**DRAFT**

# Avalon Monrovia Specific Plan
# Initial Study/Mitigated Negative Declaration

*Lead Agency:*
City of Monrovia
Planning Division
415 S. Ivy Avenue
Monrovia, California 91016

*Project Applicant:*
AvalonBay Communities Inc.
11111 Santa Monica Boulevard
Los Angeles, CA 90025

*Consultant to the City:*
MIG Inc.
537 S. Raymond Avenue
Pasadena, CA 91105

July 2018

- This document is designed for double-sided printing -

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# DATA SHEET 5

# Initial Study and Mitigated Negative Declaration

**APPLICATION**

Conditional Use Permit
Tentative Parcel Map
Specific Plan
Zoning Map Change - Specific Plan
Municipal Code Amendment

**APPLICANT/ADDRESS**

AvalonBay Communities, Inc.
2050 Main Street, #1200
Irvine, CA 92614

**PROJECT ADDRESS**

815 and 825 South Myrtle Avenue, and 126 West Walnut Avenue, Monrovia, CA

**PROJECT LOCATION**

The proposed project site is located ½-mile north of the I-210 freeway and one block south of Old Town Monrovia. The project site is located at the northwestern corner of Myrtle Avenue and Chestnut Avenue. The block is bounded by Primrose Avenue to the west, Myrtle Avenue to the east, Chestnut Avenue to the south, and Walnut Avenue to the north. A 16-foot-wide alley connecting Myrtle Avenue and Primrose Avenue bisects the site; that portion of the alley will be vacated and incorporated into the site. The proposed "L"-shaped parcel will also have a frontage on Walnut Avenue. Six parcels will be combined to create a single 2.1-acre (gross) site.

**PROJECT DESCRIPTION**

The Avalon Monrovia Specific Plan has been prepared to entitle Avalon Monrovia, a mixed-use infill development composed of a single building containing 154 apartment residential units, 3,500 square feet of ground-floor retail, and a five-story, six-level 286-space parking garage on a 2.1-acre site. The units vary in size from 689 to 1,742 square feet, and the mix of units consists of 55 one-bedroom units, 75 two-bedroom units, and 24 three-bedroom units. The residential density is 73.3 dwelling units per acre. Thirteen of the dwelling units will be reserved for lower-income residents. A density bonus has been applied pursuant to the State Density Bonus Law, as chaptered in Government Code section 65915. The concessions, sought under the State Density Bonus Law, include building height (five

floors rather than four), building setbacks (up to 10-foot set back on the 1st to 3rd floors and a 16-foot setback on the 4th and 5th floor), and a 2.49 floor area ratio (FAR) as opposed to the 2.0 maximum set forth in the General Plan.

The proposed project includes a clubhouse, and fitness area, along with private and common open spaces. Common open spaces for residents in the form of two courtyards occupy approximately 10,580 square feet. Approximately 11,680 square feet of private open spaces (balconies and decks) are provided. In addition, approximately 5,408 square feet of landscaping is located around the building perimeter.

A parcel map will be recorded to merge six lots and a portion of the alley into a single 2.1-acre development parcel. The following six parcels comprise the project site and are listed with their current Los Angeles County Assessor Parcel Number (APN) and corresponding street address:

| APN | Address | Area |
|---|---|---|
| 8508-006-037 | 815 South Myrtle Avenue | 0.17 acres |
| 8508-006-054 | 825 South Myrtle Avenue | 1.23 acres |
| 8508-006-055 | | |
| 8508-006-038 | 126 West Walnut Avenue | 0.56 acres |
| 8508-006-039 | | |
| 8508-006-040 | | |

The project site currently has three buildings totaling approximately 27,059 square feet of office space. This includes a 2,990-square-foot one-story building at 126 West Walnut Avenue, a 3,204-square-foot one-story building at 815 South Myrtle Avenue, and a 20,865-square-foot one-story building at 825 South Myrtle Avenue.

The proposed project consists of a single five-story, mixed-use building 65 feet in height and connected to a five-story, six-level 286-space parking garage; however, the tower architectural

feature at the corner of Chestnut Avenue and Myrtle Avenue reaches 75 feet in height. The mixed-use portion of the building includes approximately 162,332 square feet of gross floor area, and the parking garage portion of the building includes approximately 112,298 square feet of gross floor area.

The proposed project is estimated to take approximately 19 months to construct with construction estimated to start in July 2019 and completed in February 2021.

The proposed project also includes improvements within the public right-of-way including the creation of 14 on-street parking spaces (six spaces along Myrtle Avenue and eight spaces along Chestnut Avenue), new curb cuts, and street-edge landscaping. There are currently nine parking spaces along Chestnut Avenue; thus, the project will increase the number street parking spaces by five. The building will be set back a minimum of 10 feet along its street frontage on Myrtle Avenue to accommodate a sidewalk. A 16-foot-wide alley connecting Myrtle Avenue and Primrose Avenue bisects the site; that portion of the alley will be vacated and incorporated into the site. The utilities located underneath that portion of the alley—sewer, water, and gas—will be removed and capped at the project site. The project introduces sewer, water, and gas points of connections to existing connections located off-site.

Through the western portion of the site, a minimum 16-foot-wide public access easement driveway will connect Walnut Avenue with the alley. The proposed project includes a 14-foot-wide service driveway on Myrtle Avenue within the project site that will allow for commercial business trash collection.

Limited vegetation exists on the project site, including ornamental landscaping and trees; these would be removed as part of the project. A landscape plan is included as a component of the Specific Plan. Within the project, the following types of trees will be planted at the pool and courtyard: Afghan Pine, Crepe Myrtle, Dracaena, Fern Podocarpus, Giant Bird of Paradise, Magnolia, Saratoga, Silver Sheen, Tree Aloe, and Tristiana trees. Streetscape trees include Bay Laurel, Camphor Tree, Carrot Wood, Coppertone, Crepe Myrtle, Cypress, Giant Bird of Paradise, Magnolia, and Sycamore. Pedestrian-oriented elements such as seating areas, lighting, and planters along the

street frontages will be compatible with similar elements found in Old Town Monrovia.

The key objective of the Avalon Monrovia Specific Plan is to implement the Monrovia General Plan's land use and urban design goals for the South Myrtle Avenue Corridor and the Old Town Extension District through the construction of the project. The goals include development of housing reflective of market needs within a mixed-use setting, as well as a plan for affordable housing. Overall Specific Plan objectives are to:

1. Increase housing options in Monrovia, including housing for very-low income households.
2. Add compatible land uses around Old Town Monrovia consisting of mixed-use developments with ground-floor retail.
3. Provide an attractive streetscape and create a pleasant open space area near Old Town Monrovia.
4. Upgrade the physical conditions of the project site.
5. Provide for vehicle parking options on and off street.
6. Accommodate sustainable site and architectural designs that implement the latest California Green (CALGreen) Building and Green Energy Codes, provide alternative vehicle fueling facilities, implement the City's storm water management programs, and use water conservation landscaping techniques consistent with City regulations.

The proposed project will be serviced by existing infrastructure and utilities, including: water (Upper San Gabriel Valley Municipal Water District and Municipal Water District), sewer (Sanitation Districts of Los Angeles County), storm water (City and County), solid waste disposal (Athens Services), and gas (SoCal Gas) and electricity (Southern California Edison).

The proposed project includes adoption of the Avalon Monrovia Specific Plan, approval of a Tentative Parcel Map, approval of a Conditional Use Permit to construct the development, and adoption of a Zone Ordinance Amendment and Municipal Code Amendment to add Avalon Monrovia Specific Plan to section 17.04.035 of the Monrovia Municipal Code.

Pursuant to the authority and criteria contained in the California Environmental Quality Act (CEQA) and the CEQA Guidelines for the City of Monrovia (City), the City as the Lead Agency has analyzed the project and determined that with the inclusion of mitigation measures, the project will not have a significant impact on the environment. Based on this finding, the Lead Agency prepared this

**MITIGATED NEGATIVE DECLARATION**

This Initial Study (IS) is a preliminary analysis prepared by and for the City of Monrovia as Lead Agency to determine whether an Environmental Impact Report (EIR) or a Negative Declaration (ND) or Mitigated Negative Declaration (MND) must be prepared for a proposed project. An MND is prepared for a project when the initial study has identified potentially significant effects on the environment, but (1) revisions in the project plans or proposals made by, or agreed to by, the applicant before the proposed negative declaration and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effect on the environment would occur, and (2) there is no substantial evidence in light of the whole record before the public agency that the project, as revised, may have a significant effect on the environment.

Implementation of this proposed project could cause some potentially significant impacts on the environment, but as shown in the environmental analysis contained in this IS/MND, all of the project's potentially significant impacts would be reduced to less than significant levels through the implementation of mitigation measures. Consequently, the analysis contained herein concludes that an MND shall be prepared for the project. Based on this finding, the City has prepared this IS/MND.

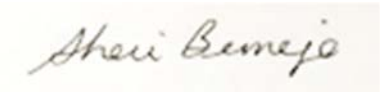
The City of Monrovia has reviewed the Initial Study/Mitigated Negative Declaration of environmental effects for the project and finds:

A. The project is in conformance with the environmental goals and policies adopted by the community.

B. The project will not have a significant effect on the environment after implementation of the required mitigation measures.

A copy of the Initial Study/Mitigated Negative Declaration documenting reasons to support the findings is on file in the Planning Division. Mitigation measures included in the project to avoid potentially significant effects are contained on the Data Sheets on file in the Planning Division, Community Development Department, 415 South Ivy Avenue, Monrovia, CA 91016, (626) 932-5565.

A period of at least 20 days from the date of publication of the notice of the MITIGATED NEGATIVE DECLARATION will be provided to enable public review of the project specifications, the Initial Study, and this document prior to the final adoption of the MITIGATED NEGATIVE DECLARATION by the Lead Agency. A copy of the project specifications is on file in the Office of Planning Division, Community Development Department, 415 South Ivy Avenue, Monrovia, California.



Date 7/12/18 By: _____

Sheri Bermejo
Planning Division Manager

# 1 Introduction

The City of Monrovia (Lead Agency) received an application for a Conditional Use Permit for New Construction, a Municipal Code Amendment, a Tentative Parcel Map, a Specific Plan, and Zoning Map Change - Specific Plan for a mixed-use development on 2.1 gross acres. The approval of the application constitutes a *project* that is subject to review under the California Environmental Quality Act (CEQA) 1970 (Public Resources Code, section 21000 et seq.), and the State CEQA Guidelines (California Code of Regulations, section 15000 et seq.) as amended.

This Initial Study/Mitigated Negative Declaration (MND) has been prepared to assess the short-term, long-term, and cumulative environmental impacts that could result from the project.

This report has been prepared to comply with section 15063 of the State CEQA Guidelines, which sets forth the required contents of an Initial Study. These include:

- A description of the project, including the location of the project (See section 2)
- Identification of the environmental setting (See section 2.11)
- Identification of environmental effects by use of a checklist, matrix, or other methods, provided that entries on the checklist or other form are briefly explained to indicate that there is some evidence to support the entries (See section 4)
- Discussion of ways to mitigate significant effects identified, if any (See section 4)
- Examination of whether the project is compatible with existing zoning, plans, and other applicable land use controls (See section 4.10)
- The name(s) of the person(s) who prepared or participated in the preparation of the Initial Study (See section 6)

In addition, to assist the reader, a list of all mitigation measures included in this Initial Study is presented in section 5.

## *1.1 – Purpose of CEQA*

The body of state law known as *CEQA* was originally enacted in 1970 and has been amended a number of times since then. The legislative intent of these regulations is established in California Public Resources Code section 21000, as follows.

> The Legislature finds and declares as follows:
>
> a) The maintenance of a quality environment for the people of this state now and in the future is a matter of statewide concern.
> b) It is necessary to provide a high-quality environment that at all times is healthful and pleasing to the senses and intellect of man.

c) There is a need to understand the relationship between the maintenance of high-quality ecological systems and the general welfare of the people of the state, including their enjoyment of the natural resources of the state.
d) The capacity of the environment is limited, and it is the intent of the Legislature that the government of the state take immediate steps to identify any critical thresholds for the health and safety of the people of the state and take all coordinated actions necessary to prevent such thresholds being reached.
e) Every citizen has a responsibility to contribute to the preservation and enhancement of the environment.
f) The interrelationship of policies and practices in the management of natural resources and waste disposal requires systematic and concerted efforts by public and private interests to enhance environmental quality and to control environmental pollution.
g) It is the intent of the Legislature that all agencies of the state government which regulate activities of private individuals, corporations, and public agencies which are found to affect the quality of the environment, shall regulate such activities so that major consideration is given to preventing environmental damage, while providing a decent home and satisfying living environment for every Californian.

PRC section 21001 states the Legislature further finds and declares that it is the policy of the State to:

a) Develop and maintain a high-quality environment now and in the future, and take all action necessary to protect, rehabilitate, and enhance the environmental quality of the state.
b) Take all action necessary to provide the people of this state with clean air and water, enjoyment of aesthetic, natural, scenic, and historic environmental qualities, and freedom from excessive noise.
c) Prevent the elimination of fish or wildlife species due to man's activities, insure that fish and wildlife populations do not drop below self-perpetuating levels, and preserve for future generations representations of all plant and animal communities and examples of the major periods of California history.
d) Ensure that the long-term protection of the environment, consistent with the provision of a decent home and suitable living environment for every Californian, shall be the guiding criterion in public decisions.
e) Create and maintain conditions under which man and nature can exist in productive harmony to fulfill the social and economic requirements of present and future generations.
f) Require governmental agencies at all levels to develop standards and procedures necessary to protect environmental quality.
g) Require governmental agencies at all levels to consider qualitative factors as well as economic and technical factors and long-term benefits and costs, in addition to short-term benefits and costs and to consider alternatives to proposed actions affecting the environment.

A concise statement of legislative policy, with respect to public agency consideration of projects for some form of approval, is found in section 21002 of the Public Resources Code, quoted below:

> *The Legislature finds and declares that it is the policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects, and that the procedures required by this division are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects. The Legislature further finds and declares that in the event specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof.*

## *1.2 – Public Comments*

Comments from all agencies and individuals are invited regarding the information contained in this Initial Study/Mitigated Negative Declaration. Such comments should explain any perceived deficiencies in the assessment of impacts, identify the information that is purportedly lacking in the Initial Study/Mitigated Negative Declaration, or indicate where the information may be found. All comments on the Initial Study/Mitigated Negative Declaration are to be submitted to:

Sheri Bermejo, Planning Division Manager
415 S. Ivy Avenue
Monrovia, CA 91016
(626) 932-5538

Following a 20-day period of circulation and review of the Initial Study/Mitigated Negative Declaration, all comments will be considered by the City of Monrovia (City) prior to adoption of the MND.

## *1.3 – Availability of Materials*

All materials related to the preparation of this Initial Study/Mitigated Negative Declaration are available for public review. The documents are available at City Hall, the Monrovia Public Library and online. To request an appointment to review these materials, please contact:

Sheri Bermejo, Planning Division Manager
415 S. Ivy Avenue
Monrovia, CA 91016
(626) 932-5538

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# 2 Project Description

## *2.1 – Project Title*

Avalon Monrovia Specific Plan

## *2.2 – Lead Agency Name and Address*

City of Monrovia, Planning Division
415 S. Ivy Avenue
Monrovia, CA 91016

## *2.3 – Contact Person and Phone Number*

Sheri Bermejo, Planning Division Manager (626) 932-5539

## *2.4 – Project Location*

Latitude 34.1430° North, Longitude -118.0014° West

The project site is located at the northwest corner of Myrtle Avenue and Chestnut Avenue. The proposed "L"-shaped parcel will also have a frontage on Walnut Avenue (Figure 2-1: Project Vicinity and Figure 2-2: Project Location).

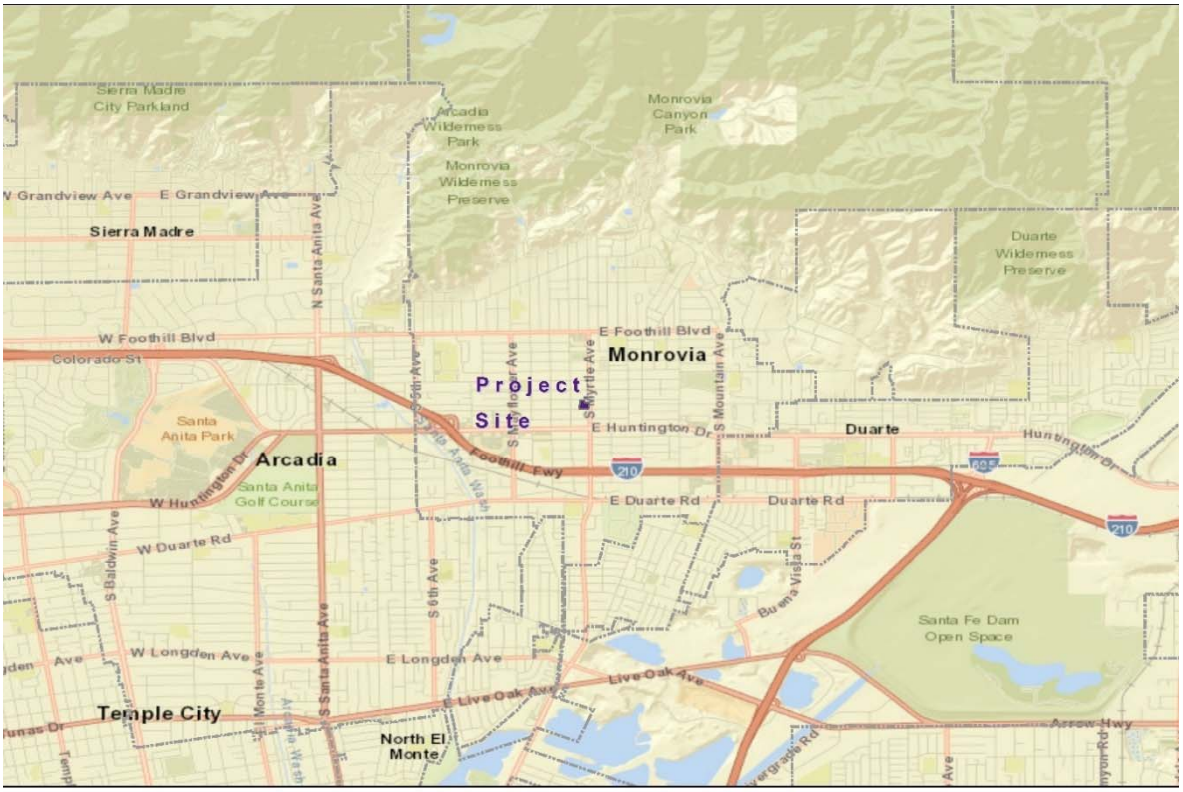


**Figure 2-1 Project Vicinity**

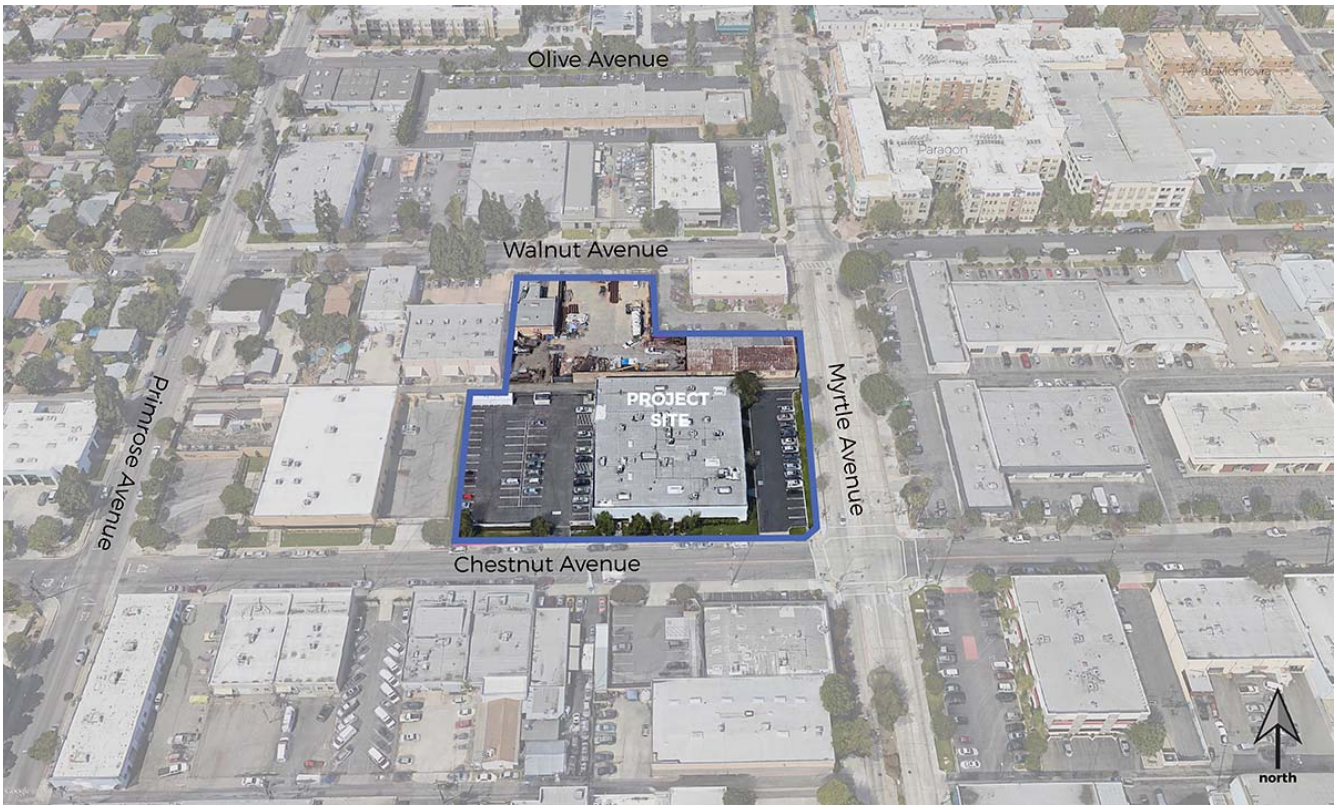


**Figure 2-2 Project Location**

## *2.5 – Project Sponsor's Name and Address*

AvalonBay Communities Inc.
2050 Main Street, #1200
Irvine, CA 92614
(949) 955-6200

## *2.6 – General Plan Land Use Designations*

- South Myrtle Avenue Corridor
- Old Town Extension District
- Office/Research and Development/Light Manufacturing with a Specific Plan/Planned Development Overlay

## *2.7 – Zoning Districts*

- Office/Research and Development/Light Manufacturing
- South Myrtle Avenue Corridor

## *2.8 – Surrounding Land Uses*

| Direction | Zoning District | Existing Land Use |
|---|---|---|
| Project Site | Office/Research and Development/Light Manufacturing (O/RD/LM); South Myrtle Avenue Corridor | Light Industrial/Professional Services |
| North | O/RD/LM; South Myrtle Avenue Corridor | Walnut Avenue/Auto Service Shop |
| South | O/RD/LM; South Myrtle Avenue Corridor | Chestnut Avenue/Gym/Auto Service Shop |
| East | O/RD/LM; South Myrtle Avenue Corridor | Myrtle Avenue/Commercial and Professional Services |
| West | Manufacturing; South Myrtle Avenue Corridor | Light Industrial/Professional Services |
| Northeast | O/RD/LM; South Myrtle Avenue Corridor | Professional Services Building |

## *2.9 – Environmental Setting*

The project site is on a 2.1-acre (gross) parcel of developed land, with three existing commercial buildings constructed between 1925 and 1984. The project includes the demolition of these three existing structures, consisting of the Tanner Research and Development office building (20,865 square feet) and two "Karl Short" office buildings (3,204 and 2,990 square feet office, respectively), for a total of approximately 27,059 square feet of office use. The area immediately surrounding the project site is completely urbanized with industrial and commercial land uses, as well as the mixed-use commercial/residential Paragon development one block north and across Myrtle Avenue.

The site is located within the South Myrtle Avenue Corridor designation, which links Old Town with the I-210 freeway and the neighborhoods around the Gold Line Monrovia station to the south. The General Plan established the South Myrtle Avenue Corridor planning area to create the policy environment for compatible pedestrian-scale land uses between Old Town and destinations to the south, which includes the emergence of mixed-use developments around the Gold Line Monrovia station.

The Old Town Extension District is one of three districts of the South Myrtle Avenue Corridor planning area, and it is intended to promote urban design and land uses more compatible with Old Town. Historically, the uses in Old Town Extension have been office and light industrial uses consistent with prior Office/Research and Development/Light Manufacturing and Manufacturing zones applied to the area. Located a block to the north of the site is Paragon, the first mixed-use development in Old Town Extension. As approved in the 700 South Myrtle Avenue Specific Plan, Paragon provides 163 multi-family residential units, including live/work units with ground-floor commercial uses along Myrtle Avenue.

The project site is approximately 530 feet above mean sea level on land that slopes gently downward in a southerly direction.

## *2.10 – Required Approvals*

The proposed project includes adoption of the Avalon Monrovia Specific Plan, approval of a Tentative Parcel Map, approval of a Conditional Use Permit to construct the development, and adoption of a Zone Ordinance Amendment and Municipal Code Amendment to add Avalon Monrovia Specific Plan to Section 17.04.035 of the Monrovia Municipal Code.

