected by the Project. A 20-day public review period has been established for the IS/MND in accordance with State CEQA Guidelines §15073. During the public review period, the IS/MND, including the technical appendices, was made available for review at the following locations:

- City of El Monte, Planning Division, City Hall West, 11333 Valley Boulevard, El Monte, California 91731; and
- City of El Monte website: https://www.ci.el-monte.ca.us/262/Planning

In reviewing the IS/MND, affected public agencies and the interested public should focus on the document's adequacy in identifying and analyzing the potential environmental impacts and the

ways in which the Project's potentially significant effects can be avoided or mitigated. Written comments on this IS/MND may be sent to:

Nancy Lee, Senior Planner
City of El Monte, Planning Division
11333 Valley Boulevard
El Monte, California 91731
Tel.: 626.580.2096
Email: nlee@elmonteca.gov

Following receipt and evaluation of comments from agencies, organizations, and/or individuals, the City will determine whether any substantial new environmental issues have been raised. If so, further documentation may be required. If not, or if the issues raised do not provide substantial evidence that the Project would have a significant effect on the environment, the IS/MND will be considered for adoption and the Project for approval. While this MND and the supporting Initial Study and technical documents were prepared by consultants, the findings represent the City of El Monte's independent judgment acting in its capacity as Lead Agency for the proposed Project.

## 1.4 Incorporation by Reference

Pursuant to State CEQA Guidelines §15150, an MND may incorporate by reference all or portions of another document which is a matter of public record or is generally available to the public. Where all or part of another document is incorporated by reference, the incorporated language shall be considered to be set forth in full as part of the MND's text.

The references outlined below were utilized during the preparation of this Initial Study. Copies of these documents are available for review at the City of El Monte Community and Economic Development Department - Planning Division (11333 Valley Boulevard, El Monte) and on the City's website (https://www.ci.el-monte.ca.us/262/Planning), unless otherwise noted.

*Vision El Monte General Plan 2011 (EMGP) (The Planning Center, June 2011)*. The City adopted the comprehensive EMGP in June 2011 and the 2014-2021 Housing Element in December 2013. The EMGP outlines the City's goals, plans, and objectives for land use within the City's jurisdiction. The EMGP places emphasis on community involvement and engagement and adopted six themes for the City:

- A friendly and diverse community,
- A balanced community,
- Convenient transportation choices,
- A healthy environment,
- A vibrant economy, and
- Sustainable growth

The EMGP evaluates existing conditions and outlines long-range policies and objectives to achieve goals associated with the adopted themes. The EMGP consists of ten elements:

- Community Design Element,
- Land Use Element,
- Housing Element,
- Parks and Recreation Element,
- Circulation Element,
- Economic Development Element,
- Public Services and Facilities Element
- Cultural Resources Element,
- Public Health and Safety Element,
- Health and Wellness Element

The EMGP was used throughout this IS/MND as a source of baseline data.

*Vision El Monte General Plan Environmental Impact Report (GPEIR) (The Planning Center, 2011) (SCH #2008071012)*. The GPEIR analyzed the potential environmental impacts that would result from EMGP implementation, with a forecast 2035 buildout. At the time of the GPEIR's writing, El Monte's residential population was estimated at 125,194 persons and the nonresidential population at 35,848 persons. GPEIR Tables 3-3 and 3-4 summarize the EMGP'S residential and nonresidential buildout estimates. As a result of increased density, floor area ratio, and a new mixed-use zone, El Monte's residential population was forecast to grow to 149,721 persons and nonresidential population to 58,807 persons by 2035. As of January 1, 2020, El Monte's housing stock was estimated at 29,588 DUs and residential population were estimated at 116,675 persons.[1] Additionally, the City anticipates an increase in non-residential land uses from 2,054 acres to 2,345 acres. The GPEIR concluded significant and unavoidable impacts concerning Transportation and Traffic, Air Quality, and Noise. The GPEIR was used throughout this IS/MND as a source of baseline data.

*El Monte Municipal Code (Codified through Ordinance No. 2941, passed January 8, 2019, Supp. No. 30)*. The El Monte Municipal Code (EMMC) regulates municipal affairs within the City's jurisdiction including zoning regulations (codified in EMMC Title 17). EMMC Title 17 is the primary tool for implementing the EMGP's goals and policies. The EMMC is referenced throughout this IS/MND to establish the Project's baseline requirements according to the City's regulatory framework.

## 1.5 Report Organization

This document is organized into the following sections:

**Section 1.0: Introduction** introduces and provides an overview of the Project, cites the CEQA Statute and Guidelines provisions to which the proposed Project is subject, and summarizes the Initial Study's conclusions.

**Section 2.0: Project Description** details the Project's location, environmental setting, background and history, characteristics, discretionary actions, construction program, phasing, agreements,

[1] State of California, Department of Finance, E-5 Population and Housing Estimates for Cities, Counties and the State — January 1, 2011-2020. Sacramento, California, May 2020.

and required permits and approvals. It also identifies the Initial Study's intended uses, including a list of anticipated permits and other approvals.

**Section 3.0: Environmental Checklist Form** provides the Project background and an overview of the Project's potential impacts that may result from Project implementation.

**Section 4.0: Evaluation of Environmental Impacts** contains an analysis of environmental impacts identified in the environmental checklist.

**Section 5.0: References** identifies resources used to prepare the Initial Study.

*This page intentionally left blank.*

2.0

# Project Description

# 2.0 PROJECT DESCRIPTION

## 2.1 Location

The KB Home Orchard Street and Cypress Avenue Modified Project (Modified Project) site is in the County of Los Angeles (County), City of El Monte (City), approximately 12 miles east of downtown Los Angeles; see **Exhibit 2-1: Regional Vicinity Map**. The Project site is centrally located in the City, near the downtown Main Street area, at 3630, 3640, and 3700 Cypress Avenue and 11312 Orchard Street. The Project site's gross land area encompasses 5.24 gross acres, comprised of four parcels (Assessor's Parcel Numbers (APN) 8568-026-002, -034, -035, and -053), located north of Iris Lane, south of Orchard Street, and east of Cypress Avenue; see **Exhibit 2-2: Local Vicinity Map.**

Regional vehicular access to the Project site is provided via Interstate 10 (I-10), which is approximately 0.3 miles south of the Project site. Local access to the Project site is provided via two access driveways at Orchard Street and Cypress Avenue at the site's northern and western borders.

## 2.2 Environmental Setting

El Monte encompasses approximately 9.7 square miles in Los Angeles County's San Gabriel Valley region. The City is fully urbanized with of a mix of residential uses and densities, although low-density single-family detached residential uses are the predominant type, comprising over half (55 percent) of all dwelling units (DUs).[2] Overall, the City also contains a mix of retail commercial, office, and industrial uses.

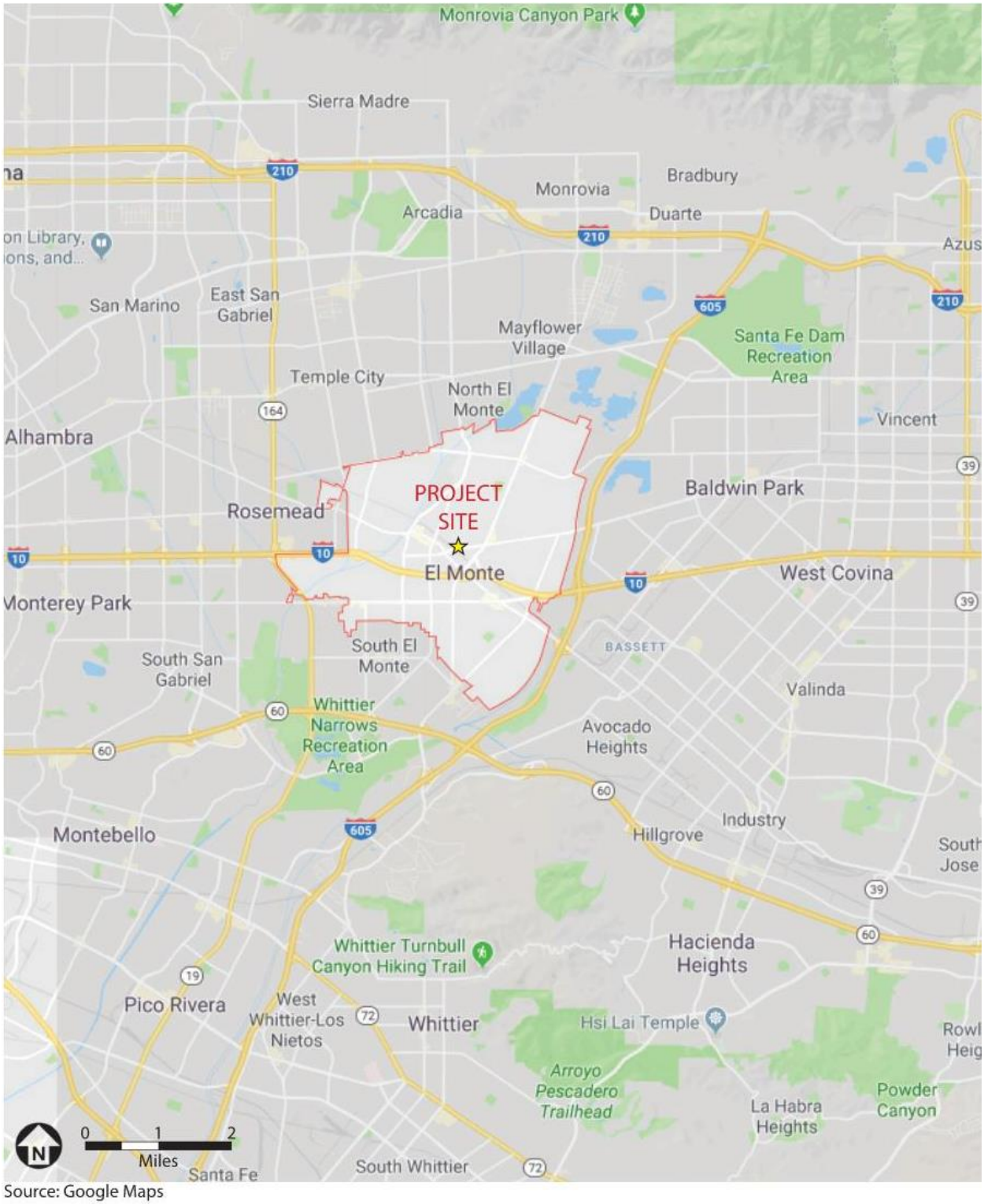
The Project site is centrally located in the City. Historically, this area of the City has served as a key manufacturing district and home to major defense industries. Residential neighborhoods (circa 1950s) border these industrial uses. Specifically, Cypress Avenue, Orchard Street, and Iris Lane bound the Project site. The site is bordered by various land uses (i.e., multi- and single-family residential, commercial, and industrial uses), and vacant land. The Project site is approximately 0.25 mile north of the El Monte Downtown Main Street area.

### 2.2.1 ON-SITE LAND USES

The L-shaped Project site is relatively flat and has an elevation of approximately 290 feet above mean sea level (amsl).[3] As depicted in **Exhibit 2-2** and detailed in **Table 2-1: Existing On-Site Land Uses**, the site is fully developed with a 159,100 square foot (SF) industrial business park *(Orchard Street Industrial)* that includes four buildings, surface parking, hardscapes, and landscaping. The business park includes 14 tenant parking spaces of which ten are occupied. Lessees include Advance Products Inc, New Way Import Inc, and other warehouse, storage, and distribution type businesses.

[2] State of California, Department of Finance, *E-5 Population and Housing Estimates for Cities, Counties and the State — January 1, 2011-2020*. Sacramento, California, May 2020.

[3] Google. (2019). Google Earth




Source: Google Maps

Kimley»Horn
SEPTEMBER 2020
CITY OF EL MONTE
kb HOME

KB HOME ORCHARD STREET AND CYPRESS AVENUE MODIFIED PROJECT

Exhibit 2-1: Regional Vicinity Map

Source: Near Map

Kimley»Horn
SEPTEMBER 2020
CITY OF EL MONTE
kb HOME

KB HOME ORCHARD STREET AND CYPRESS AVENUE MODOFIED PROJECT

Exhibit 2-2: Local Vicinity Map

The existing on-site land uses total approximately 159,100 SF and all are occupied with office, commercial, and warehouse/light industrial uses, except approximately 18,100 SF of vacant tenant space. There are drive aisles leading to two entrances, one at Cypress Avenue and the other at Orchard Street. Several public utilities and electrical system easements traverse the Project site.

**TABLE 2-1: EXISTING ON-SITE LAND USES**

| ID[1] | Assessor's Parcel Number | Site (Gross Acres) | Address | Existing Land Use | Building (Square Feet) | Year Built |
|---|---|---|---|---|---|---|
| 1 | 8568-026-002 | 0.735 | 3700 Cypress Avenue | Industrial Business Park/ Manufacturing/Vacant | 15,600 | 1959 |
| 2 | 8568-026-034 | 1.073 | 3640 Cypress Avenue | Industrial Business Park (exterior doors showroom/sales) | 22,398 | 1968 |
| | 8568-026-035 | 0.889 | 3630 Cypress Avenue | Industrial Business Park/Manufacturing | 18,356 | 1971 |
| 3 | 8568-026-053 | 2.541 | 11312 Orchard Street | Industrial Business Park/Warehouse (flooring, furniture, dry food products) | 102,742 | 1972 |
| | ***Total*** | 5.24 | | | ***159,096 (18,096 Vacant)*** | |

Note: Identification number (ID) correlates to labels on **Exhibit 2-2: Local Vicinity Map**.

Source: [1] ParcelQuest, 2019, David Lelie, Personal Communication - Email, June 28, 2019, Ingo Giani, Personal Communication - Email, January 6, 2020.

### 2.2.2 GENERAL PLAN AND ZONING

EMGP Figure LU-1: Land Use Policy Plan depicts the City's land use designations and indicates the Project site is designated Industrial/Business Park (0-1.0 Floor Area Ratio (FAR)) (4.44 acres) and Medium-Density Residential (8.1-14.0 DU/AC) (0.735 acres). **Exhibit 2-3: Existing Land Use Designations and Zoning**[4] depicts the Project site's (and surrounding areas') existing land use designations and zoning. Allowable land uses include a mix of sustainable manufacturing, processing, office, warehousing, and distribution uses. Supporting and limited retail uses are also allowed. The Medium-Density Residential land use designation allows attached and detached single-family homes, attached products with four or fewer units, and planned developments.[5]

[4] City of El Monte (March 2019). Zoning Map. El Monte, CA: City of El Monte Economic Development Department – Planning Division.

[5] City of El Monte. (2011). *Vision El Monte General Plan 2011*. Page LU-6. El Monte, CA: City of El Monte.

Source: Near Map

Kimley»Horn
SEPTEMBER 2020
CITY OF EL MONTE California
kb HOME

KB HOME ORCHARD STREET AND CYPRESS AVENUE MODIFIED PROJECT

Exhibit 2-3: Existing Land Use Designations and Zoning

The City of El Monte Zoning Map depicts the City's zones and indicates the Project site is zoned M-2 General Manufacturing Zone (4.44 acres) and R-3 Medium-Density Multiple-Family Zone (0.735 acres) (**Exhibit 2-3**). The on-site zoning and EMMC regulations pertaining to each zone are summarized in **Table 2-2: Existing Project Site Zoning**. The regulations governing the M-2 Zone and R-3 Zone are included in EMMC Chapter 17.60 - M-2 Zone and EMMC Chapter 17.40 - R-3 Zone, respectively. Under the existing zoning, up to approximately 196,151 SF of industrial uses (M-2 Zone) and ten DUs (R-3 Zone) are permitted.

**TABLE 2-2: EXISTING PROJECT SITE ZONING**

| Conditions | Zoning Classification | EMMC Chapter |
|---|---|---|
| Existing | M-2 Zone (4.503 AC) and R-3 Zone (0.734 AC) | 17.60 and 17.40 |
| Source: Kimley-Horn. (2019). | | |

### 2.2.3 SURROUNDING LAND USES

Land uses bordering the Project site are summarized below and depicted on **Exhibit 2-2**.

- North: Land uses north of the Project site include a multi-family apartment complex and a vacant lot. Single-family residential uses are further north. Orchard Street and Cypress Avenue form the northeast and northwest Project site boundaries. Areas north of the Project site are zoned R-3 Zone and R-1A Single-Family Residential Zone.
- South: Industrial land uses are immediately southwest of the Project site, at the Cypress Avenue at Iris Lane intersection. Single-family residential land uses are south of the Project site beyond Iris Lane. Ramona Boulevard is directly south of the residential land uses. The Metrolink San Bernardino line railway is approximately 200 feet south of the Project site, across Ramona Boulevard. Areas south of the Project site are zoned R-3 Zone.
- East: Single-family residential land uses are east of the Project site along Coffield Avenue and Iris Lane. This housing was constructed in 1991 after the railroad tracks were vacated and after the 2008 Ramona Boulevard underpass project. Before the 2008 Ramona Boulevard underpass project, Cypress Avenue connected to Ramona Boulevard. This housing resulted in residential land uses inconsistent with the industrial land uses north of the railroad tracks (i.e., along Tyler Avenue). Commercial uses and Our Lady of Guadalupe Catholic Church are further east beyond Orchard Street. Areas east of the Project site are zoned R-3 Zone and C-1 Limited Commercial Zone.
- West: Cypress Avenue forms the Project's western boundary. The City of El Monte Transportation Services Yard (Transportation Yard) property is across Cypress Avenue. Single-family residential uses are west of the Cypress Avenue at Kauffman Street intersection, across from the Project site. Areas west of the Project Site are zoned M-2 Zone and R-3 Zone.

The City plans to construct a 2.3-acre neighborhood park (Cypress Park) at the Transportation Yard property at 3629 Cypress Avenue. No off-street parking is proposed.[6] The property is currently occupied by a 50,000 SF vacant warehouse and the Transportation Yard, which includes three natural gas fuel pumps to service City vehicles.[7]

The surrounding zoning and corresponding EMMC regulations are summarized in **Table 2-3: Surrounding Zoning**.

**TABLE 2-3: SURROUNDING ZONING**

| Direction | Zoning Classification | EMMC Chapter |
|---|---|---|
| North | R-3 Zone and R-1A Zone | 17.40 and 17.32 |
| South | R-3 Zone | 17.32 |
| East | R-3 Zone and C-1 Zone | 17.32 and 17.5 |
| West | R-3 Zone and M-2 Zone | 17.32 and 17.60 |
| Source: Kimley-Horn. (2019). | | |

## 2.3 Background and History

As previously noted, the Project site is occupied by an industrial business park. In March 2019, the Project Applicant (KB Home Greater Los Angeles, Inc.) hosted a study session regarding the Project to the City's Planning Commission and City Council Development Ad Hoc Committee. Additionally, the Project Applicant hosted a Community Meeting on July 8, 2019 at Our Lady of Guadalupe Church. Two additional Community Meetings were held at City Hall on February 26, 2020 and at the City of El Monte Cypress Transportation Yard on July 8, 2020.

The Project's Initial Study/Mitigated Negative Declaration (IS/MND) was prepared pursuant to California Environmental Quality Act (CEQA) (Public Resources Code §§21000-21177) and State CEQA Guidelines §15063 requirements. The IS/MND and supporting documentation were made available for public review from February 11, 2020 to March 2, 2020.

Since the IS/MND's release, the Project Applicant has met with City Staff and nearby residents, and has subsequently modified the Project in response to their comments. This Modified Project involved removing seven (7) DUs (decreasing the total number of 110 DUs to 103 DUs), as well as increasing setbacks, common open space, and guest parking spaces. Additional Project modifications include reducing the height one building along Orchard Street from three- to two-stories, adding an island at the main entry, and introducing textured paving to create a more pedestrian-friendly community. The Modified Project is discussed in greater detail in **Section 2.4: Project Characteristics**, below.

[6] Nancy Lee, Personal Communication - Email, January 14, 2020.
[7] Nancy Lee, Personal Communication - Email, January 16, 2020.

Further publication and public circulation of the modified IS/MND were effectuated by the City from September 18, 2020 to October 8, 2020, in accordance with Public Resources Code §§21091–21092.6 and State CEQA Guidelines §§15072-15073.

## 2.4 Project Characteristics

### 2.4.1 Project Overview

The Project Applicant seeks approval for the proposed KB Home Orchard Street and Cypress Avenue Modified Project. The Project proposes a residential community consisting of 103 townhomes, at a density of approximately 19.7 DU/net AC; see **Exhibit 2-4: Conceptual Site Plan – Modified Project**.

All existing on-site improvements (approximately 159,100 SF) on the 5.24-gross-acre site would be demolished and replaced with the proposed community. Street dedications (totaling approximately 0.06 acre) are required along Iris Lane and Orchard Street for 30-foot half-width streets, resulting in a Project site of 5.17 net acres. The proposed units would be owner-occupied and a homeowners' association would be responsible for maintenance of the common areas, as well as the off-street parking, etc.

The Project proposes approximately 54,560 SF of open space, including private open space (in the form of enclosed courtyards on approximately 79 of the 103 DUs), "usable" common open space, "other" landscaped common open space, walkways and "community trails," a tot lot, and exercise equipment. A total of 269 parking spaces are proposed, including 206 within two-car garages with direct access to each unit and 63 open off-street parking spaces. The requested entitlements include a General Plan Amendment, Zone Change, Vesting Tentative Tract Map, Conditional Use Permit, Variance, and multiple Modifications.

As previously noted, the existing industrial business park totals approximately 159,100 SF and is fully occupied with the exception of approximately 18,100 SF, which are vacant. Consistent with relevant case law (*North County Advocates v. City of Carlsbad* (2015)—Cal.App.4th—Case No. D066488), this environmental analysis assumes 100 percent occupancy and includes these vacant use's historical operational information in establishing the environmental baseline for the Project's impact analyses.

Source: Near Map

Kimley»Horn
SEPTEMBER 2020
CITY OF EL MONTE California
kb HOME

KB HOME ORCHARD STREET AND CYPRESS AVENUE MODIFIED PROJECT

Exhibit 2-4: Conceptual Site Plan

### 2.4.2 Townhomes

The Developer proposes to construct 103 townhomes over 21 buildings (approximately 179,916 SF). One building along Orchard Street will be two stories in height, while the remaining buildings would be three-story, with between four and six DUs per building. As depicted on **Exhibit 2-4**, the proposed site plan involves 21 building clusters, most along the Project's southwest and southeast boundaries. Seven buildings are proposed along the Project's northwest and northeast boundaries. The maximum proposed building height would be approximately 36 feet (to roof ridge).

**Table 2-4: Townhome Plan Summary**, summarizes the proposed floor plans, floor areas, number of bedrooms, etc. of the proposed townhome units.

**TABLE 2-4: TOWNHOME PLAN SUMMARY**

| Plan # | Count | Unit SF | # Bedrooms | # Baths | Garage SF | Total Net SF |
|---|---|---|---|---|---|---|
| 1 | 12 | 1,340 | 2 | 2.5 | 495 | 16,080 |
| 2 | 12 | 1,344 | 2 | 2.5 | 453 | 16,128 |
| 3 | 5 | 1,708 | 3 | 2.5 | 489 | 8,540 |
| 3 Alt | 3 | 1,708 | 3 | 2.5 | 489 | 5,124 |
| 3 (Unit 59) | 1 | 1,718 | 3 | 2.5 | 489 | 1,718 |
| 4 | 44 | 1,782 | 4 | 2.5 | 448 | 78,408 |
| 5 | 3 | 2,138 | 4 | 3.5 | 436 | 6,414 |
| 5 Alt | 17 | 2,122 | 4 | 3.5 | 436 | 36,074 |
| 5 (Unit 19 & 33) | 2 | 2,169 | 4 | 3.5 | 436 | 4,338 |
| 6 | 4 | 1,773 | 3 | 2.5 | 436 | 7,092 |
| ***Total*** | ***103*** | – | – | – | – | ***179,916*** |

Source: KB Home (2020).

The Project proposes a Spanish architectural style (with three color schemes), which is an adaptation of Mission Revival architecture with additional Latin American details and elements; see **Exhibit 2-5: Conceptual Elevations**. Elevations would be generally asymmetrical. Architectural distinction would be accomplished through tile roofs, smooth stucco walls, arched entries, and exposed rafter tails.

Kimley»Horn
SEPTEMBER 2020
EL MONTE
kb HOME

*KB HOME ORCHARD STREET AND CYPRESS AVENUE MODIFIED PROJECT*

Exhibit 2-5: Conceptual Elevations

*This page is intentionally left blank.*

### 2.4.3 Open Space

As applicable to the Project, EMMC §17.42.020.H, Usable Open Space, requires 600 SF of open space per DU, with at least 200 SF of the required open space as private open space contiguous to each unit. The remaining usable open space may be private or common. Therefore, based on 600 SF of open space per DU and 103 DU, 61,800 SF of open space is required. The Project proposes approximately 54,560 SF of on-site open space comprised of the following:

Common Open Space

- 14,500 SF of "other" landscaped common open space (areas not meeting the minimum dimensions)
- 18,590 SF of walkways and "community trails" (areas not meeting the minimum dimensions)
- 1,427 SF of other open space – exercise and playground equipment (compliant with EMMC)
- 6,095 SF of "usable" common open space (as defined by EMMC §17.42.020 (H) - Usable Open Space, as landscaped, 15 feet by 15 feet minimum)

Private Open Space

- 13,948 SF of private open space (in the form of enclosed courtyards on approximately 79 of the 103 units)

The 54,560 SF of proposed open space does not meet the 61,800 SF of required open space. Additionally, the Project does not meet the private open space requirement because 24 DU are not designed with private open space and some of the remaining units do not meet the minimum private open space dimensions. Additionally, the units facing Orchard Street and Cypress Avenue are proposing private open space within the front yard setback, which conflicts with EMMC requirements. Therefore, the Project Applicant has requested approval of a Variance to reduce EMMC private and common open space requirements.

Additionally, approximately 3,827 SF of off-site open space would be provided in the street dedications along Iris Lane and Orchard Street.

### 2.4.4 Landscaping

The proposed Conceptual Landscape Plan[8] would provide approximately 14,500 SF of on-site landscaping along the Orchard Street, Cypress Avenue, and Iris Lane front yard setbacks, as well as site perimeters and dispersed throughout. Additionally, approximately 3,827 SF of off-site open landscaping would be provided in the street dedications proposed along Iris Lane and Orchard Street. The proposed conceptual plantings would include various types of trees, including Australian Willow, Desert Willow, Gold Medallion Tree, Italian Cypress, and California Sycamore, among others. All proposed landscaping has been developed with consideration to

[8] Available for review at the City of Economic Development Department, Planning Division, City Hall West, 11333 Valley Boulevard, El Monte, CA 91731.

both the proposed Spanish architectural style, as well as the state Model Water Efficient Landscape Ordinance (MWELO) requirements. This would be achieved through use of selected plant material, incorporation of climate-based irrigation control systems, and point source irrigation in all shrub areas to minimize water loss through evaporation or overspray.

### 2.4.5 Off-Street Parking and Access

Based on EMMC §17.08.090 - Parking Requirements for Specific Land Uses, the Project's parking demand would total 394 parking spaces, including 206 resident spaces within garages. The Project proposes 269 parking spaces, including 206 enclosed garage spaces, 63 open off-street spaces resulting in a 125-space deficit. The proposed parking does not meet the EMMC parking requirement; therefore, the Project Applicant has requested approval of a Modification to reduce EMMC parking requirements.

Primary vehicular access to the Project site is proposed via two-way private driveways, one at Orchard Street and one at Cypress Avenue. Two main private drive lanes (Lanes A and J) are proposed to provide access throughout the proposed townhome community, with multiple additional private drive lanes for access to each of the proposed buildings. Pedestrian access would be provided along Cypress Avenue, Iris Lane, and Orchard Street.

### 2.4.6 Utilities and Infrastructure

The potable water purveyor to the Project site is the City of El Monte Water Company (EMWC). Existing water mains are within Cypress Avenue (6.0 inches), Iris Lane (8.0 inches), and Orchard Street (6.0 inches). The Project proposes to replace approximately 140 feet of the existing 6.0-inch diameter pipeline within Cypress Avenue with an 8.0-inch diameter pipeline from Kauffman Street south to the Project entrance. In addition to the Cypress Avenue connection, the Project would connect to existing City pipelines at two other locations: at the 8.0-inch pipeline along Iris Lane and at the 6.0-inch pipeline along Orchard Street.

Local wastewater collection facilities that serve the City are owned, operated, and maintained by the City of El Monte Public Works Department (EMPW). Two local 8.0-inch diameter City sewer lines serve the Project site, one within Cypress Avenue, west of the Project site, and one within Iris Lane, south of the Project site. The Project site is also within the jurisdictional boundaries of Sanitation Districts of Los Angeles County Sanitation District No. 15 (LACSD). The Project proposes two sewer connections to the existing 8.0-inch diameter City Iris Lane sewer line. The Project's wastewater would discharge to this local sanitary sewer line for conveyance to LACSD's 18.0-inch diameter Potrero Avenue Trunk Sewer, located in Marybeth Avenue at Whitmore Street.

Proposed drainage improvements include underground infiltration devices that use best management practices (BMP), which would retain some discharge, and excess stormwater would flow south towards Iris Lane via surface drainage and pipe flow and drain into an existing Los Angeles County Flood Control District (LACFCD) 72-inch storm drain. A parkway culvert would serve as overflow for the site to the Iris Lane gutter. The Project's proposed hydrology and drainage are further discussed in IS/MND **Section 4.10**.

### 2.4.7 Requested Entitlements

The Project Applicant requests approval of the following entitlements (with a maximum of 0.80 FAR):

- General Plan Amendment (GPA No. 03-19) to change the site's land use designation from Industrial/Business Park and Medium-Density Residential to High-Density Residential;
- Zone Change (ZC No. 01-19) to change the site's zoning from M-2 General Manufacturing Zone and R-3 Medium-Density Multiple-Family Zone to R-4 High-Density Multiple-Family Zone;
- Vesting Tentative Tract Map (VTTM No. 82797)[9] for a residential subdivision;
- Conditional Use Permit (CUP No. 20-19) for residential developments with three or more DUs;
- Variance to deviate from the minimum private and common open space requirements, as well as allow private open space within the front yard setback (VAR No. 03-19); and
- Modifications to:
    - Off-street parking requirements by reducing guest parking requirements to 63 parking spaces, by allowing one parking stall and no out-let driveways to encroach within the front yard setback along Orchard Street and Cypress Avenue, and for enclosed parking stalls at 19' x 20' (MOD No. 28-19),
    - Required front yard setbacks (first and second story) along Orchard Street and Cypress Avenue (MOD No. 29-19), including allowing overhanging architectural "pop-outs" on second and third stories, as well as two buildings (Buildings 1 and 7) along Cypress Avenue to encroach into 20-foot setback,
    - Maximum allowable wall height throughout the development (behind front yard setbacks) (increase to 8.0 feet) (MOD No. 30-19),
    - Floor area ratio to exceed the maximum allowable 0.40 FAR to a maximum of 0.80 FAR (MOD No. 36-19).

## 2.5 Project Construction Activities and Phasing

Project construction is proposed to begin in April 2021 and end in December 2024, in the following sequence:

- Demolition site preparation, and grading: April – July 2021
- Wet utilities: July – October 2021
- Dry utilities: November 2021 – December 2021

[9] Available for review at the City of Economic Development Department, Planning Division, City Hall West, 11333 Valley Boulevard, El Monte, CA 91731.

- Roadways: January 2022 – February 2022
- Building construction: December 2021 – December 2024.
- Paving, architectural coating, and landscaping: February 2022 – December 2024.

Model unit opening is anticipated in April 2022.

Grading would require cut and fill to create building pads and approximately 19,630 cubic yards (CY) of soil import. The Grading and Drainage Plan is subject to compliance with the City of El Monte Grading Manual.[10] The Final Grading Plan would be reviewed/approved by the City prior to Grading Permit issuance.

## 2.6 Agreements, Permits, and Approvals

The City, as Lead Agency, has discretionary authority over the proposed Project. Other agencies, in addition to the City of El Monte, are expected to use this IS/MND in their decision-making process. To implement this Project, at a minimum, the following discretionary permits/approvals must be granted by the City and others (see also **Section 2.4.7** above):

<u>City of El Monte</u>

- General Plan Amendment GPA No. 03-19
- Zone Change ZC No. 01-19
- Vesting Tentative Tract Map VTTM No. 82797
- Conditional Use Permit CUP No. 20-19
- Variance VAR No. 03-19
- Modifications MOD No. 28-19, MOD No. 29-19, MOD No. 30-19, and MOD No. 36-19

<u>Other</u>

- Los Angeles Regional Water Quality Control Board (Regional Board)
    - National Pollutant Discharge Elimination System (NPDES) Compliance/Low Impact Development (LID) approvals
    - Oversight during site remediation process (if oversight is not provided by the Los Angeles County Fire Department)
- Los Angeles County Fire Department
    - Oversight during site remediation process (if oversight is not provided by the Regional Board)

[10] Available for review at the City of Economic Development Department, Planning Division, City Hall West, 11333 Valley Boulevard, El Monte, CA 91731.

3.0

# Environmental Checklist Form

# 3.0 ENVIRONMENTAL CHECKLIST FORM

## 3.1 Background

| | |
|---|---|
| **1.** | **Project Title:**<br>KB Home Orchard Street and Cypress Avenue Modified Project |
| **2.** | **Lead Agency Name and Address:**<br>City of El Monte<br>11333 Valley Boulevard<br>El Monte, CA 91731 |
| **3.** | **Contact Person and Phone Number:**<br>Nancy Lee, Senior Planner<br>Tel. 626.580.2096<br>Email: nlee@elmonteca.gov |
| **4.** | **Project Location:**<br>County of Los Angeles, City of El Monte, at 3630, 3640, and 3700 Cypress Avenue, and 11312 Orchard Street |
| **5.** | **Project Sponsor's Name and Address:**<br>Mr. David Lelie, LEED AP, Forward Planner<br>KB Home Greater Los Angeles, Inc.<br>25152 Springfield Court, Suite 250<br>Valencia, California 91355 |
| **6.** | **General Plan Designation:** Industrial/Business Park & Medium-Density Residential |
| **7.** | **Zoning**: M-2 General Manufacturing Zone & R-3 Medium-Density Multiple-Family Zone |
| **8.** | **Description of Project:** See **Section 2.4: Project Characteristics** |
| **9.** | **Surrounding Land Uses and Setting**: See **Section 2.2.3: Surrounding Land Uses** |
| **10.** | **Other public agencies whose approval is required (e.g., permits).**<br>• Sanitation Districts of Los Angeles County, District No. 15<br>• Los Angeles Regional Water Quality Control Board<br>• Los Angeles County Fire Department (potentially) |
| 11. | **Have California Native American tribes traditionally and culturally affiliated with the Project area requested consultation pursuant to Public Resources Code §21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?**<br>One California Native American tribe (Kizh Nation) has requested consultation, which occurred October 30, 2019; see also **Section 4.18**. |

## 3.2 Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by the proposed Project, involving at least one impact that is a "Potentially Significant Impact" or "Less Than Significant with Mitigation Incorporated," as indicated by the checklist on the following pages.

| | | | | | |
|---|---|---|---|---|---|
| | Aesthetics | | Agricultural and Forestry Resources | | Air Quality |
| X | Biological Resources | X | Cultural Resources | | Energy |
| X | Geology and Soils | | Greenhouse Gas Emissions | X | Hazards and Hazardous Materials |
| | Hydrology and Water Quality | | Land Use and Planning | | Mineral Resources |
| X | Noise | | Population and Housing | | Public Services |
| | Recreation | | Transportation | X | Tribal Cultural Resources |
| | Utilities and Service Systems | | Wildfire | | Mandatory Findings of Significance |

## 3.3 Lead Agency Determination

On the basis of this initial evaluation:

| | |
|---|---|
| I find that the proposed Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared. | |
| I find that although the proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the Project have been made by or agreed to by the Project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared. | X |
| I find that the proposed Project MAY have a significant effect on the environment and an ENVIRONMENTAL IMPACT REPORT is required. | |
| I find that the proposed Project MAY have a potentially significant or a potentially significant unless mitigated impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed. | |
| I find that although the proposed Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed Project, nothing further is required. | |

**CITY OF EL MONTE**

Nancy Lee, Senior Planner

September 17, 2020
Date

4.0

# Evaluation of Environmental Impacts

# 4.0 EVALUATION OF ENVIRONMENTAL IMPACTS

The following environmental analysis is patterned after State CEQA Guidelines Appendix G. An explanation is provided for all responses except "No Impact" responses, which are supported by the cited information sources. The responses consider the whole action involved with the proposed Project: on- and off-site, Project- and cumulative-level, direct and indirect, and short-term construction and long-term operational. The explanation of each issue also identifies the significance criteria or threshold, if any, used to evaluate each question, and the mitigation identified, if any, to avoid or reduce the impact to less than significant. To each question, there are four possible responses:

- **No Impact.** The Project would not have any measurable environmental impact.
- **Less Than Significant Impact.** The Project would have the potential to impact the environment, although this impact would be below established thresholds that are considered to be significant.
- **Less Than Significant with Mitigation Incorporated.** The Project would have the potential to generate impacts, which may be considered as a significant effect on the environment, although mitigation measures or changes to the Project's physical or operational characteristics could reduce these impacts to a less than significant level.
- **Potentially Significant Impact.** The Project could have impacts, which may be considered significant, and therefore additional analysis is required to identify mitigation. A determination that there is a potential for significant effects indicates the need to more fully analyze the Project's impacts and identify mitigation.