## *2.11 – Other Public Agency Whose Approval Is Required*

None

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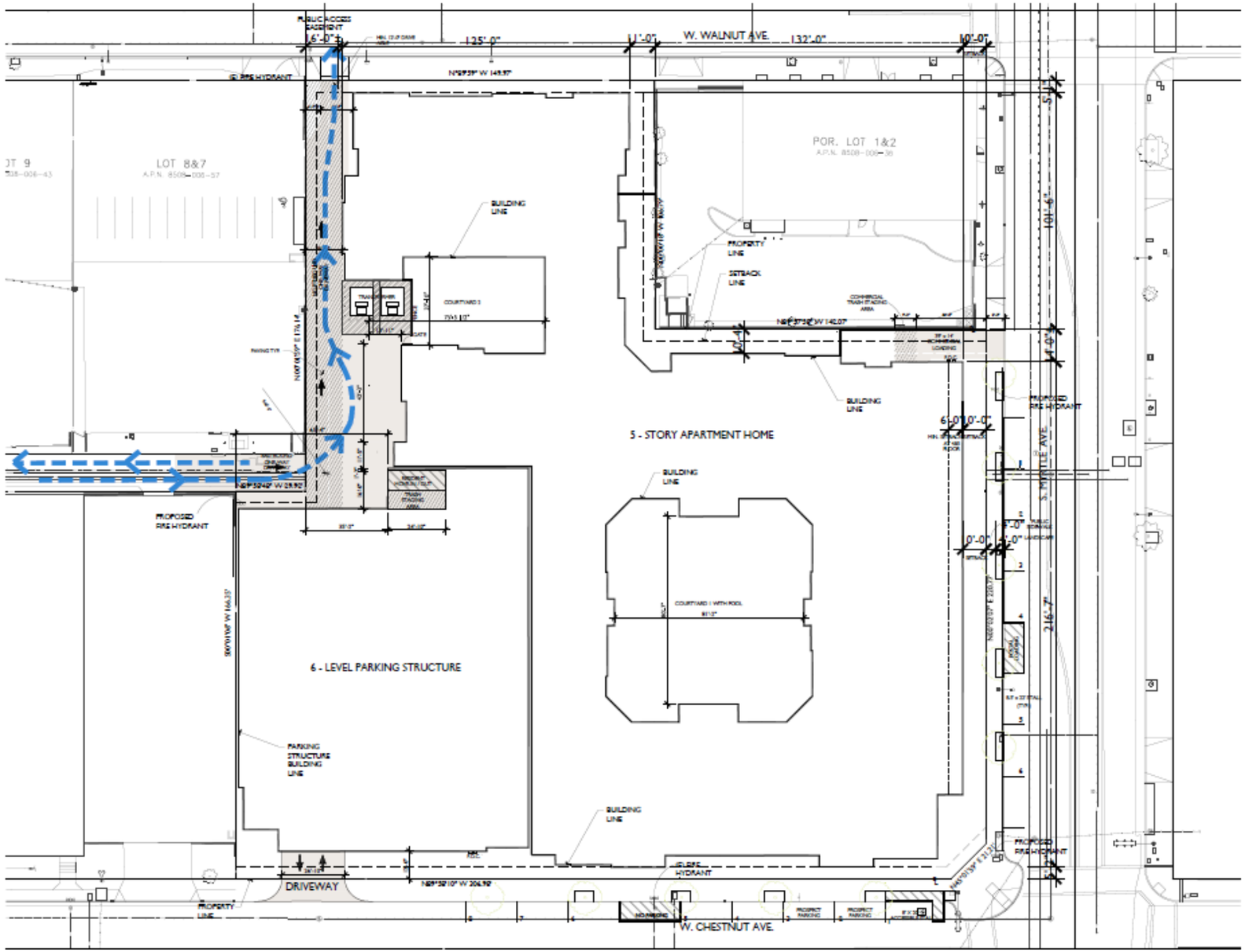
**Figure 2-3 Site Plan**




Site Summary:

Total Apartment Homes : 154
Site Area : ± 2.1 Acres
Density : ± 73.3 Homes/Acre
Apartment Mix by Bedroom Type :

| | Target | Actual |
|---|---|---|
| 1 Bedroom : | (24%) | 42 (27%) |
| 1 Bedroom Affordable Unit: | (8%) | 13 (8%) |
| 2 Bedroom : | (51%) | 75 (49%) |
| 3 Bedroom : | (16%) | 24 (16%) |
| | | 154 (100%) |

Avalonbay Prototype units 84%
BLA units - A1, B2, B3, C1 16%

UNIT MIX

| | Plan | 1st | 2nd | 3rd | 4th | 5th | Total | % |
|---|---|---|---|---|---|---|---|---|
| 1 BR | Plan AM2 | 3 | 3 | 3 | 3 | 3 | 15 | 10% |
| | Plan AM4 | 5 | 6 | 6 | 6 | 6 | 29 | 19% |
| | Plan AM6 | 2 | 2 | 2 | 2 | 2 | 10 | 6% |
| | Plan A1 | 1 | - | - | - | - | 1 | 1% |
| 2 BR | Plan BM1 | 5 | 7 | 7 | 7 | 7 | 33 | 21% |
| | Plan B2 | 2 | 3 | 3 | 3 | 3 | 14 | 9% |
| | Plan B3 | - | 1 | 1 | 1 | 1 | 4 | 3% |
| | Plan BM3 | - | 4 | 4 | - | - | 8 | 5% |
| | Plan BM5 | 2 | 2 | 2 | 2 | 2 | 10 | 6% |
| | Plan BM5 ALT | - | 1 | 1 | 1 | 1 | 4 | 3% |
| | Plan B4 | - | 1 | 1 | - | - | 2 | 1% |
| 3 BR | Plan C1 | - | 1 | 1 | 1 | 1 | 4 | 3% |
| | Plan CM1 | 3 | 3 | 3 | 3 | 3 | 15 | 10% |
| | Plan C2 | - | - | - | 4 | - | 4 | 3% |
| | Plan C3 | - | - | - | 1 | - | 1 | 1% |
| | | 23 | 34 | 34 | 34 | 29 | 154 | 100% |

Parking Provided in the Parking Structure:
9' x18' stalls with 25' drive aisles 286 Spaces
(Includes 255 Spaces for Residents + 10 accessible stalls (1.86:1)
& 18 Spaces for commercial + 1 accessible stalls + 2 prospect parking)
Parallel parking (8.5'x22') on S. Myrtle Ave.: 6 Spaces
Parallel parking (8.5'x22') on W. Chestnut Ave.: 5 Spaces
Parallel accessible parking (8'x20') on W. Chestnut Ave.:1 Space
Parallel prospect parking (8.5'x22') on W. Chestnut Ave.: 2 Spaces
Total: 300 Spaces (1.95:1)
Bicycle parking: Total: 96 Spaces

1st Floor Mixed-use

| | | |
|---|---|---|
| Commercial: | | 3,440 S.F. |
| Amenities (Clubhouse & Fitness): | | 3,100 S.F. |
| Leasing: | | 1,300 S.F. |
| Storage: | | 2,821 S.F. |
| Residential: | 1st | 21,581 S.F. |
| | 2nd | 34,053 S.F. |
| | 3rd | 34,053 S.F. |
| | 4th | 36,703 S.F. |
| | 5th | 28,120 S.F. |
| Total | | 165,171 S.F. |
| Parking Structure | Lower level | 13,172 S.F. |
| | Ground | 18,112 S.F. |
| | 2nd | 18,933 S.F. |
| | 3rd | 18,933 S.F. |
| | 4th | 18,933 S.F. |
| | 5th | 18,933 S.F. |
| | 5th extension | 5,455 S.F. |
| Total: | | 112,471 S.F. |

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**Figure 2-4 Myrtle Avenue Elevation**

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**Figure 2-5 Chestnut Avenue Elevation**

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**Figure 2-6 West Elevation**

EXTERIOR MATERIAL LEGEND

A. STANDING SEAM METAL ROOF
B. SAND FINISH STUCCO
C. METAL RAILING
D. RECESS WINDOWS
E. METAL SPANDREL PANEL
F. METAL AWNING #1
G. METAL AWNING #2
H. DECORATIVE METAL GRID
J. PAINTED CONCRETE
K. CONCRETE SCORE LINES
L. BRICK VENEER
M. PRECAST STONE BASE
N. STOREFRONT DOOR/ WINDOW
O. VINYL WINDOW

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**Figure 2-7 North Elevation**

EXTERIOR MATERIAL LEGEND

A. STANDING SEAM METAL ROOF
B. SAND FINISH STUCCO
C. METAL RAILING
D. RECESS WINDOWS
E. METAL SPANDREL PANEL
F. METAL AWNING #1
G. METAL AWNING #2
H. DECORATIVE METAL GRID
J. PAINTED CONCRETE
K. CONCRETE SCORE LINES
L. BRICK VENEER
M. PRECAST STONE BASE
N. STOREFRONT DOOR/ WINDOW
O. VINYL WINDOW

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# 3 Determination

## *3.1 – Environmental Factors Potentially Affected*

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a 'Potentially Significant Impact' as indicated by the checklist on the following pages.

| | | | | | |
|---|---|---|---|---|---|
| □ | Aesthetics | □ | Agriculture Resources | ☑ | Air Quality |
| ☑ | Biological Resources | ☑ | Cultural Resources | □ | Geology /Soils |
| □ | Greenhouse Gas Emissions | □ | Hazards & Hazardous Materials | □ | Hydrology / Water Quality |
| □ | Land Use / Planning | □ | Mineral Resources | ☑ | Noise |
| □ | Population / Housing | □ | Public Services | □ | Recreation |
| □ | Transportation/Traffic | □ | Utilities / Service Systems | □ | Mandatory Findings of Significance |
| ☑ | Tribal Cultural Resources | | | | |

## *3.2 – Determination*

| | |
|---|---|
| ☐ | 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. |
| ☐ | 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 impact' or '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. |

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# 4 Evaluation of Environmental Impacts

## *4.1 – Aesthetics*

Would the project:

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporation | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a) Have a substantial adverse effect on a scenic vista? | ☐ | ☐ | ☑ | ☐ |
| b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within view from a state scenic highway? | ☐ | ☐ | ☐ | ☑ |
| c) Substantially degrade the existing visual character or quality of the site and its surroundings? | ☐ | ☐ | ☑ | ☐ |
| d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? | ☐ | ☐ | ☑ | ☐ |

a) **Less Than Significant Impact.** A scenic vista is not defined in the City of Monrovia General Plan, nor do any Monrovia Municipal Code regulations regarding view preservation apply to this site. For the purposes of this analysis, a scenic vista is defined as "a viewpoint that provides expansive views of a highly valued landscape for the benefit of the general public. "providing or relating to views of impressive or beautiful natural scenery. A vista is defined as "a distant view through or along an avenue or opening."[1] A "substantial adverse effect" would qualitatively be a significant interruption of a public panoramic view.

The project would not have a substantial adverse effect on a scenic vista, as the project vicinity is an urbanized environment that does not afford expansive scenic views and has no aesthetic features, such as prominent ridges or scenic vistas. Located near Old Town Monrovia, the area is generally level and developed with one- and two-story commercial, office/R&D, and manufacturing buildings, with some multi-family residential buildings (three and four stories) in neighboring blocks. Limited views of the San Gabriel Mountains, approximately two miles to the north, are available along Myrtle Avenue and from West Chestnut Street, though these views are often obscured by street trees, existing

[1] www.dot.ca.gov/d7/env-docs/docs/710corridor/docs/4.0%20CEQA.pdf., accessed 6-14-18)

landscaping, or buildings. There are also limited views of the San Gabriel Mountains, but these views also are partially obscured by surrounding buildings on all sides of the project site. The residential, mixed-use building would be five stories, which is taller than the existing structures on and near the project site. The proposed building would block some street views of the San Gabriel Mountains (primarily between buildings on West Maple, but also from West Chestnut Avenue adjacent to the project site). However, because there are no designated City scenic vistas, views of the mountains are currently limited, and the project would replace existing buildings in an already urbanized area; the project would not have a substantial adverse effect on a scenic vista, and impacts resulting from the project would be less than significant.

b) **No Impact.** The proposed project would not substantially degrade scenic resources because the project is not visible from a designated state scenic highway nor has any jurisdiction identified a scenic resource in proximity to the project site. Potential scenic resources include eligible state scenic highway, or an officially designated county scenic highway, as identified on the California Scenic Highway System lists.[1] The City of Monrovia has no local scenic roadways designated in their General Plan.[2] The nearest state scenic highway is Interstate 210, approximately 0.5 miles south of the project site. The project site is located on a developed site in a currently urbanized area and contains no scenic resources such as a significant trees or unique rock outcropping. Therefore, the proposed project would result in no impact on scenic resources.

c) **Less Than Significant Impact.** Development of the proposed project could result in a significant impact if it resulted in substantial degradation of the existing visual character or quality of the site and its surroundings. The proposed mixed-use building would alter the visual character of the project site by replacing the three existing single-story structures and concrete parking lot with a five-story (six-level) mixed-use structure 65 feet in height and connected to a 286-space five-story, six-level parking garage. The maximum height of the proposed building would be approximately 75 feet (a tower on the southeast corner). The tower is not planned for residential use and does not have an elevator. The upper floors (floors 4 and 5) would be set back along South Myrtle Avenue an additional 5 feet to reduce building massing upper story massing. The proposed design would be articulated with breaks along its street walls and rooflines to create more visual interest. See previous Figure 4 – Elevations.

The proposed project would promote a more coherent visual character as identified in the General Plan Land Use Element, which, in part, calls for "Mixed uses adjacent to Old Town that would consist of residential and commercial uses that support businesses in the downtown."[3] The proposed project would be generally compatible with other recent development along South Myrtle Avenue, such as the Paragon mixed-use development, which is a 3-story, 163 residential unit building, and would promote continuation of development that focuses amenities and attractions at activity nodes along the South Myrtle Avenue corridor.

The conceptual building design includes features and elements consistent with the Old Town extension objective to expand the pedestrian zone and create new mixed-use developments supporting the historic downtown. The proposed ground-floor retail on the Myrtle Avenue side of the building would promote pedestrian use along the street. This type of development would support the pedestrian-oriented character desired along the South Myrtle Avenue corridor. Because of the area's

intense, urban character, the scale and architectural aesthetic associated with the proposed project would not conflict with the visual character of the area. Therefore, the impacts of the project on visual character and quality would be less than significant.

The potential effects of shade and shadow resulting from blockage of direct sunlight by the proposed building can be either positive or negative depending on duration and other specific circumstances. Types of land uses that could be especially impacted by shading include playgrounds/open space areas and solar farms or panels. There are no playgrounds or parks immediately adjacent to the project site. Solar panels are in place on a building to the south of the project, at 132 West Chestnut Avenue). However, these panels would be unaffected by shading given their location south of the proposed project (where shadows are not created).

A shadow study was conducted for the proposed project by the architecture and design firm Bassenian and Lagoni to determine effects of the proposed project on adjacent properties (Appendix A). The assessment projected how a shadow would be cast during three times (9AM, noon, and 3PM) during the winter solstice and vernal equinox. These reflect the periods of longest shadows and highest duration of time. An additional time (6PM) was added for the assessment during summer solstice and the autumnal equinox. The shadows during the equinox periods would not be cast on any building during each measurement period. The 6PM summer solstice measurement shows a shadow starting to be cast on the building across the street to the east (although this is slight), and the shadow would presumably increase its cast until sunset. In addition, the 3PM winter solstice measurement shows a slight shadow cast on one of the buildings to the north. However, the results of the assessment suggest that shadowing onto other buildings would not occur for much of the year and for most of the day during the solstice period. Therefore, the proposed project's effects related to shadow/shade impacts would be less than significant.

Potential beneficial effects of shading for adjacent elements produce a desired cooling effect during warm weather. Perceived adverse effects of shading may include the loss of natural light or the loss of warming influences during cool weather for longer durations of time. Construction of the proposed project would result in short-term impacts on the existing visual character and quality of the area (i.e., use of equipment, storage of materials on the project site). During construction, a six-foot chain link fence with screening material would be placed around the project site boundaries to minimize short-term visual impacts. Visual impacts related to construction activities would be less than significant.

d) **Less Than Significant Impact.** Excessive or inappropriately directed lighting can adversely impact night-time views by reducing the ability to see the night sky and stars. Glare can be caused from unshielded or misdirected lighting sources, or by reflective surfaces (i.e., polished metal, window treatments).

The Specific Plan (Chapter 3, section 3.11) requires submittal of a lighting plan to the City for review and approval, with operational criteria being that the developer must demonstrate that lighting levels would be sufficient for the safety and security of vehicular and pedestrian traffic and would not spill onto adjacent properties. Through the design review process, the City conditions projects to guard against glare effects. Monrovia Municipal Code section 17.32.090—Glare requires controlling sky-

reflected glare from buildings. In addition, the Project would be required to comply with the General Plan Land Use Element and Circulation Element EIR and Mitigation Measure AES-A that calls for ensuring that design features are incorporated into projects to avoid any adverse light and glare impacts. The General Plan Land Use Element and Circulation Element EIR also applies Mitigation Measure AES-B to development projects, prohibiting use of reflective glass, metallic, and other highly reflective and glare producing materials in new building construction.

With regard to architectural style, the proposed project would have a contemporary design that that does not include any building elements that would produce extensive glare. As currently designed, proposed exterior finishes consist of painted stucco, wood beams and trellises, and accent metal bands and awnings, with recessed windows for the residential units. Ground-floor (storefront) windows would be larger than those for the upper-story residential units. The wall of the parking structure would have a large art element or non-reflective decorative metal grid; the intent is not to have any art component that would light up or flash to avoid any potential glare effects. Because the project design largely uses non-reflective materials and recessed windows, and the design review process considers avoidance of glare/reflective materials, impact would be less than significant.

## *4.2 – Agriculture and Forest Resources*

Would the project:

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporation | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| 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? | ☐ | ☐ | ☐ | ☑ |
| b) Conflict with existing zoning for agricultural use, or a Williamson Act contract? | ☐ | ☐ | ☐ | ☑ |
| c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104 (g))? | ☐ | ☐ | ☐ | ☑ |
| d) Result in loss of forest land or conversion of forest land to non-forest use? | ☐ | ☐ | ☐ | ☑ |
| 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? | ☐ | ☐ | ☐ | ☑ |

a) **No Impact.** The proposed project is located in a fully developed urbanized area that does not allow agriculture or forest uses per the City's General Plan. The map of Important Farmland in California (2016) prepared by the Department of Conservation does not identify the project site as being Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.[4] No impact to Prime Farmland, Unique Farmland, or Farmland of Statewide Importance would occur.

b) **No Impact.** No Williamson Act contracts are active for the project site.[5] In addition, the project site is currently zoned Office/Research and Development/Light Manufacturing (OR/D/LM), which do not allow agricultural uses. Therefore, no conflict would occur with existing zoning for agricultural use or a Williamson Act contract. No impact would occur.

c) **No Impact.** There is no zoning within the City that allows forest land or timber land (although the Angeles National Forest Zone is applied to all property within the boundary of the Angeles National

Forest that is also within the City). The project site and surrounding properties are not currently being managed or used for forest land. The project site is currently developed for office use and is surrounded by urbanized lands. Therefore, development of this project would have no impact on any timberland zoning.

d) **No Impact.** The project site is currently developed with office uses and contains no forest land; thus, there would be no loss of forest land or conversion of forest land to non-forest use as a result of this project. No impact would occur.

e) **No Impact.** The project site is a currently developed site within an urban environment. The proposed project is surrounded by other urban uses. None of the surrounding sites contain existing forest or agricultural uses. Development of the proposed project would not change the existing environment in a manner that will result in the conversion of forest land to a non-forest use or agricultural land to a non-agricultural use. No impact would occur.

## *4.3 – Air Quality*

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Analysis of air quality impacts is based on the air quality and greenhouse gas report found in Appendix B. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a) Conflict with or obstruct implementation of the applicable air quality plan? | ☐ | ☑ | ☐ | ☐ |
| b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation? | ☐ | ☑ | ☐ | ☐ |
| c) 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)? | ☐ | ☑ | ☐ | ☐ |
| d) Expose sensitive receptors to substantial pollutant concentrations? | ☐ | ☑ | ☐ | ☐ |
| e) Create objectionable odors affecting a substantial number of people? | ☐ | ☐ | ☑ | ☐ |

a) **Less than Significant Impact with Mitigation Incorporated.**

Under State law, the South Coast Air Quality Management District (SCAQMD) is required to prepare an overall plan for air quality improvement, known as an AQMP. The purposed of an AQMP is to bring an air basin into compliance with federal and state air quality standards. The SCAQMD 2016 AQMP was adopted on March 3, 2017. The 2016 AQMP was designed to achieve attainment for all criteria air pollutants within the Basin while still accommodating growth in the region. Projects that are consistent with the AQMP growth assumptions would not interfere with attainment of air quality standards because this growth is included in the projections used to formulate the AQMP.

The emission forecasts and demonstrations presented in the 2016 AQMP rely heavily on information contained in other planning and strategy documents. For example, the 2016 AQMP's long-term

emissions inventory is based on the growth and land uses projections contained in the Southern California Association of Governments' (SCAG) 2016 RTP/SCS. The 2016 RTP/SCS is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals. The information contained in Chapter 5: The Road to Greater Mobility and Sustainable Growth of the 2016 RTP/SCS forms the basis for the land use and transportation components of the Air Quality Management Plan (AQMP); that information is utilized in the preparation of air quality forecasts and consistency analysis included in the AQMP. In addition, the 2016 RTP/SCS Demographics and Growth Forecast Appendix notes that SCAG began contacting local jurisdictions such as the City for general plan, land use, and zoning data in March 2013. The purpose of this contact was to develop the growth projections contained in the 2016 RTP/SCS and ultimately, the SCAQMD AQMP. Over an approximate two-year period, SCAG prepared initial growth estimates and forecasts and coordinated with local jurisdictions to ensure the forecasts reflected local input.

Pursuant to the methodology provided in Chapter 12 of the SCAQMD CEQA Air Quality Handbook, consistency with the AQMP is affirmed if the project:

1) Is consistent with the growth assumptions in the AQMP; and
2) Does not increase the frequency or severity of an air quality standard, violation, or cause a new one.

Consistency Criterion 1 refers to the growth forecasts and associated assumptions included in the 2016 AQMP. As explained above, for the current AQMP, the information in the SCAG 2016 RTP/SCS forms the basis for the land use and transportation components and growth assumptions contained in the 2016 AQMP. The City's General Plan was last updated in September 2007; therefore, the information contained in the General Plan was provided to SCAG as part of the development of the 2016 RTP/SCS. Therefore, if the project is consistent with the growth envisioned by the City's General Plan it would be consistent with the RTP/SCs and 2016 AQMP. As explained in section 4.10, the project is consistent with the City's General Plan and thus would not conflict with the AQMP.

Consistency Criterion 2 refers to the California Ambient Air Quality Standards (CAAQS). As analyzed below in b), the project would not cause or contribute to an existing or projected air quality violation with the inclusion of Mitigation Measure AIR-1, described below in b). Thus, this impact would be less than significant.

b) **Less Than Significant Impact with Mitigation Incorporated.** A project may have a significant impact if project-related emissions would exceed federal, state, or regional standards or thresholds, or if project-related emissions would substantially contribute to existing or projected air quality violations. The project is located within the South Coast Air Basin (Basin), where efforts to attain state and federal air quality standards are governed by the SCAQMD. Both the State of California (State) and the federal government have established health-based ambient air quality standards (AAQS) for certain air pollutants (known as criteria pollutants). These pollutants include ozone ($O_3$), carbon monoxide (CO), nitrogen dioxide ($NO_2$), sulfur dioxide ($SO_2$), inhalable particulate matter with a diameter of 10 microns or less ($PM_{10}$), fine particulate matter with a diameter of 2.5 microns or less ($PM_{2.5}$), and lead (Pb). The State has also established AAQS for additional pollutants such as hydrogen sulfide ($H_2S$), which would not be emitted by the Project given its residential nature. The AAQS are designed to protect the health and welfare of the populace within a reasonable margin of safety.

Air pollution levels are measured at monitoring stations located throughout the Basin. Areas that are in nonattainment with respect to federal or State AAQS are required to prepare plans and implement measures that will bring the region into attainment. Table 4-1 (South Coast Air Basin [Non-Desert] Attainment Status) summarizes the Basin's attainment status.

**Table 4-1**
**South Coast Air Basin (Non-Desert) Attainment Status**

| Pollutant | Federal | State |
|---|---|---|
| O3 (1-hr) | Nonattainment | Nonattainment |
| O3 (8-hr) | Nonattainment | Nonattainment |
| $PM_{10}$ | Maintenance | Nonattainment |
| $PM_{2.5}$ | Nonattainment | Nonattainment |
| CO | Maintenance | Attainment |
| NO2 | Maintenance | Attainment |
| SO2 | Unclassified | Attainment |
| Pb | Nonattainment | Attainment |
| Visibility Reducing Particles | -- | Unclassified |
| Sulfates (SO4) | -- | Attainment |
| H2S | -- | Unclassified |
| Sources: EPA, 2018; CARB, 2017 https://www.epa.gov/green-book; https://www.arb.ca.gov/desig/adm/adm.htm | | |

To control air pollution, the SCAQMD adopts rules that establish permissible air pollutant emissions and governs a variety of businesses, processes, operations, and products to implement the AQMP and the various federal and State air quality requirements. The project would be subject to the following SCAQMD rules:

Rule 403 – Fugitive Dust:

Minimum Dust Control Requirements: The following best available control measures are to be initiated at the start and maintained throughout the duration of the demolition activity:

- Demolition – mechanical/ manual
  6-1 - Stabilize wind erodible surfaces to reduce dust
  6-2 - Stabilize surface soil where support equipment and vehicles will operate
  6-3 - Stabilize loose soil and demolition debris
  6-4 - Comply with AQMD Rule 1403 (Asbestos Emissions from Demolition/Renovation Activities)
- Disturbed Soil
  7-1 - Stabilize disturbed soil throughout the construction site
  7-2 - Stabilize disturbed soil between structures

- Earth-moving activities
  8-1- Pre-apply water to depth of proposed cuts
  8-2 - Re-apply water as necessary to maintain soils in a damp condition and to ensure that visible emissions do not exceed 100 feet in any direction
  8-3 - Stabilize soils once earth-moving activities are complete
- Importing/exporting of bulk materials
  9-1 Stabilize material while loading to reduce fugitive dust emissions
  9-2 Maintain at least six inches of freeboard on haul vehicles
  9-3 Stabilize material while transporting to reduce fugitive dust emissions
  9-4 Stabilize material while unloading to reduce fugitive dust emissions
  9-5 Comply with Vehicle Code section 23114

Rule 445 – Wood-Burning Devices: No person shall permanently install a wood-burning device into any new development.

Rule 1113 – Architectural Coating: No person shall apply or solicit the application of any architectural coating within the SCAQMD with VOC content in excess of the values specified in a table incorporated in the Rule 1113.

A discussion of potential impacts related to short-term construction impacts and long-term area source and operational impacts is presented below.

**Construction Emissions**

The California Emissions Estimator Model (CalEEMod), Version (V.) 2016.3.2 was utilized to estimate emissions from the proposed construction activities (see Appendix B Air Quality Modeling Data). Construction phases and lengths were obtained from the project construction schedule with the exception of the paving and architectural coating phases, for which CalEEMod defaults were utilized, as summarized in Table 4-2.

**Table 4-2**
**Tentative Construction Schedule**

| Phase | Start | End | Days[(A)] |
|---|---|---|---|
| Demolition | 5/16/2019 | 6/27/2019 | 31 |
| Grading | 6/28/2019 | 8/2/2019 | 26 |
| Building Construction | 7/29/2019 | 7/30/2020 | 264 |
| Paving | 7/31/2020 | 8/6/2020 | 5 |
| Architectural Coating | 8/7/2020 | 8/13/2020 | 5 |
| | | **Total** | **331** |

Source: MIG 2018, see Appendix B.
(A) Refers to active construction work days, not calendar days.

The project's unmitigated, maximum daily construction emissions are summarized in Table 4-3 (Unmitigated Maximum Daily Construction Emissions [lbs/day]). The emissions estimates incorporate measures to control and reduce emissions as required by SCAQMD Rule 403 (Fugitive Dust) and Rule

445 (Wood Burning Devices). The implementation of Rule 403 is shown as a mitigation measure in the CalEEMod output, but it is actually a function of the project in compliance with local regulations (i.e., not a voluntary mitigation measure).

**Table 4-3**
**Unmitigated Maximum Daily Construction Emissions (lbs/day)**

| Season | ROG | $NO_X$ | CO | $SO_2$ | $PM_{10}$ | $PM_{2.5}$ |
|---|---|---|---|---|---|---|
| Summer | 206.75 | 42.36 | 30.53 | 0.08 | 5.71 | 3.27 |
| Winter | 206.77 | 42.51 | 30.06 | 0.08 | 5.71 | 3.27 |
| **SCAQMD Regional Threshold** | **75** | **100** | **550** | **150** | **150** | **55** |
| **Potential Significant Impact?** | **Yes** | **No** | **No** | **No** | **No** | **No** |
| Source: MIG 2018, see Appendix B. | | | | | | |

As shown above in Table 4-3, construction of the project would result in emissions of reactive organic gases (ROG, also sometimes referred to as volatile organic chemicals or VOCs) associated with the application of architectural coatings in excess of 200 pounds per day (lbs/day). The unmitigated emissions presented in Table 4-3 reflect compliance with SCAQMD Rule 1103, which generally sets VOC content limits for coatings at 50 grams/liter for residential coatings and 100 grams/liter for non-residential coatings). To meet the SCAQMD's regional threshold, the use of lower-VOC coatings would be required, such as the use of SCAQMD "super-compliant" coatings, which exceed SCAQMD regulatory requirements and have a VOC content of 10 grams/liter or less. The use of such coatings in all interior and exterior applications during construction would reduce potential maximum daily emissions to 52.57 lbs/day in summer and 52.59 in winter, which are both less than the threshold established by SCAQMD. The project's maximum daily mitigated emissions levels are shown in Table 4-4.

**Table 4-4**
**Mitigated Maximum Daily Construction Emissions (lbs/day)**

| Season | ROG | $NO_X$ | CO | $SO_2$ | $PM_{10}$ | $PM_{2.5}$ |
|---|---|---|---|---|---|---|
| Summer | 52.57 | 42.36 | 30.53 | 0.08 | 5.71 | 3.27 |
| Winter | 52.59 | 42.51 | 30.06 | 0.08 | 5.71 | 3.27 |
| **SCAQMD Regional Threshold** | **75** | **100** | **550** | **150** | **150** | **55** |
| **Potential Significant Impact?** | **No** | **No** | **No** | **No** | **No** | **No** |
| Source: MIG 2018, see Appendix B. | | | | | | |

The requirement for use of low-VOC coatings has been included as Mitigation Measure AQ-1, below. As shown in Table 4-4, project construction emissions would not exceed any SCAQMD-recommended CEQA significance threshold for construction emissions with the inclusion of Mitigation Measure AQ-1; therefore, construction impacts would be less than significant with mitigation incorporated.

## Mitigation Measures

**MM AQ-1:** Prior to issuance of building permits, the applicant/developer shall submit, to the satisfaction of the Planning Division, a Coating Restriction Plan (CRP), consistent with South Coast Air Quality Management District (SCAQMD) guidelines and a letter agreeing to include in any construction contracts and/or subcontracts a requirement that the contractors adhere to the requirements of the CRP. The CRP measure shall be implemented to the satisfaction of City Building and Safety and shall include a requirement that all interior and exterior architectural coatings used in project construction shall meet SCAQMD "super compliant" coating VOC standard of less than 10 grams VOC/liter of coating. The CRP shall also specify use of High-Volume, Low Pressure (HVLP) spray guns for application of coatings to reduce coating waste.

**Operational Emissions.** Long-term criteria air pollutant emissions would result from the operation of the mixed-use project. Sources of long-term emissions would include area source emissions, energy demand emissions, and mobile source emissions. Mobile source emissions would result from automobile and other vehicle sources associated with daily trips to and from the project. Project trip generation rates were available from the Traffic Impact Analysis (TIA) prepared for the Project by LSA (Appendix G). Area source emissions are the combination of many small emission sources that include use of outdoor landscape maintenance equipment, use of consumer products such as cleaning products, and periodic repainting of the proposed structure. Energy demand emissions result from use of electricity and natural gas. Emissions from area sources were estimated using CalEEMod using program default values for area and energy demand emissions.

The proposed project's net increase in maximum daily operational emissions is summarized in Table 4-5 (see Appendix B Air Quality Modeling Data). As shown in the table, operational emissions would not exceed the daily thresholds established by SCAQMD; therefore, Project impacts would be less than significant.

**Table 4-5**
**Maximum Daily Operational Emissions (lbs/day)**

| Source | ROG | $NO_X$ | CO | $SO_2$ | $PM_{10}$ | $PM_{2.5}$ |
|---|---|---|---|---|---|---|
| *Summer* | | | | | | |
| Area Sources | 4.11 | 2.45 | 13.74 | 0.02 | 0.26 | 0.26 |
| Energy Demand | 0.06 | 0.52 | 0.22 | <0.01 | 0.04 | 0.04 |
| Mobile Sources | 1.61 | 7.11 | 18.48 | 0.06 | 4.75 | 1.31 |
| *Summer Total* | 5.77 | 10.08 | 32.44 | 0.08 | 5.05 | 1.61 |
| *Existing Emissions (lbs/day)*[(A)] | 1.27 | 2.99 | 9.0 | 0.03 | 1.87 | 0.52 |
| *Net Emissions(lbs/day)* | 4.5 | 7.09 | 23.44 | 0.05 | 3.18 | 1.08 |
| *Winter* | | | | | | |
| Area Sources | 4.11 | 2.45 | 13.74 | 0.02 | 0.26 | 0.26 |
| Energy Demand | 0.06 | 0.52 | 0.22 | <0.01 | 0.04 | 0.04 |

**Table 4-5**
**Maximum Daily Operational Emissions (lbs/day)**

| Source | ROG | $NO_X$ | CO | $SO_2$ | $PM_{10}$ | $PM_{2.5}$ |
|---|---|---|---|---|---|---|
| Mobile Sources | 1.56 | 7.24 | 17.85 | 0.06 | 4.75 | 1.31 |
| *Winter Total* | 5.73 | 10.21 | 31.81 | 0.08 | 5.05 | 1.61 |
| *Existing Emissions (lbs/day)* [(A)] | 1.26 | 3.08 | 8.56 | 0.02 | 1.87 | 0.52 |
| *Net Emissions (lbs/day)* | 4.47 | 7.13 | 23.25 | 0.06 | 3.18 | 1.09 |
| **SCAQMD Regional Threshold** | **55** | **55** | **550** | **150** | **150** | **55** |
| **Potential Significant Impact?** | No | No | No | No | No | No |

Source: MIG 2018, see Appendix B, and Appendix G for Traffic Impact Analysis.
(A) Existing emissions reflect the emission generated by the existing site land uses, as estimated using CalEEMod, V. 2016.3.2 (see Appendix B).

c) **Less Than Significant Impact with Mitigation Incorporated.** The Basin is currently designated non-attainment for State and/or federal standards for ozone, $PM_{10,}$ and $PM_{2.5}$ (see Table 4-1). As discussed in a) and b) above, implementation of the proposed Project would not result in construction or operational emissions of criteria air pollutants that exceed SCAQMD thresholds of significance with the inclusion of Mitigation Measure AQ-1. In developing its CEQA significance thresholds, the SCAQMD considered the emission levels at which a project's individual emissions would be cumulatively considerable (SCAQMD 2003; page D-3). The SCAQMD considers projects that result in emissions that exceed its CEQA significance thresholds to result in individual impacts that are cumulatively considerable and significant; this is one reason the SCAQMD does not maintain separate individual and cumulative impact thresholds for regional emissions levels. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant. Since the Specific Plan would not individually exceed any SCAQMD CEQA significance thresholds, it would result in a less than significant cumulative air quality impact.

d) **Less Than Significant Impact with Mitigation Incorporated.** Some populations are more susceptible to the effects of air pollution than the population at large; these populations are defined as sensitive air quality receptors. Sensitive receptors include children, the elderly, the sick, and the athletic. Land uses associated with sensitive receptors include residences, schools, playgrounds, childcare centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes. The closest sensitive receptors to the project site include a mixed-use residential development approximately 240 feet to the north and medium- to high-density residential land uses approximately 330 feet to the north.

**Localized Significance Thresholds (LST) Analysis**
Localized emissions from construction and operational activities, coupled with ambient pollutant levels, can cause localized increases in criteria pollutant that exceed national and/or State air quality standards. Therefore, this Initial Study/Mitigated Negative Declaration evaluates the proposed project's potential to expose sensitive receptors to substantial pollutant concentrations pursuant to the SCAQMD Final Localized Significance Thresholds (LST) methodology. This methodology provides

screening tables for one- through five-acre project scenarios, depending on the amount of site disturbance during a day using the fact sheet for equipment usage in CalEEMod.

The proposed project's maximum daily construction and operational emissions are compared against the SCAQMD's-recommended LSTs in Table 4-6. The LSTs are for Source Receptor Area (SRA) 9 in which the project site is located. Based on the use of one dozer and grader during grading activities, a 1.0-acre threshold for construction and operational activities was used. The closest sensitive receptors to the project site is the mixed-use residential development located 240 feet of the project site's northern boundary; thresholds used were based off SRA distance of 50 meters (164 feet).

**Table 4-6**
**Comparison of Maximum Daily Emissions to SCAQMD LST**

| Source | $NO_X$ | CO | $PM^{10}$ | $PM^{2.5}$ |
|---|---|---|---|---|
| *Construction* | | | | |
| Maximum Daily Emissions (lbs/day)(A) | 42.51 | 30.53 | 5.71 | 3.27 |
| **SCAQMD LST (50 meters)** | **112** | **945** | **14** | **5** |
| **Potential Significant Impact?** | No | No | No | No |
| *Operations* | | | | |
| Maximum Daily Emissions (lbs/day) (B) | 3.33 | 14.86 | 0.54 | 0.36 |
| **SCAQMD LST (50 meters)** | **112** | **945** | **4** | **2** |
| **Potential Significant Impact?** | No | No | No | No |

Source: MIG 2018, see Appendix B.
(A) See Table 4.3.3 (Unmitigated Maximum Daily Construction Emissions)
(B) See Table 4.3.5 (Maximum Daily Operational Emissions). Total reflects all area source, energy source, and 5% of mobile source emissions.

As shown in the table above, emissions from construction and operational activities will not exceed the SCAQMD's recommended LSTs for SRA 9. Therefore, this impact would be less than significant.

### Toxic Air Contaminant Analysis

The proposed project could expose existing and new sensitive receptors to substantial concentrations of criteria air pollutants and toxic air contaminants (TACs) emissions[2] that pose adverse health effects. However, as described in more detail below, these impacts would be less than significant with the implementation of standard environmental review practices that development projects are subject to and the City's implementation of proposed General Plan mitigation measures.

The project would generate emissions, including emissions of diesel particulate matter (DPM), a TAC, during construction activities. As shown in Table 4-6, emissions of construction-related dust and DPM would not exceed SCAQMD LSTs during grading or any other construction activity. Potential adverse

[2] TACs are defined by the California Health and Safety Code as air pollutants which may cause or contribute to an increase in mortality or in serious illness, or which may pose a present or potential hazard to human health.

health risks from DPM emissions are evaluated assuming a constant exposure to emissions over a 70-year lifetime, 24 hours a day, seven days a week, with increased risks generally associated with increased proximity to emissions sources. Since receptors would be located more than 250 feet away from work areas and exposed to DPM emissions for a limited time (less than two years), DPM emissions from construction activities would be unlikely to result in adverse health effects that exceed SCAQMD significance criteria[6,7], Furthermore, the City would require the applicant/developer to incorporate General Plan EIR Mitigation Measure AIR-B (shown below as Project Mitigation Measure MM AIR-2) to reduce diesel engine emissions of $O_3$ precursors including ROG and $NO_x$, $PM_{10}$, and DPM.

**Mitigation Measure**

**MM AQ-2:** Idling of diesel-powered vehicles and equipment shall not be permitted during periods of nonactive vehicle use. Diesel-powered engines shall not be allowed to idle for more than five consecutive minutes in a 60-minute period when the equipment is not in use, occupied by an operator, or otherwise in motion, except as follows:

- When equipment is forced to remain motionless because of traffic conditions or mechanical difficulties over which the operator has no control;
- When it is necessary to operate auxiliary systems installed on the equipment, only when such system operation is necessary to accomplish the intended use of the equipment;
- To bring the equipment to the manufacturer's recommended operating temperature;
- When the ambient temperature is below 40 degrees F or above 85 degrees F; or
- When equipment is being repaired.

The implementation of Mitigation Measure MM AQ-2 would reduce overall TAC emissions generated by diesel-powered construction equipment and render potential TAC emissions from construction equipment to a less than significant impact.

**CO Hotspot Analysis**

Areas that experience traffic congestion may experience the formation of locally high concentrations of CO, known as CO "hot spots." Typically, high CO concentrations are associated with roadways or intersections operating at unacceptable levels of service or with extremely high traffic volumes. The significance criteria for CO hotspots are based on the CAAQS for CO, which are 9.0 ppm and 20.0 ppm for the eight-hour average and one-hour average, respectively (CARB, 2016).

The SCAQMD has achieved maintenance status for CO; therefore, the most current AQMP does not address CO hotspots. The SCAQMD's 2003 AQMP, however, included a prototypical CO hotspot analysis at four busy intersections in Los Angeles during AM and PM peak-hour periods. The busiest intersection studied in the SCAQMD analysis, Wilshire Boulevard and Veteran Avenue (approximately 26 miles southwest of the Planning Area), had 8,062 vehicles per hour during the AM peak, 7,719 vehicles per hour during the PM peak, and approximately 100,000 vehicles per day. The 2003 AQMP estimated that the one-hour CO concentration for this intersection was 4.6 ppm (SCAQMD, 2003). Thus, this analysis demonstrated that even the most congested intersections in the Basin would not experience a CO hot spot. CO concentrations have decreased over the last decade and are not anticipated to increase

substantially as a result of continued turnover of older vehicles, use of cleaner fuels, and implementation of additional, advanced control technologies.

Based on the TIA prepared for the project, the maximum number of vehicles moving through any study intersection would occur at the intersection of I-210 eastbound ramp and Huntington Drive intersection and would be equal to 3,334 vehicles per hour. This value is substantially below the hourly vehicle trips modeled by the SCAQMD as part of its 2003 AQMP. The proposed project, therefore, would not cause or contribute to CO concentrations that exceed State or federal ambient air quality standards for CO.

e) **Less than Significant Impact.** Construction-related activities such as intermittent operation of diesel-powered equipment and paving would result in odors. The effects of these odor sources would be temporary, short in duration, and would not impact a substantial number of people. According to the SCAQMD CEQA Air Quality Handbook, land uses associated with operational odor complaints include agricultural operations, wastewater treatment plants, landfills, and certain industrial operations (such as manufacturing uses that produce chemicals, paper, etc.) that are generally subject to SCAQMD permit review. The odors associated with these facilities typically involve the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing or chemical processes. The proposed mixed-use development does not include any of the above noted uses or processes; therefore, this impact would be less than significant.

## *4.4 – Biological Resources*

Would the project:

| | | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|---|
| 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? | ☐ | ☑ | ☐ | ☐ |
| 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 US Fish and Wildlife Service? | ☐ | ☐ | ☐ | ☑ |
| c) | Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? | ☐ | ☐ | ☐ | ☑ |
| 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? | ☐ | ☐ | ☐ | ☑ |
| e) | Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? | ☐ | ☐ | ☐ | ☑ |
| 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? | ☐ | ☐ | ☐ | ☑ |

a) **Less than Significant Impact with Mitigation Incorporated.** The project site is currently developed with office uses with associated parking and would continue to be improved with the construction and operation of the proposed project. Vegetation within and adjacent to the project site is limited to ornamental landscaping, including trees planted along sidewalks and roadways. The project site is not identified as critical habitat for any threatened and endangered species, as designated by the United States Fish and Wildlife Service.[8] There is one occurrence of federal endangered Braunton's milk-vetch (*Astragalus brauntonii*) approximately 1.6 miles north of the project site. However, CNDDB describes the 1986 occurrence as extirpated from the area, and critical habitat is limited to a stretch of undeveloped hills within the Arcadia Wilderness Park/Monrovia Wilderness Preserve.[9][10] Likewise, federal and State endangered slender-horned spineflower (*Dodecahema leptoceras*) has a documented occurrence approximately 1.8 miles northwest of the project site, but the 1920 occurrence has also been described as extirpated in CNDDB.[7]

Two other federal listed species, California condor (*Gymnogyps californianus*) and coastal California gnatcatcher (*Polioptila californica californica*), occur within the general geographic landscape.[6] The general geographic landscape, in this case, is coastal and inland Southern California. However, as the project site is completely developed with only limited ornamental vegetation, it does not contain any of the nesting or foraging requirements for either species. Similarly, the golden eagle (*Aquila chrysaetos*) and bald eagle (*Haliaeetus leucocephalus*), both protected under the Bald and Golden Eagle Protection Act, are listed as potentially occurring within the general vicinity of the project site.[6] However, the project site does not contain the foraging or nesting habitat required for either species. Considering the project site and areas directly adjacent do not contain native habitat and are heavily urbanized, there is no potential for federal-listed, State-listed, or other special-status species to occur. The proposed project would not adversely affect these species.

Nesting birds protected under the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (CFGC) have potential to be impacted by tree removal, ground disturbance, or general construction work if these activities take place during the nesting season. If construction takes place during the nesting season (February 1st through September 1st), Mitigation Measures BIO-1 and BIO-2 would ensure that potential impacts to nesting birds covered under the Migratory Bird Treaty Act and California Fish and Game Code would be reduced to a less than significant level.

**Mitigation Measures**

**MM BIO-1:** **Pre-Construction Nesting Surveys.** To avoid impacts to nesting birds, construction-related activities and construction-related noise shall occur outside the avian nesting season (prior to February 1 or after September 1). If construction and construction noise occur within the bird nesting season (during the period from February 1 to September 1), all habitat within and directly adjacent to the proposed project shall have a nesting bird survey completed by a qualified biologist no more than five days before commencement of any vegetation removal or ground disturbance. If the project site is occupied by nesting birds covered under MBTA and CFGC, MM BIO-2 shall apply.

**MM BIO-2:** **Construction Monitoring and Buffer Zones for Nesting Birds.** If pre-construction nesting bird surveys identify active nests, then no ground disturbance, vegetation removal, or heavy equipment activity shall take place within a no-disturbance buffer determined by a qualified biologist, typically within 300 feet of non-raptor nests and 500 feet of raptor nests. Protective measures shall be required to ensure compliance with the MBTA and California Fish and Game Code requirements. A qualified biologist shall serve as a construction monitor during those periods when construction activities occur near active nest areas to ensure that no inadvertent impacts occur. A report of the findings, prepared by a qualified biologist, shall be submitted to the CDFW and the City prior to commencement of construction-related activities that have the potential to disturb any active nests during the nesting season.

b) **No Impact.** There is no riparian habitat located on the project site [11]; therefore, no impacts to riparian habitat or other sensitive natural habitat would occur.

c) **No Impact.** According to the Federal National Wetlands Inventory, the project site does not contain any wetlands and is not located adjacent to or near any wetlands.[12] There is no vegetation or onsite water features indicative of potential wetlands. No impact would occur.

d) **No Impact.** The project site is fully improved and developed for commercial use, and is surrounded on the north, east, south, and west by development, which prevents the use of the project site and surrounding area as a wildlife corridor. There is limited ornamental landscaping on the project site, and it does not contribute to a natural habitat. The project site does not provide for the movement of any native resident or migratory fish or wildlife. No impact would occur.

e) **No Impact.** There are no oak trees on the project site. Therefore, Oak Tree Preservation Ordinance 17.020.040 does not apply. There are no other City ordinances or policies that are applicable to the removal of the existing on-site vegetation. The project would not have any impacts with City ordinances or policies that protect biological resources, including trees. No impact would occur.

f) **No Impact.** The project site is not within the planning area of any Habitat Conservation Plan or a Natural Community Conservation Plan area,[13] or other approved local, regional or state habitat conservation plan. No impact would occur.

## *4.5 – Cultural Resources*

Impacts to cultural resources were evaluated based on information in the cultural resources study, found in Appendix C. The report also provides more detail about cultural and historical resources as it relates to the proposed project.

Would the project:

| | Potentially Significant Impact | Less than Significant with Mitigation Incorporated | Less than Significant Impact | No Impact |
|---|---|---|---|---|
| a) Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5? | ☐ | ☐ | ☐ | ☑ |
| b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5? | ☐ | ☑ | ☐ | ☐ |
| c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? | ☐ | ☑ | ☐ | ☐ |
| d) Disturb any human remains, including those interred outside of formal cemeteries? | ☐ | ☑ | ☐ | ☐ |

A comprehensive cultural resource survey and report were prepared for the project and is included in Appendix C. The following analyses summarize the information in the report.

a) **No Impact.** The cultural resources records search results from the California Historical Resources Information System (CHRIS)-South Central Coast Information Center (SCCIC) indicated that there are no historical resources located within the project site, and there are five historic buildings/structures (P-19-179365, P-19-187710, P-19-187711, P-19-188268, and P-19-188268) located within a one half-mile radius of the project site. None of these five historic structures would be impacted by the proposed project because they lie outside of the project site (Appendix C).

Archival research indicates that the light manufacturing building located within the project site at 815 South Myrtle Avenue (APN: 8508-006-037) is approximately 93 years old (built in 1925) and would be directly impacted (demolished) by the proposed project.[14] Additionally, adjacent to the project's boundaries is a commercial office building located at 801 South Myrtle Avenue (APN: 8505-006-006), which is approximately 100 years old (built in 1918) that could be indirectly impacted by the project.[15] Since both of these buildings are 45 years old or older, they require an evaluation as historic sites to determine if these structures are eligible for listing in the National Register for Historic Places (NRHP), the California Register for Historic Resources (CRHR), or Local Register because the State Office of

Historic Preservation (OHP), as a general guideline, has recommended that properties 45 years or older may be of historical or cultural value (though the National Register typically will not consider a property for listing that is less than 50 years old unless of exceptional importance).

A historic site evaluation of the existing light manufacturing building located 815 South Myrtle Avenue concluded that the simple utilitarian structure lacked individual distinction and significance and is not eligible for listing on the NRHP or in the CRHR under any of the significance criteria. Additionally, the historic site evaluation of the commercial office building located at 801 South Myrtle Avenue concluded that building lacked both significance and integrity and does not warrant listing in either the NRHP or in the CRHR. Finally, an assessment of the architectural styling, human, and ecological environmental conditions existing within the neighborhood indicate that the proposed project as currently conceived would not cause an indirect impact to the commercial office building located at 801 South Myrtle Avenue (Appendix C).

The five historic buildings/structures that were identified (P-19-179365, P-19-187710, P-19-187711, P-19-188268, and P-19-188268) as being located within a one half-mile radius of the proposed project would not be impacted by construction and operation as these structures are outside of the project site. As such, there would be no impact.

b) **Less than Significant Impact with Mitigation Incorporated.** The cultural resources records search results from the SCCIC indicated that there are no archaeological resources (prehistoric and historic) located within the Project's boundaries. The nearest historic archaeological site (P19-004454: trash scatter) is located within a one half-mile radius of the project site. The archaeological (historic) resource would not be impacted by the project since it does not occur within the project site. Therefore, the proposed project would result in no substantial adverse change in the significance of an archaeological resource as defined in CEQA Guidelines section15064.5.

Despite the heavy disturbances of the project site that may have displaced archaeological resources on the surface, it is possible that intact archaeological resources exist at depth. As discussed in Appendix C: Cultural Resources study, in the event of the unanticipated discovery of archaeological or cultural resources relating to Tribal Cultural Resources (TCRs) during earthmoving operations, the following mitigation measures are recommended to reduce potentially significant impacts to archaeological resources that are accidentally discovered during implementation of the proposed Project to a less than significant level.