## 4.1 Aesthetics

| Environmental Issue | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **Except as provided in Public Resources Code §21099, would the project:** | | | | |
| a) Have a substantial adverse effect on a scenic vista? | | | X | |
| b) Substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway? | | | | X |
| c) If in a non-urbanized area, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality? | | | | X |
| d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? | | | X | |

**IMPACT ANALYSIS**

*4.1a Would the project have a substantial adverse effect on a scenic vista?*

**Less Than Significant Impact.** The City is 12 miles east of downtown Los Angeles within Los Angeles County, in the heart of the San Gabriel Valley. The San Gabriel Valley is bordered by the San Gabriel Mountains to the north, the Puente Hills and Montebello Hills to the south, and the San Jose Hills to the southeast. The City is west of the I-605 and I-10 interchanges. The San Gabriel River borders the City on the east, and the Rio Hondo River bisects the City's eastern half in a north/southwest orientation. The cities of Baldwin Park, Industry, Arcadia, Irwindale, Temple City, and Rosemead neighbor the City of El Monte.

The Project area is largely developed and built out. Multi-family apartment complexes, single-family residential, and industrial business park complexes dominate the area around the Project site. The EMGP identifies views of the San Gabriel Mountains as a scenic resource. The San Gabriel Mountains' foothills are located approximately 7 miles north of the Project site, with the ridgelines approximately 20 miles north. Where viewsheds within the Project area are not

obstructed by existing development and mature trees, the San Gabriel Mountains are visible in the distant background.

The proposed Project would develop two- and three-story residential buildings in an already urbanized area. Currently, existing residences at Iris Lane, Orchard Street, and Cypress Avenue do not experience views of the San Gabriel Mountains due to intervening structures and vegetation, including utility pole lines, mature trees, and other structures and buildings. Therefore, Project implementation would not have an adverse effect on a scenic vista. Impacts would be less than significant, and no mitigation is required.

***4.1b Would the project substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?***

**No Impact.** There are no eligible or officially designated state scenic highways that traverse or are proximate to the City. The nearest designated scenic highway, Route 2 (i.e., Angeles Crest Scenic Byway, a National Forest Scenic Byway), is approximately 14 miles north of the Project site.[11] There are no trees, rock outcroppings, or buildings on the Project site that could be considered a scenic resource. The Project would not damage scenic resources within a state scenic highway. Therefore, no impact would occur, and no mitigation is required.

***4.1c If in a non-urbanized area, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?***

**No Impact.** The Project site is in an urbanized area and is fully developed as an industrial business park with warehouses, small offices, and associated surface parking. Land uses to the north, east, and west (beyond Iris Lane, Orchard Street, and Cypress Avenue) are predominantly residential uses, although industrial uses exist to the west. The area south of the Project is predominantly characterized by industrial uses. The Project proposes to demolish all existing on-site improvements, and construct 103 attached townhomes in 21 buildings, with between three and six units per building. The maximum proposed building height would be approximately 36 feet (to roof ridge). The zoning and the EMMC regulations pertaining to each zone for the Project site and adjacent properties are provided in **Table 2-2** and **Table 2-3**. The regulations specified in the EMMC sections identified in the tables do not include standards governing scenic quality. Therefore, the Project would not conflict with applicable zoning or other regulations governing scenic quality. No impact would occur, and no mitigation is required.

[11] California Department of Transportation. (2011). *California Scenic Highway Mapping System.* Retrieved from http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm.

### *4.1d Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?*

**Less Than Significant Impact.** Existing outdoor lighting at and near the Project site is associated with industrial, residential, and street lighting along Iris Lane, Orchard Street, and Cypress Avenue, typical of urbanized areas. The proposed Project would generate lighting from two primary sources: lighting from building interiors that would pass through windows, and lighting from exterior sources (e.g., street lighting, parking lot lighting, building illumination, security lighting, and landscape lighting). The Project's outdoor lighting would be subject to compliance with EMMC §17.42.020 - R-4 Regulations, and §17.08.030 - Parking Lot Design, which include standards required to ensure that safety, potential light spillover onto the adjacent properties, and security issues are addressed in the development's design. Additionally, the Project would be subject to compliance with EMMC §17.42.020(D), which requires that an on-site lighting system in all parking areas, vehicular access ways, and along major walkways on all sites serving three or more DUs. Such lighting would be directed onto driveways and walkways within the Project site and away from dwellings and adjacent properties. The lighting system would be automated using either an electronic time switch device or photoelectric sensor device, and the lighting device would be equipped with "vandal-resistant covers." Therefore, following compliance with EMMC requirements, a less than significant impact would occur, and no mitigation is required.

## 4.2 Agricultural and Forestry Resources

| Environmental Issue | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:** | | | | |
| a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? | | | | X |
| b) Conflict with existing zoning for agricultural use, or a Williamson Act contract? | | | | X |
| c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code §12220(g)), timberland (as defined by Public Resources Code §4526), or timberland zoned Timberland Production (as defined by Government Code §51104(g))? | | | | X |
| d) Result in the loss of forest land or conversion of forest land to non-forest use? | | | | X |
| e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use? | | | | X |

**INTRODUCTION**

The California Department of Conservation Farmland Mapping and Monitoring Program (FMMP), was established by the State Legislature in 1982 to assess the location, quality, and quantity of agricultural lands and conversion of these lands over time. The FMMP has established five farmland categories.

- Prime Farmland comprises the best combination of physical and chemical features able to sustain long-term agricultural production. The land must be able to store moisture and produce high yields.
- Farmland of Statewide Importance possesses similar characteristics to Prime Farmland with minor shortcomings, such as less ability to hold and store moisture and more pronounced slopes.

- Unique Farmland has a production history of propagating crops with high-economic value.
- Farmland of Local Importance is important to the local agricultural economy. Local advisory committees and county-specific board of supervisors determine this status.
- Grazing Land is suitable for browsing or grazing of livestock.

The FMMP has also established an Urban and Built-Up Land category, which is defined as land developed at a density of at least 1.0 DU per 1.5 acres, or approximately six structures to a 10-acre parcel. Land uses include, but are not limited to, residential, industrial, office/commercial, institutional, and public administration. The Williamson Act, codified in 1965 as the California Land Conservation Act, allows local governments to enter into contracts with private landowners with the intent of restricting the use of land to agricultural or related open space through tax incentives. These incentives tax farmers based on an open space designation, which is a much lower rate than the full market value tax. Through this contract, farmers agree to freeze development of their land for 10 years.

**IMPACT ANALYSIS**

***4.2a Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?***

**No Impact.** The City, inclusive of the Project site, is fully urbanized with no farmland. The City is also bordered by urban development. The State of California Department of Conservation, Farmland Mapping and Monitoring Program indicates there is no Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or Farmland of Local Importance on the Project site or in the Project vicinity.[12] The FMMP has designated the Project site as Urban and Built-Up Land. No farmland would be converted to non-agricultural use. Therefore, no impact would occur, and no mitigation is required.

***4.2b Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?***

**No Impact.** Neither the Project site nor the adjacent properties are zoned for agricultural use; see **Table 2-2** and **Table 2-3**. Additionally, the current Los Angeles County Williamson Act Map does not identify the Project site or any nearby properties as being under a Williamson Act contract. Therefore, no impact would occur, and no mitigation is required.

***4.2c Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code §12220(g)), timberland (as defined by***

[12] California Important Farmland Finder, State of California Department of Conservation, http://maps.conservation.ca.gov/ciff/ciff.html,

***Public Resources Code §4526), or timberland zoned Timberland Production (as defined by Government Code §51104(g))?***

***4.2d Would the project result in the loss of forest land or conversion of forest land to non-forest use?***

**No Impact**. The City, inclusive of the Project site, is fully urbanized with no forest land or timberland. The City is also bordered by urban development. The Project site and surrounding areas are not zoned forest land or timberland; see **Table 2-2** and **Table 2-3**. The EMGP does not identify any forest land or timberland preservation goals or policies. Therefore, the proposed Project would not conflict with existing zoning for, or cause rezoning of, forest land. Additionally, the proposed Project would not result in a loss of forest land or conversion of forest land to non-forest use. No impact would occur, and no mitigation is required.

***4.2e Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?***

**No Impact.** The Project site and surrounding areas do not contain farmland or forest land. The City, inclusive of the Project site, is fully urbanized with no Farmland or forest land. Therefore, the proposed Project would not result in the conversion Farmland to non-agricultural use or conversion of forest land to non-forest use. No impact would occur, and no mitigation is required.

## 4.3 Air Quality

This Section is based on the *Air Quality Assessment* (Kimley-Horn, December 2019), which is included in its entirety in **Appendix A: Air Quality Assessment**.

| Environmental Issue | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:** | | | | |
| a) Conflict with or obstruct implementation of the applicable air quality plan? | | | X | |
| b) Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard? | | | X | |
| c) Expose sensitive receptors to substantial pollutant concentrations? | | | X | |
| d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people? | | | | X |

**CALIFORNIA ENERGY COMMISSION - TITLE 24 BUILDING ENERGY EFFICIENCY STANDARDS**

The Energy Efficiency Standards for Residential and Nonresidential Buildings, as specified in California Code of Regulations (CCR) Title 24 Part 6, were established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. The 2019 Energy Standards include requirements for mandatory mechanical ventilation intended to improve indoor air quality in homes, and requirements for Minimum Efficiency Reporting Value (MERV) 13 air filtration on space conditioning systems, and ventilation systems that provide outside air to a dwelling's occupiable space. The Residential Compliance Manual for the 2019 Building Energy Efficiency Standards notes that air filter efficiencies of at least MERV 13 protect occupants from exposure to the smaller airborne particles (i.e., $PM_{2.5}$) that are known to adversely affect respiratory health. CCR Title 24 Part 6 requires a particle size efficiency rating equal to or greater than 85 percent in the 1.0 to 0.3 µg range.

**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT**

Mass Emissions Thresholds. The South Coast Air Quality Management District (SCAQMD) significance criteria may be relied upon to make the Project's significance determinations. According to the SCAQMD, an air quality impact is considered significant if a proposed project

would violate any ambient air quality standard, contribute substantially to an existing or projected air quality violation, or expose sensitive receptors to substantial pollutant concentrations. The SCAQMD has established thresholds of significance for air quality during a project's construction and operations, as indicated in **Table 4.3-1: South Coast Air Quality Management District Emissions Thresholds**.

**TABLE 4.3-1: SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT EMISSIONS THRESHOLDS**

| Criteria Air Pollutants and Precursors (Regional) | Construction-Related Average Daily Emissions (pounds/day) | Operational-Related Average Daily Emission (pounds/day) |
|---|---|---|
| Reactive Organic Gases (ROG) | 75 | 55 |
| Carbon Monoxide (CO) | 550 | 550 |
| Nitrogen Oxides ($NO_X$) | 100 | 55 |
| Sulfur Oxides ($SO_X$) | 150 | 150 |
| Coarse Particulates ($PM_{10}$) | 150 | 150 |
| Fine Particulates ($PM_{2.5}$) | 55 | 55 |
| Source: South Coast Air Quality Management District, *South Coast AQMD Air Quality Significance Thresholds,* April 2019. | | |

Localized Carbon Monoxide**.** In addition to the daily thresholds listed above, a proposed project would be subject to the ambient air quality standards. These are addressed through an analysis of localized CO impacts. The significance of localized impacts depends on whether ambient CO levels near a project site are above the state or federal CO standards (the more stringent California standards are 20 ppm for 1-hour and 9 ppm for 8-hour). The Basin has been designated as attainment under the 1-hour and 8-hour standards.

Localized Significance Thresholds (LSTs)**.** In addition to the CO hotspot analysis, the SCAQMD developed LSTs for $NO_2$, CO, $PM_{10}$, and $PM_{2.5}$ emissions generated at new development sites (off-site mobile source emissions are not included in the LST analysis). LSTs represent the maximum emissions that can be generated at a project site without expecting to cause or substantially contribute to an exceedance of the most stringent national or state ambient air quality standards. LSTs are based on ambient concentrations of that pollutant within a project's source receptor area (SRA), as demarcated by the SCAQMD, and the distance to the nearest sensitive receptor. LST analysis for construction is applicable for all projects that disturb 5.0 acres or less on a single day. El Monte is within SCAQMD SRA 9 (East San Gabriel Valley). **Table 4.3-2: Local Significance Thresholds (Construction/Operations)** provides the LSTs for a 1.0-acre, 2.0-acre, and 5.0-acre project site in SRA 9 with the nearest sensitive receptors located within 25 meters of a project site.

| TABLE 4.3-2: LOCAL SIGNIFICANCE THRESHOLDS (CONSTRUCTION/OPERATIONS) | | | | |
|---|---|---|---|---|
| **Project Size** | **Nitrogen Oxide ($NO_x$) – lbs/day** | **Carbon Monoxide (CO) – lbs/day** | **Coarse Particulates ($PM_{10}$) – lbs/day** | **Fine Particulates ($PM_{2.5}$) – lbs/day** |
| 1.0 Acre | 89/89 | 623/623 | 5/2 | 3/1 |
| 2.0 Acres | 128/128 | 953/953 | 7/2 | 5/2 |
| 5.0 Acres | 203/203 | 1,733/1,733 | 14/4 | 7/2 |
| Source: South Coast Air Quality Management District, *Localized Significance Threshold Methodology,* July 2008. | | | | |

## IMPACT ANALYSIS

### *4.3a Would the project conflict with or obstruct implementation of the applicable air quality plan?*

**Less Than Significant Impact.** As part of its enforcement responsibilities, the EPA requires that each state with nonattainment areas prepare and submit a State Implementation Plan (SIP) that demonstrates the means to attain the federal standards. The SIP must integrate federal, state, and local plan components and regulations to identify specific measures to reduce pollution in nonattainment areas, using a combination of performance standards and market-based programs. Similarly, under state law, the California Clean Air Act (CCAA) requires an air quality attainment plan to be prepared for areas designated as nonattainment regarding the federal and state ambient air quality standards. Air quality attainment plans outline emissions limits and control measures to achieve and maintain these standards by the earliest practical date.

The Project site is within the South Coast Air Basin (SCAB), which is under SCAQMD's jurisdiction. The SCAQMD is required, pursuant to the Federal Clean Air Act (FCAA), to reduce criteria pollutant emissions for which SCAB is in non-attainment. To reduce such emissions, the SCAQMD drafted the 2016 AQMP. The 2016 AQMP establishes a program of rules and regulations directed at reducing air pollutant emissions and achieving state and national air quality standards. The 2016 AQMP is a regional and multi-agency effort including the SCAQMD, the CARB, the Southern California Association of Governments (SCAG), and the Environmental Protection Agency (U.S. EPA). The AQMP's pollutant control strategies are based on the latest scientific and technical information and planning assumptions, including SCAG's *2016-2040 Regional Transportation Plan/ Sustainable Communities Strategy* (RTP/SCS), which updated emission inventory methodologies for various source categories, and SCAG's latest growth forecasts. SCAG's latest growth forecasts were defined in consultation with local governments and with reference to local general plans.

The Project is subject to the SCAQMD's AQMP. Criteria for determining consistency with the AQMP are defined by the following indicators:

- **Consistency Criterion No. 1**: A proposed project would not result in an increase in the frequency or severity of existing air quality violations, or cause or contribute to new violations, or delay the timely attainment of the AQMP's air quality standards or the interim emissions reductions.

- **Consistency Criterion No. 2**: A proposed project would not exceed the AQMP's assumptions or increments based on the years of the project build-out phase.

Consistency Criterion No. 1 refers to the California ambient air quality standards (CAAQS) and national ambient air quality standards (NAAQS). As addressed in **Table 4.3-3** and **Table 4.3-4** later in this section, Project construction and operational emissions would be below SCAQMD's thresholds. As the Project would not generate localized construction or regional construction or operational emissions that would exceed SCAQMD thresholds of significance, the Project would not violate any air quality standard. Thus, the Project would be consistent with Criterion No. 1. No impact would occur, and no mitigation is required.

Consistency Criterion No. 2 refers to SCAG's growth forecasts and associated assumptions included in the AQMP. The future air quality levels projected in the AQMP are based on SCAG's growth projections, which are based, in part, on the general plans of cities located within the SCAG region. Therefore, projects that are consistent with the applicable assumptions used in AQMP development would not jeopardize attainment of the air quality levels identified in the AQMP, even if they exceed the SCAQMD's recommended daily emissions thresholds.

Concerning Consistency Criterion No. 2, the AQMP contains air pollutant reduction strategies based on SCAG's latest growth forecasts, and SCAG's growth forecasts were defined in consultation with local governments and with reference to local general plans. Therefore, it is reasonable to conclude that if a project is consistent with the applicable general plan land use designation, and if the general plan was adopted prior to the applicable AQMP, then the increase in vehicle miles traveled (VMT) and/or population generated by said project would be consistent with the AQMP's assumed VMT and population growth.

As discussed in **Section 2.2.2**, the EMGP currently designates the Project site as Industrial/ Business Park (0-1.0 FAR) (4.4.4 acres) and Medium-Density Residential (8.1-14.0 DU/AC) (0.735 acres). Based on these land use designations, the Project site's maximum development capacity is approximately 191,664 SF of industrial uses and approximately ten DUs. The Project proposes a residential community consisting of 103 townhomes, which the EMMC allows in the Industrial/Business Park designations with approval of a Conditional Use Permit. Accordingly, the Project proposes a General Plan Amendment from Industrial/Business Park and Medium-Density Residential to High-Density Residential and a zone change from M-2 Zone and R-3 Zone to R-4 Zone. The Project's forecast population growth is approximately 420 persons; see Response 4.14a. The Project's proposed land uses would differ from the allowable land uses and associated emissions. Therefore, because the proposed Project would conflict with the EMGP's land use designations for the Project site, which are the basis for the AQMP, the Project site's forecast population growth would conflict with the AQMP. However, as shown in **Table 4.3-4** later in this section, the proposed Project would result in a nominal increase in air emissions compared to the site's existing land uses/designations, which were assumed in the AQMP. The Project's forecast population growth would nominally increase (only approximately 0.36 percent) the City's existing population of approximately 116,675 persons; see Response 4.14a. Further, inclusive of the proposed Project, the City's population would total approximately 117,098

persons, which would be approximately 2.0 percent below SCAG's 2020 population forecast for El Monte of 120,000 persons. Additionally, based on a 5.17 net-acre site and the proposed High-Density Residential land use designation, which is implemented by the R-4 Zone and which allows 25 DU/AC, the Project site's maximum development capacity is approximately 129 DUs. The Project proposes a residential community of 103 townhomes at approximately 19.7 DU/net AC, which would be below the maximum allowable development capacity. As such, following the City's approval of the requested General Plan Amendment, the Project would not conflict with or exceed SCAG's regional growth forecasts for El Monte. It is also noted that the Project's construction and operational air emissions would not exceed the SCAQMD regional thresholds, and localized emissions during construction and operations would not exceed SCAQMD LST thresholds; see the Impact Analysis for Thresholds 5.2 and 5.3 below. As such, the Project would be consistent with Criterion No. 2. A less than significant impact would occur, and no mitigation is required.

***4.3b Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or State ambient air quality standard?***

**Less Than Significant Impact.**

**Construction Emissions**

Project construction activities would generate short-term emissions of criteria air pollutants. The criteria pollutants of primary concern within the Project area include ozone-precursor pollutants (i.e., ROG and $NO_X$) and $PM_{10}$ and $PM_{2.5}$. Construction-related emissions are short term and temporary, lasting only while construction activities occur, but would be considered a significant air quality impact if the volume of pollutant emissions exceed the SCAQMD's thresholds of significance.

Construction results in temporary emissions resulting from site grading, road paving, motor vehicle exhaust associated with construction equipment and worker trips, and the movement of construction equipment, especially on unpaved surfaces. Airborne particulate matter emissions are largely dependent on the amount of ground disturbance associated with site preparation activities, as well as weather conditions and the appropriate application of water.

The duration of the Project's construction activities are estimated to last approximately 45 months. The Project's construction-related emissions were calculated using the CARB-approved CalEEMod computer program, which is designed to model emissions for land use development projects, based on typical construction requirements. Project demolition, site preparation, and grading are anticipated to begin in Spring 2021. Building construction was estimated to begin in Summer 2021 and last until Winter 2024. Paving and architectural coatings were modeled to be completed by December 2024. See **Appendix A** for additional information regarding the construction assumptions used in this analysis.

The Project's estimated maximum daily construction-related emissions are summarized in **Table 4.3-3: Construction-Related Emissions**.[13] As indicated in **Table 4.3-3**, all criteria pollutant emissions would remain below their respective thresholds with implementation of required SCAQMD Rule 403. The Project would also be required to comply with SCAQMD Rules 402 and 1113, which prohibit nuisances and limit VOC content in paints, respectively, and would further reduce specific construction-related emissions. SCAQMD Rules 402, 403, and 1113 are described in the *Regulatory Setting – Regional* section above. As indicated in **Table 4.3-3**, all criteria pollutant emissions would remain below their respective thresholds and would not worsen ambient air quality, create additional violations of federal and state standards, or delay SCAB's goal for meeting attainment standards. A less than significant impact would occur, and no mitigation is required.

**TABLE 4.3-3: CONSTRUCTION-RELATED EMISSIONS**

| Construction Year | Emissions (pounds per day)[1,2] | | | | | |
|---|---|---|---|---|---|---|
| | Reactive Organic Gases (ROG) | Nitrogen Oxide ($NO_x$) | Carbon Monoxide (CO) | Sulfur Dioxide ($SO_2$) | Coarse Particulate Matter ($PM_{10}$) | Fine Particulate Matter ($PM_{2.5}$) |
| 2021 | 5.57 | 70.41 | 43.18 | 0.15 | 8.93 | 5.61 |
| 2022 | 2.15 | 17.35 | 20.05 | 0.04 | 1.86 | 1.05 |
| 2023 | 1.98 | 15.74 | 19.64 | 0.04 | 1.75 | 0.95 |
| 2024 | 34.97 | 14.77 | 19.34 | 0.04 | 1.66 | 0.86 |
| *SCAQMD Threshold* | *75* | *100* | *550* | *150* | *55* | *150* |
| **Exceed SCAQMD Threshold?** | **No** | **No** | **No** | **No** | **No** | **No** |

Notes:
1. Emissions were calculated using the California Emissions Estimator Model version 2016.3.2 (CalEEMod), as recommended by the SCAQMD, and conservatively based on the Original Project, which included 110 DU. Worst-case seasonal maximum daily emissions are reported.
2. SCAQMD Rule 403 Fugitive Dust applied for construction emissions. The Rule 403 reduction/credits include the following: properly maintain mobile and other construction equipment; replace ground cover in disturbed areas quickly; water exposed surfaces three times daily; replace ground cover of area disturbed; water all haul roads twice daily; and limit speeds on unpaved roads to 15 miles per hour. Reductions percentages from SCAQMD CEQA Handbook Tables XI-A through XI-E were applied. No mitigation was applied to construction equipment.

Source: CalEEMod version 2016.3.2. See **Appendix A** for model data outputs.

### Operational Emissions

The Project's operational emissions would be associated with area source emissions, energy source emissions, and mobile source emissions. Typically, area and energy source emissions are small sources that contribute very little emissions individually, but when combined may generate substantial amounts of pollutants. Area-specific defaults in CalEEMod were used to calculate area and energy source emissions. The estimated net increase in emissions from Project operations, which accounts for emissions associated with the existing on-site land uses that would be

[13] Conservatively based on the Original Project, which included 110 DU.

displaced, was calculated using CalEEmod and is summarized in **Table 4.3-4: Operational Emissions**.[14]

**TABLE 4.3-4: OPERATIONAL EMISSIONS**

| Source | Emissions (pounds per day)[1] | | | | | |
|---|---|---|---|---|---|---|
| | Reactive Organic Gases (ROG) | Nitrogen Oxide ($NO_x$) | Carbon Monoxide (CO) | Sulfur Dioxide ($SO_2$) | Coarse Particulate Matter ($PM_{10}$) | Fine Particulate Matter ($PM_{2.5}$) |
| **Existing Emissions** | | | | | | |
| Area Emissions | 3.56 | 0.00 | 0.02 | 0.00 | 0.00 | 0.00 |
| Energy Emissions | 0.05 | 0.44 | 0.37 | 0.00 | 0.04 | 0.04 |
| Mobile Emissions | 1.30 | 6.42 | 18.98 | 0.06 | 4.52 | 1.25 |
| **Total Emissions** | **4.91** | **6.86** | **19.37** | **0.06** | **4.56** | **1.29** |
| **Proposed Project Emissions** | | | | | | |
| Area Emissions | 2.83 | 1.66 | 9.74 | 0.01 | 0.18 | 0.18 |
| Energy Emissions | 0.05 | 0.48 | 0.20 | 0.00 | 0.04 | 0.04 |
| Mobile Emissions | 1.38 | 5.99 | 18.84 | 0.07 | 6.45 | 1.76 |
| **Total Emissions** | **4.26** | **8.13** | **28.78** | **0.08** | **6.67** | **1.98** |
| ***Net Emissions*** | ***-0.65*** | ***1.27*** | ***9.41*** | ***0.02*** | ***2.11*** | ***0.69*** |
| *SCAQMD Threshold* | *55* | *55* | *550* | *150* | *150* | *55* |
| **Exceeds Threshold?** | **No** | **No** | **No** | **No** | **No** | **No** |

Notes: Emissions were calculated using the California Emissions Estimator Model version 2016.3.2 (CalEEMod), as recommended by the SCAQMD, and conservatively based on the Original Project, which included 110 DU. Worst-case unmitigated maximum daily emissions are reported.

Source: CalEEMod version 2016.3.2. See **Appendix A** for model data outputs.

### Area Source Emissions

Area source emissions would be generated due to consumer products (i.e., household cleaners), architectural coating, hearths, and gasoline-powered landscaping and maintenance equipment that were previously not present on the site. As indicated in **Table 4.3-4**, the Project's unmitigated area source emissions would not exceed SCAQMD thresholds.

### Energy Source Emissions

Energy source emissions would be generated due to the Project's electricity and natural gas usage. The Project's primary uses of electricity and natural gas would be for space heating and cooling, water heating, ventilation, lighting, appliances, and electronics. As indicated in **Table 4.3-4**, the Project's unmitigated energy source emissions would not exceed SCAQMD thresholds for criteria pollutants.

[14] Conservatively based on the Original Project, which included 110 DU.

### Mobile Source

Mobile source emissions are from motor vehicles, including tailpipe and evaporative emissions. Depending upon the pollutant being discussed, the potential air quality impact may be of either regional or local concern. For example, ROG, $NO_X$, $PM_{10}$, and $PM_{2.5}$ are all pollutants of regional concern. $NO_X$ and ROG react with sunlight to form $O_3$, known as photochemical smog. Additionally, wind currents readily transport $PM_{10}$ and $PM_{2.5}$. However, CO tends to be a localized pollutant, dispersing rapidly at the source.

Project-generated vehicle emissions have been estimated using CalEEMod, as recommended by the SCAQMD and the Project's trip generation; see Response 4.17a.[15] The Project would result in a net increase in ADT and mobile source emissions. However, as indicated in **Table 4.3-4**, mobile source emissions would not exceed SCAQMD thresholds for criteria pollutants.

### Total Operational Emissions

As indicated in **Table 4.3-4,** emission calculations generated from CalEEMod demonstrate that Project operations, including area, energy, and mobile source emissions, would not violate any air quality standards or contribute substantially to an existing or projected air quality violation. Additionally, the Project would result in a net decrease in ROG emissions. Therefore, the Project's operational impacts would be less than significant, and no mitigation is required. It is also noted that the Project is a High-Density residential infill development with various features that create a walkable space including approximately 36,219 SF of landscaping. These Project features would help reduce VMT consistent with EMGP policy to encourage multi-use trails and alternative travel modes (Policy PHS-3.4) and policy to promote walking, cycling, and transit use (Policy HW-12.1), which would further reduce mobile source emissions below amounts indicated in **Table 4.3-4.**

### Cumulative Short-Term Emissions

SCAB is designated nonattainment for $O_3$, $PM_{10}$, and $PM_{2.5}$ for state standards and nonattainment for $O_3$ and $PM_{2.5}$ for federal standards. As discussed above, the Project's construction-related emissions by themselves would not exceed the SCAQMD significance thresholds for criteria pollutants.

Since these thresholds indicate whether individual project emissions have the potential to affect cumulative regional air quality, it can be expected that project-related construction emissions would not be cumulatively considerable. The SCAQMD has developed strategies to reduce criteria pollutant emissions outlined in the AQMP pursuant to the federal Clean Air Act mandates. The analysis assumed fugitive dust controls would be utilized during construction, including frequent water applications. SCAQMD rules, mandates, and compliance with adopted AQMP emissions control measures would also be imposed on construction projects throughout SCAB, which would include related cumulative projects. As concluded above, the Project's construction-related impacts would be less than significant. Compliance with SCAQMD rules and regulations would further minimize the Project's construction-related emissions. Therefore, Project-related

[15] Conservatively based on the Original Project, which included 110 DU.

construction emissions, in combination with those from other projects in the area, would not substantially deteriorate local air quality. The Project's construction-related emissions would not result in a cumulatively considerable contribution to significant cumulative air quality impacts.

**Cumulative Long-Term Impacts**

The SCAQMD has not established separate significance thresholds for cumulative operational emissions. The nature of air emissions is largely a cumulative impact. As a result, no single project is sufficient in size to, by itself, result in nonattainment of ambient air quality standards. Instead, individual project emissions contribute to existing cumulatively significant adverse air quality impacts. The SCAQMD developed the operational thresholds of significance based on the level above which individual project emissions would result in a cumulatively considerable contribution to SCAB's existing air quality conditions. Therefore, a project that exceeds the SCAQMD operational thresholds would also be a cumulatively considerable contribution to a significant cumulative impact.

As indicated in **Table 4.3-4**, the Project's operational emissions would not exceed SCAQMD thresholds. As a result, the Project's operational emissions would not result in a cumulatively considerable contribution to significant cumulative air quality impacts. Additionally, adherence to SCAQMD rules and regulations would alleviate potential impacts related to cumulative conditions on a project-by-project basis. Project operations would not contribute a cumulatively considerable net increase of any nonattainment criteria pollutant. A less than significant impact would occur, and no mitigation is required.

***4.3c Would the Project expose sensitive receptors to substantial pollutant concentrations?***

**Less Than Significant Impact.**

**Localized Construction Significance Analysis**

The nearest sensitive receptors to the Project site are the multi-family residences located approximately 20 feet (6.1 meters) to the north along Cypress Avenue. To identify impacts to sensitive receptors, the SCAQMD recommends addressing LSTs for construction. LSTs were developed in response to SCAQMD Governing Boards' Environmental Justice Enhancement Initiative (I-4). The SCAQMD provided the *Final Localized Significance Threshold Methodology* (dated June 2003 [revised 2008]) for guidance. The LST methodology assists lead agencies in analyzing localized impacts associated with Project-specific emissions.

Since CalEEMod calculates construction emissions based on the number of equipment hours and the maximum daily soil disturbance activity possible for each piece of equipment, **Table 4.3-5: Equipment-Specific Grading Rates** is used to determine the maximum daily disturbed acreage for comparison to LSTs. The appropriate SRA for the localized significance thresholds is East San Gabriel Valley (SRA 9), since this area includes the Project site. LSTs apply to CO, $NO_2$, $PM_{10}$, and $PM_{2.5}$. The SCAQMD provides look-up tables for projects that disturb areas less than or equal to 5.0 acres. Project construction is anticipated to disturb a maximum of 3.5 acres in a single day.

**TABLE 4.3-5: EQUIPMENT-SPECIFIC GRADING RATES**

| Construction Phase | Equipment Type | Equipment Quantity | Acres Graded Per 8-Hour Day | Operating Hours per Day | Acres Graded per Day |
|---|---|---|---|---|---|
| Site Preparation | Rubber Tired Dozers | 3 | 0.5 | 8 | 1.5 |
| | Tractors/Loaders/Backhoes | 4 | 0.5 | 8 | 2.0 |
| | | | | **Total Acres Graded per Day** | **3.5** |

Source: CalEEMod version 2016.3.2. See **Appendix A** for model data outputs.

The SCAQMD's methodology states that "off-site mobile emissions from the project should not be included in the emissions compared to LSTs." Therefore, for purposes of the construction LST analysis, only emissions included in the CalEEMod "on-site" emissions outputs were considered. The nearest sensitive receptors to the Project site are the multi-family residential dwellings located approximately 20 feet (6.1 meters) to the north of the Project site along Cypress Avenue. LST thresholds are provided for distances to sensitive receptors of 25, 50, 100, 200, and 500 meters. Therefore, as recommended by the SCAQMD, LSTs for receptors located at 25 meters were utilized in this analysis for receptors closer than 25 meters. **Table 4.3-6: Localized Significance of Construction Emissions** indicates the results of localized emissions during Project construction.[16]

**Table 4.3-6** indicates that the emissions of these pollutants on the peak day of Project construction would not result in significant concentrations of pollutants at nearby sensitive receptors. Therefore, the Project would result in a less than significant impact concerning LSTs during construction activities, and no mitigation is required.

[16] Conservatively based on the Original Project, which included 110 DU.

**TABLE 4.3-6: LOCALIZED SIGNIFICANCE OF CONSTRUCTION EMISSIONS**

| Construction Activity | Emissions (pounds per day)[1, 2] | | | |
|---|---|---|---|---|
| | Nitrogen Oxide ($NO_x$) | Carbon Monoxide (CO) | Coarse Particulate Matter ($PM_{10}$) | Fine Particulate Matter ($PM_{2.5}$) |
| Demolition (2021) | 31.44 | 21.57 | 3.49 | 1.73 |
| Site Preparation (2021) | 40.50 | 21.15 | 8.74 | 5.56 |
| Grading (2021) | 24.74 | 15.86 | 3.59 | 2.31 |
| Building Construction (2021) | 17.43 | 16.58 | 0.96 | 0.90 |
| Building Construction (2022) | 15.62 | 16.36 | 0.81 | 0.76 |
| Building Construction (2023) | 14.38 | 16.24 | 0.70 | 0.66 |
| Building Construction (2024) | 13.44 | 16.17 | 0.61 | 0.58 |
| Paving (2024) | 9.52 | 14.63 | 0.47 | 0.43 |
| Architectural Coating (2024) | 1.22 | 1.81 | 0.06 | 0.06 |
| *Maximum Daily Emissions* | *40.50* | *21.57* | *8.74* | *5.56* |
| SCAQMD Localized Screening Threshold (adjusted for 3.5 acres at 25 meters) | 166 | 1,567 | 11 | 7 |
| **Maximum Daily Emissions Exceed SCAQMD Threshold?** | **No** | **No** | **No** | **No** |

Notes:
1. Emissions were calculated using the California Emissions Estimator Model version 2016.3.2 (CalEEMod), as recommended by the SCAQMD, and conservatively based on the Original Project, which included 110 DU. Worst-case seasonal maximum daily emissions are reported.
2. SCAQMD Rule 403 Fugitive Dust applied for construction emissions. The Rule 403 reduction/credits include the following: properly maintain mobile and other construction equipment; replace ground cover in disturbed areas quickly; water exposed surfaces three times daily; replace ground cover of area disturbed; water all haul roads twice daily; and limit speeds on unpaved roads to 15 miles per hour. Reductions percentages from the SCAQMD CEQA Handbook (Tables XI-A through XI-E) were applied. No mitigation was applied to construction equipment.