**MM CUL-1:** **Conduct Archaeological Sensitivity Training for Construction Personnel**. The applicant/developer shall retain a qualified professional archaeologist who meets U.S. Secretary of the Interior's Professional Qualifications and Standards to conduct an archaeological sensitivity training for construction personnel prior to commencement of excavation activities. The training session shall be carried out by a cultural resource professional with expertise in archaeology, who meets the U.S. Secretary of the Interior's Professional Qualifications and Standards. The training session shall include a handout and shall focus on how to identify archaeological resources that may be encountered during earthmoving activities and the procedures to be followed in such

an event, the duties of archaeological monitors, and the general steps a qualified professional archaeologist would follow in conducting a salvage investigation, if one is necessary.

**MM CUL-2:** **Cease Ground-Disturbing Activities and Implement Treatment Plan if Archaeological Resources Are Encountered.** In the event that archaeological resources are unearthed during ground-disturbing activities, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. A buffer area of at least 50 feet shall be established around the find where construction activities will not be allowed to continue until a qualified archaeologist has examined the newly discovered artifact(s) and has evaluated the area of the find. Monitored work shall be allowed to continue outside of the buffer area. All archaeological resources unearthed by Project construction activities shall be evaluated by a qualified professional archaeologist, who meets the U.S. Secretary of the Interior's Professional Qualifications and Standards. In the event that the newly discovered artifacts are determined to be prehistoric, Native American Tribes/Individuals shall be contacted and consulted, and Native American construction monitoring shall be initiated. The applicant and City shall coordinate with the archaeologist to develop an appropriate treatment plan for the resources. The plan may include implementation of archaeological data recovery excavations to address treatment of the resource along with subsequent laboratory processing and analysis.

**MM CUL-3:** **Conduct Periodic Archeological Resources Spot Checks during Grading and Earth-moving Activities in Younger Alluvial Sediments.** The applicant shall retain a qualified professional archaeologist, who meets the U.S. Secretary of the Interior's Professional Qualifications and Standards to conduct periodic Archaeological Spot Checks beginning at depths of two feet below ground surface to determine if construction excavations have exposed or have a high probability of exposing archaeological resources. After the initial Archaeological Spot Check, further periodic checks shall be conducted at the discretion of the qualified archaeologist. If the qualified archaeologist determines that construction excavations have exposed or have a high probability of exposing archaeological artifacts, construction monitoring for archaeological resources will be required. The applicant shall retain a qualified archaeological monitor, who will work under the guidance and direction of a professional archaeologist, who meets the qualifications set forth by the U.S. Secretary of the Interior's Professional Qualifications and Standards. The archaeological monitor shall be present during all construction excavations (e.g., grading, trenching, or clearing/grubbing) into non-fill younger Pleistocene alluvial sediments. Multiple earth-moving construction activities may require multiple archaeological monitors. The frequency of monitoring shall be based on the rate of excavation and grading activities, proximity to known archaeological resources, the materials being excavated (native versus artificial fill soils), the depth of excavation, and if found, the abundance and type of archaeological resources encountered. Full-time monitoring can be reduced to part-time inspections if determined adequate by the project archaeologist.

**MM CUL-4:** **Prepare Report Upon Completion of Monitoring Services.** The archaeological monitor, under the direction of a qualified professional archaeologist who meets the U.S. Secretary of the Interior's Professional Qualifications and Standards, shall prepare a final report at the conclusion of archaeological monitoring (if required). The report shall be submitted to the applicant/developer, the SCCIC, the City, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the Project and required mitigation measures. The report shall include a description of resources unearthed, if any, evaluation of the resources with respect to the California Register and CEQA, and treatment of the resources.

c) **Less than Significant Impact with Mitigation Incorporated.** A paleontological resources records search was commissioned through the Vertebrate Paleontological Department of the Natural History Museum of Los Angeles County (NHMLAC) in Los Angeles, California. This institution maintains files of regional paleontological site records as well as supporting maps and documents. This records search entailed an examination of current geologic maps and known fossil localities inside and within the general vicinity of the project site. The objective of the records search was to determine the geological formations underlying the project site, whether any paleontological localities have previously been identified within the project site or in the same or similar formations near the project area, and the potential for excavations associated with the project site to encounter paleontological resources. The results also provide a basis for assessing the sensitivity of the Study Area for additional and buried paleontological resources.

Results of the paleontological resources records search through the NHMLAC indicate that no vertebrate fossil localities from the NHMLAC records have been previously recorded within the project site or within a one-mile radius.[16] Nevertheless, the results of the literature review and the search at the NHMLAC indicate that the project site is underlain by older Quaternary deposits found at varying depths that may contain significant vertebrate fossils (McLeod 2018); it is anticipated that up to five to seven feet of soil would be removed and re-compacted. Excavations that extend down into older sedimentary deposits may well uncover significant vertebrate fossil remains and therefore should be closely monitored to quickly and professionally collect any vertebrate fossil remains without impeding development (McLeod 2018). The following mitigation measures have been recommended to reduce potentially significant impacts to paleontological resources as recommended by the NHMLAC to a less than significant level.

**MM CUL-5:** **Conduct Paleontological Sensitivity Training for Construction Personnel.** The applicant/developer shall retain a professional paleontologist who meets the qualifications set forth by the Society of Vertebrate Paleontology, shall conduct a paleontological sensitivity training session for construction personnel prior to commencement of excavation activities. The training session shall focus on how to identify paleontological resources that may be encountered during earthmoving activities and the procedures to be followed in such an event, the duties of paleontological monitors, notification and other procedures to follow upon discovery of

resources, and the general steps a qualified professional paleontologist would follow in conducting a salvage investigation if one is necessary.

**MM CUL-6:** **Conduct Periodic Paleontological Spot Checks during Grading and Earth-moving Activities.** The applicant/developer shall retain a professional paleontologist who meets the qualifications set forth by the Society of Vertebrate Paleontology, shall conduct periodic Paleontological Spot Checks beginning at depths below six feet to determine if construction excavations have extended into older Quaternary deposits. After the initial paleontological spot check, further periodic checks shall be conducted at the discretion of the qualified paleontologist. If the qualified paleontologist determines that construction excavations have extended into the older Quaternary deposits, construction monitoring for paleontological resources shall be required. The applicant shall retain a qualified paleontological monitor, who will work under the guidance and direction of a professional paleontologist, who meets the qualifications set forth by the Society of Vertebrate Paleontology. The paleontological monitor shall be present during all construction excavations (e.g., grading, trenching, or clearing/grubbing) into the older Pleistocene alluvial deposits. Multiple earth-moving construction activities may require multiple paleontological monitors. The frequency of monitoring shall be based on the rate of excavation and grading activities, proximity to known paleontological resources and/or unique geological features, the materials being excavated (native versus artificial fill soils), and the depth of excavation, and if found, the abundance and type of paleontological resources and/or unique geological features encountered. Full-time monitoring can be reduced to part-time inspections if determined adequate by the qualified professional paleontologist.

**MM CUL-7:** **Cease Ground-Disturbing Activities and Implement Treatment Plan if Paleontological Resources Are Encountered.** In the event that paleontological resources and/or unique geological features are found during ground-disturbing activities, construction activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. A buffer area of at least 50 feet shall be established around the find where construction activities shall not be allowed to continue until appropriate paleontological treatment plan has been approved by the applicant/developer and the City. Work shall be allowed to continue outside of the buffer area. The applicant/developer and City shall coordinate with a professional paleontologist, who meets the qualifications set forth by the Society of Vertebrate Paleontology, to develop an appropriate treatment plan for the resources. Treatment may include implementation of paleontological salvage excavations to remove the resource along with subsequent laboratory processing and analysis or preservation in place. At the paleontologist's discretion and to reduce construction delay, the grading and excavation contractor shall assist in removing rock samples for initial processing.

**MM CUL-8:** **Prepare Report Upon Completion of Monitoring Services.** Upon completion of the above activities, the professional paleontologist shall prepare a report summarizing the results of the monitoring and salvaging efforts, the methodology used in these efforts,

as well as a description of the fossils collected and their significance. The report shall be submitted to the applicant/developer, the City, the NHMLAC, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the project and required mitigation measures.

d) **Less than Significant Impact with Mitigation Incorporated.** No known human remains have been identified from the CHRIS-SCCIC database within a one-mile radius of the project site. No human remains were identified during the site survey of the project site. However, these findings do not preclude the existence of previously unknown human remains located below the ground surface, which may be encountered during construction excavations associated with the proposed project. Similar to the discussion regarding archaeological resources and TCRs above, it is also possible to encounter buried human remains during construction given the proven prehistoric occupation of the region, the identification of the Santa Anita Wash and the San Gabriel River both located within a two-mile radius of the project site. As a result, the following mitigation measure is recommended to reduce potentially significant impacts to previously unknown human remains that may be unexpectedly discovered during project implementation to less than significant.

**MM CUL-9:** **Cease ground-disturbing activities and notify the Los Angeles County Coroner if human remains are encountered.** If human remains are unearthed during implementation of the proposed project, the City of Monrovia and the applicant/developer shall comply with State Health and Safety Code section 7050.5. The City of Monrovia and the applicant shall immediately notify the Los Angeles County Coroner and no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC shall then identify the person(s) thought to be the Most Likely Descendent (MLD). After the MLD has inspected the remains and the site, they have 48 hours to recommend to the landowner the treatment and/or disposal, with appropriate dignity, the human remains and any associated funerary objects. Upon the reburial of the human remains, the MLD shall file a record of the reburial with the NAHC and the Project archaeologist shall file a record of the reburial with the CHRIS-SCCIC. If the NAHC is unable to identify a MLD, or the MLD identified fails to make a recommendation, or the applicant rejects the recommendation of the MLD and the mediation provided for in Subdivision (k) of section 5097.94, if invoked, fails to provide measures acceptable to the applicant, the applicant or his or her authorized representative shall inter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance.

## *4.6 – Geology and Soils*

Analysis of impacts to geology and soils was based on geologic maps from the California Department of Conservation and the geotechnical study found in Appendix D. Would the project:

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: | | | | |
| 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. | ☐ | ☐ | ☑ | ☐ |
| ii) Strong seismic ground shaking? | ☐ | ☐ | ☑ | ☐ |
| iii) Seismic-related ground failure, including liquefaction? | ☐ | ☐ | ☐ | ☑ |
| iv) Landslides? | ☐ | ☐ | ☐ | ☑ |
| b) Result in substantial soil erosion or the loss of topsoil? | ☐ | ☐ | ☑ | ☐ |
| 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? | ☐ | ☐ | ☑ | ☐ |

| | | | | |
|---|---|---|---|---|
| d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1997), creating substantial risks to life or property? | ☐ | ☐ | ☐ | ☑ |
| e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water? | ☐ | ☐ | ☐ | ☑ |

a.i) **Less than Significant Impact.** The project site is located in seismically active Southern California. The closest known major, active and potentially active earthquake faults include the Raymond, Sierra Madre, Clamshell-Sawpit Section, Whittier and Newport-Inglewood Faults. The closest active fault, the Raymond Fault, is located approximately 1.6 miles north of the project site. According to the Geotechnical report (Appendix D; p. 2), the project site is not located in an Alquist-Priolo Earthquake Fault Zone, and no active faults are known to underlie or project toward the project site (Appendix D; p. 2). Therefore, the probability of fault rupture at the project site is low, and the impact would be less than significant.

a.ii) **Less Than Significant Impact.** The project would be subject to ground shaking impacts should a major earthquake occur in the future. Potential impacts include injury or loss of life and property damage.

The project site is subject to strong seismic ground shaking, as are virtually all properties in Southern California. The project is subject to the seismic design criteria of the California Building Code (CBC). The 2016 California Building Code (CBC; Title 14, California Code of Regulations, Part 2) contains seismic safety provisions with the aim of preventing building collapse during a design earthquake, so that occupants would be able to evacuate after the earthquake. A design earthquake is one with a two percent chance of exceedance in 50 years, or an average return period of 2,475 years. Adherence to these requirements and consideration of the project site's seismic coefficients would reduce the potential of the building from collapsing during an earthquake, thereby minimizing injury and loss of life. Although structures may be damaged during earthquakes, adherence to seismic design requirements would minimize damage to property within the structure because the structure is designed not to collapse. The CBC is intended to provide minimum requirements to prevent major structural failure and loss of life. Adherence to existing regulations (such as the 2016 California Building Code, referenced above) would reduce the risk of loss, injury, and death; therefore, impacts due to strong ground shaking would be less than significant.

a.iii) **No Impact.** Liquefaction is a phenomenon that occurs when soil undergoes transformation from a solid state to a liquefied condition due to the effects of increased pore-water pressure. This typically occurs where susceptible soils (particularly the medium sand to silt range) are located over a high

groundwater table (within 50 feet of the surface). The depth to groundwater on the site is approximately 200 feet.[17] Affected soils lose all strength during liquefaction and foundation failure can occur. According to the geotechnical report (Appendix D), the project site is not mapped in the potential liquefaction zone on the State of California Seismic Hazards Zones Map.[18] Therefore, the proposed project would not expose people or structures to potential ground failure due to liquefaction. No impact would occur.

a.iv) **No Impact.** Structures built below or on slopes subject to failure or landslides may expose people and structures to harm. The project site is not mapped in an area of potential earthquake-induced landslide movement on the State of California Seismic Hazards Zones Map.[19] The project site and surrounding area is in a flat, urbanized setting. Therefore, the project would not expose people or structures to injury or loss due to landslides. No impact would occur.

b) **Less Than Significant Impact.** Little, if any, native topsoil is likely to occur on the project site since it is developed and covered with paving and structures. The proposed project has the potential to expose surficial soils to wind and water erosion during construction activities. Wind erosion would be minimized through soil stabilization measures required by South Coast Air Quality Management District (SCAQMD) Rule 403 (Fugitive Dust), such as daily watering. Water erosion would be prevented through the City's standard erosion control practices required pursuant to the CBC and the National Pollution Discharge Elimination System (NPDES), such as silt fencing or sandbags. Following project construction, the project site would be covered completely by paving, structures, and landscaping. Therefore, impacts due to erosion of topsoil would be less than significant with implementation of existing regulations (e.g., SCAQMD Rule 403, Monrovia Municipal Code chapter 15.28, NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities, Order No. 2009-0009-DWQ, adopted September 2, 2009, and revised by Order No. 2010-0014-DWG).

c) **Less Than Significant Impact.** Impacts related to liquefaction and landslides are discussed above in sections 4.6.a.iii and 4.6.a.iv. Lateral spreading is the downslope movement of surface sediment due to liquefaction in a subsurface layer. The downslope movement is due to the combination of gravity and earthquake shaking. Such movement can occur on slope gradients of as little as one degree. Lateral spreading typically damages pipelines, utilities, bridges, and structures.

Lateral spreading of the ground surface during a seismic activity usually occurs along the weak shear zones within a liquefiable soil layer and has been observed to generally take place toward a free face (i.e. retaining wall, slope, or channel) and to lesser extent on ground surfaces with a very gentle slope. Liquefaction occurs when seismic waves pass through saturated granular soil, distorting its granular structure, and causing some of the empty spaces between granules to collapse.

Due to the absence of liquefaction potential on or near the project site (depth to groundwater is approximately 200 feet) and the urbanized character of the area, the potential for lateral spread occurring on or off the project site is considered negligible.[20] Compliance with existing CBC regulations (Chapter 18) would limit hazard impacts arising from unstable soils to less than significant.

d) **No Impact.** Expansive soils shrink and swell in response to moisture due to high percentages of clay. According to the Geotechnical Report (Appendix D), the onsite material tested has a very low expansion potential.[21] Moreover, because the project site is currently developed, subsurface soils would have been excavated and compacted in accordance with standard building code practices, including removal of any expansive or other non-engineered soils; therefore, there would be no impacts related to expansive soils.

e) **No Impact.** The project site is served by a fully functional municipal sewer system. The proposed project would be required by the City to connect to the municipal sewer system and would not be allowed to use septic tanks. No impact would occur.

## *4.7 – Greenhouse Gas Emissions*

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

a) **Less Than Significant Impact.** Gases that trap heat in the atmosphere and affect regulation of the Earth's temperature are known as greenhouse gases (GHGs). Many chemical compounds found in the earth's atmosphere exhibit the GHG property. GHG allows sunlight to enter the atmosphere freely, and when sunlight strikes the earth's surface, it is either absorbed or reflected back toward space. Earth that has absorbed sunlight warms up and emits infrared radiation toward space. GHG absorb this infrared radiation and "trap" the energy in the earth's atmosphere. Entrapment of too much infrared radiation produces an effect commonly referred to as "Global Warming", although the term "Global Climate Change" is preferred because effects are not just limited to higher global temperatures.

GHG that contribute to climate regulation are a different type of pollutant than criteria or hazardous air pollutants because climate regulation is global in scale, both in terms of causes and effects. The 1997 United Nations' Kyoto Protocol international treaty set targets for reductions in emissions of four specific GHGs – carbon dioxide, methane, nitrous oxide, and sulfur hexafluoride – and two groups of gases – hydrofluorocarbons and perfluorocarbons. These are the primary GHG emitted into the atmosphere by human activities. Although the U.S. was not a signatory of the Kyoto Protocol, the Protocol established the primary GHG emitted into the atmosphere are and set the basis for future emissions estimation and monitoring methodologies.

Human production of GHG has increased steadily since pre-industrial times (approximately pre-1880) and atmospheric carbon dioxide concentrations have increased from a pre-industrial value of 280 parts per million (ppm) in the early 1800s to 408 ppm in January 2018 (NOAA 2018). The effects of increased GHG concentrations in the atmosphere include climate change (increasing temperature and shifts in precipitation patterns and amounts), reduced ice and snow cover, sea level rise, and acidification of oceans. These effects in turn will impact food and water supplies, infrastructure, ecosystems, and overall public health and welfare.

On December 14, 2017, California Air Resources Board (CARB) adopted the second update to the Scoping Plan, the *2017 Climate Change Scoping Plan Update* (*2017 Scoping Plan Update*). The primary objective of the *2017 Scoping Plan Update* is to identify the measures needed to achieve the mid-term GHG reduction target for 2030 (i.e., reduce emissions by 40 percent below 1990 levels by 2030), as established under Executive Order B-30-15 and SB 32. The *2017 Scoping Plan Update* identifies an

increasing need for coordination among state, regional, and local governments to achieve the GHG emissions reductions that can be gained from local land use planning and decisions. It notes emission reduction targets set by more than one hundred local jurisdictions in the state could result in emissions reductions of up to 45 million metric tons of carbon dioxide equivalent ($MMTCO_2E$) and 83 $MMTCO_2E$ by 2020 and 2050, respectively.

To provide guidance to local lead agencies on determining the significance of GHG emissions in their CEQA documents, the SCAQMD convened the first GHG Significance Threshold Working Group (Working Group) meeting on April 30, 2008. In December 2008, the SCAQMD Governing Board adopted a GHG significance threshold for industrial projects where the SCAQMD is lead agency; however, the City is the lead agency for the proposed Project. The SCAQMD has not formally adopted GHG thresholds for local lead agency consideration; however, to date, the Working Group convened a total of 15 times, with the last meeting taking place on September 28, 2010. At this last meeting, SCAQMD presented its proposed GHG thresholds for use by local lead agencies. The proposed thresholds are tiered as follows:

- Tier 1 consists of evaluating whether or not the project qualifies for applicable CEQA exemptions.
- Tier 2 consists of determining whether or not a project is consistent with a greenhouse gas reduction plan. If a project is consistent with a greenhouse gas reduction plan, it would not have a significant impact.
- Tier 3 consists of using screening values at the discretion of the Lead Agency; however, the Lead Agency should be consistent for all projects within its jurisdiction. The following thresholds were proposed for consideration:
    - 3,000 MTCO2e/yr for all land use types; or
    - 3,500 MTCO2e/yr for residential; 1,400 MTCO2e/yr for commercial; 3,000 MTCO2e/yr for mixed use projects.
- Tier 4 has three options for projects that exceed the screening values identified in Tier 3:
    - Option 1: Reduce emissions from business as usual by a certain percentage (currently undefined)
    - Option 2: Early implementation of applicable AB 32 Scoping Measures
    - Option 3: For plan-level analyses, analyze a project's emissions against an efficiency value of 6.6 MTCO2e/yr/SP in 2020 and 4.1 MTCO2e/yr/SP by 2035. For project-level analyses, analyze a project's emissions against an efficiency value of 4.8 and 3.0 MTCO2e/yr/SP for the 2020 and 2035 calendar years, respectively.
- Tier 5 involves mitigation offsets to achieve a specific significance threshold.

The SCAQMD's draft proposed threshold use Executive Order S-3-05 goal as the basis for the Tier 3 screening levels. Achieving the objectives of Executive Order would contribute to worldwide efforts to cap CO2 concentrations at 450 ppm, stabilizing global climate. Specifically, the Tier 3 screening levels are based on an emission capture rate of 90 percent for all new or modified projects. A 90 percent emission capture rate means that 90 percent of total emissions from all new or modified projects would be subject to a CEQA analysis, including a negative declaration, a mitigated negative declaration, or an environmental impact report, which includes analyzing feasible alternatives and imposing feasible mitigation measures. This capture rate sets the emission threshold low enough to capture a substantial

fraction of future projects that will be constructed to accommodate future statewide population and economic growth, while setting the emission threshold high enough to exclude small projects that will in aggregate contribute a relatively small fraction of the cumulative statewide GHG emissions. To determine whether the proposed project's GHG emissions are significant, this analysis uses the SCAQMD draft local agency tier 3 threshold of 3,000 MTCO2e per year for mixed use projects.

**Evaluation of Environmental Impacts**

GHG emissions for the Project were quantified utilizing the California Emissions Estimator Model (CalEEMod) Version (V.) 2016.3.2 to determine if the Project could have a cumulatively considerable impact related to greenhouse gas emissions (see Appendix B, Air Quality and Greenhouse Gas Modeling Data). The emissions inventory accounts for GHG emissions from construction activities (see Table 4-2 for Tentative Construction Schedule) and operational activities. Operational emissions associated with the project would include GHG emissions from mobile sources (transportation), energy, water use and treatment, and waste disposal. GHG emissions from electricity use are indirect GHG emissions from the energy (purchased energy) that is produced offsite. Construction activities are short term and cease to emit greenhouse gases upon completion, unlike operational emissions that are continuous year after year until operation of the use ceases. Because of this difference, SCAQMD recommends amortizing construction emissions over a 30-year operational lifetime. This normalizes construction emissions so that they can be grouped with operational emissions to generate a precise project-based GHG inventory.

**Table 4-7**
**Greenhouse Gas Emissions Inventory**

| Source | GHG Emissions (MT/YR) | | | |
|---|---|---|---|---|
| | $CO_2$ | $CH_4$ | $N_2O$ | $MTCO_2e$ Total[(A)] |
| ***Construction*** | | | | |
| 2019 | 323.95 | 0.04 | 0.00 | 324.99 |
| 2020 | 335.64 | 0.03 | 0.00 | 336.51 |
| CO2 Equivalent TOTAL | | | | 661.50 |
| *AMORTIZED TOTAL (30 Year Average)* | | | | ***22.05*** |
| ***Existing Emissions*** | | | | |
| Total Operations | 567.97 | 0.50 | >0.01 | **581.76** |
| ***Operational*** | | | | |
| Area | 35.88 | >0.01 | >0.01 | 36.15 |
| Energy | 540.93 | 0.02 | >0.01 | 543.13 |
| Mobile | 988.80 | 0.06 | 0.00 | 990.19 |
| Waste | 15.21 | 0.90 | 0.00 | 37.68 |
| Water | 69.12 | 0.34 | >0.01 | 80.13 |
| Total Operations | 1,664.46 | 1.36 | 0.01 | 1,687.28 |
| ***Net Operational*** | 1,096.49 | 0.86 | 0.01 | 1,105.52 |
| **Total Construction + Net Operational** | | | | ***1,127.57*** |
| Proposed SCAQMD Screening Threshold | | | | **3,000** |
| Exceeds Screening Threshold? | | | | **No** |
| Project Service Population (Employees and Residents) | | | | **439** |
| GHG Efficiency ($MTCO_2e$ Per Year per Service Population) | | | | **3.9[(B)]** |

Source: MIG 2018, See Appendix B.
Note: Slight variations may occur due to rounding. Construction emissions amortized over 30 years

**Table 4-7**
**Greenhouse Gas Emissions Inventory**

| Source | GHG Emissions (MT/YR) | | | |
|---|---|---|---|---|
| | $CO_2$ | $CH_4$ | $N_2O$ | $MTCO_2e$ Total[(A)] |

(A) $MTCO_2E/YR$

(B) This metric is derived by dividing the project's total annual GHG emissions (operation and amortized construction) by its service population (total number of employees and residents). Although not applied in evaluating whether the proposed project's GHG emissions would have a direct or indirect significant impact on the environment, the SCAQMD's GHG CEQA Significance Working Group also considered for recommendation (as part of its Tier 4-level approach to GHG emissions analysis) the use of a plan-level efficiency value of 6.6 MTCO2e per service population in 2020 and 4.1 $MTCO_2e$ per service population in 2035.

As shown in Table 4-7, the proposed project's potential increase in GHG emissions would be below the SCAQMD's latest interim guidance and proposed GHG significance threshold for mixed-use projects (3,000 $MTCO_2e$) and, therefore, would not generate GHG emissions that have a significant effect on the environment.

The proposed project's GHG estimates do not account for potential GHG reductions associated with the green building, water conservation, and other energy efficiency measures described in the Specific Plan section 2.5 Sustainable Development and thus could be even lower than estimated above. The SCAQMD's interim thresholds use Executive Order S-3-05 goal as the basis for the screening levels, which included the long-erm goal to reduce greenhouse gas emissions to 80 percent below 1990 levels by 2050. Thus, projects that meet the SCAQMD's current interim thresholds would not interfere with the state's 2030 and 2050 GHG reduction targets. Currently, estimated GHG reductions necessary to achieve current state GHG reduction goals are addressed via regulatory requirements at the state level, which the proposed project would be required to comply with. As shown in Table 4-7, vehicle trips account for the majority of the proposed project's increase (990.19 MTCO2e) in GHG emissions. However, GHG emissions from vehicles would continue to be reduced over time as individual vehicles are retired and replaced with more efficient vehicles and electric or other alternatively-fueled, low or zero emission vehicles.

b) **No Impact.** The proposed project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions, including CARB's 2017 Climate Change Scoping Plan, the City's General Plan, or the City's Energy Action Plan. Most of the policies contained in these plans apply or are implemented at the local and regional level by regional planning agencies and municipal governments and, therefore, do not directly apply to the proposed project.

To achieve these goals, the 2017 Climate Change Scoping Plan includes a recommended plan-level efficiency threshold of six metric tons or less per capita by 2030 and no more than two metric tons by 2050. The major elements of the 2017 Climate Change Scoping Plan framework include:

- Implementing and/or increasing the standards of the Mobile Source Strategy, which include increasing zero emission vehicle (ZEV) buses and trucks;
- LCFS, with an increased stringency (18 percent by 2030);

- Implementation of SB 350, which expands the Renewable Portfolio Standard (RPS) to 50 percent and doubles energy efficiency savings by 2030;
- California Sustainable Freight Action Plan, which improves freight system efficiency, utilizes near-zero emissions technology, and deployment of ZEV trucks;
- Implementing the proposed Short-Lived Climate Pollutant Strategy, which focuses on reducing $CH_4$ and hydrocarbon emissions by 40 percent and anthropogenic black carbon emissions by 50 percent by year 2030;
- Continued implementation of SB 375;
- Post-2020 Cap-and-Trade Program that includes declining caps;
- 20 percent reduction in GHG emissions from refineries by 2030; and
- Development of a Natural and Working Lands Action Plan to secure California's land base as a net carbon sink.

As shown in Table 4-7, the proposed project would have a GHG efficiency of 3.9 MTCO2e per service population per year in 2021, which is below all applicable 2020, 2030, and 2035 efficiency-based thresholds suggested and/or recommended for use by the SCAQMD and CARB. The proposed project would thus demonstrate substantial progress with the State's long-term GHG reduction goals and be consistent with the 2017 Climate Change Scoping Plan, which generally addresses GHG emissions through 2030. Regarding the 2017 Climate Change Scoping Plan's 2050 efficiency threshold of 2.0 $MTCO_2e$ per service population, as noted above, projects that meet the SCAQMD's current interim thresholds are presumed not to interfere with the state's 2030 and 2050 GHG reduction targets. In addition, a key component of the 2017 Scoping Plan is the continued implementation of the state's Cap and Trade Program, which would cover emissions from two of the proposed project's largest GHG emissions sources: electricity consumption and fuel combustion in motor vehicles. For the years 2021 to 2050, the current Cap and Trade regulation sets forth a cumulative reduction in GHG emissions from covered sources equal to appropxiamtely 64.5% (i.e., emissions from covered activities in 2050 would be approximately 64.5% less than emissions from the same covered activities in 2021). Applying a 64.5% reduction to the proposed project's energy and mobile source GHG emissions would reduce the Project's total emissions to approximately 720 $MTCO_2e$ in Year 2050, which presuming a service populaton of 439 in Year 2050, would result in a plan-level efficiency of 1.64 $MTCO_2e$ per service population in Year 2050 (less than the 2.0 MTCO2e threshold identified in the 2017 Climate Change Scoping Plan). This Year 2050 information is not meant to be exhaustive, or an estimate of the proposed project's actual year 2050 emissions; rather it meant to provide information that indicates the proposed project would not impede progress with the state's 2050 GHG reduction goal as currently planned for and identified in the 2017 Scoping Plan.

The City's General Plan Land Use Element includes goals and policies related to GHG reduction. Most of the General Plan policies are either voluntary in nature, implemented by the City, or do not directly apply to the proposed project; however, the proposed project would be consistent with the following policies related to GHG reduction:

- Goal 10: Ensure that new development is sensitive to the City's natural and open space resources and constraints.

- Policy 10.6: Encourage the conservation of water and energy resources in order to reduce the need for expansion of water reservoirs and distribution facilities, as well as energy generating plants and distribution facilities.
- Policy 10.9: Require water efficient landscaping in regard to plant selection and irrigation.

The City does not have an adopted Climate Action Plan but does have an Energy Action Plan that seeks to decrease energy use and dependence. The plan suggests the need for citizen involvement but does not include any measures that would apply to the proposed project.

## *4.8 – Hazards and Hazardous Materials*

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? | ☐ | ☐ | ☑ | ☐ |
| 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? | ☐ | ☐ | ☑ | ☐ |
| c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? | ☐ | ☐ | ☑ | ☐ |
| d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? | ☐ | ☐ | ☑ | ☐ |
| 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 for people residing or working in the project area? | ☐ | ☐ | ☐ | ☑ |
| f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area? | ☐ | ☐ | ☐ | ☑ |
| g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? | ☐ | ☐ | ☑ | ☐ |
| h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands? | ☐ | ☐ | ☐ | ☑ |

a) **Less Than Significant Impact.** Construction of the proposed project, as well as ongoing maintenance over time, may involve the intermittent transport, use and disposal of potentially hazardous materials, including fuels and lubricants, paints, solvents, and other materials commonly used in construction and maintenance. During construction activities, any on-site hazardous materials that may be used, stored, or transported would be required to follow standard protocols and regulations for maintaining health and safety. For example, some practices include but are not limited to hazardous waste would be stored in sealed containers, and leaks and spills will be cleaned up before rain events. Future residential, retail and service uses (similar to those in Old Town Monrovia) would also be expected to use typical household hazardous substances associated with residential uses (e.g., paint, cleaners) that may be generated, stored, transported, used, or disposed, and would be subject to applicable local, State, and federal regulations. However, these future residential uses would be unlikely to involve routine transport, use, or disposal of hazardous materials, or result in hazardous emissions. In addition, Los Angeles County holds free household hazardous waste and e-waste collection events in various locations almost every week. Therefore, with existing City policies and federal, State and local regulation (such as the requirement of Health Hazardous Materials Division of Los Angeles County Fire to track and inspect hazardous materials), the potential threat to public health and safety or the environment from hazardous materials transport, use, or disposal would be less than significant.

b) **Less Than Significant Impact.** As described in (a) above, construction of the proposed project would require the use and possible release of hazardous materials, such as paints and other solvents. However, because Project would be required to comply with construction practices that include measures to prevent, contain, and/or clean-up spills and contamination from fuels, solvents, concrete wastes, and other waste materials, and because use and transport of all hazardous materials would be required to follow federal, State, and local regulations, risk of upset of hazardous materials from accidents would be less than significant.

**Asbestos-containing Materials.** A site-specific Phase I Environmental Site Assessment/Phase II Screening Subsurface Assessment has been prepared for the project site by California Environmental (January 2017) (Phase I/Phase II ESA). This document may be found in Appendix E of this IS/MND. According to the Phase I/Phase II ESA, of the three existing buildings on the project site, one was constructed around 1975 (126 West Walnut Avenue), and one was constructed around 1925 (815 South Myrtle Avenue). Because of the age of these two structures, asbestos-containing materials (ACM) could have been used in their construction (ACM were used on a widespread basis in building construction prior to and into the 1980s). The third building was constructed around 1984 (825 South Myrtle Avenue) and would not be considered likely to have building materials that contain ACM because use of ACM was banned in 1989. Asbestos generally does not pose a threat when it remains intact. However, when asbestos is disturbed and becomes airborne, such as during demolition activities, significant impacts to human health could occur. Construction workers completing demolition activities, as well as surrounding uses, have the potential to be exposed to airborne asbestos emissions due to the potential presence of ACM.

SCAQMD Rule 1403 (Asbestos Emissions from Demolition/Renovation Activities) requires work practices to limit asbestos emissions from building demolition and renovation activities, including the removal and disturbance of ACM.[22] This rule is generally designed to protect uses and persons adjacent

to demolition or renovation activity from exposure to asbestos emissions. Rule 1403 requires surveys of any facility being demolished or renovated for the presence of all friable ACM and Class I and Class II non-friable ACM. Friable implies that the material can be easily broken or to smaller pieces or powder by hand pressure; non—friable implies that the material cannot easily be broken down by hand pressure. Rule 1403 also establishes notification procedures, removal procedures (including HEPA filtration, glove bag, wetting, dry removal, and/or an approved alternative), handling operations, and warning label requirements. With adherence to SCAQMD Rule 1403, project impacts related to ACM would be less than significant.

**Lead-Based Paints**. Similar to exposure to asbestos, exposure of construction workers to lead-based paint (LBP) during demolition activities could be of concern. Sampling for LBP was not included in the work scope for the Phase I/Phase II ESA; however, because lead content in paint was not reduced significantly until 1977 and two of the buildings (126 West Walnut Avenue and 815 South Myrtle Avenue) were constructed prior to 1977, it is possible that LBP was used in either or both of these buildings. The building at 825 South Myrtle Avenue was constructed in 1984 after the use of LBP was banned and therefore is considered unlikely to have used LBP onsite. Overall, the paint coatings of all structures were determined to be in good condition during a site reconnaissance conducted for the Phase I/Phase II ESA on November 22, 2016 (Appendix E).

Demolition of existing structures onsite (including disposal of demolition debris) would be required to comply with state and federal regulations pertaining to lead exposure as caused by LBP (i.e., Title 8 California Code of Regulations section 1532.1--California Construction Safety Orders for Lead). As required by this regulation, all existing structures to be demolished would need to conduct an exposure assessment to determine if any risk to workers from exposure to lead exist and establish measures required to reduce the risk, as appropriate. Proper disposal of lead-based paint, including disposal at facilities or landfills properly equipped to handle hazardous levels of lead, would prevent contamination of soil and subsurface groundwater. In addition, the project would also be subject to Title 22 requirements for the disposal of solid waste contaminated with lead. Therefore, with adherence to these federal, State, and local regulations, project impacts related to lead based paints would be less than significant.

**Soil/Soil-Gas Samples**. The Phase I/Phase II conducted four soil borings on the project site and collected 12 samples, which were analyzed for total petroleum hydrocarbons, organochlorine pesticides, and total metals. One sample was detected to have a low concentration (51 mg/kg or 51 ppm) of total petroleum hydrocarbons (TPH), which is well below the Environmental Screening Level established by the Regional Water Quality Control Board (100 mg/kg); all the other samples were non-detect for TPH. All samples were non-detect for organochlorine pesticides (OCPs). All concentrations of metals detected were typical of background levels for the region.

Five soil-gas samples were collected from the four boring locations and analyzed for volatile organic compounds (VOC). Four of the soil-gas samples were non-detect for VOCs. However, at one site, tetrachloroethylene (PCE) and trichloroethylene (TCE) were detected at concentrations of 0.27 µg/L and 0.27 µg/L, respectively, which exceed the California Human Health Screening Level (CHHSL) for residential properties (0.18 µg/L). A vapor intrusion algorithm was used to determine the potential risk

of vapor intrusion, and based on a residential use scenario, the concentration was determined not to be "a future indoor air quality threat above the current risk standards" (Appendix E, p. 24). The results are shown in more detail in section 8.2 of the Phase 2 of the ESA (Appendix E, p. 23-24). Based on these results, further investigation of the project site was not recommended, and this impact would be less than significant.

c) **Less than Significant Impact.** The closest existing schools are Calvary Road Baptist Academy (approximately 0.25 miles northwest of the project site), Canyon Early Learning Center approximately 0.30 miles southeast of the project site), and Monroe Elementary School (approximately 0.35 miles northwest of the project site). As described in above in section (4.8 a), construction and operation of the project (a mixed-use development) would not generate hazardous emissions, nor result in the storage, handling, production, or disposal of acutely hazardous materials. Therefore, project impacts to schools from hazardous materials would be less than significant.

d) **Less than Significant Impact.** The project is not located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5 (Cortese List), including Envirostor (http://www.envirostor.dtsc.ca.gov/) and GeoTracker (http://geotracker.waterboards.ca.gov/), both accessed on February 8, 2018. The Phase I/Phase II reviewed EnviroStor, GeoTracker, and other hazardous materials databases, and determined that only one site, 727 South Myrtle Avenue, approximately 140 feet northeast of the project site, was identified as contaminated. This site contained a 14,000-gallon diesel underground storage tank (UST) and a 1,000-gallon UST (of unknown contents). According to the Phase I/Phase II ESA, the site was issued "case closed" status on the GeoTracker database on September 11, 1989. The State Water Resources Control Board evaluates sites on the basis of multiple closure criteria to determine any further actions (e.g., soil or water quality monitoring for contaminants, remediation) are warranted. Therefore, this impact would be less than significant

e-f) **No Impact.** There are no public airports or private airstrips within two miles of the project site. The closest airport is San Gabriel Valley Airport (formerly El Monte Airport), a single runway general aviation airport located approximately 4.5 miles southwest of the project site. The nearest major commercial airport is the Hollywood Burbank Airport (formerly Bob Hope Airport), located approximately 21 miles to the west. Ontario International Airport is located approximately 23 miles to the east. The closest private airport is the Wells Fargo-El Monte Heliport, approximately 6.5 miles southwest of the project site. Therefore, there would be no impact related to airport safety hazards.

g) **Less Than Significant Impact.** The project site parking access road would be approximately 150 feet west of the corner of West Chestnut Avenue and South Myrtle Avenue. South Myrtle Avenue provides freeway access and also would function as an evacuation route. The proposed project would not create, interrupt, or otherwise reduce the ability of these streets to convey traffic. The current street configuration will not change, and the route that public safety vehicles may take would be unimpeded under proposed project operation. Therefore, proposed project impacts on emergency response and evacuation plans would be less than significant.

h) **No Impact.** The project site is not located within a State-identified fire hazard zone, as indicated on the latest Fire Hazard Severity Zone (FHSZ) maps prepared by the California Department of Forestry and Fire Protection (CALFIRE).[3] According to the City's General Plan, a high fire hazard zone exists in Monrovia but is located to the north of West Hillcrest Boulevard (roughly 1.0 mile from the project). In the urbanized part of Monrovia, in which the project site is located, there are no wildland conditions, and therefore no impact would occur.

[3] http://frap.fire.ca.gov/webdata/maps/los_angeles/fhszs_map.19.pdf; accessed 6/20/18.

## *4.9 – Hydrology and Water Quality*

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a) Violate any water quality standards or waste discharge requirements? | ☐ | ☐ | ☑ | ☐ |
| b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)? | ☐ | ☐ | ☐ | ☑ |
| c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site? | ☐ | ☐ | ☐ | ☑ |
| d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site? | ☐ | ☐ | ☐ | ☑ |
| e) 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? | ☐ | ☐ | ☑ | ☐ |
| f) Otherwise substantially degrade water quality? | ☐ | ☐ | ☐ | ☑ |
| g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map? | ☐ | ☐ | ☐ | ☑ |
| h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows? | ☐ | ☐ | ☐ | ☑ |

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam? | ☐ | ☐ | ☑ | ☐ |
| j) Inundation by seiche, tsunami, or mudflow? | ☐ | ☐ | ☐ | ☑ |

a) **Less Than Significant Impact.** Violations of water quality standards or waste discharge requirements, or degradation of water quality can result in potentially significant impacts to water quality and result in environmental damage or sickness in people. The proposed project would result in a significant impact to water quality if it violated water quality standards and waste discharge requirements or resulted in the degradation of water quality.

Point-source pollutants can be traced to their original source. Point-source pollutants are discharged directly from pipes or spills. Raw sewage draining from a pipe directly into a stream is an example of a point-source water pollutant. The proposed project, which consists of a development of 154 dwelling units, a five-story parking garage, and retail and service related uses (similar to those in Old Town Monrovia), does not propose any uses that would generate point source pollutants.

Non-point-source pollutants (NPS) cannot be traced to a specific original source. NPS pollution is caused by rainfall or snowmelt moving over and through surface areas. As the runoff moves, it picks up and carries away natural and human-made pollutants, finally depositing them into lakes, rivers, wetlands, coastal waters, and even underground sources of drinking water. These pollutants include:

- Oil, grease, and toxic chemicals from urban runoff and energy production
- Sediment from improperly managed construction sites
- Atmospheric deposition and hydromodification

Impacts associated with urban water pollution include sickness or injury to people, and degradation or elimination of water bodies as recreational opportunities. Accidents, poor site management, or negligence by property owners and tenants can result in accumulation of pollutant substances on parking lots, loading, and storage areas, or result in contaminated discharges directly into the storm drain system.

As a co-permittee under Los Angeles County's MS4 National Pollutant Discharge Elimination System (NPDES) permit, the City is required to implement all pertinent regulations of the program to control pollution discharges from new development.[23] These regulations reduce NPS pollutant loading through the implementation of Best Management Practices (BMPs) and other control measures that minimize or eliminate pollutants from urban runoff, thereby protecting downstream water sources. BMPs implemented to address commercial pollutant sources generally involve maintenance of storm drain

facilities, parking lots, vegetated areas, and dissemination of educational materials. Violations of water quality standards due to urban runoff can be prevented through the continued implementation of existing regional water quality regulations.

Project construction would disturb approximately 2.1 acres of land and therefore would be subject to City's NPDES permit requirements during construction activities in addition to standard NPDES operational requirements. The City will require the project's use of BMPs, as listed in the California Storm Water Quality Association's California Storm Water Best Management Practice Handbooks. The post-construction BMPs would include drywells for infiltration and hydrodynamic separators (CDS units) as pre-treatment to the drywells. Temporary BMPs would likely include, but not be limited to gravel bags, silt fences, gravel beds/rumble plates, dumpsters, storage areas, concrete washout areas, and portable toilets.

The proposed project would also be required to comply with the City's Storm Water Management regulations (Chapter 12.36 of the Municipal Code), which requires following Low Impact Development (LID) standards. The applicant has included in the proposed project design a drainage system consisting of collection basins in the courtyards and landscaped areas to collect and filter on-site storm water and irrigation run-off. The system would allow collected runoff to percolate into the groundwater basin, and/or if acceptable to the City, to be conveyed off site to regional storm drain facilities and/or directed to exiting catch basins on the northeast corner of Chestnut Avenue and Primrose Avenue.

Drainage inlets would be constructed within the project site to convey on-site runoff to the proposed stormwater treatment systems for the site. The proposed stormwater treatment system consists of two separate drywell systems with underground detention. For the northern portion of the site, an existing drainage flow of 2.90 cubic feet per second (cfs) for the 25-year flow condition would be conveyed via the proposed storm drain system and internal plumbing to the proposed drywell system, located in the area adjacent to the alley. On-site runoff that exceeds the stormwater treatment volume near the alley would overflow via the proposed inlet overflow structure into the existing valley gutter located within the alley. Ultimately this discharge would travel west along the existing valley gutter, then travel to the south via existing curb and gutter and be conveyed to an existing catch basin located at the northeast corner of the intersection of Primrose Avenue and Chestnut Avenue.

For the southern portion of the site, an existing drainage flow of 4.21 cfs (for the 25-year flow condition) would be conveyed via the proposed storm drain system to the proposed drywell system, located within the proposed parking structure adjacent to Chestnut Avenue. On-site runoff that exceeds the stormwater treatment volume near Chestnut Avenue would overflow to the street via proposed parkway drain, which would ultimately convey the runoff via curb and gutter to the existing catch basin located approximately 350 feet south of the intersection of Primrose Avenue and Chestnut Avenue. Overall, compliance with existing regulations, including treating discharge on-site, would prevent any violation of water quality standards or waste discharge requirements. As a result of planned treatment features, impacts related to violation of water quality standards would be less than significant.

b) **No Impact.** The proposed project would not increase impervious surfaces when compared to the existing development that currently occupies the project site. The impervious surface area for the

existing site conditions site is 1.94 acres, and the impervious surface area for the proposed project is 1.73 acres. The project site is currently developed, and the proposed project would result in slightly lower amounts of impervious surfaces as currently exist; therefore, the proposed project would generate lower levels of runoff relative to existing uses. Overall, the amount or impervious surface at the Project site would be reduced from 94% to 84%.

The proposed drainage system for the site consists of two separate proposed dry well systems. While providing stormwater treatment as required by Low Impact Development (LID) design requirements, the proposed drywells would serve to re-charge the groundwater within the area through infiltration of captured stormwater. In addition, the proposed development does not include subterranean levels and would not include improvements below the groundwater level. Dewatering operations and depletion of groundwater supplies is not anticipated to be required to facilitate the proposed development. Therefore, operation of the proposed project would not result in increased runoff compared to existing conditions. No impact would occur as there would be no substantial depletion of groundwater supplies and no interference with groundwater recharge that would result in a net deficit in aquifer volume or a lowering of the local groundwater table level.

c) **No Impact.** Potentially significant impacts to the existing drainage pattern could occur if development of the proposed project results in substantial on- or off-site erosion or siltation. No streams traverse the project site; thus, the proposed project would not result in the alteration of any stream course. The proposed project mimics the existing drainage pattern, discharging via inlet overflow to the existing valley gutter within the alley for the northern portion of the property, and discharging via parkway drain overflow to the curb face of Chestnut Avenue for the southern portion of the property. In the proposed condition, siltation would be controlled by a proposed pre-treatment structure that captures sedimentation and debris prior to entering the proposed drywell systems, and ultimately discharging from the site. The proposed drywell structures would serve as the permanent Best Management Practices (BMPs) for the site.

A Storm Water Pollution Prevention Plan (SWPPP) would be prepared for the proposed project and as required by the State Water Resource Control Board. While the project is in construction, temporary construction BMPs, as well as erosion control measures, would be put in place to reduce construction and post-construction siltation. Both the existing and project site conditions are, or would be, fully developed, and no exposed soils would be present to provide for any erosion potential. For the above reasons, no impact would occur.

d) **No Impact.** As was previously detailed in section 4.9(c) above, the proposed project would not result in an alteration of the drainage pattern or increase in flows that would result in flooding on- or off-site because all on- and off-site drainage would be controlled by storm drain and flood control facilities and would not increase substantially beyond existing flow rates. The project would not generate more runoff as compared to existing conditions as the amount on impervious surface would be reduced as a result of the Project. On-site storm water would be treated by way of infiltration. Overflow storm water would discharge into adjacent streets and ultimately into an existing 24-inch diameter reinforced concrete pipe storm drain under Chestnut Avenue. The flow leaving the site towards the alley is less than the existing condition, 2.90 cubic feet (cfs) per second existing compared

to 2.77 cfs for the proposed project. The flow leaving the site towards Chestnut Ave is equal to the existing condition (4.21 cfs existing vs 4.21 cfs proposed). Thus, the total flow leaving the site is less than the existing condition (7.11 cfs existing vs 6.98 cfs proposed). Therefore, since the discharge generated from the developed condition of the site is less than the existing discharge for the site, it has been determined that the existing storm drain system has adequate capacity for the proposed development. Drainage patterns would not be altered on or off site. No impact would occur.

e) **Less Than Significant Impact.** As was previously detailed in section 4.9 (d) above, the proposed project is not anticipated to generate substantial additional runoff beyond what already exists. In fact, it is expected that there will be a reduction in the total flow leaving the project site (7.11 cfs existing vs 6.98 cfs proposed). The project site is adequately served by existing storm drain facilities and is consistent with the flood protection requirements of the City of Monrovia. During construction, the applicant/developer would be required to develop and implement a Storm Water Pollution Protection Plan (SWPPP); this would prevent polluted runoff from leaving the construction site. Operationally, the project would include BMPs as detailed in section 4.9 (a) above to reduce pollutants in runoff. Impacts would be less than significant.

f) **No Impact.** The proposed project does not propose or include any uses that would have the potential to otherwise degrade water quality beyond those issues discussed in this section (4.9). The Project will not result in increased runoff or in an increase in pollutants during storm events that could degrade water quality. The sedimentation and debris would be removed from the on-site surface water runoff by a pre-treatment system; and the pre-treatment system, the runoff would enter into one of the two on-site drywells. Onsite runoff that exceeds the stormwater treatment volume near Chestnut Avenue would overflow to the street via proposed parkway drain which would ultimately relay the runoff to the existing catch basin 350 feet south of the intersection of Chestnut Avenue and Primrose Avenue. Onsite runoff that exceeds the stormwater treatment volume near the alley would be conveyed to Primrose Avenue via the existing longitudinal gutter within the alley before it ultimately enters the existing catch basin at the northeast corner of Chestnut Avenue and Primrose Avenue. Therefore, there would be no impact.

g-h) **No Impact.** The project is not located within a 100-year floodplain, as mapped by the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps. The project site is identified as Zone X, defined by FEMA as areas outside the 0.2 percent annual chance floodplain. Since the project would not be located within a designated 100-year flood hazard area, no impact would occur.[24]

i) **Less than Significant Impact.** According to the FEMA flood maps, the project site is not located adjacent to any levee or within an area potentially subject to flooding as the result of a potential levee failure.[25] The project site is located within the dam inundation area of the Santa Anita Dam.[26] According to the Safety Element, the dam has a capacity of 1,376 acre-feet. If the dam failed at maximum capacity, the drainage area would be 11 square miles. Most of the flooding would occur in Sawpit Canyon between Myrtle Avenue and Santa Anita Wash north of I-210. The project site is located approximately three miles from the dam. The County of Los Angeles' emergency response plans as administered by the County of Los Angeles Office of Emergency Management, along with mutual aid from local jurisdictions, would implement their evacuation plans should such a dam inundation threaten the area.