Source: CalEEMod version 2016.3.2. See **Appendix A** for model data outputs.

### Localized Operational Significance Analysis

LSTs for receptors located at 25 meters for SRA 9 were utilized in this analysis. As the Project site is 5.17 net acres, the 5.0-acre threshold was conservatively used for the Project. The on-site operational emissions are compared to the LST thresholds in **Table 4.3-7: Localized Significance of Operational Emissions**.[17] **Table 4.3-7** indicates that the maximum daily emissions of these pollutants during Project operations would not result in significant concentrations of pollutants at nearby sensitive receptors. Therefore, the Project would result in a less than significant impact concerning LSTs during operational activities, and no mitigation is required.

[17] Conservatively based on the Original Project, which included 110 DU.

**TABLE 4.3-7: LOCALIZED SIGNIFICANCE OF OPERATIONAL EMISSIONS**

| Activity | Emissions (pounds per day)[1] | | | |
|---|---|---|---|---|
| | Nitrogen Oxides ($NO_X$) | Carbon Monoxide (CO) | Coarse Particulate Matter ($PM_{10}$) | Fine Particulate Matter ($PM_{2.5}$) |
| On-Site Emissions (Area Sources) | 1.66 | 9.74 | 0.18 | 0.18 |
| *SCAQMD Localized Screening Threshold (5 acres at 25 meters)* | *203* | *2,022* | *4* | *2* |
| **Exceed SCAQMD Threshold?** | **No** | **No** | **No** | **No** |

Notes: Emissions were calculated using the California Emissions Estimator Model version 2016.3.2 (CalEEMod), as recommended by the SCAQMD, and conservatively based on the Original Project, which included 110 DU. Worst-case seasonal maximum daily emissions are reported.

Source: CalEEMod version 2016.3.2. See **Appendix A** for model data outputs.

The proposed Project would not involve the use, storage, or processing of carcinogenic or non-carcinogenic toxic air contaminants, and no significant toxic airborne emissions would result from Project operations. Construction activities are subject to the regulations and laws relating to toxic air pollutants at the federal, state, and regional levels that would protect sensitive receptors from substantial concentrations of these emissions. Therefore, impacts associated with the release of toxic air contaminants would be less than significant, and no mitigation is required.

**Criteria Pollutant Health Impacts**

On December 24, 2018, the California Supreme Court issued an opinion identifying the need to provide sufficient information connecting a project's air emissions to health impacts or explain why such information could not be ascertained (*Sierra Club v. County of Fresno* [Friant Ranch, L.P.] [2018] Cal.5th, Case No. S219783). The SCAQMD has set its CEQA significance thresholds based on the FCAA, which defines a major stationary source (in extreme ozone nonattainment areas such as the South Coast Air Basin) as emitting 10.0 tons per year. The thresholds correlate with the trigger levels for the federal New Source Review (NSR) Program and SCAQMD Rule 1303 for new or modified sources. The NSR Program[18] was created by the FCAA to ensure that stationary sources of air pollution are constructed or modified in a manner that is consistent with attainment of health-based federal ambient air quality standards. The federal ambient air quality standards establish the levels of air quality necessary, with an adequate margin of safety, to protect the public health. Therefore, projects that do not exceed the SCAQMD's mass emissions thresholds would not violate any air quality standards or contribute substantially to an existing or projected air quality violation and no criteria pollutant health impacts.

$NO_X$ and ROG are precursor emissions that form ozone in the atmosphere in the presence of sunlight where the pollutants undergo complex chemical reactions. It takes time and the influence of meteorological conditions for these reactions to occur, so ozone may be formed at

[18] Code of Federal Regulation (CFR) [i.e., PSD (40 CFR 52.21, 40 CFR 51.166, 40 CFR 51.165 (b)), Non-attainment NSR (40 CFR 52.24, 40 CFR 51.165, 40 CFR part 51, Appendix S).

a distance downwind from the sources. Breathing ground-level ozone can result health effects that include: reduced lung function, inflammation of airways, throat irritation, pain, burning, or discomfort in the chest when taking a deep breath, chest tightness, wheezing, or shortness of breath. In addition to these effects, evidence from observational studies strongly indicates that higher daily ozone concentrations are associated with increased asthma attacks, increased hospital admissions, increased daily mortality, and other markers of morbidity. The consistency and coherence of the evidence for effects upon asthmatics suggests that ozone can make asthma symptoms worse and can increase sensitivity to asthma triggers.

According the SCAQMD's 2016 AQMP, ozone, $NO_X$, and ROG have been decreasing in the Basin since 1975 and are projected to continue to decrease in the future. Although vehicle miles traveled in the Basin continue to increase, $NO_X$ and ROG levels are decreasing because of the mandated controls on motor vehicles and the replacement of older polluting vehicles with lower-emitting vehicles. $NO_X$ emissions from electric utilities have also decreased due to the use of cleaner fuels and renewable energy. The 2016 AQMP demonstrates how the SCAQMD's control strategy to meet the 8-hour ozone standard in 2023 would lead to sufficient $NO_X$ emission reductions to attain the 1-hour ozone standard by 2022. In addition, since $NO_X$ emissions also lead to the formation of $PM_{2.5}$, the $NO_X$ reductions needed to meet the ozone standards will likewise lead to improvement of $PM_{2.5}$ levels and attainment of $PM_{2.5}$ standards.

The SCAQMD's air quality modeling demonstrates that $NO_X$ reductions prove to be much more effective in reducing ozone levels and will also lead to significant improvement in $PM_{2.5}$ concentrations. $NO_X$-emitting stationary sources regulated by the SCAQMD include Regional Clean Air Incentives Market (RECLAIM) facilities (e.g., refineries, power plants, etc.), natural gas combustion equipment (e.g., boilers, heaters, engines, burners, flares) and other combustion sources that burn wood or propane. The 2016 AQMP identifies robust $NO_X$ reductions from new regulations on RECLAIM facilities, non-refinery flares, commercial cooking, and residential and commercial appliances. Such combustion sources are already heavily regulated with the lowest $NO_X$ emissions levels achievable but there are opportunities to require and accelerate replacement with cleaner zero-emission alternatives, such as residential and commercial furnaces, pool heaters, and backup power equipment. The AQMD plans to achieve such replacements through a combination of regulations and incentives. Technology-forcing regulations can drive development and commercialization of clean technologies, with future year requirements for new or existing equipment. Incentives can then accelerate deployment and enhance public acceptability of new technologies.

The 2016 AQMD also emphasizes that beginning in 2012, continued implementation of previously adopted regulations will lead to $NO_X$ emission reductions of 68 percent by 2023 and 80 percent by 2031. With the addition of 2016 AQMP proposed regulatory measures, a 30 percent reduction of $NO_X$ from stationary sources is expected in the 15-year period between 2008 and 2023. This is in addition to significant $NO_X$ reductions from stationary sources achieved in the decades prior to 2008.

As previously discussed, Project emissions would not exceed SCAQMD thresholds, thus, would be less than significant; see **Table 4.3-3** and **Table 4.3-4**. Localized effects of on-site Project emissions on nearby receptors were also found to be less than significant; see **Tables 4.3-6** and **4.3-7**. The LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable NAAQS or CAAQS. The LSTs were developed by the SCAQMD based on the ambient concentrations of that pollutant for each SRA and distance to the nearest sensitive receptor. The ambient air quality standards establish the levels of air quality necessary, with an adequate margin of safety, to protect public health, including protecting the health of sensitive populations such as asthmatics, children, and the elderly. As shown above, Project-related emissions would not exceed the regional thresholds or the LSTs, and therefore would not exceed the ambient air quality standards or cause an increase in the frequency or severity of existing violations of air quality standards. Therefore, sensitive receptors would not be exposed to criteria pollutant levels in excess of the health-based ambient air quality standards.

**Carbon Monoxide Hotspots**

An CO "hot spots" analysis is needed to determine whether the change in the level of service of an intersection resulting from the proposed Project would have the potential to result in exceedances of the CAAQS or NAAQS. It has long been recognized that CO exceedances are caused by vehicular emissions, primarily when vehicles are idling at intersections. Vehicle emissions standards have become increasingly stringent in the last 20 years. Currently, California's CO standard is a maximum of 3.4 grams per mile for passenger cars (requirements for certain vehicles are more stringent). With the turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities, CO concentrations have steadily declined.

Accordingly, with the steadily decreasing CO emissions from vehicles, even very busy intersections do not result in exceedances of the CO standard. The 2016 AQMP is the most recent version that addresses CO concentrations. As part of the SCAQMD *CO Hotspot Analysis*, the Wilshire Boulevard/Veteran Avenue intersection, one of the most congested intersections in Southern California with approximately 100,000 ADT, was modeled for CO concentrations. This modeling effort identified a CO concentration high of 4.6 ppm, which is well below the 35-ppm federal standard. The proposed Project would not produce the volume of traffic required to generate a CO hot spot in the context of SCAQMD's *CO Hotspot Analysis*. As the CO hotspots were not experienced at the Wilshire Boulevard/Veteran Avenue intersection even as it accommodates 100,000 ADT, it can be reasonably inferred that CO hotspots would not be experienced at any Project area intersections from 824 ADT attributable to the Project (298 net ADT). Therefore, impacts would be less than significant, and no mitigation is required.

**Construction-Related Diesel Particulate Matter**

Project construction would generate diesel particulate matter (DPM) emissions from the use of off-road diesel equipment required. The amount to which the receptors are exposed (a function of concentration and duration of exposure) is the primary factor used to determine health risk

(i.e., potential exposure to TAC emission levels that exceed applicable standards). Health-related risks associated with diesel-exhaust emissions are primarily linked to long-term exposure and the associated risk of contracting cancer.

The use of diesel-powered construction equipment would be temporary and episodic. The duration of exposure would be short and exhaust from construction equipment would dissipate rapidly. Current models and methodologies for conducting health risk assessments are associated with longer-term exposure periods of 9, 30, and 70 years, which do not correlate well with the temporary and highly variable nature of construction activities. The nearest sensitive receptors to the Project site are the multi-family residential dwellings located approximately 20 feet (6.1 meters) to the north along Cypress Avenue, and further from the major Project construction areas.

California Office of Environmental Health Hazard Assessment has not identified short-term health effects from DPM. Construction is temporary and would be transient throughout the site (i.e., move from location to location) and would not generate emissions in a fixed location for extended periods of time. Construction activities would be subject to and would comply with California regulations limiting the idling of heavy-duty construction equipment to no more than 5.0 minutes to further reduce nearby sensitive receptors' exposure to temporary and variable DPM emissions. Additionally, it is noted that the proposed Project would replace an existing industrial business park which currently uses diesel vehicles (TAC sources) that idle on-site. With Project implementation, TAC emissions from the existing industrial business park would no longer occur. For these reasons, DPM generated by Project construction activities, in and of itself, would not expose sensitive receptors to substantial amounts of air toxics. The Project would result in a less than significant impact, and no mitigation is required.

**Railroad-Related Toxic Air Contaminants[19]**

As the Project proposes sensitive receptors (residences) proximate to an existing rail alignment located approximately 200 feet to the south, an analysis of TACs is required per SCAQMD guidance; see **Appendix B: Health Risk Assessment**. TACs of concern within the Project area include DPM, a form of $PM_{10}$ and $PM_{2.5}$ emitted mostly from diesel-powered freight trains traveling through the area south of the Project site. Anticipated impacts from rail usage to the proposed residential units were evaluated. Assumptions and calculations used to determine the health risk associated with rail usage in the Project area are included in the **Appendix A**. The following discussion summarizes results of the analysis.

[19] The California Supreme Court in a December 2015 opinion (*California Building Industry Association v. Bay Area Air Quality Management District,* 62 Cal. 4th 369 [No. S 213478]) confirmed that CEQA, with several specific exceptions, is concerned with the impacts of a project on the environment, not the effects the existing environment may have on a project. Therefore, this section is not required under CEQA and is included for informational purposes only the evaluation of the significance of Project impacts in the following discussion is provided to ensure compliance with City and State Building Code noise standards.

Locomotive emissions were estimated based on U.S. EPA emissions factors.[20] The air dispersion modeling for the freight train emissions risk assessment was performed using the U.S. EPA AERMOD model. AERMOD is a steady-state, multiple-source, Gaussian dispersion model designed for use with emission sources situated in terrain where ground elevations can exceed the stack heights of the emission sources (not a factor in this case). AERMOD requires hourly meteorological data consisting of wind vector, wind speed, temperature, stability class, and mixing height. Surface and upper air meteorological data was obtained from the SCAQMD. Surface and upper air meteorological data from the Pico Rivera Meteorological Station was selected as being the most representative for meteorology based on proximity to the Project site. National Elevation Dataset (NED) terrain data was imported into AERMOD for the Project area.

A health risk computation was performed to determine the risk of developing an excess cancer risk calculated on 30-year lifetime basis exposure scenarios. The cancer risk calculations were based on applying age sensitivity weighting factors for each emissions period modeled. Age-sensitivity factors reflect the greater sensitivity of infants and small children to cancer-causing TACs. The chronic and carcinogenic health risk calculations are based on the standardized OEHHA Guidance Manual equations. Only the risk associated with the Project's worst-case location was assessed.

Without incorporating Project design features or mitigation to reduce the potential cancer risk to future residents, cancer risks of greater than 10 cases per million are considered a substantial increase in health risk from exposure to DPM from rail usage. Based on the AERMOD outputs, the Project-related maximum potential cancer risks from DPM would be 5.64 cases per million and would not exceed the SCAQMD's threshold of 10 cases per million following compliance with CCR Title 24 Part 6. CCR Title 24 Part 6 requires MERV 13 air filtration on space conditioning systems and ventilation systems that provide outside air to the occupiable space of a dwelling (see Standard Condition [SC] AQ-1). A MERV 13 filter has a particle removal efficiency in the range of 80 to 90 percent. An 80 percent removal efficiency was conservatively used in this analysis. According to the U.S. EPA's *Exposure Factor Handbook* (2011), on average, people spend 90 percent of their time indoors. As residents are not always indoors, the filtration's overall effectiveness accounts for the time spent outdoors, which equates to approximately three hours per day. It is noted that this is a conservative assumption for this Project, as all of the time spent outdoors would not occur at the Project site.

An evaluation of the potential non-cancer effects of chronic and acute chemical exposures was also conducted. Based on the AERMOD outputs, Project-related non-cancer chronic and acute impacts are calculated by dividing the pollutant concentration by the Reference Exposure Level (REL) for that substance. Non-cancer acute and chronic risk indices would be 0.036 and 0.007, respectively, which would be below the SCAQMD's threshold of 1.0. Therefore, impacts to future residents from railroad-related TACs would be less than significant and no mitigation is required.

[20] U.S., EPA, *Emission Factors for Locomotives (EPA-420-F-09-025)*, Table 2, April 2009.

**Risk from Existing Adjacent Uses**

It is noted that the existing TAC sources at the Project site (diesel vehicles idling at the existing industrial business park) would no longer occur, and the nearest off-site industrial uses (e.g., the adjoining industrial use to the south) are not sources of TACs per SCAQMD requirements (i.e., they do not contain three or more loading bays or have the capacity to receive more than 100 trucks per day). Therefore, TAC-related impacts to future residents from existing adjacent uses would be less than significant and no mitigation is required.

***4.3d Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?***

**No Impact.**

**Construction**

Odors that could be generated by construction activities are required to follow SCAQMD Rule 402 to prevent odor nuisances on sensitive land uses. SCAQMD Rule 402, Nuisance, states:

> *A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.*

During Project construction, emissions from construction equipment, such as diesel exhaust, and volatile organic compounds from architectural coatings and paving activities may generate odors. However, these odors would be temporary, are not expected to affect a substantial number of people and would disperse rapidly. Therefore, impacts related to odors associated with the Project's construction-related activities would be less than significant, and no mitigation is required.

**Operations**

The SCAQMD *CEQA Air Quality Handbook* identifies certain land uses as sources of odors. These land uses include agriculture (farming and livestock), wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, landfills, dairies, and fiberglass molding. The Project proposes development of residential uses, which would not involve the types of uses that would emit objectionable odors affecting substantial numbers of people. The proposed Project would not include any of the land uses that have been identified by the SCAQMD as odor sources. Therefore, the proposed Project would not create objectionable odors. No impact would occur, and no mitigation is required.

**Cumulative Analysis**

The cumulative setting for air quality includes the City of El Monte and SCAB. SCAB is designated as a nonattainment area for state standards of ozone, $PM_{10}$, and $PM_{2.5}$. SCAB is designated as a

nonattainment area for federal standards of ozone and $PM_{2.5,}$ attainment and serious maintenance for federal $PM_{10}$ standards, and is designated as unclassified or attainment for all other pollutants. Cumulative growth in population and vehicle use could inhibit efforts to improve regional air quality and attain the ambient air quality standards.

The SCAQMD's approach to assessing cumulative impacts is based on the AQMP forecasts of attainment of ambient air quality standards in accordance with FCAA and CCAA requirements. As discussed above, the proposed Project would be consistent with the AQMP, which is intended to bring SCAB into attainment for all criteria pollutants. Since the Project's estimated construction and operational emissions would not exceed the applicable SCAQMD daily significance thresholds that are designed to assist the region in attaining both NAAQS and CAAQS, cumulative impacts would be less than significant, and no mitigation is required.

**STANDARD CONDITIONS AND REQUIREMENTS**

**SC AQ-1** **Ventilation Requirements**. The ventilation system shall be provided with air filter(s) having a designated efficiency equal to or greater than MERV 13 when tested in accordance with ASHRAE Standard 52.2, or a particle size efficiency rating equal to or greater than 50 percent in the 0.30-1.0 µm range and equal to or greater than 85 percent in the 1.0-3.0 µm range, when tested in accordance with Air-Conditioning, Heating, and Refrigeration Institute (AHRI) Standard 680 (California Energy Commission, 2019 Building Energy Efficiency Standards for Residential and Nonresidential Buildings Section 150.0[m][12]).

## 4.4 Biological Resources

This Section is based on the *Biological Resources Due Diligence Assessment* (Rincon Consultants, February 2019) and the *Tree Survey and Arborist Report (*Golden State Land & Tree Assessment, September 2019), which are included in their entirety in **Appendix C1: Biological Resources Due Diligence Assessment**, and **Appendix C2: Tree Survey and Arborist Report**, respectively.

| Environmental Issue | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **Would the project:** | | | | |
| a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? | | | | X |
| b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? | | | | X |
| c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? | | | | X |
| d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? | | X | | |
| e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? | | | X | |
| f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? | | | | X |

**IMPACT ANALYSIS**

*4.4a* ***Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?***

*4.4b* ***Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?***

*4.4c* ***Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?***

**No Impact.** The Project site is fully improved industrial business park with surface parking lots, and is bordered by urban built-up land uses. No natural habitat is present on the Project site or surrounding areas, and only landscaping consisting of pine, cypress, palm, eucalyptus and other ornamental trees and shrubs is present. Based on review of the existing and surrounding site conditions, no candidate, sensitive, or special-status plant or wildlife species, riparian habitat or other sensitive natural community, or wetlands are present on or adjacent to the Project site. Therefore, the proposed Project would not have an adverse effect on any candidate, sensitive, or special-status plant or wildlife species, riparian habitat or other sensitive natural community, or wetlands. No impact would occur, and no mitigation is required.

*4.4d* ***Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?***

**Less Than Significant With Mitigation Incorporated.** The Project site and surrounding areas are fully improved and developed with urban built-up land uses. The Project site is not a recognized wildlife corridor and site development would not impede fish or wildlife movement. Notwithstanding, the proposed Project would result in removal of landscaped vegetation (trees and shrubs) on a portion of the Project site with the potential to support nesting migratory birds that are protected by the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (CFGC).

Under MBTA provisions, it is unlawful "by any means or manner to pursue, hunt, take, capture (or) kill" any migratory birds except as permitted by regulations issued by the USFWS. The term "take" is defined by USFWS regulation to mean to "pursue, hunt, shoot, wound, kill, trap, capture or collect" any migratory bird or any part, nest or egg of any migratory bird covered by the conventions, or to attempt those activities. In addition, the CFGC extends protection to non-migratory birds identified as resident game birds (CFGC §3500) and any birds in the orders Falconiformes or Strigiformes (birds-of-prey) (CFGC §3503). The on-site trees and vegetation

could provide suitable nesting habitat for birds. To address potential impacts to migratory birds, the proposed Project would be subject to compliance with Mitigation Measure (MM) BIO-1, which addresses construction activities within the nesting season. Following compliance with MM BIO-1, the proposed Project's potential impacts to nesting migratory birds would be less than significant, and no mitigation is required.

**MITIGATION MEASURES**

**MM BIO-1** **Nesting Migratory Birds.** During construction, grubbing, brushing, or tree removal shall be conducted outside of the state identified nesting season for migratory birds (i.e., typically March 15 through September 1), if possible. If construction activities cannot be conducted outside of nesting season, a Pre-Construction Nesting Bird Survey within and adjacent to the Project site shall be conducted by a qualified biologist within three days prior to initiating construction activities. If active nests are found during the Pre-Construction Nesting Bird Survey, a Nesting Bird Plan (NBP) shall be prepared by a qualified biologist and implemented during construction. At a minimum, the NBP shall include guidelines for addressing active nests, establishing buffers, monitoring, and reporting. The size and location of all buffer zones, if required, shall be based on the nesting species, nesting sage, nest location, its sensitivity to disturbance, and intensity and duration of the disturbance activity.

***4.4e*** ***Would the project conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?***

**Less Than Significant Impact.** EMMC Chapter 14.03 - Tree Protection and Preservation, establishes policies, regulations, and standards to maintain the benefits of urban forests. EMMC §14.03.020 defines trees that must be protected and preserved, as follows:

- *Protected Tree* – Any public tree, Heritage Tree or Native Tree as the foregoing are defined under the chapter.
- *Heritage Tree* – Any tree, shrub, or plant that meets one of the following criteria:
    1. Any woody plant having a single trunk circumference of 36 inches or more measured at breast height, a point 4.5 feet above the natural grade;
    2. Any multi-trunk tree whose multiple trunks have a combined circumference of 75 inches or more measured at a point 4.5 feet above the root crown;
    3. Any tree that is 35 feet or more in height as measured from the root crown to the highest point above the root crown;
    4. Any stand of trees the nature of which makes each dependent upon the others for survival;

5. Any other tree as may be deemed historically or culturally significant by the City Arborist or the Economic Development Director because of its size, connection to the city's history or lore, location, or aesthetic qualities.

- *Native Tree* – Any tree with a trunk more than 8.0 inches in diameter measured at a height of 4.5 feet above natural grade that is one of the following species: *Quercus agrifolia* (Coast live oak), *Quercus engelmannii* (Engelmann oak), *Quercus chrysolepis* (Canyon oak), *Platanus racemosa* (California sycamore), *Juglans californica* (California walnut), *Quercus berberidifolia* (Scrub oak), *Quercus lobata* (Valley oak), Umbellularia californica (California bay), *Populus fremontii* (Cottonwood), *Alnus rhombifolia* (California alder), *Populus trichocarpa* (Black cottonwood), *Salix lasiolepis* (Arroyo willow), *Aesculus californica* (California buckeye) and *Sequoia sempervirens* (California redwood).

On July 19, 2019, an arborist survey was performed to document the species, stature, health, environment, and potential hazard of the on-site trees. During the survey, 100 on-site trees, comprised of eight distinct species, were assessed. The survey determined that eight of the trees meet the criteria of Protected Trees based on their height of more than 35 feet. Information regarding on-site protected trees is provided on **Table 4.4-1: On-Site Protected Trees**.

**TABLE 4.4-1: ON-SITE PROTECTED TREES**

| Tree Tag Number | Species | Height (feet) | Diameter at Breast Height (DBH) (inches): Total Trunks |
|---|---|---|---|
| 767 | Canary Island Pine | 48 | 24 |
| 774 | Canary Island Pine | 80 | 30 |
| 775 | Canary Island Pine | 76 | 25 |
| 779 | Canary Island Pine | 48 | 23 |
| 780 | Common Fig | 42 | 50 |
| 781 | Common Fig | 42 | 20 |
| 785 | Cook Pine | 68 | 21 |
| 786 | Cook Pine | 64 | 18 |

Source: Tree Survey and Arborist Report. (September 2019). Golden State Land & Tree Assessment.

The proposed Project would remove all on-site trees, including the Protected trees listed in **Table 4.4-1**. EMMC §14.03.060 states that prior to removal, relocation, or destruction of any Protected Tree, individuals must apply for a Tree Removal Permit with the City of El Monte Community and Economic Development Department. Upon receipt of the Tree Removal Permit application, the City Arborist conducts a site inspection and may grant the issuance of a Tree Removal Permit and may attach conditions of compliance, as deemed necessary. Conditions may include compliance with EMMC §14.03.090 - Tree Replacement Policy, which requires all removed trees to be replaced at a tree ratio of 2:1 with species selected from the City's recommended tree palette and with approval from the Community and Economic Development Department. Following compliance with EMMC Chapter 14.03, the proposed Project would not conflict with the City's tree protection policy. A less than significant impact would occur, and no mitigation is required.

***4.4f Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?***

**No Impact.** The Project site is not located within the boundaries of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, no impact would occur, and no mitigation is required.

## 4.5 Cultural Resources

This Section is based on the *Cultural Resources Due Diligence Assessment* (Rincon Consultants, February 2019), which is included in its entirety in **Appendix D1: Cultural Resources Due Diligence Assessment** and *Assembly Bill 52 and Senate Bill 18 Consultation,* which is included in its entirety in **Appendix D2: Assembly Bill 52 and Senate Bill 18 Communications.**

| Environmental Issue | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **Would the project:** | | | | |
| a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5? | | | | X |
| b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5? | | X | | |
| c) Disturb any human remains, including those interred outside of dedicated cemeteries? | | | X | |

**IMPACT ANALYSIS**

*4.5a Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?*

**No Impact.** On February 19, 2019, a records search was conducted of the California Historical Resources Information System (CHRIS) at the South-Central Coastal Information Center (SCCIC) at California State University, Fullerton. This archival research reviewed the status of all previously recorded cultural resources, and survey and excavation reports completed within the Project site and a 0.5-mile radius. The CHRIS search included review of the National Register of Historic Places, the California Register of Historical Resources (CRHR), the California Points of Historical Interest list, the California Historical Landmarks list, the Archaeological Determinations of Eligibility list, and the California State Historic Resources Inventory list. The SCCIC records search identified eight previously conducted cultural resources studies and 20 recorded cultural resources within a 0.5-mile radius of the Project site. None of the previous studies has assessed the Project site, and no cultural resources have been previously recorded within its boundaries.

In addition to SCCIC research, historic aerial imagery and construction records were reviewed to determine the age of extant structures on the Project site. Extant structures located at 3640 and 3700 Cypress Avenue exceed 50 years in age and structures at 3630 Cypress Avenue and 11312 Orchard Street exceed 45 years in age. None of the structures have been previously evaluated for the CRHR according to SCCIC records. Review of available imagery shows that the structures exhibit minor features of Late-Modern architectural style but are likely not

"architecturally significant" or a "historic resource" under CEQA. Therefore, the proposed Project would not cause a change in the significance of a historical resource. No impact would occur, and no mitigation is required.

### *4.5b Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?*

**Less Than Significant With Mitigation Incorporated.** CHRIS records search and historic aerial imagery review did not identify any archaeological resources within the Project site. A total of 20 cultural resources have been recorded within a 0.5-mile radius of the Project site, but none have been previously recorded within its boundaries. The Project site has been disturbed by past development and no archaeological resources have been recorded in the site vicinity. Based on the results of the records search and historic use of the Project site, the site's archaeological resources sensitivity is low. Notwithstanding, the potential exists for the discovery of archaeological resources during ground disturbing activities. To address potential impacts to archaeological resources that may be discovered during ground-disturbing activities, the proposed Project would be required to comply with MM TCR-2, which details the appropriate steps should archaeological resources be encountered during ground-disturbing activities. Following compliance with MM TCR-2, the Project's potential impacts concerning the significance of an archaeological resource would be less than significant.

**MITIGATION MEASURES**

See **Section 4.18: Tribal Cultural Resources**, MM TCR-2.

### *4.5c Would the project disturb any human remains, including those interred outside of dedicated cemeteries?*

**Less Than Significant Impact.** No formal cemeteries are on or near the Project site. Most Native American human remains are found in association with prehistoric archaeological sites. As discussed previously, the Project site is not proximate to identified archaeological resources. Given the extent of on-site disturbances from previous development, there is low potential for the Project's ground-disturbing activities to encounter human remains. If previously unknown human remains are discovered during the Project's ground-disturbing activities, a substantial adverse change in the significance of such a resource could occur. If human remains are found, those remains would require proper treatment in accordance with applicable laws, including State of California Health and Safety Code (HSC) §§7050.5-7055 and PRC §§5097.98 and 5097.99. Should any remains be uncovered, HSC §7050.5 requires that all activities cease immediately, and a qualified archaeologist and Native American monitor be contacted immediately. As required by state law, the procedures set forth in PRC §5087.98 would be implemented, including evaluation by the County Coroner and notification of the NAHC. The NAHC would designate the "Most Likely Descendent" of the unearthed human remains. Following compliance with the established regulatory framework (i.e., HSC §§7050.5-7055 and PRC §§5097.98 and 5097.99), the Project's potential impacts concerning human remains would be less than significant, and no mitigation is required.

## 4.6 Energy

| Environmental Issue | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **Would the project:** | | | | |
| a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? | | | X | |
| b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? | | | X | |

**BACKGROUND**

**Building Energy Conservation Standards**

Energy conservation standards for new residential and nonresidential buildings were adopted by the California Energy Resources Conservation and Development Commission (now the California Energy Commission) in June 1977 and are updated every three years (California Code of Regulations Title 24, Part 6). Title 24 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow for consideration and possible incorporation of new energy efficiency technologies and methods. On June 10, 2015, the California Energy Commission (CEC) adopted the 2016 Building Energy Efficiency Standards, which went into effect on January 1, 2017. On May 9, 2018, the CEC adopted the 2019 Building Energy Efficiency Standards, which went into effect on January 1, 2020.

The 2016 Standards improved upon the previous 2013 Standards for new construction of and additions and alterations to residential and nonresidential buildings. Under the 2016 Standards, residential buildings are 28 percent more energy-efficient and nonresidential buildings are 5 percent more energy efficient than under the 2013 Standards. Buildings that are constructed in accordance with the 2013 Building Energy Efficiency Standards are 25 percent (residential) to 30 percent (nonresidential) more energy efficient than the prior 2008 standards as a result of better windows, insulation, lighting, ventilation systems, and other features.

The 2019 Standards improve upon the 2016 Standards. Under the 2019 Title 24 standards, residential buildings are expected to be approximately 7.0 percent more energy-efficient, and when the required rooftop solar is factored in for low-rise residential construction, residential buildings that meet 2019 Title 24 standards would use approximately 53 percent less energy than those built to meet current standards.

The California Green Building Standards Code (California Code of Regulations, Title 24, Part 11), commonly referred to as the CALGreen Code, is a statewide mandatory construction code that

was developed and adopted by the California Building Standards Commission and the California Department of Housing and Community Development. CALGreen standards require new residential and commercial buildings to comply with mandatory measures under five topical areas: planning and design; energy efficiency; water efficiency and conservation; material conservation and resource efficiency; and environmental quality. CALGreen also provides voluntary measures (CALGreen Tier 1 and Tier 2) that local governments may adopt which encourage or require additional measures in the five green building topics. The most recent update to the CALGreen Code was adopted in 2019 and went into effect January 1, 2020.

**Renewable Portfolio Standard**

In 2002, California established its Renewable Portfolio Standard program[21] with the goal of increasing the annual percentage of renewable energy in the state's electricity mix by the equivalent of at least 1.0 percent of sales, with an aggregate total of 20 percent by 2017. The California Public Utilities Commission subsequently accelerated that goal to 2010 for retail sellers of electricity (*Public Utilities Code* §399.15(b)(1)). Then-Governor Schwarzenegger signed Executive Order S-14-08 in 2008, increasing the target to 33 percent renewable energy by 2020. In September 2009, then-Governor Schwarzenegger continued California's commitment to the Renewable Portfolio Standard by signing Executive Order S-21-09, which directs the California Air Resources Board under its AB 32 authority to enact regulations to help the State meet its Renewable Portfolio Standard goal of 33 percent renewable energy by 2020. In September 2010, the California Air Resources Board adopted its Renewable Electricity Standard regulations, which require all of the State's load-serving entities to meet this target. In October 2015, then-Governor Brown signed into legislation Senate Bill 350, which requires retail sellers and publicly owned utilities to procure 50 percent of their electricity from eligible renewable energy resources by 2030. Signed in 2018, SB 100 revised the goal of the program to achieve the 50 percent renewable resources target by December 31, 2026, and to achieve a 60 percent target by December 31, 2030. SB 100 also established a further goal to have an electric grid that is entirely powered by clean energy by 2045. Under the bill, the State cannot increase carbon emissions elsewhere in the western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target.

**IMPACT ANALYSIS**

***4.6a Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?***

**Less Than Significant Impact.**

[21] The Renewable Portfolio Standard is a flexible, market-driven policy to ensure that the public benefits of wind, solar, biomass, and geothermal energy continue to be realized as electricity markets become more competitive. The policy ensures that a minimum amount of renewable energy is included in the portfolio of electricity resources serving a state or country.

### Electricity

Southern California Edison (SCE) provides electricity to the Project area. Electricity is currently used by the existing warehouse on the Project site. The Project site is expected to continue to be served by the existing SCE electrical facilities. Total electricity demand in SCE's service area is forecast to increase by approximately 12,000 GWh—or 12 billion kWh—between 2015 and 2026.[22] The Project's anticipated electricity demand (approximately 530,483 kWh per year) would be nominal compared to overall demand in SCE's service area. Further, when compared to the existing industrial business park on-site, the proposed Project would result in a net reduction of approximately 1,536,177 kWh per year in electricity demand. Therefore, the projected electrical demand would not significantly impact SCE's level of service.

It is also be noted that the Project design and materials would comply with the 2019 Building Energy Efficiency Standards, which went into effect on January 1, 2020, and/or future Building Energy Efficiency Standards depending on when construction permits are issued (construction is scheduled to be completed in 2024). In compliance with 2019 Building Energy Efficiency Standards, the Project would include rooftop solar photovoltaic (PV) panels and (improved) energy-efficient lighting that would reduce the Project's electricity demand. Prior to issuance of a building permit, the City of El Monte Public Works Department would review and verify that the Project plans demonstrate compliance with current Building and Energy Efficiency Standards. The Project would also be required adhere to CALGreen provisions, which establishes planning and design standards for sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and internal air contaminants.

### Natural Gas

Southern California Gas Company (SoCalGas) provides natural gas service to the Project area. The Project's demand is expected to be adequately served by the existing SoCalGas facilities. From 2018 to 2035, residential demand is expected to decline from 236 billion cubic feet (bcf) to 186 bcf, while supplies remain constant at 3.775 billion cubic feet per day[23] (bcfd) from 2015 through 2035.[24] The Project's natural gas demand (approximately 1,533,270 cubic feet per year) would be nominal compared to the overall demand in SoCalGas' service area. In addition, when compared to the existing industrial business park uses on the site, the proposed Project would result in a net reduction of approximately 122,920 kWh per year in natural gas demand. Therefore, the projected natural gas demand would not significantly impact SoCalGas's level of service. The proposed Project would not result in a significant impact due to wasteful, inefficient, or unnecessary consumption of energy resources during Project construction or operation. A less than significant impact would occur, and no mitigation is required.

---

[22] California Energy Commission, *California Energy Demand 2018-2030 Revised Forecast, Figure 49 Historical and Projected Baseline Consumption SCE Planning Area*, April 2018.

[23] 1 bcfd is equivalent to about 1.03 billion kBTU.

[24] California Gas and Electric Utilities, *2018 California Gas Report, Southern California Gas Company Annual Gas Supply 2018-2035 Table 1-SCG*, 2018.

**Fuel**

During construction, transportation energy use depends on the type and number of trips, vehicle miles traveled, fuel efficiency of vehicles, and travel mode. Transportation energy use during construction would come from the transport and use of construction equipment, delivery vehicles and haul trucks, and construction employee vehicles that would use diesel fuel and/or gasoline. The use of energy resources by these vehicles would fluctuate according to the phase of construction and would be temporary. Most construction equipment during demolition and grading would be gas-powered or diesel-powered. Impacts related to transportation energy use during construction would be temporary and would not require expanded energy supplies or the construction of new infrastructure. A less than significant impact would occur during construction, and no mitigation is required.