In addition, the National Dam Safety Act of 2006 authorized a program to reduce the risks to life and property from dam failure by establishing a safety and maintenance program. The program requires regular inspection of dams to reduce the risks associated with dam failures. Based on the distance of the project site from the dam, in place dam evacuation plans, and the continued maintenance of these dams, impacts due to dam inundation would be less than significant.

j) **No Impact.** A seiche is typically caused when strong winds and rapid changes in atmospheric pressure push water from one end of a body of water to the other. When the wind stops, the water rebounds to the other side of the enclosed area. The water then continues to oscillate back and forth for hours or even days. Earthquakes, tsunamis, or severe storm fronts may also cause seiches along ocean shelves and ocean harbors. In the context of this project site, a seiche could occur on the ocean or in the body of water behind Santa Anita Dam. Monrovia is not exposed to tsunami hazards due to its inland location (over 25 miles from the Pacific Ocean) and elevation (over 500 msl). In addition, no large water bodies exist in the City that would present seiche hazards. Because the project is approximately 1.25 miles from the nearest hillside, the project would not be impacted by a mudflow. No impact would occur.

## *4.10 – Land Use and Planning*

Would the project:

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a) Physically divide an established community? | ☐ | ☐ | ☐ | ☑ |
| b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? | ☐ | ☐ | ☑ | ☐ |
| c) Conflict with any applicable habitat conservation plan or natural community conservation plan? | ☐ | ☐ | ☐ | ☑ |

a) **No Impact.** The proposed project does not propose construction of any roadway, flood control channel, or other structure that would physically divide any portion of the community. Therefore, no impact would occur.

b) **Less than Significant Impact.** The project site is located within the South Myrtle Avenue Corridor, Old Town Extension District planning area. has a General Plan land use designation and a zoning district designation of Office/Research and Development/Light Manufacturing, with a Specific Plan/Planned Development Overlay (SP/PD Overlay). The overlay allows for residential and commercial mixed-use development, which is what the project proposes. The South Myrtle Avenue Corridor zoning designation links Old Town with I-210 and the neighborhoods around the Gold Line Monrovia station, and the General Plan established this designation to create the policy environment for compatible pedestrian-scale land uses between Old Town and destinations to the south.

According to the General Plan, the purpose of the SP/PD Overlay is to allow existing office and research development uses while allowing other uses complimentary to the downtown area. Mixed-use developments are allowed in the area but require a Specific Plan, as included in this proposed Project. It is consistent with assigned uses of the General Plan.

Chapter 5 of the Avalon Monrovia Specific Plan addresses the consistency with General Plan Land Use Element goals and policies. As stated in Chapter 5, the Specific Plan is consistent with the following Land Use Element goals with descriptions as to how the Plan meets these goals:

- Goal 1: Provide for a mix of land uses (residential, commercial, industrial) which provides a balanced community.

- Goal 2: Provide adequate infrastructure for all development.
- Goal 3: Preserve the integrity of residential neighborhoods.
- Goal 4: Promote land use patterns and development which contribute to community and neighborhood identity.
- Goal 5: Encourage new development that is compatible with and complements existing land uses.
- Goal 8: Promote expansion of the City's economic base.
- Goal 9: Preserve the character of existing neighborhoods and historic residences.
- Goal 10: Ensure that new development is sensitive to the city's natural and open space resources and constraints.
- Goal 14: Maximize public participation in the planning and development review process.
- Goal 15: Ensure consistency with goals and policies of other elements of the general plan.

The proposed project meets Goal 1 by providing both residential and commercial uses. Goal 2 is met by providing sewer related infrastructure. The Old Town Extension District expands the pedestrian zone from the Old Town and creates opportunities for mixed use development, consistent with Goals 3, 4, 5, and 9. Goal 8 is met by bringing in new residents that will be within walking distance of downtown merchants which could result in increased retail sales and expand the local economic base near the Old Town area. Goal 10 is met by the proposed project redeveloping previously impacted lands and by ensuring proposed develop is consistent with laws and regulations that protect natural resources and open space providing development fees for public services. Goal 14 is met by providing for public review of the IS/MND. Goal 15 is met throughout the process as the Specific Plan itself was designed consistent with the General Plan elements.

As indicated above, the proposed project complies with existing General Plan goals and policies due, in part, to the development of a Specific Plan, as required in this part of the City. The proposed project does not conflict with any plans or programs adopted to avoid or mitigate an environmental impact. Therefore, the impact would be less than significant.

c) **No Impact.** The project site and surrounding areas are not part of any adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or State habitat conservation plan. The project would not impact any adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan. No impact from proposed project construction or operation would occur.

## *4.11 – Mineral Resources*

Would the project:

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| 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? | ☐ | ☐ | ☐ | ☑ |
| 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? | ☐ | ☐ | ☐ | ☑ |

a-b) **No Impact.** The project site is located in a completely urbanized area. There are no mineral extraction or process facilities on or near the project site. Additionally, no mineral resource areas have been designated in the City of Monrovia.[27] The project site is currently developed; therefore, the project would not result in any loss of availability of any known or unknown locally important mineral resources. There are no mining operations within the immediate vicinity of the project site, and mining is not consistent with zoning and surrounding land uses. No impact would occur.

## *4.12 – Noise*

Would the project result in:

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? | ☐ | ☑ | ☐ | ☐ |
| b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels? | ☐ | ☐ | ☑ | ☐ |
| c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project? | ☐ | ☐ | ☑ | ☐ |
| d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project? | ☐ | ☑ | ☐ | ☐ |
| 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 expose people residing or working in the project area to excessive noise levels? | ☐ | ☐ | ☐ | ☑ |
| f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels? | ☐ | ☐ | ☐ | ☑ |

A more detailed discussion of noise and noise impacts are provided in the Environmental Noise Assessment as Appendix F. This section summarizes the results of the assessment.

**Characteristics of Noise**

Noise is often defined as unwanted sound. Sound is easily measured with instruments, but the human variability in subjective and physical responses to sound complicates the understanding of its impact on people. People judge the relative magnitude of sound by subjective terms such as “loudness” or “noisiness.”

Physically, sound-pressure magnitude is measured and quantified in terms of a logarithmic scale in decibels (dB). Research on human hearing sensitivity has shown that a 3 dB increase in the sound is barely noticeable and a 10-dB increase would be perceived as twice as loud. Table 4-8 presents the subjective effect of changes in sound pressure level. The human hearing system, however, is not

equally sensitive to sound at all frequencies. Therefore, a frequency-dependent adjustment called "A-weighting" has been devised so that sound may be measured similar to the way the human hearing system responds. The A-weighted sound level is often abbreviated "dBA" or "dB(A)."

**Table 4-8 Human Hearing System Detectable Changes in Sound Levels**

| Change in Sound Level (dB) | Change in Power | | Change in Apparent Loudness |
|---|---|---|---|
| | Decrease | Increase | |
| 3 | 1/2 | 2 | Just perceptible |
| 5 | 1/3 | 3 | Clearly noticeable |
| 10 | 1/10 | 10 | Half or twice as loud |
| 20 | 1/100 | 100 | Much quieter or louder |

Source: Parsons Engineering Science

Figure 1 in Appendix F provides typical A-weighted sound levels of various noise sources and the responses people usually have to such sound levels. Another important characteristic of noise is that attenuates from the source at a reduction of 6 dBA for doubling of distance.

Land Use Criteria for Noise Exposure: Guidelines for noise compatible land use, extracted from the State of California Guidelines for the Preparation and Content of the Noise Element of the General Plan, are presented in Figure 1 in Appendix F. The guidelines provide land use compatibility with different ranges of CNEL or Ldn values, in terms of four categories of acceptability. The compatibility guidelines are based on consideration of the type of activity that would normally take place for a particular land use including the requirements of that activity for speech communication, the typical sound insulation characteristics of buildings that might be found in these areas, and additional requirements for freedom from noise intrusions that might be imposed on other activities, such as sleep. The noise exposure is such that the activities associated with the land use may be carried out with essentially no interference, e.g., for residential areas: both indoor and outdoor noise environments are pleasant.

Section 1208A of the 1998 California Building Code (Title 24, Part 2, California Code of Regulations) establishes uniform minimum noise insulation performance standards to protect persons within new hotels, motels, dormitories, apartment houses, and dwellings other than detached single-family dwellings from the effects of excessive noise.

The Environmental Noise Assessment (Appendix F) notes the following noise sources: 1) neighborhood noise sources (including radios, televisions, air conditioning equipment, animals etc.); and 2) construction activities (short-term, temporary and intermittent).

**Characteristics of Vibration**

Vibration is minute variation in pressure through structures and the earth, whereas, noise is minute variation in pressure through air. Some vibration effects can be caused by noise; e.g., the rattling of windows from truck pass-bys. This phenomenon is related to the coupling of the acoustic energy at frequencies that are close to the resonant frequency of the material being vibrated. Ground-borne vibration attenuates rapidly as distance from the source of the vibration increases. Vibration amplitude can be measured as peak particle velocity (PPV), the maximum instantaneous peak amplitude in inches

per second, or root-mean-square (RMS) velocity in inches per second or as vibration level in decibels (VdB) referenced to one micro-inch per second. The ratio between the PPV and the maximum RMS amplitude is termed the "crest factor." Typical outdoor sources of perceptible ground-borne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. Common ground-induced vibrations related to roadway traffic and construction activities pose no threat to buildings or structures. If a roadway is smooth, the ground-borne vibration from traffic is barely perceptible.

**Existing Noise Conditions**

The primary source of noise exposure to the project site is from South Myrtle Avenue, which runs north and south along the east side of the project site. The project site is also bordered by West Walnut Avenue to the north and West Chestnut Avenue to the south. These roads do not present a significant source of the noise to the project site. Other sources of noise include commercial and residential neighborhood activity but were also not observed by the study authors to be a significant source of noise.

Sensitive receivers include the apartment building to the northeast of the site, opposite S. Myrtle Avenue, and the single-family residences to the west of the site along W. Walnut Avenue. Ambient noise from S. Myrtle Avenue is approximately 65 dBA during daytime hours and 55 dBA during nighttime hours, which would likely dominate any noise levels to sensitive receivers. The single-family residence to the west is approximately 290 feet from the center of the site, 165 feet from the nearest portion of the site and 506 feet from the farthest portion of the site. These increased distances beyond 50 feet would provide approximately 10 to 20 dBA of reduction from the nearest point to the farthest point on the site, given that noise decreases by 6 dB for every doubling of distance. Therefore, construction noise would range between 61 dBA and 78 dBA throughout the construction process, depending on what equipment is being used and on what part of the site. The multi-family residential building to the northeast is approximately 400 feet from the center of the site, 220 feet from the nearest portion of the site and 570 feet from the farthest portion of the site. These increased distances beyond 50 feet would provide approximately 13 to 21 dBA of reduction from the nearest point to the farthest point on the site, given that attenuation increases by 6 dB for every doubling of distance. Therefore, construction noise would range between 60 dBA and 75 dBA throughout the construction process. depending on what equipment is being used and on what part of the site.

Long-term noise measurements were conducted at the project site from Thursday, January 25, 2018 to Saturday, January 27, 2018. A map of the locations of noise measurements may be found on page 11 in Appendix F.

- LT-1 was positioned along South Myrtle Avenue (approximately 47 feet from the centerline and 17.5 feet to the first lane of traffic) and resulted in a Community Noise Exposure Level (CNEL) of 67 dBA.
- LT-2 was positioned on the interior corner of the project site approximately 182 feet from the centerline and 157 feet to the first lane of traffic on South Myrtle Avenue and resulted in a CNEL 59 dBA.

To increase coverage of a larger proportion of the project site, short-term measurements (five minutes) were taken to obtain more precise noise data at three locations of the façade where a long-term data were not taken (Table 1 in Appendix F). The results ranged from 53.5 dBA to 65.3 dBA.

a) **Less Than Significant Impact with Mitigation Incorporated.** Table 4-9 displays significance thresholds for noise increases based on the Monrovia Municipal Code. Noise thresholds based on the Monrovia General Plan are at or below a CNEL 65 (considered "Normally Acceptable" for residential uses), while interior noise levels within a residential unit shall not exceed a CNEL 45 in any habitable room.

**Table 4-9 Significant Thresholds for Monrovia Municipal Code**

| Permitted Increase dBA | Duration of Increase Permitted (in minutes/per hour) |
|---|---|
| 5 | 15 |
| 10 | 5 |
| 15 | 1 |
| 20 | less than 1 minute |

Source: SSA Acoustics, 2018

Pursuant to the measurement results, the maximum noise exposure to the project site a would be 64 dBA CNEL, which falls within the "Normally Acceptable" and "Conditionally Acceptable" range for exterior noise levels for multi- family residential projects, based on the General Plan.

This calculated CNEL noise level accounts for 3 dB of reduction, given that the measurement of a CNEL 67 dBA was taken at a distance of 17.5 feet from South Myrtle Avenue and the actual building site is approximately 32 feet from South Myrtle Avenue. As stated previously, noise attenuates 6 dBA for doubling of distance from the noise source. For interior noise, a noise level of 64 dBA is a **potentially significant impact.**

In order for the interior noise levels for the façade residential units to achieve a CNEL 45 dBA, building materials shall provide approximately 20 dBA of noise reduction. This can be achieved with a standard wood-frame building and STC 28 windows, which will provide 25 to 30 dBA of reduction. 25 to 30 dBA of reduction generally requires that a fresh air supply system allow that the windows to the units be closed and that windows are STC rated.

**Mitigation Measure**

**MM NOI-1:** The following items shall be implemented to further reduce interior noise on for all locations of the façade in this Project (Appendix F):

- The first layer of gypsum board on the unit side of exterior walls shall be sealed at the top and bottom with acoustical sealant per ASTM Standard C919: *Standard Practice for Use of Sealants*

*in Acoustical Applications.* This includes outlet boxes and other penetrating elements within the wall.

- Window rough-in seams shall be no greater than ¼ inches. The perimeter of window and door frames shall be sealed airtight to the exterior wall construction with an acoustical sealant.
- Efforts to seal, caulk, gasket or weather-strip all joints and seams shall be made to eliminate air leakage through these assemblies. This would include around window and doorframes, at penetrations through walls, and all other openings in the building envelop.
- Windows shall be selected with offset trickle vents for air circulation through the window frame. Offset trickle vents drastically reduce sound leakage through the window assembly.
- Door seals shall be selected for exterior unit doors such as Pemko S88 Silicone compression bulb seals and Pemko door bottoms.
- Once doors are installed, the strike and latch mechanisms shall be tuned to make sure that the seals are fully compressed when the door is closed.

With implementation of MM NOI-1, impacts would be **less than significant**.

b) **Less Than Significant Impact.** Impacts from vibration would be considered significant if levels reach 0.3 in/sec PPV. Pile drivers are the only form of construction equipment that exceed 0.3 in/sec PPV at 25 feet, and this type of equipment would not be used for the proposed project. According to the environmental noise assessment (Appendix F,) vibration levels would be less than 0.2 in/sec PPV at all receptors with standard construction equipment. There is an older building adjacent to the northeast corner of the site at 801 S. Myrtle Avenue, that was originally constructed in 1918 and significantly updated in 1940. According to the noise report (Table 5), the recommended vibration limits for buildings classified as “older” or “historical” is 0.25 in/sec PPV for continuous or frequent sources of vibration. However, as stated above, vibration levels would be less than 0.2 in/sec PPV at 25 feet. Therefore, impacts would be less than significant.

c) **Less Than Significant Impact.** The significance of permanent ambient noise impacts was assessed based on two criteria. The first criterion pertains to changes in noise levels from project generated noise (traffic and operational sources), and changes above 3 dBA would represent a significant impact. The second criterion is based on total noise level. For this second criterion, the Municipal Code states that noise to the residential receiving properties should not exceed 55 dBA during the day and 50 dBA during the night, or exceed the ambient noise environment.

**Project-Generated Traffic Noise**

The Traffic Impact Analysis (discussed in section 4.16) was used to assess changes in traffic-related noise associated with the proposed project. In general, it takes a doubling of traffic volume to create a 3 dBA increase in noise levels. Traffic volumes are estimated to increase by only 3% during peak AM hours and 4% during peak PM hours. Therefore, traffic noise levels are estimated to increase by 0-1 dBA CNEL, and this increase in noise would be a less than significant impact.

*Operational Noise*

The environmental noise assessment (Appendix F) evaluated operational noise impacts on the following locations depicted in Table 4-10.

**Table 4-10 Estimated Noise Levels at Project Facilities**

| Location | Estimated Noise Levels |
|---|---|
| Courtyard 1 with pool | 65-75 dBA at 25 feet |
| Courtyard 2 | 65 dBA[1] |
| Amenity Spaces | 65 dBA[1] |
| Retail Spaces | 65 dBA[1] |
| Parking Garage | 45 dBA[2] |

1-noise levels estimated based on measured ambient noise at location ST-2 on S. Myrtle Avenue
2-noise levels based on parking garage surveys at locations with traffic levels similar to Project

Noise levels in all these spaces would be below the above referenced thresholds relative to the nearest sensitive receptors (e.g., residences within the project) and therefore would be less than significant.

Noise impacts associated with HVAC equipment were also estimated. It was determined that the HVAC equipment, which would be roof mounted, would operate within what is required by the Municipal Code (see Appendix F). Given the distance of the residential receivers from the proposed building, standard HVAC equipment would produce noise levels within these limits. Typically, rooftop equipment for low-rise apartment projects does not exceed a sound power level of 90 dBA. Based on the distance of the sensitive residential properties, this level will be reduced to less than 50 dBA at these properties. Ambient noise at the northeast residential receiver is 65 dBA during daytime hours and 55 dBA during nighttime hours, which will likely dominate any equipment noise. Ambient noise at the northwest residential receiver is 56 dBA during daytime hours and approximately 48 dBA during nighttime hours, which will not likely be increased by HVAC noise. Therefore, standard HVAC equipment noise would have a less than significant impact.

d) **Less Than Significant Impact with Mitigation Incorporated.** Construction noise would be considered significant if there would be increases that exceed standards set forth in the City's Noise Ordinance, which may be found on page 13 in Appendix F. According to the environmental noise assessment (Appendix F), construction noise is expected to range from 81 and 88 dBA on an hourly average during construction activity at a distance of 50 feet (see Table 3 in Appendix F) from the source of construction noise. The nearest sensitive receptors to construction activity are residential buildings to the northeast 400 feet from the center of the project site) and 290 feet west of the center of the project site. In both cases, noise levels would exceed the City's standard of no more than a 5 dBA increase for temporary noise sources and would result in **potentially significant impacts**.

The applicant/developer would be required to comply with the Noise Ordinance for mitigating construction noise and other practices designed to mitigate construction noise as follows. A barrier would provide as much as 5 dB of noise reduction where it blocks the line-of-site between the source and receiver. Noise attenuation from barrier varies drastically depending on the location of the source and receiver in relation to the barrier. The barrier would be most effective during demolition and initial site work. It would be less effective at reducing noise during framing of the upper floors of the building;

however, it would reduce noise from ground level equipment throughout the duration of the project (see Figure 4 in Appendix F).

**MM NOI-2:** Prior to the start of construction, the applicant/developer shall install an eight-foot-tall noise barrier along the project site boundary to reduce line-of-sight noise to sensitive receivers adjacent to the site. The noise barrier shall consist of the following:

- A continuous barrier of 3/4" plywood or a continuous mass having a weight of 2 lbs./sq. ft. or more.
- All joints in the barrier shall be sealed with acoustical sealant to create a continuous barrier without sound leaks.
- All vertical seams shall be overlapped and screwed tight together to create a continuous barrier.
- Soil shall be mounded at the base of the sound barrier to fill in larger spaces to attenuate noise.
- The barriers shall remain in place for the duration of time that construction activity utilizes heavy equipment such as earth moving equipment, demolition equipment, heavy trucks, generators, or other potentially loud construction equipment.
- Soil shall be piled a minimum of 3" high above the base of the barrier, or higher as required to ensure that air gaps are sealed.

These requirements can be adjusted by the City to meet the same ends.

With implementation of MM NOI-2 construction related noise impacts would be reduced to **less than significant levels.**

e,f) **No Impact.** The project site is not located within two miles of a public airport or public use airport, nor is it within the vicinity of a private airstrip. Refer also to Section 4.8 e-f). Therefore, there would be no impact.

## *4.13 – Population and Housing*

Would the project:

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a) Induce substantial 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)? | ☐ | ☐ | ☑ | ☐ |
| b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere? | ☐ | ☐ | ☐ | ☑ |
| c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere? | ☐ | ☐ | ☐ | ☑ |

a) **Less Than Significant Impact.** Residential uses are included in the project; therefore, this project would result in direct residential growth. According to the U.S. Census Bureau, the estimated 2016 population of Monrovia was 37,126.[28] The 2016 Regional Transportation Plan (RTP) growth projections were developed by the Southern California Association of Governments (SCAG) utilizing a comprehensive analysis of fertility, mortality, migration, labor force, housing units, and local policies such as land use plans. According to SCAG[29], the population of Monrovia is anticipated to grow to 40,300 by 2035, while Los Angeles County as a whole is anticipated to add approximately one million residents over the same time frame. However, the City's Land Use and Circulation Element EIR[30] notes that the population of the City will increase substantially more (58,805 in 2030) in large part due to medium- and high-density residential and mixed-use developments.

According to the U.S. Census Bureau, the average persons per bedroom in Monrovia is 1.536. Given this, the proposed residential component of the Project is anticipated to accommodate an estimated 427 residents (1 Bedroom: 54 (54 x 1 x 1.536 = 83) + 2 Bedrooms: 76 (76 x 2 x 1.536 = 233) + 3 Bedrooms: 24 (24 x 3 x 1.536 = 111) = 427 residents). This level of growth is within the growth forecasts developed for the RTP and well within the projection shown in the City's Land Use and Circulation Element EIR. Additionally, it is likely the population increase may be less than 427, as some of the residents of the new development may already live in Monrovia. Furthermore, the project does not include any major infrastructure extension or expansion and therefore would not result in any indirect population growth.

There will be a short-term increase in construction jobs during project construction. It is anticipated that workers will be employed locally and live in nearby towns. This impact would be less than significant and short term.

After the proposed project is built, it is anticipated that four full-time employees would manage the facility on site (one community manager, one leasing agent, one maintenance manager, and one maintenance technician). According to the SCAG 2016 RTP, employment in the City is projected to increase by 3,600 jobs between 2012 and 2040. These four new jobs represent less than one percent of projected local jobs growth.

The proposed project is located within the Old Town Extension District, designated in the Housing Element as "Residential Growth Area," with a realistic capacity to accommodate 761 residential units available to low- to very-low income households (all capacity in this district is identified for these income categories based on allowable density of 40+ units per acre). The Avalon Monrovia Specific Plan's addition of 154 multi-family units, including 13 very-low-income units, and 3,500 square feet of ground-floor retail implements the Housing Element requirements and objectives. The 13 dwelling units to be set aside as very-low-income housing would be deed restricted to be available for 55 or more years to very-low-income-qualified households consistent with State Density Bonus Law. The ground-floor retail operation could generate additional population from new customers who visit the project site. However, given that the space is less than 3,000 square feet and is expected to be very local serving in orientation, no direct population increases would be expected.

As a result, impacts on population growth from employment and residential population growth, and the presence of retail businesses would be less than significant.

b-c) **No Impact.** Currently, no existing structures at the project site include residential uses; the buildings to be demolished are commercial. Displacement, in the context of housing, can generally be defined as persons or groups of persons who have been forced or obliged to leave their homes or places of habitual residence.[31] Therefore, there would be no impacts regarding housing displacement.

## *4.14 – Public Services*

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically 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:

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a) Fire protection? | ☐ | ☐ | ☑ | ☐ |
| b) Police protection? | ☐ | ☐ | ☑ | ☐ |
| c) Schools? | ☐ | ☐ | ☑ | ☐ |
| d) Parks? | ☐ | ☐ | ☑ | ☐ |
| e) Other public facilities? | ☐ | ☐ | ☑ | ☐ |

a, b) **Less Than Significant Impact.** Monrovia Fire and Rescue is the primary provider of fire protection in the City, although mutual aid agreements exist with the City of Arcadia and the Los Angeles County Fire Department. There are two fire stations in the City: Fire Station 101 located at 141 East Lemon Avenue, approximately four blocks south (approximately 0.4 miles) of the project site, and Fire Station 102 is approximately 1.1 miles to the south of the project site. The proximity of Fire Station 101 to the proposed project ensures response times will be less than five minutes. Given the proximity of the fire stations to the project site, the proposed project would not require the construction of new or physical alteration of existing structures that could result in environmental impacts.

The Monrovia Police Department provides police services to the project site from its headquarters building at 140 East Lime Avenue (approximately five blocks or 0.4 miles north of the project site). Based on information provided by the City's Police Department, the average response time is approximately four minutes. All calls for service to the proposed project would be handled from this Police facility. The project applicant would contribute fees to establish a Community Facilities District to offset any increased demand for police services. The project would not cause the construction of new police service facilities or require physical alteration of the existing structures that could result in environmental impacts. Therefore, impacts would be less than significant.

Additionally, the proposed project must comply with the General Plan Safety Element policies related to police and fire protection. These polices, identified in Table 4-11, help ensure that the increase in

population does impact on fire services to the degree that new or expanded existing facilities would be required.

**Table 4-11**
**General Plan Safety Element Fire Protection Policies**

| Policy Number | Subject |
|---|---|
| 3.1.3 | Construction of fire retardant external features, (e.g., steps, balconies, decks) |
| 3.14 | Requirement to box eaves with stucco |
| 3.1.5 | Requirement to construct non-flammable roofs |
| 3.2.3 | Sparks arrestors in chimneys |
| 3.2.6/3.3.2 | Prohibition on fireworks/ burning of flammable materials |

As a result, the Project would result in less than significant impacts on fire and police services and facilities.

c) **Less Than Significant Impact.** The project site is served by the Monrovia Unified School District; the district operates one pre-school, five elementary schools, two middles schools, one traditional high school, and one alternative high school. According to the Monrovia Unified School District (MUSD) service maps, the project site would be served by Monroe Elementary School, Santa Fe Middle School, and Monrovia High School. Their enrollments (five-year average [2012-2017] and 2016-2017 academic year) and current capacity are summarized in Table 4-12. The enrollment at Monroe Elementary was higher in 2016-2017 compared to the other years, while the 2016-2017 data for the middle school and high school were lower than the average.

**Table 4-12**
**School Capacity and Enrollment**

| School | Capacity | Enrollment (5-year average) | Enrollment 2016-2017 |
|---|---|---|---|
| Monroe Elementary School | 648 | 584 | 628 |
| Santa Fe Middle School | 808 | 623 | 573 |
| Monrovia High School | 1,883 | 1736 | 1,687 |

Source: Monrovia Unified School District

The proposed project would result in incremental population growth, including school-age children who would attend MUSD schools. The proposed project is estimated to house 427 residents. The U.S. Census Bureau Community Survey estimates that 16.4% of the population of Monrovia is between the ages of five and 19 (roughly the ages of K-12 population). Using this as an assumption, the Project would have an estimated 83 youth in the K-12 age range. It should be noted that some parents or guardians may send their children to private schools. Regardless, the estimate of 83 K-12 aged students (or roughly 6.4 students per grade) was used to assess the impact on the school district. This would result in eight students at the K-5 Monroe Elementary, 19 students at the grades 6-8 Santa Fe Middle School, and 26 students at the four-year Monrovia High School. Using the five-year average, all three schools have capacity for the new students. The data suggest, considering the 2016-2017 student

enrollment, the proposed project could cause an exceedance of capacity at Monroe Elementary School. It is also possible this exceedance would be temporary, as enrollments do fluctuate. Also, the City's Land Use and Circulation Element EIR acknowledges that the new development in the City, as covered under the General Plan, will increase demand on school facilities. The EIR notes that the payment of development fees would offset the costs incurred by MUSD associated with providing facilities for the additional students. The EIR also notes that environmental impacts associated with the construction and operation of potential new or expanded school facilities would be evaluated by MUSD during planning. In accordance with California Government Code and the MUSD, the applicant/developer would have to pay standard school facility impact fees (currently $1.84 per residential square foot [32]) to offset any incremental impacts of the proposed project on existing school facilities. According to AB 2926, payment of developer fees constitutes adequate mitigation for any project-related impacts to school facilities. Impacts to the school facilities would be less than significant.

d) **Less than Significant Impact.** The proposed project includes residential dwelling units that would result in population growth that would incrementally increase demand on local and regional recreation facilities. The City operates seven parks and recreational facilities (see section 4.15 Recreation for list of facilities) totaling approximately 113 acres, and the City's population was 37,463 residents according to the City's 2018 Park Master Plan. The City also owns and manages the Hillside Wilderness, totaling over 1,416 acres of conserved natural area. Additionally, parks managed by Los Angeles County are in adjacent communities (see Recreation – section 4.15), and the over 650,000-acre Angeles National Forest provides outdoor recreation opportunities adjacent to Monrovia. These facilities provide a variety of recreational opportunities for existing residents and new residents. Additionally, the proposed project includes private recreational amenities for residents, somewhat reducing demand on existing public recreational facilities.

The need for parks and recreational facilities to serve the proposed project are further offset by use agreements between the City and local schools that provide additional, after school recreation opportunities. Given the existing and future planned local recreational facilities, along with new recreational facilities provided by the proposed project, the project is not anticipated to cause the construction of new recreational facilities (or physically alter existing) structures that could result in environmental impacts. Impacts would be less than significant.

e) **Less than Significant Impact.** The proposed project would result in population growth that would incrementally affect other public services such as libraries. The Monrovia Public Library is located at 321 South Myrtle Avenue. According to the General Plan Land Use and Circulation Element EIR, the anticipated growth of the City would impact library services. In response, the City rebuilt its library to serve a growing population and evolving service needs. The proposed project would not result in the construction of new library service facilities (or physically alter existing) structures that could result in environmental impacts. Impacts would be less than significant.

## *4.15 – Recreation*

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporation | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a) 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? | ☐ | ☐ | ☑ | ☐ |
| 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? | ☐ | ☐ | ☐ | ☑ |

a) **Less Than Significant Impact.** The proposed project includes residential units that would result in increased population growth, with the new residents incrementally increasing use of public recreation facilities. According to the Population and Housing section (section 4.13), the project is projected to increase the population of the City by 427 residents. While the proposed project includes several on-site recreational amenities (including a fitness area, clubhouse, and private open spaces), residents can be anticipated to use local and regional park facilities.

The City has nine public parks as follows:

- Monrovia Canyon Park (80 acres)
- Kiwanis (Grand Avenue) Park (3.5 acres)
- Julian Fisher Park (1.2 acres)
- Lucinda Garcia Park (1.7 acres)
- Recreation Park (18.9 acres)
- Monrovia Library Park (4.6 acres)
- Rotary Park (0.9 acres)
- Station Square Park (1.7 acres)
- Evergreen Plaza (0.8 acres)

The City also owns and manages the Hillside Wilderness, totaling over 1,416 acres of conserved natural area. Los Angeles County Parks maintains regional recreational facilities in adjacent communities, including Arcadia Community Regional Park, the Arboretum and Botanical Garden in Arcadia, and Pamela County Park in Duarte. Also, Monrovia is adjacent to the Angeles National Forest, which provides thousands of acres of outdoor recreation opportunities. The private open space and amenities provided by the Project would reduce the need for use of off-site recreational facilities; however, it is anticipated that a minor increase in the use of off-site recreational facilities by residents of the project would occur. Additionally, the City's draft Park Master Plan, although generally not providing specific locations, discusses future potential park acquisitions to provide parks in neighborhoods currently

underserved. Seven areas in the City are identified, ranging from 0.5-1.0 acres in size; the plan also identifies a potential new recreational facility as the Peck Lake Wetlands Project. The draft master plan discusses partnering with MUSD to improve school facilities to also meet local recreational needs. The City does not collect park impact fees to fund new parkland acquisition or existing park maintenance.

In 2016, Los Angeles County conducted a park needs assessment for communities within the County. Communities were ranked from "very high" park needs to "very low". The criteria were based on five factors: (1) park acreage per 1,000 people, (2) percentage of population within ½ mile of a park, (3) accounting for population density around parks, (4) amenities available at the parks, and (5) park condition. Monrovia was classified as "low park need." It should be noted that the assessment did not consider Monrovia Canyon Park or the Hillside Wilderness. The project would increase the population incrementally but would not change the level of park need as measured in the above referenced needs assessment. This is especially true given the City's goals to add parklands and the availability of natural resource recreation along the urban-wildland interface.

Although there is likely to be an increase in park use, the project would not increase the use such that substantial physical deterioration of the facility would occur or be accelerated. Property taxes generated by the proposed project would in part go into the City's General Fund and incrementally help finance park maintenance. Also, the applicant/developer has committed to form a Community Facilities District, as set forth in the Specific Plan, to provide long-term funding of many community services, including park maintenance. These proposed project features would reduce impacts to a less than significant level.

b) **No Impact.** The proposed project includes on-site recreational amenities, including a gym. The project does not include off-site recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. As such, there would be no impact.

## *4.16 – Transportation and Traffic*

Would the project:

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, considering all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit? | □ | □ | ☑ | □ |
| b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways? | □ | □ | ☑ | □ |
| c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks? | □ | □ | □ | ☑ |
| d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? | □ | □ | ☑ | □ |
| e) Result in inadequate emergency access? | □ | □ | ☑ | □ |
| f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities? | □ | □ | □ | ☑ |

a) **Less than Significant Impact.** Construction of the proposed project could reduce the performance of the circulation system if a project-related increase in vehicle trips or any proposed improvements decrease the Level of Service (LOS) on existing streets. In addition, impacts could occur if proposed

project improvements reduce the performance of any mode of transportation including mass transit and non-motorized travel.

A traffic impact assessment (TIA) was completed by LSA (March 2018); the report identifies potential traffic impacts that could result from the project. This section summarizes the detailed discussion and calculations contained in TIA (Appendix G). Cumulative traffic impacts are also addressed in this section and section 4.16 – Mandatory Findings of Significance.

The TIA evaluated potential project-related traffic impacts at 10 intersections in the vicinity of the project site as follows:

- Interstate-210 (I-210) eastbound ramps/Huntington Drive (signalized)
- I-210 westbound ramps/Huntington Drive (signalized)
- Myrtle Avenue/Foothill Boulevard (signalized)
- Myrtle Avenue/Chestnut Avenue (signalized)
- Myrtle Avenue/Huntington Drive (signalized)
- Myrtle Avenue/Central Avenue and I-210 westbound ramps (signalized)
- Myrtle Avenue/Evergreen Avenue and I-210 eastbound ramps (signalized)
- Mountain Avenue/Huntington Drive (signalized)
- Proposed Western Project Driveway/Chestnut Avenue (unsignalized)
- Proposed Eastern Project Driveway/Chestnut Avenue (unsignalized)

LOS is divided into six categories, LOS A through F, with LOS A representing the best operating condition and LOS F indicative of a high level of congestion. Per the General Plan Circulation Element, the City considers an intersection unsatisfactory when it exceeds a volume-to-capacity ratio of 0.90 (LOS E). The exception would be at an intersection where LOS E and LOS F already exist. LOS D represents a condition with some congestion but acceptable per City standards.

During the AM peak hour, all studied intersections operate at LOS C or better, except for the intersection of Mountain Avenue and Huntington Drive (operates at LOS D). In the PM peak hour, all studied intersections operate at LOS C or better except for the Myrtle Avenue/Central Avenue intersection and the I-210 westbound and eastbound ramps. Additionally, the intersection of Myrtle Avenue/Evergreen Avenue operates at LOS D, and the intersection of Mountain Avenue/Huntington Drive operates at LOS E.

The TIA assessed how the eight roadway intersections would be impacted under the project (Table 4-13). The assessment considered net new traffic added to the roadway system, meaning the trips associated with the proposed project's less the trips now associated by the existing office uses that would be eliminated. The proposed western and eastern project driveways were evaluated separately (see Table H in Appendix G).

Nine of the 10 study intersections would not experience a change in LOS. The one intersection that would change under the existing plus Project Scenario would be I-210 westbound ramps/Huntington Drive, which would change from LOS A to LOS B during the PM peak period.

Additional analyses presented in the TIA are summarized as follows:

- The effect that the project would have on the four Caltrans jurisdiction ramp intersections was assessed, and no change in LOS would occur as a result of net new trips (Table F in Appendix G).

- Both the western and eastern project driveways were evaluated as a part of an access analysis, and it was concluded that the LOS of the driveways would stay at LOS B (Table H in Appendix G).

- A project site distance analysis was completed on the Chestnut Avenue driveway, and no site obstructions were identified.

- A queuing analysis was completed to determine if eastbound Chestnut Avenue traffic could be accommodated on left-turn entry into the project without creating excessive queues. It was determined that Project vehicles would not impact eastbound traffic on Chestnut Avenue (Table I in Appendix G).

The project includes proposed public right-of-way reconfiguration and improvements on Myrtle Avenue that would allow for additional on-street parking and realignment of the sidewalk to provide for smooth pedestrian movement. While pedestrian travel may be slightly disrupted during project construction, City requirements for a construction management plan would provide for safe pedestrian diversion. Once constructed, the project would provide City-standard sidewalks.

There are 10 bus stops within 0.5 miles of the project site. None of these occur along the streets fronting the project; thus, bus stops and mass transit circulation would not be impacted by the project.

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**Table 4-13**
**Existing and Existing Plus Project LOS Summary**

| Intersection | Existing | | | | Existing Plus Project | | | | Peak-Hour Change in ICU | | Significant Impact? |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | AM Peak Hour | | PM Peak Hour | | AM Peak Hour | | PM Peak Hour | | | | |
| | ICU | LOS | ICU | LOS | ICU | LOS | ICU | LOS | AM | PM | |
| Interstate-210 (I-210) eastbound ramps/Huntington Drive | 0.693 | B | 0.553 | A | 0.693 | B | 0.558 | A | 0.000 | 0.005 | No |
| I-210 westbound ramps/Huntington Drive | 0.616 | B | 0.599 | A | 0.617 | B | 0.602 | B | 0.001 | 0.003 | No |
| Myrtle Avenue/Foothill Boulevard | 0.729 | C | 0.761 | C | 0.730 | C | 0.761 | C | 0.001 | 0.000 | No |
| Myrtle Avenue/Chestnut Avenue | 0.431 | A | 0.507 | A | 0.434 | A | 0.526 | A | 0.003 | 0.019 | No |
| Myrtle Avenue/Huntington Drive | 0.746 | C | 0.746 | C | 0.747 | C | 0.747 | C | 0.001 | 0.001 | No |
| Myrtle Avenue/Central Avenue and I-210 westbound ramps | 0.763 | C | 0.864 | D | 0.768 | C | 0.865 | D | 0.005 | 0.001 | No |
| Myrtle Avenue/Evergreen Avenue and I-210 eastbound ramps | 0.662 | B | 0.823 | D | 0.667 | B | 0.825 | D | 0.005 | 0.002 | No |
| Mountain Avenue/Huntington Drive | 0.853 | D | 0.957 | E | 0.853 | D | 0.957 | E | 0.000 | 0.000 | No |

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**Cumulative (2020) Conditions**

The TIA assumed the proposed project would be completed in 2020 and used this year to complete the cumulative impact analysis. To present a cumulative traffic condition, a regional ambient growth rate was determined and traffic volumes for the cumulative projects in the vicinity were developed and added to the existing traffic counts. To reflect regional growth in the study area, a growth rate of 0.45 percent per year (total of 1.35 percent) was added to the existing traffic volumes. A list of cumulative projects was provided by the City of Monrovia Planning Division. Significant projects located near the proposed project were analyzed as cumulative projects. The cumulative projects' trip generation rates are shown in Table E of Appendix G. The following projects were considered as a part of the cumulative impact assessment:

- Towneplace Suites by Marriot Hotel (102-140 West Huntington Drive)
- 725 Huntington Drive Commercial Center
- 530 Fano Street (New 12-unit multifamily development)
- 1218 South 5th Avenue (a nonresidential façade remodel and equipment upgrade)
- MODA Residential Development (new 261-unit multifamily development)
- 1110 - 1212 Fifth Avenue Residential Development
- The Lumber Yard (137 West Pomona Avenue) - An Artisan Food Village
- 239 West Chestnut Avenue (10-unit industrial condominiums)
- 303 South Madison Avenue (6-detached two-story residential units)
- 717-721 West Duarte Road (11-unit residential condominium)
- 1601 Myrtle Avenue (103-unit Residential Development with public parking structure)
- Northeast Corner of Magnolia Avenue and Duarte Road (296-unit residential development)
- 1625 South Magnolia Avenue Residential Development (392 units)
- 825 South Myrtle Avenue (154 residential units)
- 239 West Huntington Drive (Starbucks with drive-through)
- Corner of Myrtle and Lime Residential Development (140 units)

The cumulative impact assessment compared the intersections under study first without the proposed project and then with the proposed Project. The cumulative analysis of future conditions absent the project identified three intersections with LOS D in the AM peak hours and four intersections in the PM peak hours with LOS D or E ratings (Table 4.14). Adding project trips to the future condition would not change any of the LOS ratings for any of the eight intersections. The table indicates that the proposed project would not cause any study intersection to operate at LOS E or F, the City's criteria for poor operating conditions. Therefore, the Project's contribution to cumulative traffic impacts would be less than significant.

*Cumulative Traffic Noise*

The Traffic Impact Analysis was also used to assess changes in cumulative traffic noise. Based on the predicted increase in traffic volume under cumulative conditions, the cumulative noise plus project generated noise is estimated to be a 0-1 dBA increase. Therefore, this would result in a less than significant impact.

Overall, the proposed project would have less than significant impacts to the circulation system since the project-related increase in vehicle trips would not decrease the LOS at the study intersections to LOS E or F.

b) **Less than Significant Impact.** The Congestion Management Program (CMP) is a State-mandated program that was enacted by the State Legislature with the passage of Proposition 111 in 1990. The program is intended to address the impact of local growth on the regional transportation system. As outlined in the 2010 CMP for Los Angeles County, a review has been prepared to determine if a formal TIA would be required to determine the potential impacts on designated monitoring locations on the CMP highway system. The review has been prepared in accordance with procedures outlined in the *2010 Congestion Management Program*, County of Los Angeles Metropolitan Transportation Authority, October 2010.

**Intersections.** There are no CMP intersection monitoring locations within the City of Monrovia. The nearest CMP intersection monitoring location is the Rosemead Boulevard/Huntington Drive intersection, located approximately five miles west of the project site in an unincorporated area of Los Angeles County. The CMP TIA guidelines require that intersection monitoring locations must be examined if the proposed project will add 50 or more trips during either the weekday AM or PM peak hours. Based on trip distribution calculations explained in the TIA, the proposed project would not add 50 or more trips during the AM or PM peak hours at any CMP monitoring intersections. Therefore, no further review of potential impacts to intersection monitoring locations that are part of the CMP highway system is required.

The proposed project would not, therefore, conflict with an applicable congestion management program or level of service standard established by the congestion management agency. Impact would be less than significant.

**Table 4-14**
**Cumulative and Cumulative Plus Project LOS Summary**

| Intersection | Cumulative Future | | | | Cumulative Future Plus Project | | | | Peak-Hour Change in ICU | | Significant Impact? |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | AM Peak Hour | | PM Peak Hour | | AM Peak Hour | | PM Peak Hour | | | | |
| | ICU | LOS | ICU | LOS | ICU | LOS | ICU | LOS | AM | PM | |
| Interstate-210 (I-210) eastbound ramps/Huntington Drive | 0.713 | C | 0.584 | A | 0.713 | C | 0.589 | A | 0.000 | 0.005 | No |
| I-210 westbound ramps/Huntington Drive | 0.641 | B | 0.648 | B | 0.642 | B | 0.650 | B | 0.001 | 0.002 | No |
| Myrtle Avenue/Foothill Boulevard | 0.748 | C | 0.780 | C | 0.748 | C | 0.780 | C | 0.000 | 0.000 | No |
| Myrtle Avenue/Chestnut Avenue | 0.469 | A | 0.544 | A | 0.472 | A | 0.562 | A | 0.003 | 0.018 | No |
| Myrtle Avenue/Huntington Drive | 0.828 | D | 0.817 | D | 0.834 | D | 0.818 | D | 0.006 | 0.001 | No |
| Myrtle Avenue/Central Avenue and I-210 westbound ramps | 0.872 | D | 0.946 | E | 0.876 | D | 0.947 | E | 0.004 | 0.001 | No |
| Myrtle Avenue/Evergreen Avenue and I-210 eastbound ramps | 0.756 | C | 0,900 | E | 0.761 | C | 0,902 | E | 0.004 | 0.001 | No |
| Mountain Avenue/Huntington Drive | 0.880 | D | 0.985 | E | 0.880 | D | 0.985 | E | 0.000 | 0.000 | No |

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**Transit.** As required by the *2010 Congestion Management Program*, a review has been made of the CMP transit service. Transit service is provided in the project vicinity. The Project trip generation was adjusted by values set forth in the CMP (i.e., person trips equal 1.4 times vehicle trips and transit trips equal 3.5 percent of the total person trips) to estimate transit trip generation. Pursuant to the CMP guidelines, the project is forecast to generate demand for four new transit trips during the weekday AM peak hour. During the weekday PM peak hour, the project is anticipated to generate demand for four new transit trips. Over a 24-hour period, the project is forecast to generate demand for 35 daily transit trips. The calculations are as follows:

- AM Peak Hour = 58 × 1.4 × 0.035 = 3 Transit Trips
- PM Peak Hour = 83 × 1.4 × 0.035 = 4 Transit Trips
- Daily Trips = 721 × 1.4 × 0.035 = 35 Transit Trips

Foothill Transit bus stops are provided at the intersections of South Primrose and Walnut Avenue (Line 270) and Huntington Drive and Myrtle Avenue West (Lines 187 and 270). Overall, 10 bus stops occur within 0.5 miles of the project site. Line 187 runs every 15 or 20 minutes (in each direction) during most of the day and every half hour before 6:25 AM and after 9:30 PM. Line 270, running from El Monte to Monrovia, runs once or twice per hour (in each direction) from 5:00 AM until 9:00 PM. Therefore, based on the above calculated AM and PM peak-hour transit trips, this would correspond to an average of less than one new transit rider per bus due to the proposed project and one new transit rider per bus during these respective peak periods. The Monrovia Gold Line Station is approximately 0.75 miles from the proposed project and is linked by sidewalks and crosswalks. It is anticipated that the existing transit service in the project site would adequately accommodate the project generated transit trips because the number of trips generated by the project is small compared to the number of buses serving the project site. Thus, given the low number of generated transit trips per bus, no impacts on existing or future transit services that serve the project site are expected to occur as a result of the proposed project.

c) **No Impact.** There are no public airports or private airstrips within two miles of the project site. The nearest major commercial airports are Hollywood Burbank Airport (formerly Bob Hope) at approximately 21 miles and Ontario International Airport located approximately 23 miles to the east. The San Gabriel Valley Airport (formerly El Monte Airport) is a single runway general aviation airport located approximately 4.5 miles southwest of the project site. A significant impact would occur if the proposed project caused a change in air traffic patterns that would result in a substantial safety risk. The project site is not located within an airport land use plan and does not include any structures that would change air traffic patterns or uses that would generate air traffic. Therefore, no impacts related to a change in air traffic patterns would occur.

d) **Less Than Significant Impact.** A significant impact would occur if the proposed project substantially increased an existing hazardous design feature or introduced incompatible uses to the existing traffic pattern. Access to the project site is proposed by a full access driveway on Chestnut Avenue. The design of the proposed project would comply with all applicable City regulations, including line-of-sight triangles and distances. The sight distance analysis conducted for both driveways (see Appendix G)

concluded that the sight distance was greater than the required 275 feet and no obstructions were observed. Thus, the proposed project would result in a less than significant impact regarding traffic safety hazards.

e) **Less Than Significant Impact.** A significant impact would occur if the design of the proposed project would not satisfy emergency access requirements of the City of Monrovia Fire Department or in any other way threaten the ability of emergency vehicles to access and serve the project site or adjacent uses. The proposed project would not result in inadequate emergency access since all access features are subject to and must satisfy the City of Monrovia design requirements, including the Fire Department's requirements. Thus, the proposed project would result in less than significant impacts regarding emergency access.

f) **No Impact.** The proposed project would not result in changes to lane configuration of surrounding roads and therefore would not conflict with public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities. The proposed project incorporates design features to improve pedestrian access in the form of improved sidewalks along Myrtle Avenue. Also, the northwestern corner of the Myrtle Avenue/Chestnut Avenue intersection would be extended creating a choker at the intersection, thus, protecting pedestrians. There would be no conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of these facilities; no impact would result.

## *4.17 – Tribal Cultural Resources*

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 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 Cultural Native American tribe, and that is:

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a) 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 Section 5020.1(k), or | ☐ | ☑ | ☐ | ☐ |
| b) 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 Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. | ☐ | ☑ | ☐ | ☐ |

(a - b) **Less than Significant Impact with Mitigation Incorporated.** Assembly Bill (AB) 52 specifies that a project that may cause a substantial adverse change to a defined Tribal Cultural Resource (TCR) may result in a significant effect on the environment. AB 52 requires tribes interested in development projects within a traditionally and culturally affiliated geographic area to notify a lead agency of such interest and to request notification of future projects subject to CEQA prior to determining if a negative declaration, mitigated negative declaration, or environmental impact report is required for a project. The lead agency is then required to notify the tribe within 14 days of deeming a development application subject to CEQA complete to notify the requesting tribe as an invitation to consult on the project. AB 52 identifies examples of mitigation measures that will avoid or minimize impacts to TCR. The bill makes the above provisions applicable to projects that have a notice of preparation or a notice of intent to adopt a negative declaration/mitigated negative declaration circulated on or after July 1, 2015. AB 52 amends sections 5097.94 and adds sections 21073, 21074, 2108.3.1., 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3 to the California Public Resources Code (PRC), relating to Native Americans.

The results of the records research compiled from the CHRIS-SCCIC and the Scared Lands File Search (commissioned through the NAHC) failed to indicate known TCR within the Project boundaries or within a one-half mile radius of the project Site, as specified in Public Resources Code (PRC): 210741, 5020.1(k), or 5024. [33] [34] Despite the heavy disturbances of the project site that may have displaced or

submerged archaeological resources relating to TCRs on the surface it is possible that intact tribal cultural resources exist at depth. Due to this uncertainty, Mitigation Measures CUL-1 through CUL-4 in section 4.5 (Cultural Resources), above, are included to address any previously undiscovered archaeological resources relating to TCRs encountered during Project implementation.

Although there was no indication of TCRs at the project site and the research and surveys conducted by MIG qualified archaeologists were negative for known or anticipated TCRs, AB 52 (Gatto, 2014) is clear in stating that it is the responsibility of the public agency (e.g., lead agency) to consult with Native American tribes early in the CEQA process to allow tribal governments, lead agencies, and Project proponents to discuss the appropriate level of environment review, identify and address potential adverse impacts to TCRs, and reduce the potential for delay and conflict in the environmental review process (see PRC section 2108.3.2). Specifically, government-to-government consultation may provide "tribal knowledge" of the project site that can be used in identifying TCRs that cannot be obtained through other investigative means. Impacts would be less than significant with the implementation of mitigation measures.