During operations, energy consumption would be associated with resident and visitor vehicle trips, and occasional trash/recycling collection and other delivery trucks/vehicles (e.g., FedEx, United Parcel Service, or United States Postal Service, etc.). The Project is an infill residential development adjacent to existing residential, commercial, and institutional uses, near public transportation options, and I-10 and I-605, reducing the need to drive long distances to a major highway and/or services. Consequently, the proposed Project would not result in a substantial demand for energy that would require expanded supplies or the construction of other infrastructure or expansion of existing facilities.

The gasoline and diesel fuel associated with on-road vehicular trips is calculated based on total VMT calculated for the analyses within **Section 4.3** and **Section 4.8**. The total gasoline and diesel fuel associated with on-road trips would be approximately 82,023 gallons per year and 14,840 gallons per year, respectively.[25] Los Angeles County annual gasoline fuel use in 2018 was 3,868,517,088 gallons and diesel fuel use was 519,517,409 gallons.[26] Expected Project operational use of gasoline would represent approximately 0.003 percent of current gasoline use and approximately 0.005 percent of current diesel use in the County. The projected energy uses would not exceed one percent of their corresponding County use. As such, Project operations would not substantially affect existing energy or fuel supplies or resources. The Project would comply with applicable energy standards and new capacity would not be required. Fuel consumption associated with Project-related vehicle trips would not be considered inefficient, wasteful, or unnecessary.

As discussed above, the Project would not result in the wasteful, inefficient, or unnecessary consumption of energy or fuel resources during Project construction or operations. Impacts would be less than significant, and no mitigation is required.

[25] Conservatively based on the Original Project, which included 110 DU.

[26] California Air Resources Board, EMFAC2017.

### *4.6b Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?*

**Less Than Significant Impact.** The City of El Monte has not adopted a local plan for renewable energy or energy efficiency. State plans for renewable energy and energy efficiency include the California Public Utilities Commission (CPUC) Energy Efficiency Strategic Plan, the 2019 California Building Energy Efficiency Standards (Title 24), and the 2019 CALGreen standards. The Project would be required to comply with Title 24 and CALGreen standards. Compliance with the Title 24 standards and CALGreen standards would ensure the Project incorporates energy-efficient windows, insulation, lighting, ventilation systems, water-efficient fixtures, rooftop solar PV systems, and other energy-efficient features. Further, the 2019 CALGreen standards require recycling and/or salvaging a minimum of 65 percent of the nonhazardous construction and demolition waste. Adherence to the CPUC's energy requirements, as well as the most current Title 24 and CALGreen standards, would be in furtherance of the State's goal of promoting energy efficiency and renewable energy. Therefore, the proposed Project would result in less than significant impact concerning renewable energy or energy efficiency plans, and no mitigation is required.

## 4.7 Geology and Soils

This Section is based on the *Geotechnical Investigation, Orchard and Cypress* (RMA GeoScience, 2019) which is included in its entirety in **Appendix E: Geotechnical Investigation**.

| Environmental Issue | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **Would the project:** | | | | |
| a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: | | | | X |
| i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. | | | X | |
| ii) Strong seismic ground shaking? | | X | | |
| iii) Seismic-related ground failure, including liquefaction? | | | X | |
| iv) Landslides? | | | | X |
| b) Result in substantial soil erosion or the loss of topsoil? | | | X | |
| c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse? | | | X | |
| d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property? | | | X | |
| e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater? | | | | X |
| f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? | | X | | |

## IMPACT ANALYSIS

***4.7ai*** ***Would the project directly or indirectly cause potential substantial adverse effects, including the risks of loss, or death involving the rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.***

**No Impact.** The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazard of surface faulting to structures for human occupancy by preventing the construction of buildings used for human occupancy on the surface trace of active faults. The Act requires the State Geologist to establish regulatory zones, known as "Alquist-Priolo Earthquake Fault Zones," around the surface traces of active faults and to issue appropriate maps. If an active fault is found, a structure for human occupancy cannot be placed over the trace of the fault and must be set back from the fault (typically 50 feet). The Project site is not within an Alquist-Priolo Earthquake Fault Zone.[27] Therefore, the Project would not expose people or structures to adverse effects involving rupture of a known earthquake fault. No impact would occur, and no mitigation is required.

***4.7aii*** ***Would the project directly or indirectly cause potential substantial adverse effects, including the risks of loss, or death involving strong seismic ground shaking?***

**Less Than Significant Impact with Mitigation Incorporated.** The City is in a seismically active region with several active fault zones including the San Andreas Fault, San Gabriel Fault, Newport-Inglewood Fault, and Whittier and Puente Hills Fault. There are no faults in the City. The closest zoned fault is the East Montebello fault zone, approximately 3.75 miles southwest of the Project site. The faults described above could cause moderate to intense ground shaking during the Project's lifetime. Additionally, the Project site has experienced earthquake-induced ground shaking in the past and can be expected to experience further shaking in the future.

However, the proposed Project would adhere to local and state regulatory standards that address seismic hazards and building design. Pursuant to EMMC Chapter 15.01 – Building Code, the City has adopted the 2016 California Building Standards Code (CBSC) and the 2016 Los Angeles County Building Code (LACBC), subject to certain amendments and changes, including those that address seismic resistance. The Project would be subject to compliance with all applicable regulations in the EMMC (and adopted CBSC and LACBC), including design requirements that mitigate the effects of potential earthquake hazards. Moreover, the Geotechnical Investigation evaluated various geologic and seismic hazards (i.e., seismic ground shaking, liquefaction, total and differential settlement, surface displacement, landslides, slope instabilities, seismically-induced

[27] CDMG, Seismic Hazard Zone Report for the El Monte 7.5-Minute Quadrangle, Los Angeles County, California, 1998, Seismic Hazard Zone Report 024.

settlement, seismically-induced flooding, seismically-induced landslides, seiche, and tsunami) based on site-specific parameters, field exploration, laboratory testing, and data analysis. Geotechnical Evaluation (**Appendix E**, Section 3.0 makes preliminary recommendations concerning seismic design parameters, foundations, slabs, and general earthwork and grading, among other factors). The Geotechnical Investigation concludes that, based on the data collected, the Project appears feasible from a geotechnical standpoint. MM GEO-1 requires that the proposed Project comply with the Geotechnical Investigation's recommendations. The City's Building and Safety Department would review construction plans to verify the Project's compliance with the EMMC and the Geotechnical Investigation's recommendations. Following compliance with the local and state regulatory standards and implementation of MM GEO-1, the Project would not cause potential substantial adverse effects involving strong seismic ground shaking. With mitigation, a less than significant impact would occur in this regard.

**MITIGATION MEASURE**

**MM GEO-1** Prior to Grading Permit issuance, the City shall review all Project plans and all other relevant construction permits to verify compliance with the *Geotechnical Investigation, Orchard and Cypress* (RMA GeoScience, 2019) recommendations and other applicable Code requirements.

***4.7aiii*** ***Would the project directly or indirectly cause potential substantial adverse effects, including the risks of loss, or death involving seismic-related ground failure, including liquefaction?***

**Less Than Significant Impact.** Liquefaction is a phenomenon where earthquake-induced ground vibrations increase the pore pressure in saturated, granular soils until it is equal to the confining, overburden pressure. When this occurs, the soil can completely lose its shear strength and enter a liquefied state. According to the California Geological Survey's Earthquake Zones of Required Investigation El Monte Quadrangle Map the Project site lies within a "Zone of Required Investigation for Liquefaction."[28] Further, according to EMGP Figure PHS-1, the Project site is within a liquefaction hazard area. Concerning liquefaction, the Geotechnical Investigation concluded there are discrete layers of sandy alluvial soils that would be susceptible to liquefaction during design level earthquake. For liquefaction to occur, free groundwater must exist in the sediment, a condition that does not exist on site. However, static groundwater was not encountered in boring drilled to a maximum depth of 50 feet. Following compliance with the local and state regulatory standards and implementation of MM GEO-1, the Project would not cause potential substantial adverse effects involving liquefaction. With mitigation, a less than significant impact would occur in this regard.

[28] California Department of Conservation. (2015). Earthquake Zones Required Investigation El Monte Quadrangle. Retrieved from http://gmw.consrv.ca.gov/SHP/EZRIM/Maps/EL_MONTE_EZRIM.pdf

***4.7aiv Would the project directly or indirectly cause potential substantial adverse effects, including the risks of loss, or death involving landslides?***

**No Impact.** Landslides are mass movements of the ground that include rock falls, relatively shallow slumping and sliding of soil, and deeper rotational or transitional movement of soil or rock. According to the California Geological Survey's Earthquake Zones of Required Investigation El Monte Quadrangle Map, the Project site is not within a landslide hazard zone. The Project site is relatively flat and bordered by urban development. Concerning landslides, the Geotechnical Investigation concluded that the site does not lie in a landslide hazard zone. Since the site is relatively flat, earthquake-induced landslides does not appear to be a hazard to proposed development. Given the Project site's setting and conditions, no impact related to landslides would occur, and no mitigation is required.

***4.7b Would the project result in substantial soil erosion or the loss of topsoil?***

**Less Than Significant Impact.** The Project site is currently developed with surface parking and an Industrial Business Complex. The Geotechnical Investigation concluded that the Project site is composed of artificial fills approximately 3.0 feet thick with asphalt and base conditions between 5.5 inches and 6.0 inches. Given the Project site's existing condition and history of disturbance, the potential loss of topsoil is low. Grading and earthwork activities during construction would expose soils to potential short-term erosion by wind and water. During construction, the Project would be subject to compliance with erosion and siltation control measures and the National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Order No. 2009-0009-DWQ, and all subsequent amendments) (Construction General Permit); see Response 4.10a. EMMC Chapter 15.40 - Grading and Erosion Control, provides the minimum standards to substantially reduce the potential for erosion and sedimentation damage within the City. Additionally, EMMC §13.16.100.D - Notification of Intent and Compliance with General Permits, specifies that each discharger associated with construction activity shall provide notice of intent, comply with, and undertake all other activities required by any general stormwater permit applicable to such discharges. Following compliance with the established regulatory framework (NPDES and EMMC), the Project's potential impacts concerning soil erosion and loss of topsoil would be less than significant, and no mitigation is required.

***4.7c Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?***

***4.7d Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?***

**Less Than Significant Impact.** The Project site would not be subject to seismically-induced liquefaction (see Response 4.7aiii) or landslides (see Response 4.7aiv). The Geotechnical

Investigation did not identify a potential for lateral spreading or collapse, however, concluded that subsidence of up to 0.1-foot could occur. Additionally, the surface site soils were tested and found to have a low expansion potential. The proposed Project would be subject to compliance with the EMMC and MM GEO-1. Compliance with the local and state regulatory standards and implementation of MM GEO-1 would reduce the Project's potential impacts concerning unstable geologic units and expansive soils to less than significant.

***4.7e Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?***

**No Impact.** Sewers would be available for disposal of Project-generated wastewater; see Responses 4.19aii and 4.19aiii. The proposed Project would not utilize septic tanks or alternative wastewater disposal systems. Therefore, no impact would occur, and no mitigation is required.

***4.7f Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?***

**Less Than Significant With Mitigation Incorporated.** Paleontological resources are the fossilized remains of organisms from prehistoric environments found in geologic strata. The potential for fossil occurrence depends on the rock type exposed at the surface in a given area. Previous construction-related excavation on the Project site has disturbed sediments beyond depths at which buried prehistoric cultural resources are likely. Although not expected, there is potential for Project construction activities to affect as yet unidentified paleontological resources. MM GEO-2 details the appropriate steps should paleontological resources be encountered during ground-disturbing activities. Following compliance with MM GEO-2, the Project's potential impacts to a unique paleontological resource/site or geologic feature would be reduced to less than significant.

**MITIGATION MEASURE**

**MM GEO-2** **Paleontological Resources.** For ground disturbances greater than 3.0 feet where sediments are known to produce significant fossil discoveries, prior to initiation of ground-disturbing activities, field personnel shall be alerted to the possibility of buried paleontological resources. If fossils or fossil bearing deposits are encountered during ground-disturbing activities, work within a 100-foot radius of the find shall halt and a professional vertebrate paleontologist shall be contacted immediately to evaluate the find. The paleontologist shall have the authority to stop or divert construction, as necessary. Documentation and treatment of the discovery shall occur in accordance with Society of Vertebrate Paleontology standards. The significance of the find shall be evaluated pursuant to the State CEQA Guidelines. If the discovery proves to be significant, before construction activities resume at the location of the find, additional work such as data recovery excavation may be warranted, as deemed necessary by the paleontologist.

## 4.8 Greenhouse Gas Emissions

This Section is based on the Greenhouse Gas Emissions Assessment (Kimley-Horn, 2019), which is included in its entirety in **Appendix F: Greenhouse Gas Emissions Assessment**.

| Environmental Issue | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **Would the project:** | | | | |
| a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? | | | X | |
| b) Conflict with applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases? | | | X | |

**BACKGROUND**

**City of El Monte General Plan**

The EMGP Public Health and Safety Element contains an Air Quality section intended to help improve the City's air quality. The air quality goals and policies from the Public Health and Safety Element listed below, which are intended to reduce Citywide GHG emissions, apply to the proposed Project.

Policy PHS-3.4 Transportation. Encourage alternative modes of travel to work and school by maximizing transit service, purchasing alternative fuel vehicles, completing all sidewalks, and creating a network of multiuse trails and bicycle paths.

**Goal HW-12: Land use patterns reduce driving, enhance air quality, and improve respiratory health.**

Policy HW-12.1 Walking, Cycling, and Transit Use. Promote land use patterns that reduce driving rates and promote walking, cycling and transit use.

**IMPACT ANALYSIS**

***4.8a Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?***

**Less Than Significant Impact.**

**Short-Term Construction Greenhouse Gas Emissions**

The proposed Project would result in direct GHG emissions from construction-related activities. The approximate daily GHG emissions generated by construction equipment utilized to build the

proposed Project are included in **Table 4.8-1: Construction-Related Greenhouse Gas Emissions**.[29]

**TABLE 4.8-1: CONSTRUCTION-RELATED GREENHOUSE GAS EMISSIONS**

| Category | MTCO2e |
|---|---|
| Total Construction Emissions | 475 |
| 30-Year Amortized Construction | 16 |
| Source: CalEEMod version 2016.3.2. See **Appendix E** for model data outputs. Conservatively based on the Original Project, which contained 110 DU. | |

As indicated in **Table 4.8-1**, Project construction-related activities would generate approximately 475 $MTCO_2e$ of GHG emissions over the course of construction. Construction GHG emissions are typically summed and amortized over the Project's lifetime (assumed to be 30 years), then added to the operational emissions.[30] The amortized Project emissions would be 16 $MTCO_2e$ per year. Once construction is complete, the generation of construction-related GHG emissions would cease.

**Long-Term Operational Greenhouse Gas Emissions**

Operational or long-term emissions would occur over the proposed Project's life. The Project's operational GHG emissions would result from direct emissions such as Project-generated vehicular traffic, on-site combustion of natural gas, and operation of any landscaping equipment. Operational GHG emissions would also result from indirect sources, such as off-site generation of electrical power, the energy required to convey water to the Project site and wastewater from the Project site, the emissions associated with solid waste generated from the Project site, and any fugitive refrigerants from air conditioning or refrigerators. The existing 156,100 SF of industrial business park uses currently generate GHG emissions. The Project's total operational GHG emissions and net emissions are provided in **Table 4.8-2: Project Greenhouse Gas Emissions**.[31] As indicated in **Table 4.8-2**, the Project would generate approximately 1,560 $MTCO_2e$/year, which is a net decrease of 262 $MTCO_2e$/year as compared to the site's existing emissions, primarily due to a decrease in energy and water consumption and waste and wastewater generation. The Project would not increase GHG emissions or cause an exceedance of the SCAQMD's screening threshold of 3,000 $MTCO_2e$/yr. Therefore, Project-related GHG emissions would be less than significant, and no mitigation is required.

**Table 4.8-2** indicates that most of the Project's emissions (approximately 93 percent) would be from energy and mobile sources. As noted above, energy and mobile sources are targeted by statewide measures such as continued implementation of the Renewable Portfolio Standard (the

[29] Conservatively based on the Original Project, which included 110 DU.

[30] The project lifetime is based on the standard 30-year assumption of the South Coast Air Quality Management District (South Coast Air Quality Management District, *Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group #13,* August 26, 2009).

[31] Conservatively based on the Original Project, which included 110 DU.

target is now set at 60 percent renewables by 2030) and extension of the Cap-and-Trade Program (requires reductions from industrial sources, energy generation, and fossil fuels). The Cap-and-Trade Program covers approximately 85 percent of California's GHG emissions as of January 2015. The statewide cap for GHG emissions from the capped sectors (i.e., electricity generation, industrial sources, petroleum refining, and cement production) began in 2013 and will decline approximately 3.0 percent per year, achieving GHG emission reductions throughout the program's duration. The passage of AB 398 in July 2017 extended the duration of the Cap-and-Trade program from 2020 to 2030.

**TABLE 4.8-2: PROJECT GREENHOUSE GAS EMISSIONS**

| Emissions Source | $MTCO_2e$ per Year |
|---|---|
| **Existing Emissions** | |
| Area Source | 0 |
| Energy | 604 |
| Mobile | 950 |
| Waste | 99 |
| Water and Wastewater | 169 |
| **Total Existing Emissions** | **1,822** |
| **Proposed Project Emissions** | |
| Construction Amortized over 30 Years | 16 |
| Area Source | 25 |
| Energy | 241 |
| Mobile | 1,207 |
| Waste | 25 |
| Water and Wastewater | 46 |
| **Total Proposed Project Emissions[1]** | **1,560** |
| ***Net Project Emissions[1]*** | ***-262*** |
| SCAQMD Project Threshold | 3,000 |
| **Threshold Exceeded?** | **No** |
| Notes: Totals may be slightly off due to rounding. | |
| Source: CalEEMod version 2016.3.2. See **Appendix E** for model data outputs. Conservatively based on the Original Project, which contained 110 DU. | |

**Table 4.8-2** indicates that the proposed Project would not exceed the SCAQMD GHG threshold of 3,000 $MTCO_2e$ per year and would result in a net decrease in annual GHG emissions. In addition, with continued implementation of various statewide measures, the Project's operational energy and mobile source emissions (approximately 93 percent of total Project emissions) would continue to decline in the future. Project-related GHG emissions would be less than significant, and no mitigation is required.

### *4.8b Would the project conflict with applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

**Less than Significant Impact.** There are currently no adopted local or regional GHG reduction plans applicable to the proposed Project. As such, the most applicable GHG reduction plans to the proposed Project include the SCAG RTP/SCS and CARB 2017 Scoping Plan discussed below.

**2016-2040 RTP/SCS Consistency**

On April 7, 2016, SCAG adopted the 2016-2040 RTP/SCS. The RTP/SCS is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals. The RTP/SCS embodies a collective vision for the region's future and is developed with input from local governments, county transportation commissions, tribal governments, nonprofit organizations, businesses, and local stakeholders in the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura. SCAG's RTP/SCS establishes GHG emissions goals for automobiles and light-duty trucks for 2020 and 2035 as well as an overall GHG target for the Project region consistent with both the target date of AB 32 and the post-2020 GHG reduction goals of Executive Orders 5-03-05 and B-30-15.

The RTP/SCS accounts for operations and maintenance costs to ensure reliability, longevity, and cost-effectiveness. The RTP/SCS is also supported by a combination of transportation and land use strategies that help the region achieve the State's GHG emissions reduction goals and Federal Clean Air Act (FCAA) requirements, preserve open space areas, improve public health and roadway safety, support our vital goods movement industry, and utilize resources more efficiently. GHG emissions resulting from development-related mobile sources are the most potent source of emissions, and therefore Project comparison to the RTP/SCS is an appropriate indicator of whether the Project would inhibit the post-2020 GHG reduction goals promulgated by the State. The Project's consistency with the RTP/SCS goals is analyzed in **Table 4.8-3: 2016-2040 RTP/SCS Consistency**.

**TABLE 4.8-3: 2016-2040 RTP/SCS CONSISTENCY**

| Actions and Strategies | Project Consistency Analysis |
|---|---|
| **Land Use Actions and Strategies** | |
| Encourage the use of range-limited battery electric and other alternative-fueled vehicles through policies and programs, such as, but not limited to, neighborhood-oriented development, complete streets, and Electric (and other alternative fuel) Vehicle Supply Equipment in public parking lots. | Consistent. The Project would not impair SCAG's ability to encourage the use of alternatively-fueled vehicles. The Project includes the development of 103 townhomes and does not include public parking facilities. |
| Collaborate with the region's public health professionals to enhance how SCAG addresses public health issues in its regional planning, programming, and project development activities. | Consistent. The Project consists of a residential development and would not impair SCAG's or the State's ability to collaborate with the region's public health professionals regarding the integration of public health issues in regional planning. |

| TABLE 4.8-3: 2016-2040 RTP/SCS CONSISTENCY | |
|---|---|
| **Actions and Strategies** | **Project Consistency Analysis** |
| Support projects, programs, and policies that support active and healthy community environments that encourage safe walking, bicycling, and physical activity by children, including, but not limited to development of complete streets, school siting policies, joint use agreements, and bicycle and pedestrian safety education. | Consistent. The Project would include opportunities for healthy, physical activities for residents. The Project proposes approximately 54,650 SF of open space including private open space (in the form of enclosed courtyards and common open space with walkways and community trails, a tot lot, and exercise equipment. |
| Support projects, programs, policies and regulations that encourage the development of complete communities, which includes a diversity of housing choices and educational opportunities, jobs for a variety of skills and education, recreation and culture, and a full-range of shopping, entertainment and services all within a relatively short distance. | Consistent. The Project consists of a residential development located within approximately 500 feet of Foothill Transit and LA Metro bus stops along Ramona Boulevard, and within 0.50-mile of educational, commercial, and institutional uses. Additionally, the El Monte Metrolink Station, is less than 0.5 mile from the Project site, at 10925 Railroad Street, El Monte. |
| **Transportation Network Actions and Strategies** | |
| Cooperate with stakeholders, particularly county transportation commissions and the California Department of Transportation, to identify new funding sources and/or increased funding levels for the preservation and maintenance of the existing transportation network. | Consistent. While this action/strategy is not directly applicable, and while the Project would not impair the ability of SCAG, California Transportation Commissions (CTCs), or the County to cooperate with stakeholders to identify new funding sources and/or increase funding levels, the Project would support this action/strategy by connecting to the existing transportation network and improving on-site pedestrian access, with appropriate design considerations to ensure travel safety and reliability. |
| Explore and implement innovative strategies and projects that enhance mobility and air quality, including those that increase the walkability of communities and accessibility to transit via non-auto modes, including walking, bicycling, and neighborhood electric vehicles (NEVs) or other alternative-fueled vehicles. | Consistent. The Project would include opportunities for healthy, physical activities for residents, including walking paths, and landscaped open space areas. |
| Collaborate with local jurisdictions to provide a network of local community circulators that serve new Transit-Oriented Development (TOD), HQTAs, and neighborhood commercial centers providing an incentive for residents and employees to make trips on transit. | Consistent. The Project would not impair the ability of SCAG, the CTCs, or the County to provide such a network of local community circulators that serve new TOD, High-Quality Transit Areas (HQTAs), and neighborhood commercial centers. |
| Develop first-mile/last-mile strategies on a local level to provide an incentive for making trips by transit, bicycling, walking, or neighborhood electric vehicle or other ZEV options. | Consistent. The Project would not impair the CTCs' or the County's ability to develop first-mile/last-mile strategies. The Project site is within approximately 500 feet of Foothill Transit and LA Metro bus stops along Ramona Boulevard. Additionally, the El Monte Metrolink Station, is less than 0.5 mile from the Project site, at 10925 Railroad Street, El Monte. |

| TABLE 4.8-3: 2016-2040 RTP/SCS CONSISTENCY | |
|---|---|
| **Actions and Strategies** | **Project Consistency Analysis** |
| **Transportation Demand Management (TDM) Actions and Strategies** | |
| Support work-based programs that encourage emission reduction strategies and incentivize active transportation commuting or ride-share modes. | Consistent. The Project would be located within approximately 500 feet of LA Metro and Foothill Transit bus stops, and less than 0.5 mile from the El Monte Metrolink Station, and future residents at the Project site would have ample opportunities for ride-share commuting via smartphone ride-share applications and other ride-sharing programs. |
| Encourage the development of telecommuting programs by employers through review and revision of policies that may discourage alternative work options. | Consistent. As a residential development project, the Project would not impair the County's or CTCs ability to encourage the development of telecommuting programs by employers. |
| Emphasize active transportation and alternative-fueled vehicle projects as part of complying with the Complete Streets Act (AB 1358). | Consistent. As an infill residential development project, the Project would not impair the County's ability to develop infrastructure plans and education programs to promote active transportation options and other alternative-fueled vehicles. |
| Work with relevant state and local transportation authorities to increase the efficiency of the existing transportation system. | Consistent. The Project would not impair the ability of SCAG, the County, or the State to work with relevant transportation authorities to increase the efficiency of the existing transportation system. Moreover, all proposed footpaths and roadways would be designed to conform to City standards. |
| Source: Southern California Association of Governments, 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, April 2016. | |

As indicated in **Table 4.8-3**, the Project would be consistent with the RTP/SCS' stated goals. Therefore, the Project would not result in any significant impacts or interfere with SCAG's ability to achieve the region's post-2020 mobile source GHG reduction targets.

### California Air Resource Board Scoping Plan Consistency

The California State Legislature adopted AB 32 in 2006. AB 32 focuses on reducing GHGs ($CO_2$, $CH_4$, $NO_X$, HFCs, PFCs, and $SF_6$) to 1990 levels by 2020. Pursuant to AB 32 requirements, CARB adopted the *Climate Change Scoping Plan* (CCSP) in 2008, which outlines actions recommended to obtain that goal. The CCSP provides a range of GHG reduction actions that include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms such as the Cap-and-Trade Program, and an AB 32 implementation fee to fund the program. As indicated in **Table 4.8-4: Project Consistency with Applicable CARB Scoping Plan Measures**, the Project is consistent with the applicable strategies.

**TABLE 4.8-4: PROJECT CONSISTENCY WITH APPLICABLE CARB SCOPING PLAN MEASURES**

| Scoping Plan Sector | Scoping Plan Measure | Implementing Regulations | Project Consistency Analysis |
|---|---|---|---|
| Transportation | California Cap-and-Trade Program Linked to Western Climate Initiative | Regulation for the California Cap on GHG Emissions and Market-Based Compliance Mechanism October 20, 2015 (CCR 95800) | Consistent. The Project would not be a gross emitter of CO2e emissions (25,000 Metric tons per year), and thus would be exempt from the Cap-and-Trade Program. The Project would not conflict with this measure. |
| | California Light-Duty Vehicle GHG Standards | Pavley I 2005 Regulations to Control GHG Emissions from Motor Vehicles | Consistent. This measure applies to all new vehicles starting with model year 2012. The Project would not conflict with its implementation as it would apply to all new passenger vehicles purchased in California, including those that would be used during Project construction and operations. |
| Commercial and Residential | California Light-Duty Vehicle GHG Standards | Pavley I 2005 Regulations to Control GHG Emissions from Motor Vehicles | Passenger vehicles, model year 2012 and later, associated with Project construction and operations would be required to comply with the Pavley emissions standards. |
| | | 2012 LEV III California GHG and Criteria Pollutant Exhaust and Evaporative Emission Standards | Consistent. The LEV III amendments provide reductions from new vehicles sold in California between 2017 and 2025. Passenger vehicles associated with the Project would be required to comply with LEV III standards. |
| | Low Carbon Fuel Standard | 2009 readopted in 2015. Regulations to Achieve GHG Emission Reductions Subarticle 7. Low Carbon Fuel Standard CCR 95480 | Consistent. This measure applies to transportation fuels utilized by vehicles in California. The Project would not conflict with implementation of this measure. Motor vehicles associated with Project construction and operations would utilize low carbon transportation fuels, as required under this measure. |
| | Regional Transportation-Related GHG Targets. | SB 375. Cal. Public Resources Code §§21155, 21155.1, 21155.2, 21159.28 | Consistent. The Project would provide development in the region that is consistent with the RTP/SCS growth projections. |
| | Goods Movement | Goods Movement Action Plan January 2007 | Not applicable. The Project does not propose any changes to maritime, rail, or intermodal facilities or forms of transportation. |
| | Medium/Heavy-Duty Vehicle | 2010 Amendments to the Truck and Bus Regulation, the Drayage Truck Regulation and the Tractor-Trailer GHG Regulation | Consistent. This measure applies to medium and heavy-duty vehicles that operate in the State. The Project would not conflict with implementation of this measure. Medium and heavy-duty vehicles associated with Project construction and operations would be required to comply with this regulation's requirements. |
| | High-Speed Rail | Funded under SB 862 | Not applicable. This is a statewide measure that cannot be implemented by a project applicant or Lead Agency. |

**TABLE 4.8-4: PROJECT CONSISTENCY WITH APPLICABLE CARB SCOPING PLAN MEASURES**

| Scoping Plan Sector | Scoping Plan Measure | Implementing Regulations | Project Consistency Analysis |
|---|---|---|---|
| Electricity and Natural Gas | Energy Efficiency | Title 20 Appliance Efficiency Regulation | Consistent. The Project would not conflict with implementation of this measure. The Project would comply with the latest energy efficiency standards. |
| | | Title 24 Part 6 Energy Efficiency Standards for Residential and Non-Residential Building | |
| | | Title 24 Part 11 California Green Building Code Standards | |
| | Renewable Portfolio Standard/Renewable Electricity Standard. | 2010 Regulation to Implement the Renewable Electricity Standard (33 percent 2020) | Consistent. The Project would obtain electricity from the electric utility, Southern California Edison (SCE). SCE obtained 32 percent of its power supply from renewable sources in 2018. Therefore, the utility would provide power when needed for the Project that is composed of a greater percentage of renewable sources. |
| | Million Solar Roofs Program | SB 350 Clean Energy and Pollution Reduction Act of 2015 (50 percent 2030) | |
| Electricity Generation | Million Solar Roofs Program | Tax Incentive Program | Consistent. This measure is to increase solar throughout California, which is being implemented by various electricity providers and existing solar programs. The program provides incentives that are in place at the time of construction. In compliance with the 2019 Building Energy Efficiency Standards, the Project would include rooftop solar PV panels and (improved) energy-efficient lighting that would reduce the Project's electricity demand. |
| Water | Water | Title 24 Part 11 California Green Building Code Standards | Consistent. The Project would comply with the CalGreen standards, which require a 20 percent reduction in indoor water use. The Project would also comply with the City's water conservation and efficiency standards. |
| | | SBX 7-7—The Water Conservation Act of 2009 | |
| | | Model Water Efficient Landscape Ordinance | |
| Green Buildings | Green Building Strategy | Title 24 Part 11 California Green Building Code Standards | Consistent. The State is to increase the use of green building practices. The Project would implement required green building strategies through compliance with existing regulations that require the Project to comply with various CalGreen requirements. |

**TABLE 4.8-4: PROJECT CONSISTENCY WITH APPLICABLE CARB SCOPING PLAN MEASURES**

| Scoping Plan Sector | Scoping Plan Measure | Implementing Regulations | Project Consistency Analysis |
|---|---|---|---|
| Industry | Industrial Emissions | 2010 CARB Mandatory Reporting Regulation | Not applicable. The Mandatory Reporting Regulation requires facilities and entities with more than 10,000 MTCO2e of combustion and process emissions, all facilities belonging to certain industries, and all electric power entities to submit an annual GHG emissions data report directly to CARB. As shown above, total Project GHG emissions would not exceed 10,000 MTCO2e. Therefore, this regulation would not apply. |
| Recycling and Waste Management | Recycling and Waste | Title 24 Part 11 California Green Building Code Standards<br>AB 341 Statewide 75 Percent Diversion Goal | Consistent. The Project would not conflict with implementation of these measures. The Project is required to achieve the recycling mandates via compliance with the CALGreen code. The City has consistently achieved its state recycling mandates. |
| Forests | Sustainable Forests | Cap-and-Trade Offset Projects | Not applicable. The Project is within an urban area and does not contain forested lands. |
| High Global Warming Potential | High Global Warming Potential Gases | CARB Refrigerant Management Program CCR 95380 | Consistent. The regulations are applicable to refrigerants used by large air conditioning systems and large commercial and industrial refrigerators and cold storage system. The Project would include air conditioning systems consistent with the CARB Refrigerant Management Program and would not use industrial refrigerators. |
| Agriculture | Agriculture | Cap-and-Trade Offset Projects for Livestock and Rice Cultivation | Not applicable. The Project site is designated for urban development. No grazing, feedlot, or other agricultural activities that generate manure exist on-site or are proposed by the Project. |

Source: California Air Resources Board, California's 2017 Climate Change Scoping Plan, November 2017 and CARB, Climate Change Scoping Plan, December 2008.

As indicated in **Table 4.8-4**, the Project would be consistent with the stated RTP/SCS goals. Therefore, the Project would not result in any significant impacts or interfere with SCAG's ability to achieve the region's post-2020 mobile source GHG reduction targets.

The 2017 Scoping Plan identifies additional GHG reduction measures necessary to achieve the 2030 target. These measures build upon those identified in the first update to the CCSP in 2013. Although a number of these measures are currently established as policies and measures, some have not yet been formally proposed or adopted. It is expected that these actions to reduce GHG emissions will be adopted as required to achieve statewide GHG emissions targets.

**Conclusion**

In summary, the consistency analyses provided above demonstrate that the Project complies with the plans, policies, regulations, and GHG reduction actions/strategies outlined in the 2016-2040 RTP/SCS and the 2017 Scoping Plan. In addition, the Project would result in a net decrease in GHG emissions compared to existing conditions; see **Table 4.8-2**. Therefore, the Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing GHG emissions. A less than significant impact would occur, and no mitigation is required.

**Cumulative Setting**

Climate change is a global problem. GHGs are global pollutants, unlike criteria air pollutants and toxic air contaminants, which are pollutants of regional and local concern. Whereas pollutants with localized air quality effects have relatively short atmospheric lifetimes (approximately one day), GHGs have much longer atmospheric lifetimes of one year to several thousand years that allow them to be dispersed around the globe.

**Cumulative Impacts**

It is generally the case that an individual project of the proposed Project's size and nature is of insufficient magnitude by itself to influence climate change or result in a substantial contribution to the global GHG inventory. GHG impacts are recognized as exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective. The additive effect of Project-related GHG emissions would not result in a reasonably foreseeable cumulatively considerable contribution to global climate change. In addition, the proposed Project as well as other cumulative related projects, would be subject to applicable regulatory requirements, which would further reduce GHG emissions. As indicated in **Table 4.8-2**, the proposed Project's GHG emissions would not exceed SCAQMD thresholds and are less than the existing uses on the site. Additionally, as discussed above, the Project would be consistent with the RTP/SCS and 2017 Scoping Plan. As a result, the Project would not conflict with any GHG reduction plan. Therefore, the Project's cumulative contribution of GHG emissions would be less than significant, and the Project's cumulative GHG impacts would also be less than cumulatively considerable.

## 4.9 Hazards and Hazardous Materials

This Section is based on the following documentation:

- Phase I Environmental Site Assessment Report (Stantec, March 2019, revised February 2020)
- Phase II Environmental Site Assessment (Stantec, March 2019, revised February 2020)
- Pre-Demolition Asbestos and Lead-Based Paint Survey (Stantec, July 2019)
- Remedial Action Plan (Stantec, November 15, 2019, revised February 2020)

These are included in their entirety in **Appendix G1: Phase I Environmental Site Assessment, Appendix G2: Phase II Environmental Site Assessment Memo, Appendix G3: Pre-Demolition Asbestos and Lead-Based Paint Survey, Appendix G4: Remedial Action Plan**, **Appendix G5: Third Party Review, and Appendix G6: Stantec Response to Review** respectively.