## *4.18 – Utilities and Service Systems*

Would the project:

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporation | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board? | ☐ | ☐ | ☑ | ☐ |
| b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? | ☐ | ☐ | ☑ | ☐ |
| c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? | ☐ | ☐ | ☑ | ☐ |
| d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed? | ☐ | ☐ | ☑ | ☐ |
| e) 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? | ☐ | ☐ | ☑ | ☐ |
| f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs? | ☐ | ☐ | ☑ | ☐ |
| g) Comply with federal, state, and local statutes and regulations related to solid waste? | ☐ | ☐ | ☐ | ☑ |

a, e) **Less Than Significant Impact.** Wastewater discharges from the project will be treated by the Sanitation Districts of Los Angeles County (LACSD) at the San Jose Creek Reclamation Plant (near Whittier) and the Whittier Narrows Reclamation Plant (in El Monte). Both plants are part of the District's extensive Joint Outflow System which has a combined capacity of nearly 600 million gallons per day (MGD)[35]. The San Jose Creek Water Reclamation Plant is designed for primary, secondary, and tertiary treatment for up to 100 MGD of wastewater and serves a population of approximately one

million people; the plant treated 77 MGD in 2010.[36] The Whittier Narrows Reclamation Plant is designed for treatment of up to 15 million MGD of wastewater and serves a population of approximately 150,000 people; the plant treated seven MGD in 2010.[37]

Wastewater discharge requirements (WDR) are issued by the Los Angeles Regional Water Quality Control Board (RWQCB) with the latest WDRs effective as of April 17, 2015 for the San Jose Creek Water Reclamation Plant (R4-2015-0070) and November 6, 2014 for the Whittier Narrows Reclamation Plant (R4-2014-0213-A01). The WDRs establish standard Clean Water Act (CWA) effluent limitations and individual limitations on biochemical oxygen demand, total suspended solids, oil and grease, settleable solids, and turbidity. The proposed project would result in wastewater discharges consisting of black water from restrooms and gray water from residential kitchens and showers. These are common wastewater discharges and would not require special processing at the treatment plants.

David Evans and Associates (Appendix H) completed a sewer capacity analysis for the project. The study estimated 38,000 gpd of wastewater generated by the residential development and 1,813 gpd as a result of the retail. It is estimated that the existing buildings generate 17,680 gpd. This would not cause the treatment plants to exceed the treatment capacity of 100 MGD and 15 MGD for the plants as specified in the WDRs, considering this is less than one percent of either facilities design flow. This is consistent with the General Plan Land Use and Circulation Elements EIR that projects a population of 58,805 in 2030. Impacts would be less than significant.

b) **Less than Significant Impact.** The City owns, operates, and maintains a sanitary sewer collection system composed of approximately 92 miles of City sewers, with pipelines varying from six to 24 inches in diameter. The City provides local sewage collection service via in-street lines that connect to regional trunk lines. A 12-inch diameter sewer main runs southerly in Myrtle Avenue and turns west at Chestnut Avenue, and 50% of the project related sewage will flow to this sewer main. In the updated sewer report prepared in June 2018, it was concluded that existing City sewers have adequate capacity to receive project related sewage (Appendix H). The report states in the cover letter: "…it is concluded that the existing sewers have sufficient capacity to convey additional wastewater flows from the proposed Avalon Bay Development." Therefore, as discussed in sections 4.18(a) and (d), the project would not require the construction of new water or wastewater treatment facilities. Prior to issuance of building permits, the developer would provide the City with a detailed study that identifies any minor modifications required to the existing conveyance system to accommodate proposed project needs. The impact would be less than significant.

c) **Less than Significant Impact.** The project site is currently developed with office buildings, along with paved surfaces. According to the Specific Plan, the development plan for the project will comply with the City's Storm Water Management Regulations (Chapter 12.36 of the Municipal Code) and implement Low Impact Development (LID) standards. A Los Angeles County Flood Control District (LACFCD) maintained, 24-inch diameter reinforced concrete pipe storm drain exists in Chestnut Avenue. Refer to section 4.9 (b) and (c) for a discussion of new stormwater infrastructure and stormwater runoff following project implementation. No new storm drain facilities are required to be constructed to serve the proposed project. The impact would be less than significant.

d) **Less than Significant Impact.** Potable water is provided by the City of Monrovia Community Services Department – Public Works Division. The City's primary source of potable water is groundwater. Monrovia's water distribution system consists of five individual but interconnected zones throughout the City The main source of water is five active wells that pump water from the Main San Gabriel Groundwater Basin. The City is a member of both the Upper San Gabriel Valley Municipal Water District (USGVMWD) and the Metropolitan Water District of Southern California, thus ensuring the availability of imported water, if necessary, via standby connections. The standby connections allow the City to obtain water from both the Colorado River and State Water Project; this enables the City to obtain up to an additional 14 million gallons per day.

According to the City's 2015 UWMP [38], the City consumed approximately 6,200 acre-feet of water in 2015. The City projects an increase in consumption to approximately 7,000 acre-feet in 2035. Consumption is expected to increase incrementally over this time period. The 2015 UWMP states a goal of limited per-capita consumption to 181 gallons per capita per day (GPCD); currently, the City consumes 153 GCPD. The residential component of the Project would accommodate 427 residents. As such, it is expected that the proposed project would use approximately 77,300 gallons of water per day, or approximately 87 acre-feet annually. This is very likely a worst-case scenario, as the multi-family nature of the development (and the relatively limited number of irrigated areas) suggest the amount water consumed would be less than the City's GCPD. There would also be water consumed as a part of the ground-floor commercial use (3,500 square feet). Using an assessment developed by the Water Research Foundation, it is estimated, at the high end, that a supermarket would consume up to 52 gallons of water per square foot annually or 202,800 gallons annually (or approximately 0.6-acre feet) for the entire commercial area. Project-wide, water consumption is expected to be close to 88 acre-feet annually.

Given existing and future projected groundwater supplies along with the City's ability to access imported water, there City has adequate water supplies to serve the proposed project, and no new entitlements would be needed. Impacts would be less than significant.

f) **Less than Significant Impact.** According to CalRecycle's Disposal Reporting System (DRS), the City generated 28,500 tons of disposed solid waste in 2016; this translates to an average of 4.2 pounds per person per day, or 1,535 pounds per person per year. According to the DRS, waste generated in the City was sent to numerous landfills in the region. The Mid Valley landfill received the most of any facility (13,177 tons), followed by the San Timoteo Sanitary Landfill (5,294), the Olinda Alpha Sanitary Landfill (2,958 tons), the Sunshine Canyon City/County Landfill (2,310 tons), the El Sobrante Landfill (1,942 tons), and the Frank R, Bowerman Sanitary Landfill (1,075 tons). The following landfills received relatively small amounts of solid waste: (1) the Azusa Land Reclamation County Landfill (689 tons) and (2) the Chiquita Canyon Sanitary Landfill (363 tons). The Antelope Valley Public Landfill and the Lancaster Landfill and Recycling center each received fewer than 75 tons from Monrovia in 2016. Given the regional nature of the City's distribution of solid waste, a county-wide estimate of landfill capacity is used rather than the individual landfills. CalRecycle projected landfill capacity county-wide in 2011[39]. Under a medium growth scenario, it projects 32 million tons of remaining capacity in 2025.

The proposed project is anticipated to have 427 residents (see section 4.13: Population and Housing). Assuming the per capita 1,535 pounds per person per year rate, this results in approximately 655,500 pounds (328 tons) of solid waste generated annually. The proposed project also includes 3,500 square feet of ground floor commercial. CalRecycle[40] provides estimates of waste generation by land use type. The report typically reports these estimates based on the number of employees for most land uses; however, the report does provide an estimate for commercial centers based on square footage (2,028 lbs per 1,000 square feet), resulting in an estimated 7,909 pounds (four tons) of waste annually. Therefore, the proposed Project is anticipated to generate approximately 332 tons annually of solid waste. It is likely that the actual waste generation rate would be lower, as additional solid waste strategies and policies are implemented over the term of the proposed project, which would also be subject to the City's construction and residential recycling programs. Overall, the amount waste produced is nominal in relation to landfill capacity. The proposed project would not result in a substantial increase in solid waste generation; therefore, impacts would be less than significant.

g) **No Impact.** The primary State legislation regarding solid waste is AB939, The Integrated Waste Management Act, adopted in 1989. AB939 requires local jurisdiction to achieve a minimum 50 percent solid waste diversion rate. A minimum 50 percent diversion rate for construction demolition and debris is also required. Recently, AB341 (2011) was adopted requiring mandatory commercial recycling programs.

The proposed project is a mixed-use development that does not have any unusual waste production characteristics and thus would not include any component that could conflict with State laws governing construction or operational solid waste diversion. The proposed project would comply pursuant to local implementation requirements. The proposed project would comply with federal, State, and local statutes related to the management of solid waste. This includes the City's construction and demolition disposal and recycling requirements. The City requires projects that include demolition and/or construction of structures of 1,000 square feet or greater to acquire a construction/demolition permit.[4] To obtain a permit, a Waste Management Plan (WMP) must be completed and submitted to the Public Works department. A performance security must be paid in the amount of $0.20 per square foot or $250, whichever is greater. The diversion requirements for all projects shall be 50% of the materials generated by an entire Construction and Demolition project. Once the project is complete, a Waste Management Report (WMR) indicating the quantities of material recycled, along with receipts or weight tickets may be submitted. If the WMR indicates that all diversion requirements have been met, the performance security is refunded. With compliance with existing regulations, no impact would occur.

[4] (http://www.cityofmonrovia.org/your-government/public-works/trash-services/construction-demolition-debris; access 6/20/18).

## *4.19 – Mandatory Findings of Significance*

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? | ☐ | ☑ | ☐ | ☐ |
| b) Does the project have impacts that are individually limited, but cumulatively considerable? | ☐ | ☐ | ☑ | ☐ |
| c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? | ☐ | ☑ | ☐ | ☐ |

a) The proposed project would not substantially impact any scenic vistas, scenic resources, or the visual character of the area, as discussed in section 4.1, and would not result in excessive light or glare.

The project site is located within an urbanized area with no natural habitat. With mitigation, the proposed project would not significantly impact any sensitive plants, plant communities, fish, wildlife or habitat for any sensitive species, as discussed in section 4.4. Mitigation Measures BIO-1 and BIO-2 would ensure no impacts would occur to any birds nesting in any of the ornamental vegetation on the project site, consistent with the requirements of the federal Migratory Birds Treaty Act.

Adverse impacts to archaeological and paleontological resources would not occur. Construction-phase procedures would be implemented in the event any archaeological or paleontological resources are discovered during grading and excavation, consistent with Mitigation Measure CUL-2, CUL-3, CUL-6, CUL-7, and CUL-9. Implementation of these Mitigation Measures would ensure that impacts related to cultural resources would be less than significant.

The project site is not known to have any association with an important example of California's history or prehistory.

b) Cumulative impacts can result from the interactions of environmental changes resulting from one proposed project with changes resulting from other past, present, and future projects that affect the

same resources, utilities and infrastructure systems, public services, transportation network elements, air basin, watershed, or other physical conditions. Such impacts could be short-term and temporary, usually consisting of overlapping construction impacts, as well as long term, due to the permanent land use changes involved in the project. The following projects were considered for the cumulative analysis:

1 - Towneplace Suites Hotel
2 - 725 Huntington Drive Commercial Center
3 - MODA Residential Development
4 - 1110 - 1212 Fifth Avenue Residential Development
5 - The Lumber Yard - An Artisan Food Village
6 - 1601 Myrtle Avenue Residential Development
7 - Starbucks
8 - Corner of Myrtle and Lime Residential Development
9 - Duarte Road Apartments Residential Development
10 - 1625 Magnolia Avenue Residential Development

Short-term impacts related to noise and pollutant emissions would be at less than significant levels and therefore would not contribute substantially to any other concurrent construction programs that may be occurring in the vicinity. The project's contribution to long-term, cumulative impacts would not be substantial with implementation of the City's existing policies, programs, and regulatory requirements. In particular, the project is subject to development impact fees and property taxes to offset project-related impacts to public services and utility systems such as fire protection services, traffic control and roadways, storm drain facilities, water and wastewater facilities, and other public facilities and equipment. The City hereby finds that the contribution of the proposed project to cumulative impacts would be less than significant.

c) The environmental analysis provided in section 4.3 concludes that impacts related to emissions of criteria pollutants and other air quality impacts would be less than significant with incorporation of Mitigation Measures AIR-1 and AIR-2.

Section 4.12 concludes there would be impacts related to interior noise, but these would be mitigated to less than significant with Mitigation Measure NOI-1. The noise analysis section also concludes that there would be impacts of a periodic or temporary increase in noise. These impacts would be mitigated to less than significant with implementation of Mitigation Measures NOI-2 and NOI-3.

Sections 4.7 and 4.9 conclude that impacts related to climate change and hydrology and water quality would be less than significant.

Based on the preceding analysis of potential impacts in the responses to checklist items 4.1 thru 4.18, no evidence is presented that this Project would degrade the quality of the environment. For all the foregoing reasons, the City hereby finds that, with implementation of the incorporated Mitigation Measures listed in this IS/MND, there would be no substantial, adverse impacts on human beings, directly, or indirectly, with mitigation incorporated.

**MM AQ-1:** Prior to issuance of building permits, the applicant/developer shall submit, to the satisfaction of the Planning Division, a Coating Restriction Plan (CRP), consistent with South Coast Air Quality Management District (SCAQMD) guidelines and a letter agreeing to include in any construction contracts and/or subcontracts a requirement that the contractors adhere to the requirements of the CRP. The CRP measure shall be implemented to the satisfaction of City Building and Safety and shall include a requirement that all interior and exterior architectural coatings used in project construction shall meet SCAQMD "super compliant" coating VOC standard of less than 10 grams VOC/liter of coating. The CRP shall also specify use of High-Volume, Low Pressure (HVLP) spray guns for application of coatings to reduce coating waste.

**MM AQ-2:** Idling of diesel-powered vehicles and equipment shall not be permitted during periods of nonactive vehicle use. Diesel-powered engines shall not be allowed to idle for more than five consecutive minutes in a 60-minute period when the equipment is not in use, occupied by an operator, or otherwise in motion, except as follows:

- When equipment is forced to remain motionless because of traffic conditions or mechanical difficulties over which the operator has no control;
- When it is necessary to operate auxiliary systems installed on the equipment, only when such system operation is necessary to accomplish the intended use of the equipment;
- To bring the equipment to the manufacturer's recommended operating temperature;
- When the ambient temperature is below 40 degrees F or above 85 degrees F; or
- When equipment is being repaired.

**MM BIO-1:** **Pre-Construction Nesting Surveys.** To avoid impacts to nesting birds, construction-related activities and construction-related noise shall occur outside the avian nesting season (prior to February 1 or after September 1). If construction and construction noise occur within the bird nesting season (during the period from February 1 to September 1), all habitat within and directly adjacent to the proposed project shall have a nesting bird survey completed by a qualified biologist no more than five days before commencement of any vegetation removal or ground disturbance. If the project site is occupied by nesting birds covered under MBTA and CFGC, MM BIO-2 shall apply.

**MM BIO-2:** **Construction Monitoring and Buffer Zones for Nesting Birds.** If pre-construction nesting bird surveys identify active nests, then no ground disturbance, vegetation removal, or heavy equipment activity shall take place within a no-disturbance buffer determined by a qualified biologist, typically within 300 feet of non-raptor nests and 500 feet of raptor nests. Protective measures shall be required to ensure compliance with the MBTA and California Fish and Game Code requirements. A qualified biologist shall serve as a

construction monitor during those periods when construction activities occur near active nest areas to ensure that no inadvertent impacts occur. A report of the findings, prepared by a qualified biologist, shall be submitted to the CDFW and the City prior to commencement of construction-related activities that have the potential to disturb any active nests during the nesting season.

**MM CUL-1:** **Conduct Archaeological Sensitivity Training for Construction Personnel**. The applicant/developer shall retain a qualified professional archaeologist who meets U.S. Secretary of the Interior's Professional Qualifications and Standards to conduct an archaeological sensitivity training for construction personnel prior to commencement of excavation activities. The training session shall be carried out by a cultural resource professional with expertise in archaeology, who meets the U.S. Secretary of the Interior's Professional Qualifications and Standards. The training session shall include a handout and shall focus on how to identify archaeological resources that may be encountered during earthmoving activities and the procedures to be followed in such an event, the duties of archaeological monitors, and the general steps a qualified professional archaeologist would follow in conducting a salvage investigation, if one is necessary.

**MM CUL-2:** **Cease Ground-Disturbing Activities and Implement Treatment Plan if Archaeological Resources Are Encountered.** In the event that archaeological resources are unearthed during ground-disturbing activities, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. A buffer area of at least 50 feet shall be established around the find where construction activities will not be allowed to continue until a qualified archaeologist has examined the newly discovered artifact(s) and has evaluated the area of the find. Monitored work shall be allowed to continue outside of the buffer area. All archaeological resources unearthed by Project construction activities shall be evaluated by a qualified professional archaeologist, who meets the U.S. Secretary of the Interior's Professional Qualifications and Standards. In the event that the newly discovered artifacts are determined to be prehistoric, Native American Tribes/Individuals shall be contacted and consulted, and Native American construction monitoring shall be initiated. The applicant and City shall coordinate with the archaeologist to develop an appropriate treatment plan for the resources. The plan may include implementation of archaeological data recovery excavations to address treatment of the resource along with subsequent laboratory processing and analysis.

**MM CUL-3:** **Conduct Periodic Archeological Resources Spot Checks during Grading and Earth-moving Activities in Younger Alluvial Sediments.** The applicant shall retain a qualified professional archaeologist, who meets the U.S. Secretary of the Interior's Professional Qualifications and Standards to conduct periodic Archaeological Spot Checks beginning at depths of two feet below ground surface to determine if construction excavations have exposed or have a high probability of exposing archaeological resources. After the initial Archaeological Spot Check, further periodic checks shall be conducted at the

discretion of the qualified archaeologist. If the qualified archaeologist determines that construction excavations have exposed or have a high probability of exposing archaeological artifacts, construction monitoring for archaeological resources will be required. The applicant shall retain a qualified archaeological monitor, who will work under the guidance and direction of a professional archaeologist, who meets the qualifications set forth by the U.S. Secretary of the Interior's Professional Qualifications and Standards. The archaeological monitor shall be present during all construction excavations (e.g., grading, trenching, or clearing/grubbing) into non-fill younger Pleistocene alluvial sediments. Multiple earth-moving construction activities may require multiple archaeological monitors. The frequency of monitoring shall be based on the rate of excavation and grading activities, proximity to known archaeological resources, the materials being excavated (native versus artificial fill soils), the depth of excavation, and if found, the abundance and type of archaeological resources encountered. Full-time monitoring can be reduced to part-time inspections if determined adequate by the project archaeologist.

**MM CUL-4:** **Prepare Report Upon Completion of Monitoring Services.** The archaeological monitor, under the direction of a qualified professional archaeologist who meets the U.S. Secretary of the Interior's Professional Qualifications and Standards, shall prepare a final report at the conclusion of archaeological monitoring (if required). The report shall be submitted to the applicant/developer, the SCCIC, the City, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the Project and required mitigation measures. The report shall include a description of resources unearthed, if any, evaluation of the resources with respect to the California Register and CEQA, and treatment of the resources.

**MM CUL-5:** **Conduct Paleontological Sensitivity Training for Construction Personnel.** The applicant/developer shall retain a professional paleontologist who meets the qualifications set forth by the Society of Vertebrate Paleontology, shall conduct a paleontological sensitivity training session for construction personnel prior to commencement of excavation activities. The training session shall focus on how to identify paleontological resources that may be encountered during earthmoving activities and the procedures to be followed in such an event, the duties of paleontological monitors, notification and other procedures to follow upon discovery of resources, and the general steps a qualified professional paleontologist would follow in conducting a salvage investigation if one is necessary.

**MM CUL-6:** **Conduct Periodic Paleontological Spot Checks during Grading and Earth-moving Activities.** The applicant/developer shall retain a professional paleontologist who meets the qualifications set forth by the Society of Vertebrate Paleontology, shall conduct periodic Paleontological Spot Checks beginning at depths below six feet to determine if construction excavations have extended into older Quaternary deposits. After the initial paleontological spot check, further periodic checks shall be conducted at the discretion of the qualified paleontologist. If the qualified paleontologist determines that

construction excavations have extended into the older Quaternary deposits, construction monitoring for paleontological resources shall be required. The applicant shall retain a qualified paleontological monitor, who will work under the guidance and direction of a professional paleontologist, who meets the qualifications set forth by the Society of Vertebrate Paleontology. The paleontological monitor shall be present during all construction excavations (e.g., grading, trenching, or clearing/grubbing) into the older Pleistocene alluvial deposits. Multiple earth-moving construction activities may require multiple paleontological monitors. The frequency of monitoring shall be based on the rate of excavation and grading activities, proximity to known paleontological resources and/or unique geological features, the materials being excavated (native versus artificial fill soils), and the depth of excavation, and if found, the abundance and type of paleontological resources and/or unique geological features encountered. Full-time monitoring can be reduced to part-time inspections if determined adequate by the qualified professional paleontologist.

**MM CUL-7:** **Cease Ground-Disturbing Activities and Implement Treatment Plan if Paleontological Resources Are Encountered.** In the event that paleontological resources and/or unique geological features are found during ground-disturbing activities, construction activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. A buffer area of at least 50 feet shall be established around the find where construction activities shall not be allowed to continue until appropriate paleontological treatment plan has been approved by the applicant/developer and the City. Work shall be allowed to continue outside of the buffer area. The applicant/developer and City shall coordinate with a professional paleontologist, who meets the qualifications set forth by the Society of Vertebrate Paleontology, to develop an appropriate treatment plan for the resources. Treatment may include implementation of paleontological salvage excavations to remove the resource along with subsequent laboratory processing and analysis or preservation in place. At the paleontologist's discretion and to reduce construction delay, the grading and excavation contractor shall assist in removing rock samples for initial processing.

**MM CUL-8:** **Prepare Report Upon Completion of Monitoring Services.** Upon completion of the above activities, the professional paleontologist shall prepare a report summarizing the results of the monitoring and salvaging efforts, the methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall be submitted to the applicant/developer, the City, the NHMLAC, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the project and required mitigation measures.

d) **Less than Significant Impact with Mitigation Incorporated.** No known human remains have been identified from the CHRIS-SCCIC database within a one-mile radius of the project site. No human remains were identified during the site survey of the project site. However, these findings do not preclude the existence of previously unknown human remains located below the ground surface, which may be encountered during construction excavations associated with the proposed project. Similar to

the discussion regarding archaeological resources and TCRs above, it is also possible to encounter buried human remains during construction given the proven prehistoric occupation of the region, the identification of the Santa Anita Wash and the San Gabriel River both located within a two-mile radius of the project site. As a result, the following mitigation measure is recommended to reduce potentially significant impacts to previously unknown human remains that may be unexpectedly discovered during project implementation to less than significant.

**MM CUL-9:** **Cease ground-disturbing activities and notify the Los Angeles County Coroner if human remains are encountered.** If human remains are unearthed during implementation of the proposed project, the City of Monrovia and the applicant/developer shall comply with State Health and Safety Code section 7050.5. The City of Monrovia and the applicant shall immediately notify the Los Angeles County Coroner and no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC shall then identify the person(s) thought to be the Most Likely Descendent (MLD). After the MLD has inspected the remains and the site, they have 48 hours to recommend to the landowner the treatment and/or disposal, with appropriate dignity, the human remains and any associated funerary objects. Upon the reburial of the human remains, the MLD shall file a record of the reburial with the NAHC and the Project archaeologist shall file a record of the reburial with the CHRIS-SCCIC. If the NAHC is unable to identify a MLD, or the MLD identified fails to make a recommendation, or the applicant rejects the recommendation of the MLD and the mediation provided for in Subdivision (k) of section 5097.94, if invoked, fails to provide measures acceptable to the applicant, the applicant or his or her authorized representative shall inter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance.

**MM NOI-1:** The following items shall be implemented to further reduce interior noise on for all locations of the façade in this Project (Appendix F):

- The first layer of gypsum board on the unit side of exterior walls shall be sealed at the top and bottom with acoustical sealant per ASTM Standard C919: *Standard Practice for Use of Sealants in Acoustical Applications.* This includes outlet boxes and other penetrating elements within the wall.
- Window rough-in seams shall be no greater than ¼ inches. The perimeter of window and door frames shall be sealed airtight to the exterior wall construction with an acoustical sealant.
- Efforts to seal, caulk, gasket or weather-strip all joints and seams shall be made to eliminate air leakage through these assemblies. This would include around window and doorframes, at penetrations through walls, and all other openings in the building envelop.
- Windows shall be selected with offset trickle vents for air circulation through the window frame. Offset trickle vents drastically reduce sound leakage through the window assembly.

- Door seals shall be selected for exterior unit doors such as Pemko S88 Silicone compression bulb seals and Pemko door bottoms.
- Once doors are installed, the strike and latch mechanisms shall be tuned to make sure that the seals are fully compressed when the door is closed.

**MM NOI-2:** Prior to the start of construction, the applicant/developer shall install an eight-foot-tall noise barrier along the project site boundary to reduce line-of-sight noise to sensitive receivers adjacent to the site. The noise barrier shall consist of the following:

- A continuous barrier of 3/4" plywood or a continuous mass having a weight of 2 lbs./sq. ft. or more.
- All joints in the barrier shall be sealed with acoustical sealant to create a continuous barrier without sound leaks.
- All vertical seams shall be overlapped and screwed tight together to create a continuous barrier.
- Soil shall be mounded at the base of the sound barrier to fill in larger spaces to attenuate noise.
- The barriers shall remain in place for the duration of time that construction activity utilizes heavy equipment such as earth moving equipment, demolition equipment, heavy trucks, generators, or other potentially loud construction equipment.
- Soil shall be piled a minimum of 3" high above the base of the barrier, or higher as required to ensure that air gaps are sealed.

These requirements can be adjusted by the City to meet the same ends.

# 6 List of Preparers

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