It is also noted that the Applicant has been in communication with the Los Angeles Regional Water Quality Control Board (Regional Board), Site Cleanup Unit 5, regarding the Phase I and Phase II Environmental Site Assessment reports. The Applicant will work under the oversight and satisfaction of either the Regional Board or the Los Angeles County Fire Department Waste Mitigation Unit for complete assessment that addresses the human health concern.

| Environmental Issue | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **Would the project:** | | | | |
| a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? | | | X | |
| b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? | | X | | |
| c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? | | | | X |
| d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment? | | | | X |

| Environmental Issue | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area? | | | X | |
| f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? | | | X | |
| g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires? | | | | X |

**IMPACT ANALYSIS**

***4.9a Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?***

**Less Than Significant Impact.** During demolition and construction, small quantities of potentially hazardous substances such as gasoline, diesel fuel, lubricants for machines, and other-petroleum-based products would be used on-site. Once operational, limited quantities of hazardous materials such as solvents, fertilizers, pesticides, and other materials used for regular household maintenance of buildings and landscaping would be utilized by homeowners within the Project. However, quantities of these materials would not be significant enough to pose a significant hazard to the public or the environment. Compliance with the established regulatory framework including the Department of Transportation provisions regulating the transport of hazardous materials, would minimize risks to the maximum extent practicable. Therefore, impacts concerning the Project's potential to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials would be less than significant, and no mitigation is required.

***4.9b Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?***

**Less Than Significant with Mitigation Incorporated.** The Project site currently serves as an Industrial Business complex with multiple tenants including import/export warehouses, furniture warehouses, woodworking, print press, and storage/maintenance of forklifts and other various

machinery. Due to the site's current and historical uses, there is a potential for release of hazardous materials into the environment during Project construction.

**Property Background**

According to historical records, portions of the Project site were used for agricultural purposes from at least 1928 to the early-1940s. In 1948, commercial structures were developed in the northeastern portion of the Project site, with a vehicle fleet visible on the property in the mid-1950s. By the late 1970s, the Project site was occupied by multiple commercial structures and the surrounding area is developed with a mixture of residential and commercial uses. Available City directory listings reveal that the Project site was occupied by multiple commercial/light industrial business uses from 1976 through 2014. Businesses include the following: Dunhill Chair (1976); Jayar Manufacturing Co (1976-2006); Golden West Industries (1980); Electra Food Machinery (1980-1985); Teds Decorating Inc. (1985-1995); Rainbow Textile Inc. (1995); and New Generation Decorative Doors (2014).

Disagreement exists concerning the age of the onsite buildings- whether developed between 1964 and 1977 (Ninyo & Moore), or the 1950s (Stantec). Notwithstanding, this would not alter the non-ASTM recommendation of performing a pre-demolition asbestos-containing materials (ACMs) and lead-based paint (LBP) survey, as discussed below.

Disagreement exists concerning the presence of a rail line and railroad spur nearby. According to historical topographic maps, Ninyo and Moore report that a Pacific Electric rail line may have adjoined the site to the south from 1923 to 1966. In addition, a railroad spur may have terminated at the site's southwest corner in 1948. The potential historical presence of a ROW adjoining the site presents a potential for contamination resulting from leaks or spills from the railcars or historic application of surface chemicals during railroad operations. The suspected presence of railroad-related chemicals in shallow site soils due to operation of the railroad tracks would be considered a Recognized Environmental Condition (REC) for the site. PAHs, TPHs, PCBs, OCPs, chlorinated herbicides, and metals are typically detected along railroad easements from operational activities, spills, and use of herbicides. However, there is disagreement concerning the interpretation of the topographic maps and whether evidence exists of railroad spurs within the property boundaries in the aerial photographs. Although the presence of former railroad spurs within the Property boundary is uncertain, in an abundance of caution, Stantec recommends incorporating the potential railroad spur in the western-southwestern portion into a Soil Management Plan. If a former railroad spur line or part of a spur line is identified during demolition or grading activities, additional assessment would be required.

**Site Reconnaissance**

Site reconnaissance performed on February 7, 2019 identified several RECs from current and historical site operations observed. A summary is provided below.

<u>11312 Orchard Street, Unit B.</u> The former Electra Food Machinery Inc. is listed in the dry cleaner database as Anitsa Inc, Valet Services, DBA for this address. County of Los Angeles Fire Department Hazardous Materials Division records showed Valet Services (an industrial laundry

facility) occupied the building until 2010. A chemical spill occurred on the property in 2007, in which a bleach solution was wrongfully pumped into the wrong tank, resulting in approximately 10 gallons of foam overflowing, releasing chlorine odor into the atmosphere. The chemical spill is considered a Recognized Environmental Condition (REC). A Phase II soil vapor survey was conducted to further evaluate if the off-site impacts to the underlying groundwater have generated a soil vapor issue of concern to the proposed residential development. The laboratory reported elevated levels, above the San Francisco Bay Region Water Quality Control Board's 2019 Environmental Screening Levels (ESLs), of volatile organic compounds (VOCs) including chloroform, benzene, and PCE in all soil vapor samples.

3700 Cypress Avenue. A former flammable exterior storage area and a suspect chemical storage area were identified at the property. Releases are known to occur from these areas and therefore the site is considered a REC.

3640 Cypress Avenue. The current tenant utilizes the building for door storage and woodworking. A paint spray booth was observed in the southwest portion of the building's interior, with various small containers, less than 5.0 gallons, of paints and paint thinners not secured and improperly stored. Release of chemical hazards may have occurred, therefore, the site is considered a REC.

11305 Iris Lane. Printing press machinery was observed at the property address of 11305 Iris Lane. Although no hazardous materials were observed in this space, this machinery are known to leak hydraulic fluid. Therefore, there is a potential for chemical leaks and the site is considered a REC.

11170 Kauffman Street. There is a plugged well at the City of El Monte Transportation Service property, west of the Project site. Oil well gases, including methane, can escape from former oil wells and exist in the subsurface at levels of concern. The potential for methane gas escape is a REC.

City of El Monte. The Project site is within a National Priority List (NPL) Site identified as the San Gabriel Valley Superfund Site; see also Response 4.9d. Groundwater in the area has been known to contain various volatile compounds. Off-gassing of VOCs from the contaminated groundwater could potentially affect soil vapor conditions at the Project site, therefore, the superfund site is a REC.

Former Oil Well. According to the Division of Oil, Gas, and Geothermal Resources (DOGGR) well finder database there are no oil wells plotted on the Project site. The nearest oil well is a plugged oil well, identified as "Ferris 1" API 040370564, and operated by Chevron USA Inc., plotted approximately 250 feet to the west at the City of El Monte Transportation Service Center. California Geologic Energy Management Division (CalGEM) replaced DOGGR effective January 1, 2020. Upon review of the CalGEM well record the "Ferris 1" well is described as "located from the intersection of the centerline of Iris Lane and Cypress Avenue, 149' northeast along the centerline of Cypress Avenue, thence 276' southeast at right angles" which places the plugged oil well near the southeast edge of the Property. A geophysical survey was performed in the southeast portion of the Property and the surrounding off-site areas using ground

penetrating radar and a magnetometer on January 17, 2020. The geophysical survey was performed in the parking lot areas and all open spaces within the building located in the southeast corner of the Property. No oil wells were identified in the southeast corner of the Property during the geophysical survey; however, a potential oil well was located approximately 15 feet south of the southern property line on the adjacent parcel located at 3620 Cypress Avenue. The off-site oil well was located at approximately the same dimensions as stated in the DOGGR well record, but on the adjacent parcel to the south of the Property. A geophysical survey report is included in the revised Phase II ESA.

Between February and March 2019 Stantec completed a Phase II ESA, which included the advancement of 20 soil borings to a maximum depth of 15 feet bgs to evaluate soil vapor concentrations in shallow soil. Stantec field screened the Property for the presence of methane with a GEM 2000 meter and found not detections above background levels.

Given the Project site's proximity to the potentially inactive oil well, methane mitigation systems prepared by a registered design professional such as a licensed civil engineer and/or licensed petroleum engineer, for future site buildings is recommended.

**Database Search Results**

The Project site appears on several database searches from various agencies. The Division of Oil, Gas, and Geothermal Resources identified no active oil wells on the Project site, although a plugged oil well exists 250 feet west of the Project site on the El Monte Transportation Service Center.

Although the State Water Resources Control Board GeoTracker database did not identify any records on the Project site, hard copy records were obtained for two addresses on the Project site:

- 3700 Cypress Avenue: Operated as a manufacturer of laminated plastic kitchen and bathroom countertops and sink products. Subsurface investigation reports of the chemical storage areas noted no detectable volatile organics present, and therefore no further soil investigation was warranted. Additionally, there is conflicting data as to the presence of a former landfill. According to historical aerial photographs, the western portion of the site had a U-shaped road and potentially disturbed soil in 1928 and 1938. This could be associated with former landfill operations. The California Department of Resources Recycling and Recovery (CalRecycle) Solid Waste Information System (SWIS) database was reviewed for information on this potential landfill. According to the SWIS database, the site is not listed. The nearest landfill was approximately 0.67 mile west of the Project site. The potential former landfill on the site may be considered a REC. However, Stantec advanced three borings in this area (SV-8, SV-9, and SV-10) to a depth of 15 feet below ground surface and no substantial evidence to support the conclusion of the former presence of a landfill. Therefore, this is not considered a REC.

- 11312 Orchard Street: Formerly operated as Electra Foods Machinery. Soil remediation was performed in 1995. Subsequent testing after remediation concluded that contaminants detected in groundwater were below maximum concentrations and the case was closed.

The Project site has been assessed under the Regional Board's oversight. Those assessments resulted in the site obtaining a no further action letter from the Regional Board dated February 21, 1997. Three groundwater monitoring wells remain on the Property as a result of those assessments. Those wells are currently dry and part of the U.S. EPA groundwater monitoring well network for the El Monte groundwater contamination plume that underlies the Property. It has been confirmed (Raymond Chavira, U.S. EPA) that the dry groundwater monitoring well should be properly abandoned and are not requesting that the replacement monitoring well be reinstalled at the Project site. Well abandonment permits would be required from the Los Angeles County Public Health, Drinking Water Program (LACPH) prior to the start of work.

The Department of Toxic Substances Control EnviroStor database did not identify any records on the Project site.

**Phase I ESA - Soil Vapor Survey**

The Phase I ESA indicated that the Project site has the potential for vapor intrusion due to various factors. The groundwater beneath the Project site is part of the San Gabriel Valley Superfund Site and is documented to be impacted with various VOCs from point sources throughout the San Gabriel area. Groundwater in the Project area is generally below 100 feet, but off-gassing of VOCs has the potential to affect soil vapor conditions. Given the above-mentioned property characteristics and historical uses, the Phase I ESA recommended that a soil vapor survey be performed to characterize possible soil vapor impacts from on-site sources or from groundwater off-gassing.

**Phase II ESA - Soil Vapor Survey**

In response to the Phase I ESA's recommendations, a Phase II ESA Soil Vapor Survey was conducted between February 28 to March 5, 2019. The Phase II Soil Vapor Survey installed 20 soil vapor probes below the concrete foundation to a maximum depth of 15 feet. Laboratory results reported low levels of volatile organic compounds (VOCs) in all soil vapor samples. The VOCs included chloroform, benzene, and tetrachloroethene (PCE) above the San Francisco Bay Region Water Quality Control Board's newly published Environmental Screening Levels (ESLs). The reported concentrations of VOCs are as follows:

- Chloroform ranged from less than the laboratory reporting limit to 1,000 ug/m3 in soil vapor sample SV-2-15' located near the sump/clarifiers and associated trenching at 11312 Orchard, Unit B. Elevated concentrations of chloroform were reported in all six soil vapor samples collected near the sump/clarifier.

- Low levels of Benzene ranged from less than the laboratory reporting limit to 7.6 ug/m3 in soil vapor sample SV-11-5' located near the storm water vault in the southern corner of the Property.
- PCE ranged from less than the laboratory reporting limit to 180 ug/m3 in soil vapor sample SV-6-15' located in the parking lot area of 11308 Orchard. SV-6 was one (1) of three (3) soil vapor probes installed away from on-site RECs to assess the regional San Gabriel Valley Superfund plume.

The Phase II ESA recommended that a Vapor Intrusion Human Health Risk Assessment (VIHHRA) be performed to determine if vapor barriers with passive vents are required for proposed residential developments in the three areas of the property identified above; see MM HAZ-1. The VIHHRA would analyze soil vapor data collected at the Project site to evaluate a reasonable maximum exposure (RME) scenario on a point-by-point bases under the proposed future Project site use as residential. The VIHHRA would determine the final recommendations for vapor barriers with passive vents, however, it is likely that they would be required based on newly published ESLs and soil vapor results. It is assumed the HHRA will recommend a vapor mitigation, in the form of vapor barriers, beneath all the proposed dwellings.

**Phase II ESA - Soil Surveys**

Ten soil borings were advanced to a maximum depth of 15 feet below ground surface to determine if there are any concentrations in the shallow soil that may impact the Project site at the subsurface level. Low levels of diesel range organics (DRO), motor oil range organics (ORO), and arsenic were detected above residential screening levels in two areas of the Project site. Low levels or DRO were detected along the interior trench drains connected to the clarifiers at 11312 Orchard Street. Additionally, concentrations of DRO, ORO, and arsenic were detected above residential screening levels in shallow soil samples collected from the flammable exterior storage area at 3700 Cypress Avenue. Given that the Project site is over the San Gabriel Valley Superfund plume and elevated levels of contaminants, the Phase II recommended that a VIHHRA be performed to determine if vapor barriers with passive vents are required for proposed residential developments; see MM HAZ-1. The VIHHRA would determine the final recommendation for vapor barriers with passive vents.

The sump/clarifier area at 11312 Orchard Street reported elevated concentrations of chloroform and PCE in the soil vapor and low levels of DRO in the soil samples. PCE and chloroform were not reported in the soil samples collected around the sump/clarifiers and drains, however, releases are known to occur from these structures. Therefore, implementation of MM HAZ-2 is recommended, which requires that over-excavation followed by soil sampling be performed during demolition to verify concentrations are below residential screening levels.

**Remedial Action Plan**

In response to the Phase II ESA's recommendations, a Remedial Action Plan (RAP) was prepared to address contaminants of concern including detected VOCs, low levels of DRO, ORO, and arsenic above residential screening levels; see MM HAZ-3. The RAP discusses a proposed plan of

excavation and off-site disposal of petroleum-impacted soils above residential screening levels and presents a plan for confirmation soil sampling to verify removal of the impacted soils to levels below the approved site cleanup goals. Additionally, the RAP presents a plan to determine if implementation of soil vapor barriers beneath the proposed residential buildings is required to mitigate against soil vapor intrusion into these residential buildings. As discussed above, it is assumed that soil vapor barriers beneath the proposed residential dwellings will be required to mitigate potential vapor intrusion.

The proposed preliminary cleanup goals for each contaminant of concern are described below:

Arsenic. Background arsenic in California exceeds the conservative regional screening levels (RSLs). Accordingly, the Project site cleanup goal for residual arsenic in soil will be based on the DTSC Southern California regional background level of 12 mg/kg (DTSC, 2018).

Total Petroleum Hydrocarbon (TPH). TPH has been detected historically in Project site soils. The Project site cleanup goals for TPH will be based on the USEPA RSL for residential soil. The Project site cleanup goal for TPH are proposed at: TPH-g: 82 mg/kg, TPH-d: 96 mg/kg, and TPH-o: 2,500 mg/kg.

Volatile Organic Compounds. Preliminary Project site cleanup goals for VOCs in soil will follow the USEPA RSLs or DTSC HERO Note #3. Chloroform, benzene, and PCE are the primary VOCs of concern at the Project site. The USEPA RSLs or DTSC HERO Note #3 for these compounds are listed at: Chloroform: 0.32 mg/kg, Benzene: 0.33 mg/kg, and PCE: 0.59 mg/kg.

Preliminary Site cleanup goals for VOCs in soil vapor will follow the USEPA RSLs or DTSC HERO Note #3. Chloroform, benzene, and PCE are the primary VOCs of concern at the Project site. The USEPA RSLs or DTSC HERO Note #3 for these compounds are listed at: Benzene: 3.2 ug/m3, Chloroform: 3.1 ug/m3, and PCE: 15 ug/m3.

In general, the remediation program would follow the sequence outlined below. However, flexibility would be an important factor in the remediation process to optimize resources as environmental conditions are better understood throughout the demolition and remediation process. In general, the activities described in the RAP would be performed in the sequence described below:

- Procure the appropriate permits (i.e., Plumbing/Sewer Removal Permit) from the City of El Monte Public Works Department and prepare a site-specific Health and Safety Plan (HASP).
- Remove drains and clarifier along with shallow impacted soil within the clarifier excavation area.
- Remove shallow impacted soil near the former flammable storage area by excavation.
- Demolish other on-site structures.

- Prepare a Soil Management Plan (SMP) consistent with standard procedures and cleanup objectives issued by regulatory agencies that provide oversight of environmental remediation. Conduct additional investigations and characterizations of unknown source area, if discovered during demolition and include such findings in a Soil Management Plan.
- Conduct confirmation soil sampling of contaminants of concern, as necessary. Prepare a Soil Excavation Report (SER) upon completion of the SMP described above. The SER would be required to document all remediation activities completed on the site. The SER would describe how the excavation was completed to remove the elevated concentrations of contaminants.
- Following SER submittal and filing the soil vapor design plans with the City of El Monte Building Department and deed notification/restriction for the vapor barrier mitigation system with the Los Angeles County Recorder, the engineer of record will recommend closure/no further action for the Project site.

It is anticipated that on-site implementation of the field activities outlined in the RAP would meet general expectations presented in applicable USEPA guidance, Cal-EPA guidance, and other applicable guidance/advisory documents.

**Pre-Demolition Asbestos and Lead-Based Paint Survey**

The Project site was also tested for the presence of asbestos-containing materials (ACMs) and Lead-Based Paint (LBP) that would require special handling and/or disposal during demolition. The results indicated the presence of ACMs on the Project site. In addition, due to the age of the structures, detectable concentrations of lead are likely. Implementation of MM HAZ-4 and MM HAZ-5 would reduce impacts involving ACMs and LBP to a less than significant level.

**Conclusion**

The Project site is comprised of an Industrial Business complex. Current and historical site operations have created several RECs and the presence of contamination on the Project site with the potential to impact future development. Following compliance with the MM HAZ-1 through MM HAZ-5, which are listed below, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. With mitigation, a less than significant impact would occur in this regard.

The proposed Project would not be a generator of or facilitate the generation of hazardous materials. The proposed Project could involve the transport and use of materials associated with routine maintenance of residential developments, such as janitorial supplies for cleaning purposes and/or herbicides and pesticides for landscaping. However, the types and quantities of materials to be used and stored on-site would not be of a significant quantity to create a reasonably foreseeable upset or accident. Project operations would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials and impacts would be less than significant.

## MITIGATION MEASURES

**MM HAZ-1** **Vapor Intrusion Human Health Risk Assessment (VIHHRA).** Prior to Grading Permit issuance, under Los Angeles County Fire Department (LACFD) or California Regional Water Quality Control Board, Los Angeles Region (Regional Board) oversight, a VIHHRA shall be completed by a qualified toxicologist to verify that vapor barriers with passive vents are required for the proposed residential development in the following three areas of the property (although the Project proposes a vapor intrusion mitigation system (VIMS) in the form of a passive barrier beneath the slabs of each dwelling):

- At soil vapor sample SV-2-15' located near the sump/clarifiers and associated trenching at 11312 Orchard, Unit B.
- At soil vapor sample SV-11-5' located near the storm water vault in the southern corner of the Property.
- At soil vapor sample SV-6-15' located in the parking lot area of 11308 Orchard.

The Homeowner's Association (HOA) shall be responsible for the VIMS. The VIHHRA shall analyze soil vapor data collected at the Project site to evaluate a reasonable maximum exposure (RME) level under the proposed future Project site, as a residential use. The VIHHRA shall determine the final recommendations for design, installation, and operation of a VIMS, if required, and which may be in the form of vapor barriers with passive vents. A long-term soil vapor monitoring plan shall be prepared if elevated RME levels dictate the necessity for such plan based on VIHHRA findings. If long-term soil vapor monitoring is deemed necessary, the HOA shall be responsible.

**MM HAZ-2** **Over Excavation.** During demolition at the sump/clarifier area at 11312 Orchard Street, over-excavation followed by soil sampling shall be performed to confirm the concentrations of chloroform and PCE in the soil vapor and concentrations of DRO in the soil samples are below the residential screening levels. If concentrations are above the residential screening levels, then additional investigations and characterizations shall be conducted, and such findings shall be included in a Soil Management Plan (see below).

**MM HAZ-3** **Remedial Action Plan (RAP).** The RAP (Stantec, November 15, 2019). Prior to Grading Permit issuance, a RAP consistent with standard procedures and cleanup objectives issued by regulatory agencies shall be implemented. The RAP's following proposed plans shall be implemented:

- Plan of excavation and off-site disposal of petroleum-impacted soils above residential screening levels,

- Plan for confirmation soil sampling to verify removal of the impacted soils to levels below the site cleanup goals for each contaminant of concern, as specified in the RAP,
- Plan to determine if implementation of soil vapor barriers beneath the proposed residential buildings is required to mitigate against soil vapor intrusion into these residential buildings.

The remediation program shall not deviate from regulatory agency standard procedures and cleanup objectives. The remediation program shall also generally follow the sequence outlined below, except for implementation of more stringent measures, as environmental conditions are better understood throughout the demolition and remediation process. The required plans shall be prepared by an environmental consultant with experience in implementing RAPs.

- The appropriate permits (i.e., Plumbing/Sewer Removal Permit) shall be procured from the City of El Monte Public Works and a site-specific Health and Safety Plan (HASP) shall be prepared.
- The following shall be removed by excavation:
  - The drains and clarifier along with shallow impacted soil within the clarifier excavation area.
  - The shallow impacted soil near the former flammable storage area.
- Other on-site structures shall be removed.
- Additional investigations and characterizations of an unknown source area shall be conducted, as per the Soil Management Plan (SMP) requirements, if discovered during demolition, and such findings shall be included in a Soil Excavation Report (SER) upon completion.
- Confirmation soil sampling of contaminants of concern, shall be conducted, as necessary.

A SER shall be prepared upon completion of the remediation activities described above. The SER shall document all remediation activities completed on the site. The SER shall describe how the excavation was completed to remove the elevated concentrations of contaminants.

Following SER submittal and filing the soil vapor design plans with the City of El Monte Building Department and deed notification/restriction for the vapor barrier mitigation system with the Los Angeles County Recorder, the engineer of record will recommend closure/no further action for the Project site.

**MM HAZ-4** **Asbestos Containing Materials (ACMs).** Abatement of asbestos shall be completed prior to any activities that would disturb ACMs or create an airborne asbestos hazard. Asbestos removal shall be performed by a State certified

asbestos containment contractor in accordance with the South Coast Air Quality Management District (SCAQMD) Rule 1403.

**MM HAZ-5** **Lead-Based Paint (LBP).** If paint is separated from building materials (chemically or physically) during demolition of the structures, the paint waste shall be evaluated independently from the building material by a qualified Environmental Professional. If lead-based paint is found, abatement shall be completed by a qualified Lead Specialist prior to any activities that would create lead dust or fume hazard. Lead-based paint removal and disposal shall be performed in accordance with California Code of Regulation Title 8, Section 1532.1, which specifies exposure limits, exposure monitoring and respiratory protection, and mandates good worker practices by workers exposed to lead. Contractors performing LBP removal shall provide evidence of abatement activities to the City Engineer.

***4.9c*** ***Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?***

**No Impact.** The nearest school to the Project site is Legore Elementary School, 0.70 mile to the north, at 11121 Bryant Road, El Monte. There are no existing or proposed schools within 0.25 mile of the Project site. Moreover, the Project involves a residential development that would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste. As such, no impact would occur, and no mitigation is required.

***4.9d*** ***Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment?***

**No Impact.** Government Code §65962.5 refers to the Hazardous Waste and Substances Site List, commonly known as the Cortese List, maintained by the Department of Toxic Substances Control (DTSC). The Cortese list contains hazardous waste and substance sites including public drinking water wells with detectable levels of contamination, sites with known underground storage tanks (USTs) having a reportable release, solid waste disposal facilities from which there is a known migration, hazardous substance sites selected for remedial action, historic Cortese sites, and sites with known toxic material identified through the abandoned site assessment program. Review of EnviroStor[32] and GeoTracker[33] websites, the Project site is not included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5. No impact would occur, and no mitigation is required.

It is noted, one Cortese site, the San Gabriel Groundwater Basin, is partially located in the City. The San Gabriel Valley has been under environmental investigation since 1979 when

[32] Department of Toxic Substance Control. (2019). *Envirostor Database.* Retrieved from https://www.envirostor.dtsc.ca.gov/public/.

[33] State Water Resources Control Board. (2019). *GeoTracker*. Retrieved from https://geotracker.waterboards.ca.gov/.

groundwater contaminated with volatile organic compounds (VOCs) was first identified. The groundwater contamination resulted from the historic use and improper handling and disposal of chlorinated solvents (such as tetrachloroethene (PCE) and trichloroethene (TCE)) and other chemicals (other VOCs, 1,4-dioxane, perchlorate, NDMA).

In May 1984, U.S. EPA listed four broad areas of regional-scale groundwater contamination within the Groundwater Basin on the National Priorities List (NPL) under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). Since listing the San Gabriel Valley Superfund Sites, U.S. EPA has been working to address the groundwater contamination on a regional scale through installation and operation of groundwater extraction systems that control the contaminant migration. Extracted groundwater is treated to safe levels and, if feasible, is reused for drinking water supply. Although the groundwater cleanup activities started in the 1990s, and progress has been made, the groundwater contamination in the San Gabriel Valley is extensive and will require long-term remediation. See also Response 4.9b.

***4.9e*** ***For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?***

**Less Than Significant Impact.** The Project site is approximately 1.2 miles south of the San Gabriel Valley Airport (formally named the El Monte Airport or "Airport"), which is located at 4233 Santa Anita Avenue, El Monte. The Airport, with over 97,000 general aviation takeoffs/landings each year, is owned and operated by the County of Los Angeles. The El Monte Airport Master Plan (Master Plan) Report (County of Los Angeles, June 1995) comprehensively reviews the Airport development's current status, anticipated future use, and proposed future course. The Master Plan must be consistent with the Los Angeles County Airport Land Use Commission (ALUC) and Federal Aviation Administration (FAA) regulations. Airport Land Use Compatibility Plans (ALUCP) cover aviation activities of 15 Los Angeles County public use airports, including the San Gabriel Valley Airport. The ALUCP depicts the Airport's boundaries and development restrictions. All proposed land uses within the ALUCP boundaries must comply with ALUCP restrictions. Review of the ALUCP indicates the Airport is not within the Airport Influence Area, Airport Runway Protection Zones (RPZ) and Inner Safety Zone, and Airport Noise Contours.[34] Therefore, the proposed Project would not result in a safety hazard or excessive noise for people residing in the Project area. A less than significant impact would occur, and no mitigation is required.

***4.9f*** ***Would the project impair implementation of or physically interfere with an emergency response plan or emergency evacuation plan?***

**Less Than Significant Impact.** The City has an emergency preparedness plan that complies with state law and interfaces with other Southern California cities and counties. The EMGP designates

[34] Los Angeles County Department of Regional Planning. 2009. Airports- Los Angeles County GIS Interactive Map. Available at: http://lacounty.maps.arcgis.com/apps/webappviewer/index.html?id=acf2e87194a54af9b266bf07547f240a, Accessed September 25, 2019.

potential evacuation routes in the City (including Ramona Boulevard, Valley Boulevard, Peck Road, and Santa Anita Avenue). The Project would develop residential uses near designated evacuation routes, however, the proposed improvements would be constructed within the site boundaries. Additionally, as discussed in **Section 4.17: Transportation**, the proposed Project would not result in full lane closures during construction. Access to existing roadways within the Project area would not be impeded. Therefore, the Project would not impair the implementation of or physically interfere with an emergency response plan or emergency evacuation plan. Project impacts would be less than significant, and no mitigation is required.

***4.9g Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?***

**No Impact.** The City is fully urbanized and there are no nearby wildlands. Therefore, the Project would not expose people or structures to risks involving wildland fires. No impact would occur, and no mitigation is required.

## 4.10 Hydrology and Water Quality

This Section is based on the Hydrology and Low Impact Development (LID) Report (Forma Engineering, September 2019) which is included in its entirety in **Appendix H1: Hydrology and LID Report**, and the Fire Flow Analysis (Psomas, May 2019) which is included in its entirety in **Appendix H2: Fire Flow Analysis**.

| Environmental Issue | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **Would the project:** | | | | |
| a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality? | | | X | |
| b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the projects may impede sustainable groundwater management of the basin? | | | X | |
| c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: | | | X | |
| (i) Result in substantial erosion or siltation on- or off-site. | | | X | |
| (ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; | | | X | |
| (iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff? or | | | X | |
| (iv) Impede or redirect flood flows? | | | X | |
| d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation? | | | X | |
| e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? | | | X | |

## IMPACT ANALYSIS

***4.10a Would the project violate water quality or waste discharge requirements or otherwise substantially degrade surface or ground water quality?***

**Less Than Significant Impact.**

**Water Quality Standards/Waste Discharge Requirements - Short-Term Construction**

The proposed Project's construction-related activities would include excavation, grading, and trenching, which would displace soils and temporarily increase the potential for soils to be subject to wind and water erosion. Construction-related erosion effects would be addressed through compliance with the NPDES program. During construction, the Project would be subject to compliance with erosion and siltation control measures and the NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Order No. 2009-0009-DWQ, and all subsequent amendments) (Construction General Permit). Dischargers whose projects disturb 1.0 or more acres of soil are required to obtain coverage under the Construction General Permit. The Project would disturb approximately 5.17 net acres, and would therefore be subject to the Construction General Permit. Construction activity subject to the Construction General Permit includes clearing, grading, grubbing, or excavation, and ground disturbances such as stockpiling or excavation.

To obtain coverage under this Permit, dischargers are required to file with the State Water Board Permit Registration Documents (PRDs), which include a Notice of Intent (NOI), Storm Water Pollution Prevention Plan (SWPPP), and other compliance-related documents. EMMC Chapter 15.40 - Grading and Erosion Control, provides the minimum standards to substantially reduce the potential for erosion and sedimentation damage within the City. The Construction General Permit requires development and implementation of a SWPPP and monitoring plan, which must include erosion-control and sediment-control Best Management Practices (BMPs) that would meet or exceed measures required by the General Permit to control potential construction-related pollutants. Erosion-control BMPs are designed to prevent erosion, whereas sediment controls are designed to trap sediment once it has been mobilized. EMMC Chapter 13.16 - Stormwater Management and Discharge Control, addresses stormwater and runoff pollution control and is intended to protect and enhance water quality pursuant to and consistent with the Clean Water Act. EMMC §13.16.100.D specifies that each discharger associated with construction activity shall provide notice of intent, comply with, and undertake all other activities required by any general stormwater permit applicable to such discharges. EMMC Chapter 13.20 - Stormwater and Urban Runoff Pollution Control, (known as the Low Impact Development (LID) Ordinance), addresses stormwater pollution control measures for development planning and construction activities. EMMC §13.20.020 specifies that all applicants for any development project shall submit a LID plan to the City for review. LID plan approval shall occur prior to Grading Permit issuance.

See Response 4.10.c.ii for a description of existing and proposed site drainage. Following compliance with NPDES and EMMC requirements, which include implementation of BMPs, the

Project's construction-related activities would not violate any water quality standards or otherwise substantially degrade surface or groundwater quality. A less than significant impact would occur, and no mitigation is required.

**Water Quality Standards/Waste Discharge Requirements - Long-Term Operations**

The Los Angeles County Flood Control District, the County of Los Angeles, and the City along with 83 other incorporated cities therein (Permittees) discharge pollutants from their municipal separate storm sewer (drain) systems (MS4s). Stormwater and non-stormwater enter and are conveyed through the MS4 and discharged to Los Angeles Region surface water bodies. These discharges are regulated under countywide waste discharge requirements contained in Order No. R4-2012-0175[35] (NPDES Permit No. CAS004001, *Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges Within the Coastal Watersheds of Los Angeles County, Except Discharges Originating from the City of Long Beach MS4*, which was adopted November 8, 2012.[36] The MS4 Permit Order provides the revised waste discharge requirements for MS4 discharges within the Los Angeles County watersheds, which includes the City of El Monte. The MS4 Permit Order, which became effective December 28, 2012, supersedes Order No. 01-182. Los Angeles County uses its Low Impact Development (LID) Ordinance to require that projects comply with NPDES MS4 Permit water quality requirements.

The MS4 Permit Order requires development and implementation of a Planning and Land Development Program for all "New Development" and "Redevelopment" projects subject to the Order. New development and redevelopment projects/activities subject to Los Angeles County's LID Ordinance include all development projects equal to 1.0 acre or greater of disturbed area and residential new or redeveloped projects that create, add, or replace 10,000 SF or greater impervious surface area. The Project involves approximately 5.24 gross acres of disturbed area and adds more than 10,000 SF of impervious surface area; as such, the Project is subject to Los Angeles County's LID Ordinance. LID controls effectively reduce the amount of impervious area of a completed project site and promote the use of infiltration and other controls that reduce runoff. Source control BMPs prevent runoff contact with pollutant materials that would otherwise be discharged to the MS4. Specific structural controls are also required to address pollutant discharges from certain uses including but not limited to housing developments, parking lots, and new streets, among others.

The following is a list of materials anticipated during Project operations, which would potentially contribute to pollutants, other than sediment, to stormwater runoff:

- Vehicle fluids, including oil, grease, petroleum, and coolants from personal vehicles;
- Landscaping materials and wastes (topsoil, plant materials, herbicides, fertilizers, mulch, pesticides);

[35] State of California Water Quality Control Board. (undated). *Order NO. R4-2012-0175 NPDES Permit NO. CAS004001.* Los Angeles, CA: State of California Water Quality Control Board.

[36] Ibid.

- General trash debris and litter; and
- Pet waste (bacteria/ fecal coliforms).
- The Project proposes site design concepts intended to minimize urban runoff and the impervious surface footprint. Infiltration is Los Angeles County's first option when screening potentially feasible LID BMPs. Infiltration systems collect stormwater runoff and conduct it into permeable soils beneath the site; effectively reducing pollution, reducing runoff and flooding, and recharging groundwater. The Project would treat site runoff in accordance with the Los Angeles County Low Impact Development Manual, 2014. To do so, runoff resulting from the 85$^{th}$ percentile rain event would be treated prior to leaving the site. As determined from the Project's LID Plan, the 85-percentile rain event for the Project site is 0.95 inches, which is used as the design storm for LID.

Under existing conditions, the Project site is divided into two subareas; subarea 1 consists of approximately 55 percent of the site and drains to Iris Lane curb and gutter and subarea 2 consists of the remaining 45 percent of the site and drains into an existing LACFCD catch basin located at the Project site's southwest corner; see **Appendix H1** Figure 2. Upon Project Implementation, the Project site would be combined into a single Subarea, Subarea 1, and divided into two smaller subareas, Subareas 1a and 1b. Each subarea is treated using separate LID Best Management Practices (BMPs) due to space limitations. Overflow from the proposed BMPs combines at an on-site catch basin and discharges to a proposed LACDCF connection.

The proposed Project would decrease the site's effective imperviousness from 95 percent to 77 percent. Additionally, for the 50-year rain event, the peak flowrate discharging from the Project site to the LACFCD storm drain system would decrease from 13.39 cubic feet per second (cfs) to 11.51 cfs. Therefore, the Project would decrease the site's impervious surface area and runoff, as compared to pre-Project conditions. Thus, the Project is considered exempt from the requirements of the hydromodification.

LID is a requirement of NPDES Permit No. CAS004001, Order No. R4-2012-0175 and City of El Monte Ordinance No. 2840. The LID explains the type of development and site drainage, and addresses post-construction water quality. BMPs must be implemented to address storm water pollution and peak flow discharge impacts. All BMPs must be sized to meet specified water quality design/peak flow discharge criteria.

Following compliance with NPDES and EMMC requirements, which include LID BMPs, Project operations would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. Therefore, Project impacts would be less than significant, and no mitigation is required.

***4.10b Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?***

**Less Than Significant Impact.** The Project site is in the City of El Monte Water Company's service area, and specifically, within the Central District, which serves areas north of the San Bernardino Freeway and contains primarily business and shopping areas. The City of El Monte Water Company is a sub-agency of the Upper San Gabriel Valley Municipal Water District, that delivers water to sub-agencies for direct use and groundwater recharge. The City of El Monte Water Company serves approximately 16 percent of the City and exclusively uses local groundwater. The City's water supply is produced from the Main San Gabriel Groundwater Basin (Main Basin), and if the El Monte Water Company exceeds their groundwater allocation, replenishment water is available from the Main San Gabriel Basin (Watermaster). The Main Basin encompasses the valley floor of the San Gabriel Valley, except the Raymond and Puente Basins. The Main Basin is replenished by runoff from adjacent mountains and hills, rainfall, subsurface inflow, return flow from overlaying uses, and imported water.

The City has four active wells, Well 2A, 10, 12, and 13, in the Main Basin. A fifth well, Well 3, is close to being made active after completion of a nitrate blending project. Well 4 is currently inactive but permitted for standby operation in case of emergency. In sum, the City's wells have pumping capacity ranging from 900 gallons per minute (gpm) to 3,000 gpm. The total capacity of the City's wells is 9,500 gpm, or 15,000 AF per year. The City's projected total water demand is 675 MG in 2020.

As noted above, Project implementation would reduce the site's effective imperviousness from 95 percent to 77 percent, thus allowing for more groundwater recharge to occur. The proposed Project would not reduce the maximum availability of stormwater for groundwater recharge through percolation of precipitation. As concluded in Response 4.10e, the Project's water demand would total approximately 35,329 gallons per day (GPD), an increase of 24,953 GPD from existing conditions. The City of El Monte Water Company has confirmed that water service is available to the Project site. Therefore, the Project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that the Project would impede the basins' sustainable groundwater management. Project impacts would be less than significant, and no mitigation is required.

***4.10c Would the project substantially alter the existing drainage pattern of the site or area, including through the alterations of the course of stream or river or through the addition of impervious surfaces, in a manner which would:***

***(i) Result in substantial erosion or siltation on- or off-site?***

***(ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?***

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

***(iv) Impede or redirect flood flows?***

**Less Than Significant Impact.** As noted in Response 4.10a, under existing conditions, the Project site is divided into two subareas. Runoff from Subarea 1 flows westerly along Iris Lane's northerly curb and gutter to an existing City-owned catch basin, which outlets into an existing LACFCD 72-inch storm drain. Runoff from Subarea 2 is captured by the existing LACFCD catch basin and outlets to the same 72-inch storm drain, upstream of the Subarea. In the developed condition, the site's drainage pattern would remain generally the same and would continue to flow south towards Iris Lane via surface drainage and pipe flow and ultimately drain to the existing LACFCD 72-inch storm drain. However, the existing drainage areas would be combined into a single subarea, Subarea 1, that drains south towards Iris Lane and would be divided into two separate areas, 1a and 1b, for the purposes of LID design. Additionally, a new lateral connection is proposed to connect the site drainage directly to the LACFCD 72-inch storm drain. A parkway culvert is also proposed to serve as overflow for the site to the Iris Lane gutter.

The proposed Project consists of 103 townhome units and open space area on approximately 5.24 gross acres. The development proposes to include drive aisles, parking, landscaping, walkways, and open space areas. The site would be graded to collect runoff at various low points throughout the site. Stormwater runoff generated by the entire site would be directed towards the site's southwest corner. The proposed development would utilize catch basins and an on-site area drain system to collect and convey to a proposed underground storm drain system. The stormwater runoff would be conveyed off-site via a proposed LACFCD connection to the existing 72-inch RCP storm drain system within Iris Lane.

**Infiltration BMPs**

As noted in Response 4.10a, infiltration is the first option in Los Angeles County when screening potentially feasible LID BMPs. Geotechnical and infiltration reports for the proposed Project did not identify any hazards that would disallow on-site infiltration.

The Project's proposed infiltration system is based upon the Los Angeles Department of Public Works (LADPW) LID Manual, 2014, RET-3, Infiltration Trench. The proposed infiltration trench is a StormTech system, which incorporates an isolator row that serves as a settling basin for silt and debris and would be accessible for maintenance. The proposed BMPs would be located within the site's open areas; see **Appendix H1** Developed Condition Hydrology Map.

The Stormwater Quality Design Volume ($SWQD_V$) was used to determine the detention volume requirements for LID design. The LID BMP Design Summary is provided in **Table 4.10-1**.

| TABLE 4.10-1: LID BMP DESIGN SUMMARY | | | | | |
|---|---|---|---|---|---|
| **Subarea** | **BMP** | **BMP Area Required ($ft^2$)** | **BMP Area Provided ($ft^2$)** | **BMP Volume Required ($ft^3$)** | **BMP Area Provided ($ft^3$)** |
| 1a | StormTech Infiltration Trench (RET-3) | 1,194 | 1,938 | 9,551 | 9,555 |
| 1b | StormTech Infiltration Trench (RET-3) | 398 | 915 | 3,184 | 4,529 |
| Source: Forma Engineering, Inc. (September 2019). *Hydrology & LID Report*. | | | | | |

The proposed BMPs would exceed the County's required capacity and would be sufficient to meet the Project's drainage needs. To ensure the water quality BMPs' effectiveness, routine maintenance would be required for the structural BMPs and the surrounding areas. The operation and maintenance program would include regular sweeping and removal of debris, regular inspections, maintenance of the StormTech infiltration system, stenciling to ensure legibility of stencils and/or signs, and an updated maintenance log kept on-site.

Additionally, there are no streams or rivers near the Project site. Therefore, the Project would not substantially alter the site's existing drainage pattern or add impervious surfaces, such that it would substantially increase the rate or amount of surface runoff in a manner which would result in flooding, create/contribute runoff, which would exceed the capacity of existing drainage system, or impede/redirect flood flows. Impacts would be less than significant, and no mitigation is required. See Response 4.10a concerning potential impacts involving erosion.

### *4.10d In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?*

**Less Than Significant Impact.** The Project site is in "Zone X," which is an area of minimal flood hazard that is outside the 500-year flood.[37] Tsunamis are sea waves that are generated in response to large-magnitude earthquakes. When these waves reach shorelines, they sometimes produce coastal flooding. Seiches are the oscillation of large bodies of standing water, such as lakes, that can occur in response to ground shaking. The Project site is approximately 30 miles from the Pacific Ocean and there are no nearby bodies of standing water. Tsunamis and seiches do not pose hazards due to the Project site's inland location and lack of nearby bodies of standing water. The Project is a residential development project and would involve the use of materials associated with routine maintenance of the property, such as janitorial supplies for cleaning purposes and/or herbicides and pesticides for landscaping. The Project is not within a flood hazard, tsunami, or seiche zone and would not risk the release of pollutants. Therefore, potential impacts associated with inundation by flood hazard, tsunami, or seiche would be less than significant, and no mitigation is required.

[37] Federal Emergency Management Agency. (September 2019). *FEMA Flood Map Service Center.* Retrieved from https://msc.fema.gov/portal/search?AddressQuery=3630%20Cypress%20Avenue%2C%20El%20Monte%2C%20CA#searchresultsanchor

### *4.10e Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

**Less Than Significant Impact.** As noted in Response 4.10b, the City's local groundwater water supply is produced from the Main Basin. The Main Basin includes essentially the entire valley floor of the San Gabriel Valley, except the Raymond Basin on the northwest and the Puente Basin on the east. The Main Basin is bordered by the base of the San Gabriel Mountains on the north and the Whitter Narrows on the southwest. The Main basin is a large groundwater basin that is replenished by stream runoff from the adjacent mountains and hills, by rainfall directly on the surface of the Valley floor, subsurface inflow from the Raymond and Puente Basins, and by return from water applied for overlaying uses. Additionally, the Main Basin may be replenished with imported water purchased from the Metropolitan Water District (District).

The Watermaster annually prepares and updates its Five-Year Water Quality and Supply Plan in order to coordinate groundwater-related activities to protect and improve the Main Basin's water supply and quality. Drought conditions have persisted in the San Gabriel Valley for the past two decades, but the Watermaster has diligently managed groundwater supply and groundwater levels through the establishment of Operating Safe Yield (OSY). Despite below-average rainfall and stormwater runoff during Fiscal Year 2017-2018, the groundwater level only decreased by one foot.

During Fiscal Year 2017-2018, San Gabriel Valley's total water use was 229,000 AF, which is approximately 8.0 percent lower than the 10-year average of 248,000 AF. To ensure long-term water supply reliability, the Watermaster has implemented drought management tools such as a Three-Year Purchased Water Plan, implementation of Water Resource Development Assessment Program, and additional protective measures to increase cyclic storage. In addition to these supply management methods, the Watermaster is pursuing new replenishment methods such as recycled water, storage and export programs, and retail water conservation.

In accordance with the California Urban Water Management Planning Act, the El Monte Water Department (EMWD) must prepare and adopt an Urban Water Management Plan (UWMP) every five years. The City's most recent UWMP, which was published in 2017, describes the City's management operations in achieving the maximum practicable conservation and efficient use of local water resources.

Total retail water demand was estimated to be 787 million gallons (MG) by the Year 2035. Additionally, the retail population is expected to increase from 17,839 persons in 2015 to 22,645 persons by 2035. EMWD retail supplies are expected to increase to 836 MG in Year 2035. In the case of a water supply shortage, the EMWD has prepared a Water Shortage Contingency Plan to ensure adequate service.

An average day demand water for the Project was estimated based on the City's 2010 Water Master Plan Update, which estimates a per capita use for multi-family residential land use equal to 81 GPD with 4.24 people per household. This equates to an average of 343 GPD/DU. The Project's forecast population growth is approximately 420 persons; see Response 4.14a. The

Project's estimated average day demand would be 35,329 GPD, a 24,953 GPD increase over existing conditions. This represents a nominal increase in water demand that would not cause the EMWD's UWMP demand projections to be exceeded. EMWD has confirmed water service would be available to the Project site.[38] The Project would be subject to compliance with the mandatory CALGreen standards for residential buildings, which require a 20 percent reduction in indoor water use and the City's water conservation and efficiency standards. It is also noted, the Watermaster would continue to implement drought management tools (see discussion above) to ensure long-term water supply reliability. Therefore, the proposed Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. A less than significant impact would occur, and no mitigation is required.

[38] Ed Diggs, Interim Utilities Director EMWD. (March, 2019). *Will Serve Letter for 11312 Orchard Street, El Monte.*

## 4.11 Land Use and Planning

| Environmental Issue | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **Would the project:** | | | | |
| a) Physically divide an established community? | | | | X |
| b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? | | | X | |

**IMPACT ANALYSIS**

***4.11a Would the project physically divide an established community?***

**No Impact.** An example of a project that has the potential to divide an established community includes a new freeway or highway through an established neighborhood. The proposed Project is an infill development, which would demolish the existing Industrial Business Park and, in its place, develop a residential community consisting of 103 attached townhomes in 21 buildings. Given its nature and scope, the Project would not physically divide an established community. No impact would occur, and no mitigation is required.

***4.11b Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?***

**Less Than Significant Impact.** EMGP Figure LU-1, *Land Use Policy Plan*, depicts the City's land use designations and indicates the Project site is designated Industrial/Business Park (0-1.0 Floor Area Ratio (FAR)) (4.44 acres) and Medium-Density Residential (8.1-14.0 DU/AC) (0.735 acres). The Industrial/Business Park designation is intended primarily for the Northwest Industrial District.[39] Allowable land uses include a mix of sustainable manufacturing, processing, office, warehousing, and distribution uses. Industrial uses are allowed at an intensity of up to 1.0 FAR. The Medium-Density Residential land use designation allows attached and detached single-family homes, attached products with four or fewer units, and planned developments.[40] The Project proposes a residential community consisting of 103 townhomes at a density of 19.7 DU/net AC, which would conflict with the site's existing Industrial/Business Park and Medium-Density Residential designations. Therefore, the Project Applicant has requested approval of General Plan Amendment GPA 03-19 to change the site's land use designation from Industrial/

[39] City of El Monte. (2011). *Vision El Monte General Plan 2011*. Page LU-8. El Monte, CA: City of El Monte.
[40] Ibid. Page LU-6.

Business Park and Medium-Density Residential to High-Density Residential. It is noted, the proposed Project would support Policy LU-4.1 Housing Opportunities, which aims to support a variety of housing types and prices to meet present and future needs. The proposed Project would introduce new multi-family townhomes to the City and increase the diversity and quantity of City's overall housing supply, furthering Policy LU-4.1.

The City of El Monte Zoning Map depicts the City's zones and indicates the Project site is zoned M-2 Zone (4.44 acres) and R-3 Zone (0.735 acres).[41] Regulations governing the M-2 Zone are included in EMMC Chapter 17.60 - M-2 Zone. EMMC §17.60.010 outlines the uses permitted in the M-2 Zone, which include any use permitted in the M-1 Zone, among others. Regulations governing the R-3 Zone are included in EMMC Chapter 17.40 - R-3 Zone. The R-3 Zone allows any use permitted in the R-2 Zone, group dwellings, multiple-family dwellings and apartment houses, among others; see EMMC Chapter 17.40. The maximum development density allowed in the R-3 Zone is no more than 1 DU/3,111 SF of net lot area, provided the lot width is 250 feet or greater. Based on the existing zoning, the Project site's maximum development capacity is approximately 191,664 SF of industrial uses and approximately ten DUs. The Project proposes a residential community consisting of 103 townhomes at a density of 19.7 DU/net AC, which would conflict with the site's existing zoning (i.e., M-2 and R-3 Zones). Therefore, the Project Applicant has requested approval of Zone Change ZC 01-19 to change the site's zoning designation from M-2 Zone and R-3 Zone to the R-4 Zone.

EMMC §17.42.020 - R-4 Regulations, provides the development regulations for the R-4 Zone. The R-4 Zone implements the High-Density Residential land use designation, which specifies that the maximum permitted density is 25 DU/AC. Based on a 5.17 net-acre site and 25 DU/AC, the Project site's maximum development capacity is approximately 129 DUs. The Project proposes a residential community of 103 townhomes at approximately 19.7 DU/net AC, which would be below the maximum allowable development capacity/density in the R-4 Zone. Additionally, the Project would be subject to the R-4 Zone's regulations specified in EMMC §17.42.020 concerning the following key development standards:

A. Front and side yards [setbacks]
B. Rear yard [setback]
C. Reserved (i.e., no standard)
D. Lot area
E. Distance between buildings
F. Reserved (i.e., no standard)
G. Minimum floor area
H. Useable open space
I. Maximum [building] length
J. Trash areas
K. Fencing
L. Etc.

[41] City of El Monte (March 2019). *Zoning Map*. El Monte, CA: City of El Monte Economic Community Development Department - Planning Division.

The City's review of the Project for consistency with the EMMC has determined the Project complies with all relevant development standards, except those listed below. Therefore, the Project Applicant has requested approval of the following Variance and Modifications:

- Front and side yard and rear yard setbacks: Modification to modify the required front and rear yard setbacks, and allow for "second and third story overhangs," to allow two buildings (Buildings 1 and 7) along Cypress Avenue to encroach into 20-foot setback, allowing a 12-foot setback along the diagonal property line, as well as allow private open space and common open space within front yard setback (of irregularly shaped property), and one parking spot to encroach into front yard setback on Cypress Avenue.
- Usable open space: Variance to deviate from minimum private open space and common open space requirements,
- Fencing: Modification to modify the maximum allowable wall height throughout the development at a height of 8.0 feet, in lieu of 6.0 feet,
- Parking: Modification concerning:
  - Minimum parking per unit: To reduce the garage size clearance from 20 feet by 20 feet to 19 feet by 20 feet,
  - Additional parking standards: To reduce the guest parking requirements to 0.50 (51/103) and allow one parking spot to encroach into front yard setback along Cypress Avenue (see EMMC §17.08.090 below), and
- Floor Area Ratio: Modification to exceed the maximum allowable 0.40 FAR to 0.90 FAR.

EMMC §17.08.090 - Parking Requirements for Specific Land Uses, specifies the following:

> *Two (2) parking spaces within a fully enclosed garage are required for the first 1,200 SF of gross floor area, for the R-4 Zone. Additional parking spaces are required at a rate of one space per each additional 300 square feet of gross floor area or portion thereof. For multi-family developments of 10 or more units in R-3 and R-4 zones, 10 percent of the total required parking shall be reserved for guest parking.*

Accordingly, the Project's total parking demand would be 394 parking spaces, including 206 resident spaces within garages and 188 additional spaces, of which 173 spaces would be required for resident parking and 44 required for guest parking. The Project proposes 269 parking spaces, including 206 resident spaces within garages and 63 additional spaces, resulting in a 125-space deficit. Therefore, the Project Applicant has requested approval of a Modification to reduce EMMC parking requirements.

The Project would also be subject to EMMC Chapter 17.24 concerning conditional use permits (CUP), which specifies that residential developments with three or more DUs require a CUP. The Project includes 103 DUs; thus, the Project Applicant has requested approval of Conditional Use Permit CUP 20-19.

The Project would also be subject to EMMC regulations concerning residential subdivisions, including EMMC Chapter 16.10 - Tentative Tract Map, which specifies that the subdivider shall have a tentative map prepared by a registered civil engineer or licensed land surveyor in a manner acceptable to the Planning Services Manager and the City Engineer. Therefore, the Project Applicants has requested approval of Vesting Tentative Tract Map #82797 to subdivide the site for townhome purposes.

Following the City's approval of the requested entitlements (i.e., General Plan Amendment, Zone Change, Vesting Tentative Tract Map, Conditional Use Permit, Variance, and Modifications), the Project would not conflict with the EMGP or EMMC. Impacts would be less than significant, and no mitigation is required.

## 4.12 Mineral Resources

| Environmental Issue | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **Would the project:** | | | | |
| a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State? | | | | X |
| b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan? | | | | X |

**IMPACT ANALYSIS**

***4.12a Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?***

***4.12b Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?***

**No Impact.** The Surface Mining and Reclamation Act of 1975 (SMARA) requires classification of land into mineral resource zones (MRZs) according to the known or inferred mineral potential of the area.[42] The Project site is not located in an area identified as a locally important mineral resource recovery site.[43] The Project site and surrounding areas are fully developed. Neither the EMGP nor the EMGP EIR identify significant mineral resources within the City. Therefore, the Project would not result in the loss of a known mineral resource or loss of availability of a known mineral resource or locally important mineral resource site. Therefore, no impact would occur, and no mitigation is required.

[42] California Department of Conservation. (2018). *California Statutes and Regulations for the California Geological Survey*. Sacramento, CA: California Geological Survey.

[43] California Department of Conservation. (2015). *CGS Information Warehouse: Regulatory Maps.* Retrieved from http://maps.conservation.ca.gov/cgs/informationwarehouse/.

## 4.13 Noise

This Section is based on the *Noise Memorandum for Orchard and Cypress* (Noise Memorandum) (Rincon Consultants, Inc., March 2019), which is included in its entirety in **Appendix I: Noise Memorandum.** Supplemental information and analysis are provided by Kimley-Horn and Associates, Inc.

| Environmental Issue | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **Would the project:** | | | | |
| a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? | | X | | |
| b) Generation of excessive ground borne vibration or groundborne noise levels? | | | X | |
| c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? | | | X | |

**SOUND AND ENVIRONMENTAL NOISE**

Acoustics is the science of sound. Sound can be described as the mechanical energy of a vibrating object transmitted by pressure waves through a medium (e.g., air) to human (or animal) ear. If the pressure variations occur frequently enough (at least 20 times per second), they can be heard and are called sound. The number of pressure variations per second is called the frequency of sound and is expressed as cycles per second, or hertz (Hz).

Noise is defined as loud, unexpected, or annoying sound. In acoustics, the fundamental model consists of a noise source, a receptor, and the propagation path between the two. The loudness of the noise source, obstructions, or atmospheric factors affecting the propagation path, determine the perceived sound level and noise characteristics at the receptor. Acoustics deal primarily with the propagation and control of sound. A typical noise environment consists of a base of steady background noise that is the sum of many distant and indistinguishable noise

sources. Superimposed on this background noise is the sound from individual local sources. These sources can vary from an occasional aircraft or train passing by to continuous noise from traffic on a major highway. Perceptions of sound and noise are highly subjective from person to person.

Measuring sound directly in terms of pressure would require a large range of numbers. To avoid this, the decibel (dB) scale was devised. The dB scale uses the hearing threshold of 20 micropascals (µPa) as a point of reference, defined as 0 dB. Other sound pressures are then compared to this reference pressure, and the logarithm is taken to keep the numbers in a practical range. The dB scale allows a million-fold increase in pressure to be expressed as 120 dB, and changes in levels correspond closely to human perception of relative loudness.

**Noise Descriptors**

The dB scale alone does not adequately characterize how humans perceive noise. The dominant frequencies of a sound have a substantial effect on the human response to that sound. Several rating scales have been developed to analyze the adverse effect of community noise on people. Because environmental noise fluctuates over time, these scales consider that the effect of noise on people is largely dependent on the total acoustical energy content of the noise, as well as the time of day when the noise occurs. The equivalent noise level ($L_{eq}$) is the average noise level averaged over the measurement period, while the day-night noise level ($L_{dn}$) and Community Equivalent Noise Level (CNEL) are measures of energy average during a 24-hour period, with dB weighted sound levels from 7:00 PM to 7:00 AM Most commonly, environmental sounds are described in terms of an average level ($L_{eq}$) that has the same acoustical energy as the summation of all the time-varying events. Each is applicable to this analysis and defined below:

- Decibel (dB): A unit describing the amplitude of sound, equal to 20 times the logarithm to the base 10 of the ratio of the pressure of the sound measured to the reference pressure. The reference pressure for air is 20.
- Sound Pressure Level: Sound pressure is the sound force per unit area, usually expressed in µPa (or 20 micronewtons per square meter), where 1 pascals is the pressure resulting from a force of 1 newton exerted over an area of 1 square meter. The sound pressure level is expressed in dB as 20 times the logarithm to the base 10 of the ratio between the pressures exerted by the sound to a reference sound pressure (e.g., 20 µPa). Sound pressure level is the quantity that is directly measured by a sound level meter.
- Frequency (Hz): The number of complete pressure fluctuations per second above and below atmospheric pressure. Normal human hearing is between 20 Hz and 20,000 Hz. Infrasonic sound are below 20 Hz and ultrasonic sounds are above 20,000 Hz.
- A-Weighted Sound Level (dBA): The sound pressure level in dB as measured on a sound level meter using the A-weighting filter network. The A-weighting filter de-emphasizes the very low and very high frequency components of the sound in a manner similar to the frequency response of the human ear and correlates well with subjective reactions to noise.

- Equivalent Noise Level ($L_{eq}$): The average acoustic energy content of noise for a stated period of time. Thus, the $L_{eq}$ of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. For evaluating community impacts, this rating scale does not vary, regardless of whether the noise occurs during the day or the night.
- Maximum Noise Level ($L_{max}$)/Minimum Noise Level ($L_{min}$): The maximum and minimum dBA during the measurement period.
- Exceeded Noise Levels ($L_{01}$, $L_{10}$, $L_{50}$, $L_{90}$): The dBA values that are exceeded 1 percent, 10 percent, 50 percent, and 90 percent of the time during the measurement period.
- Day-Night Noise Level ($L_{dn}$): A 24-hour average $L_{eq}$ with a 10-dBA weighting added to noise during the hours of 10:00 PM to 7:00 AM to account for noise sensitivity at nighttime. The logarithmic effect of these additions is that a 60 dBA 24-hour $L_{eq}$ would result in a measurement of 66.4 dBA $L_{dn}$.
- Community Noise Equivalent Level (CNEL): A 24-hour average $L_{eq}$ with a 5-dBA weighting during the hours of 7:00 AM to 10:00 AM and a 10-dBA weighting added to noise during the hours of 10:00 PM to 7:00 AM to account for noise sensitivity in the evening and nighttime, respectively. The logarithmic effect of these additions is that a 60 dBA 24-hour $L_{eq}$ would result in a measurement of 66.7 dBA CNEL.
- Ambient Noise Level: The composite of noise from all sources near and far. The normal or existing level of environmental noise at a given location.
- Intrusive: That noise which intrudes over and above the existing ambient noise at a given location. The relative intrusiveness of a sound depends on its amplitude, duration, frequency, and time of occurrence and tonal or informational content as well as the prevailing ambient noise level.

The A-weighted decibel (dBA) sound level scale gives greater weight to the frequencies of sound to which the human ear is most sensitive. Because sound levels can vary markedly over a short period of time, a method for describing either the average character of the sound or the statistical behavior of the variations must be utilized. Most commonly, environmental sounds are described in terms of an average level that has the same acoustical energy as the summation of all the time-varying events.

The scientific instrument used to measure noise is the sound level meter. Sound level meters can accurately measure environmental noise levels to within about plus or minus 1.0 dBA. Various computer models are used to predict environmental noise levels from sources, such as roadways and airports. The accuracy of the predicted models depends on the distance between the receptor and the noise source.

### A-Weighted Decibels

The perceived loudness of sounds is dependent on many factors, including sound pressure level and frequency content. However, within the usual range of environmental noise levels, perception of loudness is relatively predictable and can be approximated by dBA values. There is a strong correlation between dBA and the way the human ear perceives sound. For this reason, the dBA has become the standard tool of environmental noise assessment. All noise levels reported in this section are in terms of dBA, but are expressed as dB, unless otherwise noted.

### Addition of Decibels

The dB scale is logarithmic, not linear, and therefore sound levels cannot be added or subtracted through ordinary arithmetic. Two sound levels 10 dB apart differ in acoustic energy by a factor of 10. When the standard logarithmic dB is A-weighted, an increase of 10 dBA is generally perceived as a doubling in loudness. For example, a 70-dBA sound is half as loud as an 80-dBA sound and twice as loud as a 60-dBA sound. When two identical sources are each producing sound of the same loudness, the resulting sound level at a given distance would be 3.0 dBA higher than one source under the same conditions. Under the dB scale, three sources of equal loudness together would produce an increase of 5.0 dBA.

### Sound Propagation and Attenuation

Sound spreads (propagates) uniformly outward in a spherical pattern, and the sound level decreases (attenuates) at a rate of approximately 6.0 dB for each doubling of distance from a stationary or point source. Sound from a line source, such as a highway, propagates outward in a cylindrical pattern. Sound levels attenuate at a rate of approximately 3.0 dB for each doubling of distance from a line source, such as a roadway, depending on ground surface characteristics. No excess attenuation is assumed for hard surfaces like a parking lot or a body of water. Soft surfaces, such as soft dirt or grass, can absorb sound, so an excess ground-attenuation value of 1.5 dB per doubling of distance is normally assumed. For line sources, an overall attenuation rate of 3.0 dB per doubling of distance is assumed.

Noise levels may also be reduced by intervening structures; generally, a single row of buildings between the receptor and the noise source reduces the noise level by about 5 dBA, while a solid wall or berm reduces noise levels by 5.0 to 10 dBA. The way older homes in California were constructed generally provides a reduction of exterior-to-interior noise levels of about 20 to 25 dBA with closed windows. The exterior-to-interior reduction of newer residential units is generally 30 dBA or more.

### Human Response to Noise

The human response to environmental noise is subjective and varies considerably from individual to individual. Noise in the community has often been cited as a health problem, not in terms of actual physiological damage, such as hearing impairment, but in terms of inhibiting general well-being and contributing to undue stress and annoyance. The health effects of noise in the community arise from interference with human activities, including sleep, speech, recreation,

and tasks that demand concentration or coordination. Hearing loss can occur at the highest noise intensity levels.

Noise environments and consequences of human activities are usually well represented by median noise levels during the day or night or over a 24-hour period. Environmental noise levels are generally considered low when the CNEL is below 60 dBA, moderate in the 60 to 70 dBA range, and high above 70 dBA. Examples of low daytime levels are isolated, natural settings with noise levels as low as 20 dBA and quiet, suburban, residential streets with noise levels around 40 dBA. Noise levels above 45 dBA at night can disrupt sleep. Examples of moderate-level noise environments are urban residential or semi-commercial areas (typically 55 to 60 dBA) and commercial locations (typically 60 dBA). People may consider louder environments adverse, but most will accept the higher levels associated with noisier urban residential or residential-commercial areas (60 to 75 dBA) or dense urban or industrial areas (65 to 80 dBA). Regarding increases in dBA, the following relationships should be noted:

- Except in carefully controlled laboratory experiments, a 1.0-dBA change cannot be perceived by humans.
- Outside of the laboratory, a 3.0-dBA change is considered a just-perceivable difference.
- A minimum 5.0-dBA change is required before any noticeable change in community response would be expected. A 5.0-dBA increase is typically considered substantial.
- A 10-dBA change is subjectively heard as an approximate doubling in loudness and would almost certainly cause an adverse change in community response.

**Hearing Loss**

While physical damage to the ear from an intense noise impulse is rare, a degradation of auditory acuity can occur even within a community noise environment. Hearing loss occurs mainly due to chronic exposure to excessive noise but may be due to a single event such as an explosion. Natural hearing loss associated with aging may also be accelerated from chronic exposure to loud noise. The Occupational Safety and Health Administration has a noise exposure standard that is set at the noise threshold where hearing loss may occur from long-term exposures. The maximum allowable level is 90 dBA averaged over eight (8) hours. If the noise is above 90 dBA, the allowable exposure time is correspondingly shorter.

**Annoyance**

Attitude surveys are used for measuring the annoyance felt in a community for noises intruding into homes or affecting outdoor activity areas. In these surveys, it was determined that causes for annoyance include interference with speech, radio and television, house vibrations, and interference with sleep and rest. The $L_{dn}$ as a measure of noise has been found to provide a valid correlation of noise level and the percentage of people annoyed. People have been asked to judge the annoyance caused by aircraft noise and ground transportation noise. There continues to be disagreement about the relative annoyance of these different sources. A noise level of

about 55 dBA $L_{dn}$ is the threshold at which a substantial percentage of people begin to report annoyance.

**Existing Noise Sources**

El Monte is impacted by various noise sources, including mobile and stationary. The EMGP identifies mobile noise from roadways, railroads, and the San Gabriel Valley Airport as the City's predominant noise sources. Mobile noise sources, especially cars, trucks, trains, and airplanes are the most common. In addition, stationary noise sources from industrial uses are also identified as a primary noise contributor in the City.[44] Other noise sources include various land uses (i.e., residential, commercial, institutional, and recreational) throughout the City that generate stationary-source noise. Land uses near these significant noise-producers can incorporate buffers and noise control techniques including setbacks, landscaping, building transitions, site design, and building construction techniques to reduce the impact of excessive noise.

As previously noted, the Project site is fully developed with an industrial business park comprised of four buildings, surface parking, hardscapes, and landscaping. Existing noise sources from current Project site operations include noise from truck deliveries, idling and backing up, etc., as well as mechanical equipment (e.g., rooftop heating, ventilation, and air conditioning [HVAC]) and parking lot activities.

**Mobile Sources**

The existing mobile traffic noise sources in the Project vicinity are predominantly generated by motor vehicles traveling along Ramona Boulevard, Valley Boulevard, and Cypress Avenue, including truck traffic associated with the existing on-site industrial land uses. Other mobile noise sources in the Project vicinity include train pass-bys along the Metrolink San Bernardino line railway 200 feet south of the Project site and airplanes flying overhead to/from the San Gabriel Valley Airport to the north. The EMGP identifies mobile noise from roadways, railroads, and the San Gabriel Valley Airport as the City's predominant noise sources.

**Stationary Sources**

The primary stationary noise sources in the Project vicinity are those associated with operations of the on- and off-site industrial uses. Stationary noise sources associated with the existing industrial business park uses include loading/unloading activities, backup beepers, trucks idling, the use of forklifts and other mobile equipment, mechanical equipment (e.g., HVAC equipment), and surface parking lots. Other stationary noise sources in the Project vicinity include parking lot noise and residential HVAC equipment. The noise associated with these sources and other nearby sources may represent a single-event noise occurrence or short-term noise.

[44] City of El Monte. (2011). "*Vision El Monte" General Plan 2011*. Page PHS-38.

### Noise Measurements

To quantify the Project area's existing ambient noise levels, Rincon Consultants conducted one long-term (24-hour) noise measurement and two short-term (15-minute) noise measurements February 19-20, 2019, using an ANSI Type II integrating sound level meter. The noise measurement sites were representative of typical existing noise exposure within and immediately adjacent to the Project site. The noise measurement sites and respective noise measurements are listed in **Table 4.13-1: Existing Noise Measurements,** and depicted on **Appendix I**, Figure 3.

**TABLE 4.13-1: EXISTING NOISE MEASUREMENTS**

| Site # | Location | Date/Time | $L_{eq}$ (dBA) | $L_{max}$ (dBA) | CNEL (dBA) |
|---|---|---|---|---|---|
| **15-Minute Sound Level Measurements** | | | | | |
| NM 1 | Parking lot north of Project site | 2/19/2019<br>5:32 PM – 5:47 PM | 63.3 | 75.9 | - |
| NM 2 | Along Orchard Street north of Project site | 2/19/2019<br>5:08 PM – 5:23 PM | 56.4 | 85.4 | - |
| **Long-Term Sound Level Measurements** | | | | | |
| NM 3 | Southwest of the Project site boundary | 2/19/2019 – 2/20/2019<br>5:08 PM – 5:23 PM | 64.9 | 106.0 | 72.1 |

Source: Noise measurements taken by Rincon Consultants, February 2019. See Appendix A of **Appendix I** for noise measurement results.

The short-term ambient sound levels in the Project vicinity (NM 1 and NM 2) range from 56 dBA $L_{eq}$ to 63 dBA $L_{eq}$, and the measured long-term ambient sound level was 72 CNEL (NM 3); see **Table 4.13-1**. The long-term measurement captured noise from passing trains running along the Metrolink San Bernardino line railway approximately 200 feet south of the Project site. It is noted that the long-term measurement (NM 3) was located approximately 50 feet from the Metrolink San Bernardino line railway and 150 feet from the Project site. As such, noise measurement NM 3 (72 CNEL) would be approximately 63 CNEL at the Project site when adjusted for distance attenuation.[45]

### Sensitive Receptors

Noise exposure goals for various types of land uses reflect the varying noise sensitivities associated with those uses. Noise sensitive uses typically include residences, hospitals, schools, childcare facilities, and places of assembly. Vibration sensitive receivers are generally similar to noise-sensitive receivers but may also include businesses, such as research facilities and laboratories that use vibration-sensitive equipment. Sensitive receptors near the Project site

[45] Rincon Consultants, Inc. *Noise Memorandum for Orchard and Cypress, a Residential Development in El Monte, California,* March 2019.

consist mostly of residential (i.e., single- and multi-family), institutional (i.e., religious and educational), and recreational uses. The site is bounded by a multi-family apartment complex and a vacant lot to the north, single-family residential uses to the south and east, and single-family residential uses to the west of the Cypress Avenue at Kauffman Street intersection. **Table 4.13-2: Sensitive Receptors** lists the distances and locations of sensitive receptors within the Project vicinity.

**TABLE 4.13-2: SENSITIVE RECEPTORS**

| Receptor Type/Description | Distance and Direction from the Project Site |
|---|---|
| **RESIDENTIAL** | |
| Single-Family Residences | Adjoining to the north, south, east, and west |
| Multi-Family Residential Dwellings | Adjoining to the north and east |
| **RELIGIOUS INSTITUTIONS** | |
| El Monte First United Methodist | 2,150 feet northwest |
| El Monte Vietnamese Seventh-day Adventist Church | 2,610 feet northeast |
| Our Lady of Guadalupe Catholic Church | 285 feet east |
| First Baptist Church-El Monte | 940 feet south |
| True Jesus Church | 1,840 feet southwest |
| Calvary Assembly of God | 600 feet west |
| Nativity Church | 1,630 feet northwest |
| **EDUCATIONAL INSTITUTIONS** | |
| Legore Elementary School | 1,950 feet north |
| Columbia School | 1,265 feet southwest |
| Nativity School | 1,760 feet northwest |
| **RECREATIONAL FACILITIES** | |
| Lambert Park | 4,260 feet northeast |
| Arceo Park | 3,300 feet southwest |
| Rio Vista Park | 3,730 feet northwest |

## Local Regulatory Setting

### City of El Monte General Plan

The EMGP Noise Element establishes goals, policies, and programs to protect residents from excessive noise. The EMGP includes acceptable noise levels associated with specific land uses; see **Table 4.13-3: El Monte Noise and Land Use Compatibility**. The City has also designated several roadways/roadway segments as truck routes. EMGP Figure C-1 illustrates the locations of El Monte's designated truck routes and indicates those nearest the Project site are Romana Boulevard and Valley Boulevard to the south.[46]

[46] City of El Monte. (2011). *Vision El Monte General Plan 2011*. Figure C-1: Circulation Policy Plan.

**TABLE 4.13-3: EL MONTE NOISE AND LAND USE COMPATIBILITY**

| Land Use Category | CNEL, dBA[1] | | | | | | |
|---|---|---|---|---|---|---|---|
| | 50 | 55 | 60 | 65 | 70 | 75 | 80 |
| Residential – Single-family, multi-family, duplex | | | | | | | |
| Residential – Multiple Family | | | | | | | |
| Transient Lodging – Hotels and Motels | | | | | | | |
| Schools, Libraries, Churches, Hospitals, Nursing Homes | | | | | | | |
| Auditoriums, Concert Halls, Amphitheaters | | | | | | | |
| Sports Arenas, Outdoor Spectator Sports | | | | | | | |
| Playground, Neighborhood Parks | | | | | | | |
| Golf Courses, Riding Stables, Water Recreation, Cemeteries | | | | | | | |
| Office Buildings, Businesses, Commercial and Professional | | | | | | | |
| Industrial, Manufacturing, Utilities, Agriculture | | | | | | | |

Notes:

**Normally Acceptable**: Specified land use is satisfactory based on the assumption that any buildings involved are of conventional construction, without special noise insulation requirements.

**Conditionally Acceptable**: New construction should be undertaken only after a detailed analysis of the noise reduction requirements and needed noise insulation features are included in the design.

**Normally Unacceptable:** New construction should be discouraged, unless a detailed analysis of noise reduction requirements is made and needed insulation features are fully included in the design.

**Clearly Unacceptable:** New construction or development should generally not be undertaken.

Source: City of El Monte, "*Vision El Monte" General Plan 2011,* Table PHS-1: Noise/Land Use Compatibility Standards*,* June 2011.

### City of El Monte Municipal Code

EMMC §8.36.040 establishes the City's allowable noise standards in terms of $L_{eq}$(15). The allowable noise levels at land uses receiving noise are summarized in **Table 4.13-4: Allowable Noise Levels**. EMMC §8.36.040(D) states that if a residential use is located within a commercial or industrial zone, the ambient noise level shall not exceed 50 dBA between the hours of 10:00 PM and 7:00 AM EMMC §8.36.050(B) prohibits noise from machinery, fans, and other mechanical devices to exceed the allowable noise limits in **Table 4.13-4** at any property line. EMMC §8.36.050(C) states that it is unlawful for any person within the City to operate power construction tools or equipment in the performance of any outside construction or repair work on buildings, structures, or projects in or adjacent to a residential area, except between the hours of 6:00 AM and 7:00 PM Monday through Friday or between the hours of 8:00 AM and 7:00 PM on Saturday and Sunday.

**TABLE 4.13-4: ALLOWABLE NOISE LEVELS**

| Type of Land Use | 15-Minute Average Noise Level ($L_{eq}$ (15)) | |
|---|---|---|
| | 7:00 AM to 10:00 PM | 10:00 PM to 7:00 AM |
| Single-Family | 50 dBA | 45 dBA |
| Multi-Family | 55 dBA | 50 dBA |
| Commercial | 65 dBA | 60 dBA |
| Industrial | 70 dBA | 70 dBA |
| Source: City of El Monte, *El Monte - Municipal Code 2000*, Section 8.36.040, 2019. | | |

## IMPACT ANALYSIS

*4.13a* ***Would the project result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?***

**Less Than Significant With Mitigation Incorporated.**

### Construction Noise

Construction noise typically occurs intermittently and varies depending on the nature or phase of construction (e.g., land clearing, grading, excavation, paving). Noise generated by construction equipment, including earthmovers, material handlers, and portable generators, can reach high levels. During construction, exterior noise levels could affect residential neighborhoods surrounding a construction site. Project construction would occur adjacent to existing residential uses north, south, east, and west of the Project site. However, it is noted that construction activities would occur throughout the Project site and would not be concentrated at a single point near sensitive receptors.

Construction activities would include demolition, site preparation, grading, building construction, paving, and architectural coating. Such activities would require excavators, dozers, and concrete/ industrial saws during demolition; dozers and tractors during site preparation; graders, dozers, tractors, and excavators during grading; cranes, forklifts, generators, tractors, and welders during building construction; pavers, rollers, mixers, tractors, and paving equipment during paving; and air compressors during architectural coating. Typical operating cycles for these types of construction equipment may involve one or two minutes of full power operation followed by three to four minutes at lower power settings. Other primary sources of acoustical disturbance would be random incidents, which would last less than one minute (such as dropping large pieces of equipment or the hydraulic movement of machinery lifts). Noise generated by construction equipment, including earthmovers, material handlers, and portable generators, can reach high levels. Typical noise levels associated with individual construction equipment are provided in **Table 4.13-5: Typical Construction Noise Levels**.

The nearest noise-sensitive receptors to the Project site are residential uses: single-family residences adjoining the site to the north, south, east, and west; and multi-family residences adjoining the site to the north and east. As shown in **Table 4.13-5**, construction noise levels could affect the nearest noise-sensitive receptors. However, construction noise would be acoustically dispersed throughout the Project site and not concentrated in one area near surrounding sensitive uses. In addition, the EMMC does not establish quantitative construction noise standards. Instead, the City has established limited hours of construction activities. EMMC §8.36.080 exempts noise from power construction tools or equipment in the performance of any outside construction or repair work on buildings, structures, or projects in or adjacent to a residential area from the EMMC noise limitations, provided construction activities take place between the hours of 6:00 AM and 7:00 PM on weekdays, and between the hours of 8:00 AM and 7:00 PM on Saturdays and Sundays. Further, all motorized equipment used during construction activities would be equipped with functioning mufflers, as mandated by the State to reduce noise levels.

Construction activities could also cause increased noise along access routes to and from the Project site due to movement of equipment, materials, and workers. A maximum of approximately 20,370 CY of soil import is anticipated, which would be transported along local roadways, including Cypress Avenue and Iris Lane and the truck routes nearest the Project site (i.e., Ramona Boulevard and Valley Boulevard to the south).

Compliance with the EMMC would minimize impacts from construction noise, as construction would be restricted to daytime hours on weekdays and weekends. Thus, following compliance with EMMC restrictions, Project construction activities would result in a less than significant noise impact, and no mitigation is required.

| TABLE 4.13-5: TYPICAL CONSTRUCTION NOISE LEVELS | | |
|---|---|---|
| **Equipment** | **Typical Noise Level (dBA) at 50 feet from Source** | **Typical Noise Level (dBA) at 100 feet from Source[1]** |
| Air Compressor | 80 | 74 |
| Backhoe | 80 | 74 |
| Compactor | 82 | 76 |
| Concrete Mixer | 85 | 79 |
| Concrete Pump | 82 | 76 |
| Concrete Vibrator | 76 | 70 |
| Crane, Derrick | 88 | 82 |
| Crane, Mobile | 83 | 77 |
| Dozer | 85 | 79 |
| Generator | 82 | 76 |
| Grader | 85 | 79 |
| Impact Wrench | 85 | 79 |
| Jack Hammer | 88 | 82 |
| Loader | 80 | 74 |
| Paver | 85 | 79 |
| Pile-driver (Impact) | 101 | 95 |
| Pile-driver (Sonic) | 95 | 89 |
| Pneumatic Tool | 85 | 79 |
| Pump | 77 | 71 |
| Roller | 85 | 79 |
| Saw | 76 | 70 |
| Scraper | 85 | 79 |
| Shovel | 82 | 76 |
| Truck | 84 | 78 |
| Note:<br>1. Calculated using the inverse square law formula for sound attenuation: $dBA_2 = dBA_1+20Log(d_1/d_2)$<br>Where: $dBA_2$ = estimated noise level at receptor; $dBA_1$ = reference noise level; $d_1$ = reference distance; $d_2$ = receptor location distance | | |
| Source: Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, September 2018. | | |

### Operational Noise

The Project proposes to replace the existing industrial business park with residential townhomes. Thus, the operational noise (stationary and traffic) associated with the existing industrial uses would cease and would be replaced with operational noise typical of residential uses. The Project's major operational noise sources that would potentially impact nearby residences include stationary noise sources and off-site traffic noise.

**Stationary Noise Sources.** With Project implementation, the stationary noise sources (i.e., loading/unloading activities, backup beepers, trucks idling, the use of forklifts and other mobile equipment, HVAC equipment, and surface parking lots) associated with the existing industrial business park that would be demolished would be replaced with stationary noise sources typical of residential uses. Noise sources typical of residential uses include group

conversations, pets, and general maintenance activities. Generally, noise levels from stationary sources are anticipated to decrease with implementation of the proposed residential uses when compared to the existing industrial uses, given the existing surface parking lot and loading/unloading activities would cease. Further, noise from residential stationary noise sources would primarily occur during the "daytime" activity hours of 7:00 AM to 10:00 PM. Additionally, the residential uses would be required to comply with EMGP and EMMC noise standards.

The Project is bordered primarily by residential and industrial uses. The nearest noise sensitive receptors to the Project site are residential uses adjoining to the north, south, east, and west. Potential stationary noise sources related to long-term Project operations would include mechanical equipment. Mechanical equipment (e.g., HVAC equipment) typically generates noise levels of approximately 55 dBA at 3 feet.47 The HVAC units associated with the proposed residential buildings would be located approximately 20 feet from the closest sensitive receptors. At 20 feet, HVAC noise levels would be approximately 38.5 dBA. Ground-mounted HVAC equipment is anticipated to be installed in the rear of proposed homes and attenuated by a solid property wall that would reduce noise levels to approximately 35.5 dBA. As noise levels would be below the City's most stringent noise standard of 45 dBA from 10:00 PM to 7:00 AM for single-family residential uses, noise impacts associated with HVAC equipment would be less than significant. Nominal parking noise would occur within the on-site shared driveways and visitor parking stalls. Each proposed DU would include a two-car garage, which would attenuate parking noise. It is also noted that parking noise occurs at the adjacent properties under existing conditions. Parking and driveway noise would be consistent with the existing noise in the site's vicinity and would be partially masked by background traffic noise from motor vehicles traveling along Ramona Boulevard and Cypress Avenue/Iris Lane. Actual noise levels over time resulting from parking activities are anticipated to be far below the City's noise standards. Therefore, noise impacts associated with the Project's parking lots would be less than significant.

**Off-Site Traffic Noise**. Project implementation would generate traffic volumes along Cypress Avenue, Iris Lane, Orchard Street, Ramona Boulevard, and other Project area roadways. The Project would result in 824 daily trips (298 net daily trips)[48] and additional mobile noise on Project area roadways. In general, a 3.0-dBA increase in traffic noise is barely perceptible to people, while a 5.0-dBA increase is readily noticeable. Traffic volumes on Project area roadways would have to approximately double for the resulting traffic noise levels to generate a 3.0-dBA increase.[49] The Circulation Element classifies Ramona Boulevard (the nearest roadway with ADT data) as a Secondary Arterial roadway with traffic volumes of 23,192 ADT.[50] Based on the Project's trip generation, the proposed Project would not generate sufficient traffic to result in a permanent

[47] Elliott H. Berger, Rick Neitzel1, and Cynthia A. Kladden. (2010). *Noise Navigator Sound Level Database with Over 1700 Measurement Values*.

[48] Ganddini Group, Inc. *Orchard and Cypress Residential Project Trip Generation Comparison Analysis 19-0057*, July 2019.

[49] According to the California Department of Transportation, *Technical Noise Supplement to the Traffic Noise Analysis Protocol* (September 2013), it takes a doubling of traffic to create a noticeable (i.e., 3 dBA) noise increase.

[50] ESRI, *Traffic Count Map EL Monte City, CA*, December 22, 2015.

3.0-dBA increase in ambient noise levels. Therefore, noise impacts associated with the Project's traffic would be less than significant.

**Project Site Compatibility[51]**

According to the EMGP Noise Element, a normally acceptable exterior noise exposure for single-family residences and townhomes would be less than 60 dBA CNEL while a conditionally acceptable exterior noise exposure would be between 60 and 70 dBA CNEL. Based on both 24-hour sound measurements shown in **Table 4.13-1** and the noise modeling shown in Table 4 and Figure 4 of **Appendix I**, the Project site is exposed to a CNEL of up 63 dBA. Therefore, proposed on-site noise-sensitive residences would be exposed to a conditionally acceptable exterior noise level, which according to the EMGP noise compatibility guidelines, requires incorporation of noise insulation features into project design. However, the manner in which buildings under modern building codes are constructed typically provides a reduction of exterior-to-interior noise levels of up to 25 dBA with windows in a closed position.[52] Therefore, based on a maximum exterior noise level of approximately 63 CNEL, interior noise would be approximately 37 CNEL and compliant with the Title 24 interior noise standard of 45 CNEL. As such, interior noise for the proposed project would comply with applicable standards.

Based on the noise modeling shown in Table 4 and Figure 4 of **Appendix I**, exterior noise levels along the Project's southern and southeastern boundaries range from 60 dBA CNEL to 63 dBA CNEL, which are categorized as conditionally acceptable for multi-family residential uses according to the EMGP noise compatibility guidelines. As such, MM NOI-1 would be required to reduce exterior noise levels at outdoor patio or yard areas along the southern and southeastern boundaries of the Project site below the City's normally acceptable noise level of 60 dBA CNEL. MM NOI-1 requires the construction of a six-foot-high perimeter wall along the southern and southeastern boundaries of the Project site, which would reduce exterior noise levels at outdoor patio and yard areas by a minimum of 5 dBA[53] and below 60 dBA CNEL. Following compliance with MM NOI-1, the Project's potential on-site noise impacts would be less than significant.

**MITIGATION MEASURES**

**MM NOI-1** Prior to the issuance of building permits, the Project Applicant shall demonstrate, to the satisfaction of the City of El Monte Building Official that a 6-foot-high perimeter wall is located along the southern and southeastern boundaries of the Project site. The perimeter wall should generally parallel the Metrolink San Bernardino line railway in a northwest-southeast direction and Iris Lane in an east-

[51] The California Supreme Court in a December 2015 opinion (*California Building Industry Association v. Bay Area Air Quality Management District,* 62 Cal. 4th 369 [No. S 213478]) confirmed that CEQA, with several specific exceptions, is concerned with the impacts of a project on the environment, not the effects the existing environment may have on a project. Therefore, this section is not required under CEQA and is included for informational purposes only the evaluation of the significance of Project impacts in the following discussion is provided to ensure compliance with City and State Building Code noise standards.

[52] Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, May 2006.

[53] Federal Highway Administration, *Roadway Construction Noise Model User's Guide*, January 2006.

west direction along the site's southern and southeastern boundaries. Acceptable materials for the construction of the barrier shall have a density of 3.5 pounds per square foot of surface area and may be composed of the following: masonry block, stucco veneer over wood framing (or foam core), glass, Plexiglass, or Lexan 9¼ inch thick). The barrier may also be constructed out of a combination of the above-listed materials.

### *4.13b Would the project generate excessive groundborne vibration or groundborne noise levels?*

**Less Than Significant Impact.**

**Construction**

Increases in groundborne vibration levels attributable to the Project would be primarily associated with short-term construction-related activities. Project construction could result in varying degrees of temporary groundborne vibration, depending on the specific construction equipment used and the operations involved.

The Federal Transit Administration (FTA) has published standard vibration velocities for construction equipment operations. In general, the FTA architectural damage criterion for continuous vibrations (i.e., 0.2 inches per second (in/sec)) appears to be conservative. The types of construction vibration impacts include human annoyance and building damage. Human annoyance occurs when construction vibration rises significantly above the threshold of human perception for extended periods of time. Building damage can be cosmetic or structural. Ordinary buildings that are not particularly fragile would not experience any cosmetic damage (e.g., plaster cracks) at distances beyond 30 feet. This distance can vary substantially depending on the soil composition and underground geological layer between vibration source and receiver. In addition, not all buildings respond similarly to vibration generated by construction equipment. For example, for a building that is constructed with reinforced concrete with no plaster, the FTA guidelines show that a vibration level of up to 0.20 in/sec is considered safe and would not result in any construction vibration damage. This evaluation uses the FTA architectural damage criterion for continuous vibrations at non-engineered timber and masonry buildings of 0.2 in/sec peak particle velocity (PPV) and human annoyance criterion of 0.4 in/sec PPV in accordance with California Department of Transportation guidance.[54]

**Table 4.13-6: Typical Construction Equipment Vibration Levels** provides vibration levels at 25 feet for typical construction equipment. Groundborne vibration generated by construction equipment spreads through the ground and diminishes in magnitude with increases in distance. As indicated in **Table 4.13-6**, based on FTA data, vibration velocities from typical heavy construction equipment operations that would be used during Project construction range from 0.003 to 0.089 in/sec PPV at 25 feet from the activity source.

[54] California Department of Transportation, *Transportation and Construction Vibration Guidance Manual, Table 20*, September 2013.

**TABLE 4.13-6: TYPICAL CONSTRUCTION EQUIPMENT VIBRATION LEVELS**

| Equipment | Peak Particle Velocity at 25 Feet (in/sec)[1] | Peak Particle Velocity at 18 Feet (in/sec)[1] |
|---|---|---|
| Large Bulldozer | 0.089 | 0.124 |
| Caisson Drilling | 0.089 | 0.124 |
| Loaded Trucks | 0.076 | 0.076 |
| Rock Breaker | 0.059 | 0.083 |
| Jackhammer | 0.035 | 0.049 |
| Small Bulldozer/Tractors | 0.003 | 0.004 |

Notes:[1] Calculated using the following formula: $PPV_{equip} = PPV_{ref} \times (25/D)^{1.5}$, where: $PPV_{equip}$ = the peak particle velocity in in/sec of the equipment adjusted for the distance; $PPV_{ref}$ = the reference vibration level in in/sec from Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual Table 12-2*, 2018; D = the distance from the equipment to the receiver.

Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, 2018.

The nearest off-site structures are residences located approximately 20 feet from the proposed active construction zone. As indicated in **Table 4.13-6**, at 20 feet, construction equipment vibration velocities would not exceed 0.124 in/sec PPV, which is below the FTA's 0.20 PPV threshold and 0.4 in/sec PPV threshold for human annoyance. It is also acknowledged that construction activities would occur throughout the Project site and would not be concentrated at the point closest to the nearest residential structure. Therefore, Project construction would not generate excessive groundborne vibration or groundborne noise levels. Impacts would be less than significant, and no mitigation is required.

**Operations**

The Project proposes a residential development that would not involve railroads or substantial heavy truck operations, which are typically associated with groundborne vibration. Rather, the Project would demolish the existing industrial uses and the groundborne vibration associated with the existing truck operations. Therefore, Project operations would not generate excessive groundborne vibration or groundborne noise levels. Impacts would be less than significant, and no mitigation is required.

***4.13c*** ***Would the project be located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project expose people residing or working in the project area to excessive noise levels?***

**Less Than Significant Impact.** There are no private airstrips within 2.0 miles of the Project site. However**,** the Project site is approximately 1.2 miles south of the San Gabriel Valley Airport, which is located at 4233 Santa Anita Avenue, El Monte. The Airport, with over 97,000 general aviation takeoffs/landings each year, is owned and operated by the County of Los Angeles. This airport generates noise primarily along the flight path from aircraft landings and departures. Landings and takeoffs occur in a north-south direction with planes generally flying east over the City. Noise

from the San Gabriel Valley Airport, while noticeable, is less than the noise produced from jets at larger commercial airports. Airport Land Use Compatibility Plans (ALUCP) cover aviation activities of 15 Los Angeles County public use airports, including the San Gabriel Valley Airport. The ALUCP depicts the Airport's boundaries and development restrictions. All proposed land uses within the ALUCP boundaries must comply with ALUCP restrictions. Review of the ALUCP indicates the Airport is not within the Airport Influence Area, Airport Runway Protection Zones (RPZ) and Inner Safety Zone, and Airport Noise Contours.[55] According to the EMGP, no residential uses in the City (including the Project site) fall within the 65 CNEL noise contour.[56] As such, airplane noise levels at the Project site are expected to be within the City's "Normally Acceptable" range for residential noise/land use compatibility; see **Table 4.13-3**. The Project would not expose people residing or working in the Project area to excessive noise levels? Impacts would be less than significant, and no mitigation is required.

**Cumulative Noise Impacts**

The Project's construction activities would not result in a substantial temporary increase in ambient noise levels. As discussed in Response 4.13a above, the City permits construction activities between 6:00 AM and 7:00 PM on weekdays, and between 8:00 AM and 7:00 PM on Saturdays and Sundays. There would be periodic, temporary, noise impacts that would cease upon completion of construction activities. The Project would contribute to other proximate construction project noise impacts if construction activities were conducted concurrently. However, based on the noise analysis above, the Project's construction-related noise impacts would be less than significant following compliance with the EMMC.

Given that noise dissipates as it travels away from its source, operational noise impacts from on-site activities and other stationary sources would be limited to the Project site and vicinity. Thus, cumulative operational noise impacts from related projects, in conjunction with Project-specific operational noise impacts, would not be cumulatively significant.

[55] Los Angeles County Department of Regional Planning. 2009. Airports- Los Angeles County GIS Interactive Map. Available at: http://lacounty.maps.arcgis.com/apps/webappviewer/index.html?id=acf2e87194a54af9b266bf07547f240a, Accessed September 25, 2019.

[56] City of El Monte. (2011). *Vision El Monte General Plan 2011*. Page PHS-38.

## 4.14 Population and Housing

| Environmental Issue | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **Would the project:** | | | | |
| a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? | | | X | |
| b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? | | | | X |

**IMPACT ANALYSIS**

*4.14a* ***Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?***

**Less Than Significant Impact.** The City's current population as of January 1, 2020 is approximately 116,675 persons.[57] The City's housing stock totaled 29,588 DUs with approximately 4.08 persons per household (PPH). The Project proposes development of a residential community consisting of 103 attached townhomes. Assuming 103 DU and 4.08 PPH, the Project's forecast population growth is approximately 420 persons. Therefore, the Project would induce direct population growth in the City by proposing new homes. The Project's forecast population growth would increase the City's existing population of approximately 116,675 persons to approximately 117,098 persons, or approximately 0.36 percent. Additionally, the Project would comply with EMGP Policy H-2.1 Housing Sites, which aims to provide adequate sites through land use, zoning, and specific plan designations to allow single-family homes, apartments, mobile homes, and special needs housing.

The City of El Monte's Regional Housing Needs Assessment (RHNA) for the 2014-2021 planning period identifies the City's future housing need of 2,142 units. The Project would contribute toward the City's future housing need for the 2014-2021 planning period.

SCAG has developed growth forecasts for individual cities and counties, which is included in the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategies. El Monte's

[57] State of California, Department of Finance, E-5 Population and Housing Estimates for Cities, Counties and the State — January 1, 2011-2020. Sacramento, California, May 2020.

population is forecast to increase to 137,200 persons and 34,700 households by 2040.[58] Inclusive of the proposed Project, the City's existing housing stock (29,588 DUs) would total approximately 29,691 DUs, and the City's existing population (116,675 persons) would total approximately 117,098 persons Therefore, Project implementation would not cause SCAG's household and population forecasts for 2040 to be exceeded.

The housing and population growth resulting from Project implementation would not conflict with projected growth in the City based on SCAG's growth forecasts. Additionally, the Project does not include the extension of roads or other infrastructure to unserved areas, which could induce indirect growth. Therefore, the Project would not induce substantial unplanned population growth in the City. Less than significant impacts would occur, and no mitigation is required.

### *4.14b Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?*

**No Impact.** There are no housing units on the Project site; therefore, the Project would not displace existing housing or require construction of replacement housing elsewhere. No impact would occur, and no mitigation is required.

## 4.15 Public Services

| *Environmental Issue* | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physical altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:** | | | | |
| a) Fire protection? | | | X | |
| b) Police protection? | | | X | |
| c) Schools? | | | X | |
| d) Parks? | | | X | |
| e) Other public facilities? | | | X | |

**IMPACT ANALYSIS**

*4.15a Fire Protection?*

**Less Than Significant Impact.** The City contracts the Los Angeles County Fire Department (LACFD) for fire protection and emergency medical services. LACFD operates four fire stations within the City. The closest fire station to the Project site is Station 167 at 11567 Bryant Road, approximately 0.5 miles east of the Project site. The Project's forecast population growth would incrementally increase the demand for fire protection and emergency medical services to the Project site. However, the LACFD Fire Prevention Division has reviewed the Project and specified fire protection, emergency access circulation, and fire flow/water system requirements, which would enhance the proposed development's fire protection. LACFD Fire Prevention Division granted clearance of the Project's TTM on August 27, 2019 (revised to reduce fire flow on November 12, 2019) and the Project would be required to comply with standard LACFD conditions of approval. Therefore, Project impacts concerning fire protection services would be less than significant, and no mitigation is required. Additionally, the Project does not propose, and would not create a need for, new/physically altered fire protection facilities, thus, no environmental impact would occur in this regard.

*4.15b Police Protection?*

**Less Than Significant Impact.** Police protection services would be provided by the City of El Monte Police Department (EMPD). The EMPD has 121 police officers and 139 civilian employees, police volunteers, and reserve police officers. The El Monte Police Station is at 11333 Valley Boulevard, approximately 1.0 mile south of the Project site. The Project's forecast population growth would incrementally increase the demand for police protection services to

the Project site. However, through the City's Site Plan review process, the EMPD would review the Project concerning access and other safety measures, which would enhance the proposed development's police protection. Therefore, Project impacts concerning police protection would be less than significant, and no mitigation is required. Additionally, the Project does not propose, and would not create a need for, new/physically altered police protection facilities, thus, no environmental impact would occur in this regard.

### *4.15c Schools?*

**Less Than Significant Impact.** The Project site is within El Monte School District (EMSD) and El Monte Union High School District (EMUHSD) boundaries. The public schools listed below would serve the proposed Project[59]:

- Le Gore Elementary School (TK-6)
- Wright Intermediate School (7-8), and
- Arroyo High School (9-12).
- Various private schools serving Kindergarten through 12th grades also exist in the Project area.

Student generation rates for new development are provided in the GPEIR at the following rates:

- 0.4: Kindergarten – 6th grade students per new DU
- 0.1: 7th – 8th grade students per new DU
- 0.2: 9th – 12th grade students per new DU

Based on 103 DUs and the GPEIR's student generation factors, the proposed Project is forecast to generate approximately 41 new elementary age students, 10 middle school age students, and 21 high school age students to the EMSD. The GPEIR forecasted an increase of 3,839 students through buildout. The student population growth associated with the Project represents approximately 1.8 percent of total forecasted student growth and would incrementally increase the demand for school facilities/services. However, the Project would be subject to payment of school impact fees in accordance with Senate Bill 50 (SB50). Pursuant to Government Code §65995(3)(h), "payment of statutory fees is deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use or development of real property…" Therefore, Project impacts to schools would be less than significant, and no mitigation is required. Additionally, the Project does not propose, and would not create a need for, new/physically altered school facilities, thus, no environmental impact would occur in this regard.

[59] El Monte School District. (2019). http://apps.schoolsitelocator.com/?districtcode=47472#

### *4.15d Parks?*

Less Than Significant Impact. See Response 4.16 below.

### *4.15e Other public facilities?*

**Less Than Significant Impact.** Los Angeles County Library operates 84 community-based library outlets, including four bookmobiles, in 51 of 88 cities and unincorporated areas.[60] Los Angeles County Library is responsible for maintenance and library improvements to meet future library service's needs. The Project's forecast population growth would incrementally increase the demand for library services, and specifically at the library located nearest the Project site, the El Monte Library at 3224 Tyler Avenue, El Monte. Los Angeles County Library system has developed a Strategic Plan that identifies goals and objectives including financial management and fundraising strategies to maintain and enhance library facilities to meet future demands. Given the Project's nature and scope, impacts to library facilities/services would be less than significant, and no mitigation is required. Additionally, the Project does not propose, and would not create a need for, new/physically altered library protection facilities, thus, no environmental impact would occur in this regard.

[60] LA County Library. (2019). Public Libraries. https://www.lacounty.gov/things-to-do/libraries-museums/public-libraries/ .

## 4.16 Recreation

| Environmental Issue | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **Would the project:** | | | | |
| a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? | | | X | |
| b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment? | | | X | |

**IMPACT ANALYSIS**

*4.16a* ***Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?***

*4.16b* ***Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?***

**Less Than Significant Impact.** As specified in EMMC Chapter 16.34 - Dedications, Reservations and Fees, the City requires dedication of land, pay fees in lieu thereof, or pay and dedicate a combination of both for park and/or recreational purposes. City Council Ordinance No. 2663 establishes the standards for land dedication or in lieu fees. The EMGP adopted a long-term goal to provide 3.0 acres of usable park area per 1,000 residents. However, El Monte currently has 0.41 acre per 1,000 residents. Therefore, the City has adopted an interim, 10-year goal to provide 2.0 acres of parkland per 1,000 residents. The Project's forecast population growth is approximately 420 persons; see Response 4.14a. Based on this forecast population growth and the City's long-term goal of 3.0 acres of parkland per 1,000 residents, the Project would create a demand for approximately 1.3 acres of parkland. Additionally, the Project's forecast population growth could also incrementally increase the use of existing recreational facilities, potentially accelerating their deterioration. The Modified Project would result in seven (7) fewer DUs and more onsite open space (+5,699SF or +10 percent), than the Original Project.

Following compliance with EMMC Chapter 16.34 and City Council Ordinance No. 2663, the proposed Project would result in a less than significant impact to recreational facilities, and no mitigation is required. Additionally, the Project does not propose, and would not create a need for, new or physically altered recreational facilities. Thus, no environmental impact would occur in this regard.

## 4.17 Transportation

This Section is based on the following documentation:

- Orchard and Cypress Residential Project Trip Generation Comparison Analysis (Ganddini Group, July 2019),
- Comments on Orchard and Cypress Residential Project Trip Generation Comparison Analysis (TEP, August 2019), and
- Due Diligence Traffic Analysis (Ganddini Group, March 25, 2019).

These documents are included in their entirety in **Appendix J1: Trip Generation Comparison Analysis, Appendix J2: Comments on Trip Generation Comparison Analysis**, and **Appendix J3: Due Diligence Traffic Analysis**, respectively.

| Environmental Issue | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **Would the project:** | | | | |
| a) Conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycles, and pedestrian facilities? | | | X | |
| b) Conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b)? | | | X | |
| c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (for example, farm equipment)? | | | | X |
| d )Result in inadequate emergency access? | | | X | |

**IMPACT ANALYSIS**

*4.17a* ***Would the project conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?***

**Less Than Significant Impact.** The Project site is fully developed with an industrial business park comprised of four buildings, surface parking, hardscapes, and landscaping. The existing on-site land uses total approximately 156,100 SF and all are occupied except approximately 18,100 SF are vacant. The Project proposes to demolish these existing uses and develop a residential community consisting of 103 attached townhomes. Therefore, the trips associated with the Project site's existing uses would be taken as a trip credit to offset the new trips that would be generated by the proposed Project. Although the number of trips generated by the existing

industrial business park as compared to the proposed multi-family residential project is very similar, the characteristics of the traffic generated are different, with industrial business park uses generally including a much higher percentage of truck traffic.

**Project Site Existing Trip Generation**

**Table 4.17-1: Existing Land Uses Trip Generation Rates and Estimates** indicates the Project site's existing trip generation estimate based upon Institute of Transportation Engineers (ITE) Trip Generation Manual (10th Edition, 2017) trip generation rates. The existing trips are calculated by multiplying the trip generation rates by the existing land use quantity. As previously noted, existing industrial business park uses total approximately 156,100 SF and are fully occupied, except approximately 18,000 SF. Consistent with recent case law (*North County Advocates v. City of Carlsbad* (2015)—Cal.App.4th—Case No. D066488), this trip generation analysis is based on 100 percent occupancy and includes these vacant use's historical operational information in establishing the baseline for the Project's transportation impact analysis.

The Project site's existing land uses are estimated to generate approximately 526 ADT on a typical weekday, including 62 AM peak hour trips and 62 PM peak hour trips.

**TABLE 4.17-1: EXISTING LAND USES TRIP GENERATION RATES AND ESTIMATES**

| Land Use | ITE Code | Unit | Trip Generation Rates [1] | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| | | | Daily | AM Peak Hour | | | PM Peak Hour | | |
| | | | | In | Out | Total | In | Out | Total |
| Industrial Park | ITE 130 | TSF | 0.32 | 0.08 | 0.40 | 0.08 | 0.32 | 0.40 | 3.37 |
| **Land Use** | **Quantity** | **Unit** | **Trip Generation Estimates** | | | | | | |
| | | | **Daily** | **AM Peak Hour** | | | **PM Peak Hour** | | |
| | | | | **In** | **Out** | **Total** | **In** | **Out** | **Total** |
| Industrial Park | 156,100 | TSF | 526 | 50 | 12 | 62 | 12 | 50 | 62 |

Notes:
1. ITE = Institute of Transportation Engineers Trip Generation Manual (10th Edition, 2017); ### = Land Use Code.
2. TSF = Thousand Square Feet

Source: Ganddini Group, Inc (2019)

Since trucks generally utilize more capacity than a passenger car, like various jurisdictions throughout the region, El Monte requires land uses that generate a substantial amount of truck traffic (e.g., industrial and warehouse land uses), to convert truck trips into Passenger Car Equivalent (PCE) trips. For example, a large truck may be considered the equivalent of two passenger cars. For purposes of this trip generation analysis, the Project site's existing trip generation was not converted to PCE trips; thus, providing a conservative estimate of the net Project trip generation, since trips generated by existing uses would be subtracted from the proposed land use's trip generation forecast.

### Proposed Project Trip Generation

**Table 4.17-2: Proposed Project Trip Generation** indicates the proposed Project's trip generation based upon Los Angeles County Traffic Impact Analysis Report Guidelines (LAC Guidelines) (December 2013) trip generation rates. The LAC Guidelines indicate that trip generation rates from ITE Trip Generation Manual's latest edition should be used, except concerning condominiums/townhomes, for which the LAC Guidelines provide trip generation rates that are slightly higher than the ITE Trip Generation Manual's current trip generation rates for the multi-family housing land use. Therefore, the LAC Guidelines' trip generation rates for condominiums/townhomes guidelines were used to provide a conservative analysis. The proposed Project trips are calculated by multiplying the trip generation rates by the proposed land use quantity. The proposed Project would generate approximately 824 ADT on a typical weekday, including 56 AM peak hour trips and 76 PM peak hour trips.

**TABLE 4.17-2: PROPOSED PROJECT TRIP GENERATION**

| Land Use | ITE Code | Unit | Trip Generation Rates [1] | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| | | | Daily | AM Peak Hour | | | PM Peak Hour | | |
| | | | | In | Out | Total | In | Out | Total |
| Condominiums/Townhomes | LAC | DU | 8.00 | 0.06 | 0.48 | 0.54 | 0.47 | 0.26 | 0.73 |
| **Land Use** | **Quantity** | **Unit** | **Trip Generation Estimates** | | | | | | |
| | | | **Daily** | **AM Peak Hour** | | | **PM Peak Hour** | | |
| | | | | **In** | **Out** | **Total** | **In** | **Out** | **Total** |
| Condominiums/Townhomes | 103 | DU | 824 | 7 | 50 | 56 | 49 | 27 | 76 |

Notes:
1. LAC = Los Angeles County Traffic Impact Analysis Report Guidelines (December 2013).
2. DU = Dwelling Units (1) ITE = Institute of Transportation Engineers Trip Generation Manual (10th Edition, 2017)

Source: Ganddini Group, Inc (2019)

### Net Project Trip Generation

**Table 4.17-3: Net Project Trip Generation** indicates the net Project trip generation, which is the trips forecast to be generated by the proposed Project minus the trips estimated to be generated by the existing land uses that would be displaced. As indicated in **Table 4.17-3**, the proposed Project is forecast to generate approximately 298 net new ADT, including -6 net AM peak hour trips and 14 net new PM peak hour trips.

**TABLE 4.17-3: NET PROJECT TRIP GENERATION**

| Land Use | Trip Generation Rates [1] | | | | | | |
|---|---|---|---|---|---|---|---|
| | Daily | AM Peak Hour | | | PM Peak Hour | | |
| | | In | Out | Total | In | Out | Total |
| Existing Uses | 526 | 50 | 12 | 62 | 12 | 50 | 62 |
| Proposed Project | 824 | 7 | 50 | 56 | 49 | 27 | 76 |
| Net Trip Generation | 298 | -43 | 38 | -6 | 37 | -23 | 14 |

Source: Ganddini Group, Inc (2019)

In accordance with the Los Angeles County Congestion Management Program, El Monte like various jurisdictions throughout the region generally use a project trip contribution threshold of 50 peak hour trips for determining the need to prepare a full traffic impact analysis and identifying study area intersections. As indicated in **Table 4.17-3**, at most, the proposed Project would generate 40 inbound AM peak hour trips. Because the proposed Project is forecast to generate fewer than 50 net new peak hour trips, the Project would result in a less than significant traffic impact and further traffic analysis is not required.

It is noted, a third-party review of the Project's traffic analysis was completed on behalf of the City (TEP, August 2019); see **Appendix J2**. The third-party review concluded the traffic analysis "presents a fair and reasonable comparison of the existing land use trip generation versus the trip generation for the proposed use" and "unless there are other extenuating circumstances that would warrant further analysis, it is recommended that the technical memorandum be accepted as presented and the project be allowed to proceed without further traffic analysis."

**Cypress Park Trip Generation**

The City proposes to construct a 2.3-acre neighborhood park (Cypress Park) at the City of El Monte Transportation Yard property, at 3629 Cypress Avenue, immediately west of the Project site, across Cypress Avenue. The Cypress Park project would generate 2 ADT, with no trips during the AM or PM peak hours.[61] This trip generation estimate is conservative given trip credits for the existing Transportation Yard and warehouse that would be displaced have not been applied. When trip credits for the existing land uses are applied to the Cypress Park project's trip generation estimates, the Cypress Park project is estimated to generate -125 ADT, with -12 AM peak hour trips and -13 PM peak hour trips. Notwithstanding, conservatively, for purposes of this analysis, it is assumed the Cypress Park project would generate 2 ADT and no AM or PM peak hour trips, excluding trip credits.

As indicated in **Table 4.17-3**, the proposed Project is forecast to generate approximately 298 net new ADT, including -6 net AM peak hour trips and 14 net new PM peak hour trips. When the Cypress Park project trip generation is added to the proposed Project, approximately 356 net new ADT, including -6 net AM peak hour trips and 14 net new PM peak hour trips. Inclusive of the Cypress Park project, at most, the proposed Project would generate 40 inbound AM peak hour trips- no change given the Cypress Park project would generate no trips during the AM peak hour. Because inclusive of the Cypress Park project, the proposed Project is forecast to generate fewer than 50 net new peak hour trips, both projects combined would result in a less than significant traffic impact and further traffic analysis is not required.

The Project's daily and PM peak hour increase in trips is considered negligible. Impacts would be less than significant, and no mitigation is required.

[61] Kimley-Horn and Associates, *Trip Generation Technical Memorandum for the Proposed Cypress Avenue Park Project in the City of El Monte*, February 8, 2020.

**Transit Facilities**

Foothill Transit serves the Project site with two bus stops located near the Ramona Boulevard at Lee Lane intersection, southeast of the Project site. There is one stop near 11346 Ramona Boulevard and another across the street, directly south of the 11330 Iris Lane property. Bus routes serving the Project area are described below.

**Foothill Transit Line 190** operates between the cities of El Monte, Baldwin Park, Covina, and Pomona traveling through El Monte along Ramona Avenue in the Project vicinity. Line 190 operates on weekdays from approximately 4:45 AM to 1:00 AM, with 30-minute to 1-hour headways (the time between bus arrivals); on Saturdays from approximately 6:00 AM to 12:00 AM and on Sundays and Holidays from approximately 6:15 AM to 11:00 PM with approximately 1-hour headways.

**Foothill Transit Line 194** operates between the City of El Monte and Cal Poly Pomona, traveling along Ramona Avenue in the Project vicinity. Line 194 operates on weekdays from approximately 4:15 AM to 2:00 AM with 30-minute to 1-hour headways; on Saturdays and Sundays from approximately 5:00 AM to 2:00 AM with 30-minute to 1-hour headways.

**Foothill Transit Line 282** operates between the cities of El Monte and La Puente, traveling along Ramona Avenue in the Project vicinity. Line 282 operates on weekdays from approximately 5:00 AM to 12:30 AM with 30-minutes to 1-hour headways. On weekends, Line 282 operates from approximately 6:00 AM to 12:30 AM with 30-minute to 1-hour headways.

The Project would continue to be served by the existing transit system described above. The Project's forecast population growth could incrementally increase the demand for public transit services. However, the Project would not conflict with a program plan, ordinance, or policy addressing transit. Therefore, the Project would result in a less than significant impact, and no mitigation is required.

Additionally, the El Monte Metrolink Station, is less than 0.5 mile from the Project site, at 10925 Railroad Street, El Monte.

**Bicycle Facilities**

Ramona Boulevard is designated as a Class III bike route, but there is no signage along the street that denotes "BIKE ROUTE." The Project's forecast population growth could incrementally increase the usage of this bike route and others throughout the City. However, the Project would not conflict with a program plan, ordinance, or policy addressing bicycle facilities. Therefore, the Project would result in a less than significant impact, and no mitigation is required.

**Pedestrian Facilities**

Pedestrian sidewalks are provided along Orchard Street, Cypress Avenue, and Iris Lane. The Project would not interfere with the Project area's sidewalks, except along Iris Lane and Orchard Street where street dedications are proposed and the sidewalks would be realigned. The roadway dedications/improvements proposed along Iris Lane and Orchard Street would be implemented

pursuant to EMMC standards. The Project also proposes pedestrian access via the proposed entrances on Orchard Street and Cypress Avenue. The Project would not conflict with a program plan, ordinance, or policy addressing bicycle facilities. Therefore, the Project would result in a less than significant impact, and no mitigation is required.

### *4.17b Would the project conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b)?*

**Less Than Significant Impact.** State CEQA Guidelines §15064.3 codifies the change from Level of Service to VMT as a metric for transportation impact analysis. Pursuant to Senate Bill (SB) 743, VMT analysis is the primary method for determining CEQA impacts. Jurisdictions were not required to adopt VMT as a significant impact determination until July 1, 2020. The City of El Monte adopted Resolution No. 10172, which adopted a VMT baseline and thresholds of significance for purposes of analyzing transportation impacts under CEQA.

Resolution No. 10172 Exhibit B includes three screening options (i.e., "screening thresholds") to quickly identify when a project should be expected to cause a less than significant impact without conducting a detailed study. Thus, a project could screen out VMT impacts by land use and size, whether a project site is in a low VMT area, and by proximity to a transit priority area ("TPA"). The proposed Project is analyzed below concerning these three screening options.

By Use. The Modified Project would generate approximately 298 ADT (see IS/MND Table 4.17-3), which would exceed the 110 daily trip screening threshold. As such, the Project was not screened under this criterion from conducting further VMT analysis.

By VMT Area. The City's Residential Home-Based VMT per Capita Map depicts areas in the City that have a VMT of at least 15 percent below the baseline, thus, are presumed to have a less than significant impact. The Project site is located in such an area; therefore, the Project is screened from further VMT analysis.

By Proximity to Transit. Areas within 0.5-mile radius of existing or planned major transit stops or existing stops along a high quality transit corridor are presumed to have a less than significant impact. For El Monte, such Transit Priority Areas (TPAs) currently include the El Monte Bus Station, El Monte Metrolink Station, and most of the Garvey Avenue Corridor. The City's Transit Priority Area Map depicts the City's TPAs and indicates the Project site is located within 0.5-mile radius of the El Monte Metrolink Station, located at 10925 Railroad Street, El Monte. As such, the Project is screened from further VMT analysis. It is also noted, the Project site is located within approximately 500 feet of Foothill Transit and LA Metro bus stops along Ramona Boulevard.

Based on VMT Area and Proximity to Transit screening, the Project would result in a less than significant transportation impact concerning VMT. Therefore, the Project would not conflict with State CEQA Guidelines §15064.3(b). A less than significant impact would occur in this regard, and no mitigation is required.

### *4.17c Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?*

**No Impact.** The proposed Project does not include the use of any incompatible vehicles or equipment on-site, such as farm equipment. The Project would not provide any off-site roadway improvements that could substantially increase hazards due to a design feature. The Project is compatible with the surrounding land uses. All on-site and site-adjacent improvements, including traffic signing/striping and Project driveways, would be constructed as approved by the City of El Monte Public Works Department. Sight distance at Project access points would comply with applicable City of El Monte/California Department of Transportation sight distance standards. Therefore, no impact would occur, and no mitigation is required.

### *4.17d Would the project result in inadequate emergency access?*

**Less Than Significant Impact.** Primary vehicular access to the Project site is proposed via a two-way driveway at the Orchard Street and Cypress Avenue. Internal site access roads would accommodate fire truck access and turning radius. Variable width private driveways would allow for fire lane easements throughout the Project site; see **Figure 2-3**. The LACFD Fire Prevention Division has reviewed the Project and specified access requirements concerning minimum roadway width, fire apparatus access roads, fire lanes, signage, access devices and gates, and access walkways, among other requirements, which would enhance emergency access to the Project site. Following compliance with LACFD access requirements, adequate emergency access to the Project site would be provided. Impacts would be less than significant, and no mitigation is required.

## 4.18 Tribal Cultural Resources

This Section is based on the *Assembly Bill 52 and Senate Bill 18 Consultation initiated by the City of El Monte*. The documents for the initiation process are included in **Appendix D2: Assembly Bill 52 and Senate Bill 18 Communications**.

| Environmental Issue | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **Would the project:** | | | | |
| a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code §21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is | | | | |
| i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code §5020.1(k)? | | X | | |
| ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code §5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code §5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. | | X | | |

**IMPACT ANALYSIS**

***4.18ai*** ***Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code §5020.1(k)?***

***4.18aii*** ***A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code §5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code §5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?***

**Less Than Significant With Mitigation Incorporated.**

**Assembly Bill 52**

Chapter 532 Statutes of 2014 (i.e., Assembly Bill 52 (AB 52)) requires that lead agencies evaluate a project's potential impact on "tribal cultural resources," which include "[s]ites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are eligible for inclusion in the California Register of Historical Resources or included in a local register of historical resources." AB 52 also gives lead agencies the discretion to determine, based on substantial evidence, whether a resource qualifies as a "tribal cultural resource."

In compliance with PRC §21080.3.1(b), the City provided formal notification to California Native American tribal representatives identified by the California NAHC. Native American groups may have knowledge about cultural resources in the area and may have concerns about adverse effects from development on tribal cultural resources as defined in PRC §21074. The City has contacted the tribal representatives of the tribes noted below. Correspondence to and from tribal representatives is included as **Appendix D2**.

AB 52 Native American Groups Contacted:

- San Gabriel Band of Mission Indians, Anthony Morales
- Gabrielino/Tongva Tribal Council
- Gabrieleño Band of Mission Indians-Kizh Nation, Andrew Salas
- Gabrieleño Tongva of the Los Angeles Basin Peo'Tskome, Tribal Council
- Torres Martinez Desert Cahuilla Indians
- Gabrielino Tongva Tribe, Sam Dunlap.

On September 23, 2019, the City received a request for consultation pursuant to AB 52 from the Gabrieleño Band of Mission Indians-Kizh Nation. In response to this request, consultation occurred on October 30, 2019. As a result of consultation, mitigation has been imposed to minimize potential impacts to tribal cultural resources. Compliance with MM TCR-1 and MM TCR-2 would address potential impacts that the Kizh Nation discussed in their comment letter. Impacts would be less than significant with mitigation incorporated.

**Senate Bill 18**

Chapter 905 Statutes of 2004 (i.e., Senate Bill 18 (SB 18) requires that lead agencies, "prior to the adoption or amendment of a city or county's general plan, conduct consultations with California Native American tribes for the purpose of preserving specified places, features, and objects that are located within the city or county's jurisdiction. The bill would define the term "consultation" for purposes of those provisions. By imposing new duties on local governments with respect to consultations regarding the protection and preservation of California Native American historical, cultural, and sacred sites, the bill would impose a state-mandated local program." In compliance with PRC §21080.3.1(b), the City provided formal notification to California Native American tribal

representatives identified by the California Native American Heritage Commission (NAHC). Native American groups may have knowledge about cultural resources in the area and may have concerns about adverse effects from development on tribal cultural resources as defined in PRC §21074. The City contacted the tribal representatives noted below. Correspondence to the tribal representatives is included as **Appendix D2**. As of the release date of this Initial Study, the City has not received a request for consultation pursuant to SB 18.

SB 18 Native American Groups contacted:

- Gabrielino/Tongva Nation, Sandonne Goad,
- Gabrielino-Tongva Indians of California Tribal Council, Robert Dorame,
- Gabrielino-Tongva Tribe, Charles Alvarez,
- Gabrieleño/Tongva San Gabriel Band of Mission Indians, Anthony Morales, and
- Gabrieleño Band of Mission Indians-Kizh Nation, Andrew Salas.

As discussed in Response 4.5b, the Project site has been disturbed by past development and no archaeological resources have been recorded in the site vicinity. Notwithstanding, the potential exists for the discovery of archaeological or cultural resources during ground disturbing activities. To address potential impacts during ground-disturbing activities, the proposed Project would be required to comply with MM TCR-2 (see also **Section 4.5: Cultural Resources**), which details the appropriate steps should archaeological resources be encountered during ground-disturbing activities. Following compliance with MM TCR-2, the Project's potential impacts concerning archaeological resources would be less than significant.

Construction activities would include excavation and grading. Compliance with MM TCR-2 would address potential impacts to archaeological resources. Specifically, MM TCR-2 would require proper documentation and treatment of discovery of archaeological resources. With implementation of MM TCR-2, potential impacts to tribal cultural resources would be less than significant.

**MITIGATION MEASURES**

**MM TCR-1** **Native American Monitor/Consultant**: Prior to Grading Permit issuance, the Project Applicant shall retain and compensate for the services of a Tribal monitor/consultant who is both approved by the Gabrieleño Band of Mission Indians-Kizh Nation Tribal Government and listed under the Native American Heritage Commission's (NAHC) Tribal Contact list (provided by the NAHC). The monitor/consultant shall only be present on the site during the construction phases that involve the following on-site ground-disturbing activities: grading, excavation, and trenching. The Tribal Monitor/consultant shall complete daily monitoring logs that provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when the ground-disturbing activities are completed,

or when the Tribal Representatives and monitor/consultant have indicated that the site has a low potential for impacting Tribal Cultural Resources.

**MM TCR-2** **Unanticipated Discovery of Tribal Cultural and Archaeological Resources**: Prior to initiation of ground-disturbing activities, field personnel shall be alerted to the possibility of buried prehistoric or historic cultural deposits. If cultural resources are encountered during ground-disturbing activities, work within a 100-foot radius of the find shall halt and an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology (National Park Service (NPS) 1983) shall be contacted immediately. The archaeologist shall have the authority to stop or divert construction, as necessary. All archaeological resources unearthed by ground-disturbing activities shall be evaluated by the archaeologist and a tribal monitor/consultant approved by the Gabrieleño Band of Mission Indians-Kizh Nation. Documentation and treatment of the discovery shall occur in accordance with NPS standards.

If the discovery proves to be significant, before construction activities resume at the location of the find, additional work such as data recovery excavation may be warranted, as deemed necessary by the archaeologist. If the resources are Native American in origin, the Gabrieleño Band of Mission Indians-Kizh Nation shall coordinate with the landowner regarding treatment and curation of these resources. Typically, the Tribe requests reburial or preservation for educational purposes. Work may continue elsewhere on the Project site while evaluation and, if necessary, mitigation takes place (State CEQA Guidelines §15064.5 [f]). If the archaeologist determines that the resource constitutes a "historical resource" or "unique archaeological resource," time allotment and funding sufficient to allow for implementation of avoidance measures or appropriate mitigation shall be made available. The find's significance and treatment plan shall be in accordance with State CEQA Guidelines §15064.5(f) for historical resources and Public Resources Code § 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is infeasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any historic archaeological material that is not Native American in origin shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be offered to a local school or local historical society for educational purposes.

## 4.19 Utilities and Service Systems

| Environmental Issue | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **Would the project:** | | | | |
| a) Require or result in the relocation or construction of new or expanded facilities concerning the following, the construction or relocation of which could cause significant environmental effects?<br>i. Water,<br>ii. Wastewater,<br>iii. Wastewater Treatment (see Response 4.19.c below),<br>iv. Stormwater Drainage,<br>v. Electric Power, Natural Gas, and Telecommunications. | | | X | |
| b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years? | | | X | |
| c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? | | | X | |
| d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals? | | | X | |
| e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste? | | | X | |

**IMPACT ANALYSIS**

*4.19a* ***Require or result in the relocation or construction of new or expanded facilities concerning the following, the construction or relocation of which could cause significant environmental effects?***

***i. Water,***

**Less Than Significant Impact.** See Response 4.19b below.

*ii. Wastewater,*

**Less Than Significant Impact.** See Response 4.19.c below.

*iii. Wastewater Treatment,*

**Less Than Significant Impact.** See Response 4.19.c below.

*iv. Stormwater Drainage,*

**Less Than Significant Impact.** See Response 4.10c concerning drainage patterns and stormwater drainage systems. As discussed in Response 4.10c, the Project proposes on-site drainage improvements. No off-site drainage improvements are proposed/required. The environmental effects associated with the proposed drainage improvements are analyzed throughout this Initial Study. As concluded in this Initial Study, following compliance with the established regulatory framework, the proposed drainage improvements' environmental effects would be less than significant, and no mitigation is required.

*v. Electric Power, Natural Gas, and Telecommunications facilities.*

**Less Than Significant Impact.** Electrical power is provided by SCE and natural gas is provided by SoCalGas. Telecommunications are provided by various companies. SCE, SoCalGas, and local telecommunications companies operate and maintain transmission and distribution infrastructure in the Project area, which currently serve the Project site. See Responses 4.6a and 4.6b for further discussions concerning electricity and natural gas usage. The Project's anticipated electricity demand would be approximately 530,483 kWh per year and anticipated natural gas demand would be approximately 1,533,270 cubic feet per year. SCE and SoCalGas have confirmed that the Project site is within their respective service areas and service would be provide through existing infrastructure[62,63]. Telecommunications services are provided by Charter Communications and AT&T. Both providers confirmed that the Project site is served by existing infrastructure and would be within the companies' serve areas.[64,65] The Project proposes to connect to existing electrical, natural gas, and telecommunications infrastructure, and no off-site improvements are proposed or required. The environmental effects associated with the necessary on-site electrical, natural gas, and telecommunications improvements are analyzed throughout this Initial Study. As concluded in this Initial Study, following compliance with the established regulatory framework, the proposed utility improvements' environmental effects would be less than significant, and no mitigation is required.

[62] Antoine Williams, SCE Design Representative. (July 9, 2019). *Will Serve Letter Only*.
[63] Katrina Regan, Planning Supervisor. (February 20, 2019).
[64] Dianna Netherlaine, SoCal Central Specialist. (February 14, 2019). *Will Serve Letter*
[65] Armand Dabuet, AT&T OSP Design Engineer. (February 19, 2019). *Will Serve Letter, Non-Interference Letter.*

### *4.19b Would the project have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years?*

**Less Than Significant Impact.** The EMWD supplies water to the Project site. Final Draft 2015 Urban Water Management Plan Tables 7-2, 7-3, and 7-4 indicate water supplies would meet the service area's water demands for normal, single-dry, and multiple dry-year conditions through 2035. UWMP water demand forecasts are based on adopted general plans.

As noted in Response 4.10b, the City's water supply is produced from the Main Basin. If EMWC exceeds their groundwater allocation, replenishment water is available from the Main San Gabriel Basin Watermaster. The Watermaster annually prepares and updates its Five-Year Water Quality and Supply Plan in order to coordinate groundwater-related activities to protect and improve the Main Basin's water supply and quality. Drought conditions have persisted in the San Gabriel Valley for the past two decades, but the Watermaster has diligently managed groundwater supply and groundwater levels through the establishment of Operating Safe Yield (OSY). Despite below-average rainfall and stormwater runoff during Fiscal Year 2017-2018, the groundwater level only decreased by one foot. In its 2017 UWMP, EMWD forecasted its total retail water demand to be 787 million gallons (MG) by Year 2035. Additionally, the retail population is expected to increase from 17,839 persons in 2015 to 22,645 persons by 2035. EMWD retail supplies are expected to increase to 836 MG in Year 2035. In the case of a water supply shortage, the EMWD has prepared a Water Shortage Contingency Plan to ensure adequate service.

The UWMP is based on adopted general plans. The Project proposes a General Plan Amendment from Industrial/Business Park and Medium-Density Residential to High-Density Residential. The Project's forecast population growth is approximately 420 persons; see Response 4.14a. The Project's proposed land uses would differ from the allowable land uses and associated water demands under the existing land use designations. Therefore, because the proposed Project would conflict with the EMGP's land use designations for the Project site, which are the basis for the UWMP, the Project site's forecast population growth would conflict with the UWMP. However, the proposed Project would result in a nominal increase in water demand, as compared to the site's existing land uses/designations, which were assumed in the UWMP. Additionally, the Project's forecast population growth would nominally increase (only approximately 0.36 percent) the City's existing population of approximately 116,675 persons.[66] Further, inclusive of the proposed Project, the City's population would total approximately 117,098 persons, which would be approximately 2.0 percent below SCAG's 2020 population forecast for El Monte of 120,000 persons. As such, following the City's approval of the requested General Plan Amendment, the Project would not conflict with or exceed SCAG's regional growth forecasts for El Monte or conflict with the UWMP. As such, and as concluded in **Section 4.10**, Project impacts concerning water demand would be less than significant, and no mitigation is required.

[66] Ibid.

Existing water mains are within Cypress Avenue (6.0-inches), Iris Lane (8.0 inches), and Orchard Street (6.0 inches). The Project proposes to replace approximately 140 feet of the existing 6.0-inch pipeline within Cypress Avenue with an 8.0-inch pipeline south from Kaufman Street to the Project entrance. In addition to the Cypress Avenue connection, the Project would connect to existing City pipelines at two other locations: at the 8.0-inch pipeline along Iris Lane; and at the 6.0-inch pipeline along Orchard Street. The environmental effects associated with the proposed water improvements are analyzed throughout this Initial Study. As concluded in this Initial Study, following compliance with the established regulatory framework, the proposed water improvements' environmental effects would be less than significant, and no mitigation is required.

***4.19c Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?***

**Less Than Significant Impact.**

**Wastewater Generation and Infrastructure**

Wastewater collection facilities that serve the City are owned, operated, and maintained by the City of El Monte Public Works Department. The City's current wastewater system includes a total of 125 miles of pipeline, eight sewage lift stations, and 2,687 manholes. The City is part of the Joint Outfall Agreement, which provides a regional interconnected system of facilities and an inter-jurisdictional agreement to own, operate, and maintain sewers, pumping plants, treatment plants, and other facilities. This network is known as the Joint Outfall System.

The Project site is also within the jurisdictional boundaries of Sanitation Districts of Los Angeles County Sanitation District No. 15 (LACSD). The Project's wastewater would discharge to the City's local sanitary sewer line for conveyance to an LACSD trunk sewer. Access to the City's sanitary sewer system would be provided with connection to an existing 8.0-inch line within Iris Lane, at the site's southwest corner.

The Project's wastewater would discharge to the City's local sanitary sewer line for conveyance to LACSD's 18.0-inch diameter Potrero Avenue Trunk Sewer, located in Marybeth Avenue at Whitmore Street. The Project proposes two sewer connections at the Project site's southern portion along Iris Lane. No off-site wastewater improvements are proposed/required. The Project's wastewater flow is estimated at 195 GPD/DU, for a total of 20,085 GPD (0.03 cfs).[67] The wastewater generated at the Project site would be treated at the Whitter Narrows Water Reclamation Plant which has a capacity of 15 MGD and currently processes an average flow of 9.1 MGD. The Project would generate approximately 0.03 cfs (20,085 GPD).[68] At peak flow rates,

[67] Adriana Raza, Customer Service Specialist. (March 2, 2020). *NOI Response for 3630, 3640, and 3700 Cypress Avenue and 11312 Orchard Street.*

[68] Adriana Raza, Customer Service Specialist. (February 13, 2019). *Will Serve Letter for 11312 Orchard Street Residential Development.*

the proposed Project's wastewater generation flows would increase the overall downstream system. However, during the entitlement review process, the City would review the Project's sewer improvement plans and calculations to verify that the overall flow volume would not exceed 50 percent of the downstream pipe's capacity. Moreover, the increase in wastewater generated would account for less than one percent of the Whitter Narrows Reclamation Plant treatment capacity. Therefore, the Project's peak wastewater flow rates and volumes would not significantly impact or exceed the existing sewer capacity in the public sewer system.

As concluded in this Initial Study, following compliance with the established regulatory framework, the wastewater improvements' environmental effects would be less than significant, and no mitigation is required.

**Wastewater Treatment**

The wastewater generated by the proposed Project would be treated at LACSD's Joint Water Pollution Control Plant located in the City of Carson. The Plant has a capacity of 400 mgd and currently produces an average recycled water flow of 254.6 mgd. The Project would generate approximately 0.03 cfs (20,085 GPD). The HSC empowers the LACSD to charge a fee for the privilege of connecting to the LACSD's Sewage System for increasing the strength or quantity of wastewater discharged from connected facilities. The fee payment would be required before a permit to connect to the sewer is issued. Additionally, the Project would not require or result in the construction of new water treatment facilities or expansion of existing facilities. A less than significant impact would occur, and no mitigation is required.

***4.19d Would the project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?***

***4.19e Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?***

**Less Than Significant Impact.** The City's Environmental Services Division oversees all matters related to solid waste and recycling, including management of waste hauler contracts and implementation of recycling programs. The City currently contracts with three waste haulers: American Reclamation, which serves the entire City; Waste Management Inc., which serves areas south of I-10; and Valley Vista Services, which serves areas north of I-10, including the Project site. The City is served by three landfills including Sunshine Canyon, Olinda Alpha, and El Sobrante.[69] Capacities for each of these landfills are presented in **Table 4.19-1: Landfill Capacities**.

Based on a Los Angeles County's solid waste generation rate of 4.0 pounds per DU per day, Project operations would generate approximately 440 pounds per day. As indicated in

[69] California Department of Resources Recycling and Recovery (CalRecycle). (2019). *SWIS Facility/Site Search.* Available at https://www2.calrecycle.ca.gov/SWFacilities/Directory/. Accessed on October 2, 2019.

**Table 4.19-1**, the Project would be served by landfills with sufficient permitted capacity to accommodate the Project's solid waste disposal needs.

| TABLE 4.19-1: LANDFILL CAPACITIES | | | |
|---|---|---|---|
| **Landfill** | **Maximum Permitted Throughput** | **Maximum Permitted Capacity** | **Remaining Capacity** |
| Sunshine Canyon | 12,100 tons/day | 149,900,000 CY | 77,900,000 CY |
| Olinda Alpha | 8,000 tons/day | 148,800,000 CY | 34,200,00 CY |
| El Sobrante | 16,054 tons/day | 209,910,000 CY | 143,977,170 CY |

Additionally, state law requires a 65 percent diversion rate for construction and demolition projects. EMMC §8.20.261 states that each covered project applicant shall divert at least 65-percent, or the state-mandated construction and demolition percentage, whichever is greater, by weight of construction and demolition materials generated by the project to be diverted from landfills. A diversion plan prepared by the Project Applicant and would be reviewed by the Chief Building Official and may be subject to amendments, modifications, or conditions prior to approval. Within 60 days from completion of a covered project, the Project Applicant must submit a final diversion report to determine if the diversion requirements have been met. Construction and operational activities would be required to comply with all applicable federal, state, and local statutes and regulations for solid waste, including those identified under the most recent CALGreen and the EMMC. There is sufficient landfill capacity to serve the proposed Project, and the proposed Project would not conflict with solid waste reduction goals. The Project would result in a less than significant impact concerning solid waste, and no mitigation is required.

## 4.20 Wildfire

| Environmental Issue | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:** | | | | |
| a) Substantially impair an adopted emergency response plan or emergency evacuation plan? | | | | X |
| b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? | | | | X |
| c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? | | | | X |
| d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes? | | | | X |

**IMPACT ANALYSIS**

***4.20a Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?***

**No Impact.** According to CalFire Fire Hazard Severity Zone Map for the City of El Monte, the Project site is not within a State Responsibility Area. The Project site is in a Non-Very High Fire Hazard Severity Zone (VHFHSZ) zone within a local responsibility area.[70] Project design and site access would adhere to LCFD regulations and designs; see Response 4.15a above. Further, Project construction would not require the complete closure of any public or private roadways during construction. Temporary construction activities would not impede use of nearby roadways for emergencies or access for emergency response vehicles. Therefore, the Project would not result in inadequate emergency access. No impact would occur, and no mitigation is required.

[70] CalFire. (June, 2019). *FHSZ Viewer. Retrieved from* https://egis.fire.ca.gov/FHSZ/.

***4.20b Would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?***

**No Impact.** As discussed above, the Project is not within an area classified as very high fire hazard severity zone. Further, the Project site and its surrounding areas are relatively flat. Therefore, no impact would occur, and no mitigation is required.

***4.20c Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?***

**No Impact.** As discussed above, the Project site is not within an area classified as very high fire hazard severity zone. The site is bordered by existing development in an urbanized area of the City. The Project would connect to existing infrastructure that currently serves the Project area. Project implementation would not result in the new construction, installation, or maintenance of new infrastructure. Therefore, no impact would occur, and no mitigation is required.

***4.20d Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?***

**No Impact.** The Project is not within an area classified as very high fire hazard severity zone. The Project site and surrounding vicinity are relatively flat. There are no known landslides near the site nor is the site in the path of any known or potential landslides. Therefore, no impact would occur, and no mitigation is required.

## 4.21 Mandatory Findings of Significance

| Environmental Issue | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **Does the Project:** | | | | |
| a) Have the potential to substantially 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, substantially 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? | | | X | |
| b) 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 the past projects, the effects of other current projects, and the effects of probable future projects.) | | | X | |
| c) Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? | | | X | |

**IMPACT ANALYSIS**

*4.21a* ***Does the project have the potential to substantially 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, substantially 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?***

**Less Than Significant Impact.** As discussed throughout this Initial Study, the Project does not have the potential to degrade the quality of the environment or result in significant impacts to the environment that cannot be reduced to less than significant following compliance with the established regulatory framework (i.e., local, state, and federal regulations) and the recommended mitigation measures.

As concluded in **Section 4.4**, the Project would not 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, or reduce the number or restrict the range of a rare or endangered plant or animal.

As concluded in **Section 4.5**, the Project would not eliminate important examples of the major periods of California history or prehistory. CHRIS records search and historic aerial imagery review did not identify any historic or archaeological resources within the Project site. A total of 20 cultural resources have been recorded within 0.5-mile of the Project site, but none have been previously recorded within its boundaries. Review of available imagery reveals that the structures exhibit minor features of Late-Modern architectural style but are likely not "architecturally significant" or a "historic resource" under CEQA. Therefore, the proposed Project would not cause a change in the significance of a historical resource.

***4.21b 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 the past projects, the effects of other current projects, and the effects of probable future projects.)***

**Less Than Significant Impact.** The proposed Project would result in significant impacts unless mitigated for the following environmental issues: cultural resources, geology and soils, hazards and hazardous materials, and tribal cultural resources. Mitigation has been specified for each of these environmental issue areas to reduce impacts to less than significant. Other development projects within the City would be subject to compliance with the established regulatory framework, as applicable. All other Project impacts were determined either to have no impact or a less than significant impact following compliance with the established regulatory framework, without the need for mitigation. Cumulatively, the proposed Project would not result in any significant impacts that would substantially combine with impacts of other current or probable future impacts; see also Responses 4.3d and 4.8b. Therefore, the proposed Project, in conjunction with other future projects, would not result in any cumulatively considerable impacts, and no mitigation is required.

***4.21c Does the project have environmental effects which will cause substantial adverse effects on human beings, directly or indirectly?***

**Less Than Significant Impact.** Concerning Mandatory Findings of Significance, State CEQA Guidelines §15065 states that "a lead agency shall find that a project may have a significant effect on the environment and thereby require an EIR [Environmental Impact Report] to be prepared for the project where there is substantial evidence, in light of the whole record, that …… the environmental effects of a project will cause substantial adverse effects on human beings, either directly or indirectly." Thus, "substantial" in this context is a significant effect on the environment such that preparation of an Environmental Impact Report (EIR) would be required.

As discussed in this Initial Study, the proposed Project would not cause a significant effect on the environment that would result in substantial adverse effects on human beings directly or

indirectly, such that preparation of an EIR would be required. Therefore, impacts concerning adverse effects on human beings would be less than significant.

See **Sections 4.7**, **4.9**, and **4.13**, which address potential impacts to humans concerning geology and soils, hazardous materials, and noise, respectively.

*This page intentionally left blank.*

5.0

# References

# 5.0 REFERENCES

Adriana Raza, Customer Service Specialist. (March 2, 2020). *NOI Response for 3630, 3640, and 3700 Cypress Avenue and 11312 Orchard Street*.

Blodgett Baylosis Environmental Planning, Review of KB Homes Orchard Street and Cypress Avenue Townhouse Development [Project IS/MND], December 23, 2019.

CalFire. (June, 2019). *FHSZ Viewer*. Retrieved from: https://egis.fire.ca.gov/FHSZ/.

California Building Standards Commission. (2016). 2016 California Green Building Standards Code: California Code of Regulations Title 24, Part 11. International Code Council.

California Department of Conservation. (2015). CGS Information Warehouse: Regulatory Maps. Retrieved from: http://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=regulatorymaps.

California Department of Conservation. (2015). *CGS Information Warehouse: Regulatory Maps.* Retrieved from: http://maps.conservation.ca.gov/cgs/informationwarehouse/.

California Department of Conservation. (2015). Earthquake Zones Required Investigation El Monte Quadrangle. Retrieved from: http://gmw.consrv.ca.gov/SHP/EZRIM/Maps/EL_MONTE_EZRIM.pdf

California Department of Conservation. (2016). *California Important Farmland Finder.* Retrieved from: https://maps.conservation.ca.gov/dlrp/ciff/.

California Department of Conservation. (2016). *Williamson Act/Land Conservation Act.*

California Department of Conservation. (2018). *California Statutes and Regulations for the California Geological Survey.* Sacramento, CA: California Geological Survey.

California Department of Resources Recycling and Recovery (CALRecycle). (2018). *Solid Waste Information System Facility/Site Search.* Retrieved from: https://www2.calrecycle.ca.gov/SWFacilities/Directory/.

California Department of Transportation. (2011). *California Scenic Highway Mapping System.* Retrieved from: http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm.

California Energy Commission. (April 2018). *California Energy Demand 2018-2030 Revised Forecast, Figure 49: Historical and Projected Baseline Consumption SCE Planning Area.* Sacramento, CA: California Energy Commission.

California Energy Commission. (January 2019). *2016 Building Energy and Efficiency Standards Frequently Asked Questions Fact Sheet.* Retrieved from: https://www.energy.ca.gov/title24/2016standards/rulemaking/documents/2016_Building_Energy_Efficiency_Standards_FAQ.pdf.

David Lelie, Personal Communication - Email, June 28, 2019.

Department of Toxic Substance Control. (2019). *Envirostor Database.* Retrieved from: https://www.envirostor.dtsc.ca.gov/public/map/?global_id=19490135.

Federal Emergency Management Agency. (April 2019). *FEMA Flood Map Service Center.* Retrieved from: https://msc.fema.gov/portal/search?AddressQuery=1515%20W%20178th%20St%2C%20Gardena%2C%20CA%2090248#searchresultsanchor.

Ingo Giani, Personal Communication - Email, January 6, 2020.

Kimley-Horn and Associates, *Trip Generation Technical Memorandum for the Proposed Cypress Avenue Park Project in the City of El Monte*, February 8, 2020.

Nancy Lee, Personal Communication - Email, January 14, 2020.

Nancy Lee, Personal Communication - Email, January 16, 2020.

ParcelQuest, 2019.

Southern California Association of Governments. (April 2016). *Final 2016–2040 RTP/SCS*, April 2016, p. 153. Los Angeles, CA: Southern California Association of Governments.

State of California, Department of Finance, E-5 Population and Housing Estimates for Cities, Counties and the State — January 1, 2011-2020. Sacramento, California, May 2020

State of California Water Quality Control Board. (undated). *Order NO. R4-2012-0175 NPDES Permit NO. CAS004001.* Los Angeles, CA: State of California Water Quality Control Board.

State Water Resources Control Board. (April 2019). *Sustainable Groundwater Management Act (SGMA).* Retrieved from: https://www.waterboards.ca.gov/water_issues/programs/gmp/sgma.html